FILE 60

United States Department of the Interior

FISH AND WILDLIFE SERVICE
2001-A Highway 98
P. O. Drawer 1190
Daphne, Alabama 36526

IN REPLY REFER TO:

W4396076a

October 9, 1996

Mr. Paul H. Griggs
Volkert and Associates, Inc.
P.O. Box 7434
Mobile, AL 36670

Dear Mr. Griggs:

This responds to your letter of October 2, 1996 concerning a proposal to construct a bridge to interstate highway standards over the Mobile River near the central business district of Mobile, Alabama. We have reviewed a map of the project area and provided the following comments in accordance with the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.)

Our records indicate that the Alabama red-bellied turtle *Pseudemys alabamensis* and the gulf sturgeon *Acipenser oxyrinchus desotoi*, which are Federally endangered and threatened species, respectively, are known to occur in the project area. During the environmental review process for this project, you should assess potential impacts to these Federally listed species and determine if the proposed project may affect them. A finding of "may affect" could require initiation of formal consultation as described in Section 7 of the Endangered Species Act with our agency. We recommend that you submit a copy of your assessment and findings regarding the involvement of these two Federally listed species to this office for review.

For further coordination regarding this matter, please contact Brett Wehrle at our office (Phone: 334/441-5181 Ext. 29).

Sincerely yours,

Larry E. Goldman
Field Supervisor

United States Department of the Interior

FISH AND WILDLIFE SERVICE
2001-A Highway 98
P. O. Drawer 1190
Daphne, Alabama 36526

IN REPLY REFER TO:
98-1514a

October 2, 1998

Mr. Paul Griggs
David Volkert & Associates, Inc.
P.O. Box 7434
Mobile, AL 36670

Dear Mr. Griggs:

Thank you for your letter, dated September 8, 1998, requesting comments on the expansion of the scope of the I-10, Mobile River Bridge Project (DPI-0030 (005)). We have reviewed the information you enclosed and are providing the following comments in accordance with the Endangered Species Act of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.).

The Service has no additional endangered species information to add to our letter of October 9, 1996 (W4396076a). We maintain that the Alabama red-bellied turtle (*Pseudemys alabamensis*) and the gulf sturgeon (*Acipenser oxyrinchus desotoi*) are known to occur throughout this area and potential impacts should be determined.

If you have any questions or need additional information, please contact Mr. Patric Harper at (334) 441-5181, ext. 34.

Sincerely,

Larry E. Goldman
Field Supervisor

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United States Department of the Interior

FISH AND WILDLIFE SERVICE
P. O. Drawer 1190
Daphne, Alabama 36526

IN REPLY REFER TO:
02-0076a

November 13, 2001

Mr. Joe D. Wilkerson
Federal Highway Administration
500 Eastern Boulevard, Suite 200
Montgomery, AL 36117-2018

Dear Mr. Wilkerson:

This is the report of the U.S. Fish and Wildlife Service (Service) in response to your letter, dated October 9, 2001, with which you submitted a Biological Assessment for Mobile River Bridge/I-10 Bayway Widening in Mobile and Baldwin Counties, Alabama. This report is prepared in accordance with the requirements of the Fish and Wildlife Coordination Act (16 U. S. C. 661-667e) and the Endangered Species Act of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) and in your public interest review as they relate to protection of fish and wildlife resources.

The Service does not agree with the conclusion that direct or indirect impacts to current federally listed species will not occur as a result of this project. We are concerned that indirect impacts from vehicle collisions may occur to the bald eagle (*Haliaeetus leucocephalus*) using the upper Mobile Bay area near the Bayway for foraging. In addition, direct impacts will occur from disturbance, siltation and loss of forage areas used by the Alabama red-bellied turtle (*Pseudemys alabamensis*) and the gulf sturgeon (*Acipenser oxyrinchus desotoi*). We do agree that no impacts will occur to the Alabama sturgeon (*Scaphirhynchus suttkusi*) as a result of this project.

This project will result in the direct loss of up to 23.0 acres of submerged aquatic vegetation (SAV). Additional losses of SAV are expected from erosion and increased turbidity by disturbing bottom sediments during construction. The loss of SAV translates to a loss of food sources and protective habitat for many Mobile Bay aquatic species. SAV is a barometer for the health of the bay ecosystem and, in turn, the economy of the region's important fishery.

SAV habitats support a large and diverse community of commercial, recreational, and ecologically important avian, shellfish, fish, and invertebrate species. These habitats are extremely important in the production of both fishery and avian resources. Species of noted importance found in the areas include spotted seatrout (*Cynoscion nebulosus*), mullet (*Mugil* spp.), Atlantic croaker (*Micropogonias undulatus*), spot (*Leiostomus xanthrus*), red drum (*Sciaenops ocellata*), blue crab (*Callinectes sapidus*), shrimp (*Penaeus* spp.), Atlantic menhaden

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FAX: 334-441-6222

(*Brevoortia tyrannus*), and flounder (*paralichthys* spp.). In addition to providing refuge from potential predators, submerged aquatic vegetation beds are a primary nursery ground for blue crab, shrimp, and a number of fish species. SAV improves water quality by trapping and stabilizing sediments and removing waterborne pollutants. The economic and ecological importance of estuarine SAV habitat found in Mobile Bay is a resource of regional and national importance. SAV areas are prime habitat for shorebirds, wading birds, and waterfowl on a year-round basis.

While SAV is a major resource concern, the proposed project's impact on emergent marsh will also be considerable. The resources mentioned above are dependent on such habitats for their life requirements. The proposed project would affect large areas of this habitat. This loss and mitigative needs should be addressed now.

Mitigation planning for the loss of SAV habitat as well as losses of other valuable wetland habitats, such as emergent marsh, should be included in early discussions relating to this project. Transplanting or establishing SAV populations is difficult to do in the best scenario and should be done in areas where SAV have been located in the past but lost due to environmental conditions. Past marsh mitigation projects have not always been successful. Mitigation sites should be identified as soon as possible for all losses likely to be incurred. Transplanting or the creation of SAV beds should not wait until the commencement of the project but rather completed and monitored for success before project impacts are realized.

We note the document indicates (page 7) that to construct the Bayway underwater part of the project, barges would be used in the construction canal excavated over 20 years ago when the existing I-10 structures were built. Also, the document indicates no dredging is anticipated. Large areas of the construction canal have silted in since the earlier project was completed and substantial areas of marsh have covered what was formerly an excavated open water area. In addition, certain areas of the Apalachee River mouth have become much more shallow during the last 20 years. We strongly urge careful re-examination of construction plans to verify that no dredging would be required. If dredging is required, then additional impacts would be very likely on all these species. If construction would involve use of barges without dredging, then a detailed examination of the technique to be used would be appropriate, since even temporary placement of barges on marsh could severely damage this habitat.

According to bridge design information presented at the South Alabama Regional Planning Commission (SARPC) meeting held on November 7, 2001, the approximate height of the tower supports will be 450 feet ASL. Federal Aviation Administration regulations require structures near travel corridors, that are higher than 199 above ground level (AGL), be equipped with blinking or strobe lights to alert pilots to their location. Free-standing structures and associated guy supports of this size present additional concerns for migratory birds and their attraction for lighted structures during inclement weather. Due to their protection under the Migratory Bird Treaty Act of 1918, any assessment should include impacts resulting from tower strikes by migratory birds. Recent research, although inconclusive, has shown that color as well as duration of strobe may be key to reducing bird strikes with towers.

The Daphne Field Office looks forward to working with your office and the Alabama Department of Transportation through the life of this project. If you have any questions or comments, please contact Bruce Porter of this office (Phone 251/441-5181 ext 37).

Sincerely,

Larry E. Goldman
Field Supervisor

cc: EPA, Atlanta, GA
NMFS, Panama City, FL
ALDOT, Montgomery, AL
ADCNR, Montgomery, AL
ADCNR, Spanish Fort, AL
ADCNR, Dauphin Island, AL
ADEM, Montgomery, AL
ADEM, Mobile, AL

January 28, 2002

Contract No. 911600.10

Project DPI-0030 (005)
Mobile River Bridge, I-10
Mobile and Baldwin Counties, Alabama

RESUME OF MEETING

Date: January 23, 2002

Location: ALDOT 9th Division Office

Purpose: The meeting was held to discuss coordination letters on the project.

Subject: National Marine Fisheries Service (NMFS) and
U.S. Fish and Wildlife Service (FWS)
Comments on ALDOT Project #DPI-0030 (005)
Mobile River Bridge, Mobile County, Alabama

Attendees:

John Shill	ALDOT	334-242-6132	shill@dot.state.al.us
R. F. Poiroux	ALDOT	251-470-8204	
Alfedo Acoff	ALDOT	334-242-614	acoffa@dot.state.al.us
Bill Van Luchene	FHWA	334-223-7379	william.van.luchene@fhwa.dot.gov
Brett Gaar	Volkert	251-968-7551	bgaar@volkert.com
Russell Holland	Volkert	251-342-1070	rholland@volkert.com
Joe Wilkerson	FHWA	334-223-7370	joe.wilkerson@fhwa.dot.gov
Darren LeBlanc	USFWS	251-441-5181	
Bruce Porter	USFWS	251-441-5181	
Jennifer Robinson	NMFS	850-234-5061	jennifer.robinson@noaa.gov
N. D. Skeeter McClure	Volkert	251-342-1070	smcclure@volkert.com

The meeting was held to discuss the following coordination letters on the project:

- November 13, 2001 – USFWS to FHWA on Endangered Species
- January 9, 2002 – NMFS to ALDOT on Essential Fish Habitat

The meeting began with all attendees introducing themselves. Mr. Wilkerson then discussed the history of the project explaining how the construction channel was dredged in 1974 and the Bayway was completed in 1976. ALDOT purchased 900 acres, of which 100 acres was used as

a disposal site. The other eight hundred acres were placed in conservation instead of filling the construction channel at Maeher Park.

The discussion then led to impacts to submerged aquatic vegetation (SAVs) from shading by additional lanes on the Bayway. The wetland report indicated that 17.11 acres of SAVs would be shaded by construction. After detailed discussion it was determined that 60 feet of additional bridge would be needed instead of the original estimate of 70 feet. This will reduce the SAV impacts to 14.66 acres. The wetland report will be revised to show 14.66 acres of SAV impacts and 1.45 acres of emergent wetland impacts.

Jennifer Robinson, NMFS said SAVs impacted by shading will have to be mitigated. She could not give mitigation ratio at this time but indicated that she will let the DOT know after discussing it with Dauphin Island Sea Lab Scientists. Darren LeBlanc, FWS indicated that many areas in the bay could be suitable mitigation sites. Jennifer indicated that mitigation for SAV impacts would include relocation of SAVs to an approved location in the bay.

Brett Gaar discussed the high degree of variability in SAV quantities from year to year. He stated that quantities of SAVs can change as much as 80 percent from year to year. This number is largely based on salinity levels in the Bay.

Mr. Wilkerson discussed the construction method involving working from barges and leap frogging the barges as work progresses. He stated the barges would be lifted by a crane and placed on the shallow areas. They will not be drug across the wetlands. Mr. Wilkerson also stated that the bridge rail to be removed will be collected for disposal and will not be allowed to drop into the water. Darren LeBlanc, FWS asked why work could not be done from the deck of the new lanes. Mr. Wilkerson explained stating that safety and significant additional costs would be required in such a high traffic area. The span length is also too great to work from the end.

Ms. Robinson said ALDOT must consider the impacts of widening to the outside rather than the inside. Brett Gaar indicated there would be much greater emergent wetland impacts and probably greater SAV impacts by widening to the outside. Mr. McClure stated that widening the Bayway to inside avoided more serious impacts to SAVs and emergent vegetation that would accrue if the widening was to the outside. Also, the construction methodology minimizes impacts to both SAVs and emergent vegetation. Ms. Robinson agreed but said it needed to be addressed.

Mr. Wilkerson stated the ALDOT will begin looking for mitigation sites in the Bay.

Bruce Porter, FWS then discussed concerns regarding federally protected fish and wildlife species.

Mr. Porter was concerned about migratory fowl flying into cables and bridge columns on the bridge. He suggested installing strobe lights with a three-second duration on the bridge. Bill

Van Luchene stated that the FAA controls lighting requirements; however, ALDOT will request approval for these lights from FAA.

Mr. Porter then stated impacts to the Bald Eagle and Gulf Sturgeon are not major concerns. These are species that can occur in the project vicinity but he does not anticipate impact to these species.

The Alabama Red-Bellied Turtle (RBT) is an endangered species that is known to occur in the project area. Mr. Porter noted concern that limiting traffic on the Bayway would increase traffic on the Causeway which can increase the road mortality of RBTs. Mr. Wilkerson stated there will be no decrease in laneage on the Bayway during construction. All lanes will remain open. Any temporary closures for unloading materials would be accomplished during periods of low traffic volumes, such as at night. Bruce Potter said even without an increase of traffic on the Causeway, the take of RBTs can occur because the shallow SAV areas are known to be feeding habitat for RBTs. Placing construction barges in these SAV areas could potentially harm RBTs if they were present. Mr. Potter said a biological opinion and an Incidental Take Permit (ITP) would be required.

Respectfully submitted,

Volkert Environmental Group, Inc.

Brett Gaar, R.E.P.A.
Assistant Vice President

BG/als

c All Attendees

United States Department of the Interior

VOLKERT-MOBILE

SEP 1 1 2002

FISH AND WILDLIFE SERVICE
P. O. Drawer 1190
Daphne, Alabama 36526

IN REPLY REFER TO:
02-0076

August 28, 2002

Mr. Joe D. Wilkerson
Division Administrator
Federal Highway Administration
500 Eastern Boulevard, Suite 200
Montgomery, AL 36117-2018

Dear Mr. Wilkerson:

This is to confirm receipt of your letter, dated July 18, 2002, requesting formal consultation regarding possible impacts to two federally listed species, *Pseudemys alabamensis* and *Acipenser oxyrinchus desotoi,* from the Mobile River Bridge/I-10 Bayway Widening Project between Mobile and Baldwin Counties, Alabama. We have also received the biological assessment from the Alabama Department of Transportation as written by Volkert & Associates, Inc. Your initiation package is now complete and the initiation date for formal consultation is August 28, 2002. Although the U.S. Fish and Wildlife Service has up to 90 days to consult and then 45 days to finalize a Biological Opinion, it is likely that we will be able to conclude consultation in a much shorter time frame. We look forward to working with your agency in an expeditious manner.

If you have any questions or need additional information, please contact Mr. Bruce Porter at (334) 441-5181, ext. 37.

Sincerely,

for Larry E. Goldman
Field Supervisor

cc: DOT, Montgomery, AL (John Shill)

United States Department of the Interior

FISH AND WILDLIFE SERVICE
P. O. Drawer 1190
Daphne, Alabama 36526

IN REPLY REFER TO:

May 14, 2003

Mr. Joe D. Wilkerson
Division Administrator
Federal Highway Administration
500 East Boulevard, Suite 200
Montgomery, AL 36117-2018

Dear Mr. Wilkerson:

This document transmits the Fish and Wildlife Service's (Service) biological opinion based on our review of the proposed Federal Highway Administration Project DPI-0030(005) located in Mobile and Baldwin Counties, Alabama over Mobile Bay, and its effects on the endangered Alabama red-bellied turtle (*Pseudemys alabamensis*) and the threatened Gulf sturgeon (*Acipenser oxyrinchus desotoi*) in accordance with section 7 of the Endangered Species Act of 1973, as amended, (16 U.S.C. 1531 et seq.). Your July 11, 2002 request for formal consultation was received on July 18, 2002.

This biological opinion is based on information provided in the October 9, 2002 biological assessment, discussions with experts in the field, and other sources of information. A complete administrative record of this consultation is on file at the Daphne Field Office.

CONSULTATION HISTORY

October 2, 1996	The Daphne Field Office (DFO) was notified by David Volkert and Associates (Volkert) by letter that they had been contracted by the Alabama Department of Transportation (ALDOT) to conduct a feasibility study for a bridge over the Mobile River.
October 9, 1996	DFO responded to Volkert via a letter.
August 31, 1998	The DFO subsequently received a letter from Volkert changing the scope of the project.
October 2, 1998	The DFO acknowledged receipt of the letter from Volkert changing the scope of the project and restated the federally listed species that may be

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SHIPPING ADDRESS: 1208-B Main Street, Daphne, AL 36526

affected by this project.

October 9, 2001 — The Federal Highway Administration (FHWA) submitted a Biological Assessment prepared by Volkert.

November 13, 2001. — The DFO position concerning the conclusions of the Biological Assessment was provided to the FHWA by letter.

January 23, 2002 — An inter-agency meeting was held on in Mobile, Alabama to discuss the project.

July 11, 2002. — The FHWA requested formal section 7 consultation regarding impacts to the Alabama red-bellied turtle and the Gulf sturgeon associated with the widening of Interstate 10.

August 28, 2002. — By letter, the DFO initiated formal consultation with the FHWA regarding the widening of the Interstate 10 corridor and the erection of a bridge over the Mobile River.

DESCRIPTION OF THE PROPOSED ACTION:

The FHWA and ALDOT have proposed to construct a 2,200-foot-long and 190-foot-high cable stay bridge over the Mobile River and to widen from four lanes to eight lanes the existing Interstate 10 corridor (locally known as the Bayway) over Mobile Bay between Mobile and Daphne, Alabama. ALDOT plans to construct the four additional lanes inside of the twin existing Bayway bridges. The construction of the I-10 Bayway widening will be carried out using segmented barges traversing the area between the existing Bayway lanes. The barges will either float if sufficient water depth exists or rest on the bottom in shallow areas. The barge segments will serve as a construction platform and would be "leap-frogged" ahead using construction cranes as the construction progresses. The project will destroy 14 acres of submerged aquatic vegetation and 6.5 acres of emergent wetlands due to shading from the new structure. At this time, the agencies have not identified the habitat mitigation measures that would be carried out in association with the project.

The action area is considered to include a corridor that encompasses the existing Interstate Highway 10 and a distance of 150 feet north and south of the existing Interstate corridor between Daphne and Mobile, Alabama. The action area also includes existing abandoned/vacant parking lots and public/ALDOT parking facilities identified as staging areas for construction equipment

along U.S. 90/98 (Causeway).

STATUS OF THE SPECIES/CRITICAL HABITAT

Alabama red-bellied turtle (*Pseudemys alabamensis*)

Species/critical habitat description: The Alabama red-bellied turtle (*Pseudemys alabamensis*) was listed on June 16, 1987 as endangered (Federal Register, 52:22939-22943), with no critical habitat designated, in Alabama. This is a large, freshwater, herbivorous turtle attaining a shell length of 33 centimeters (13 inches). It normally has an orange to red plastron and at the tip of the upper jaw a prominent notch bordered on each side by a tooth-like cusp. The elongate carapace is high-domed, its highest point often anterior to mid-body, where the shell is widest. The background carapace coloration is brown, olive, or black with yellow to light orange striping. This turtle is thought to be restricted to freshwater habitats in the vicinity of Mobile Bay, including parts of Mobile, Baldwin and Monroe Counties, Alabama. Snags and dense beds of submersed and emergent aquatic vegetation provide turtles with a substrate for cover, predator avoidance, food, and for thermo-regulation by basking.

Life history: The species is believed to be strictly herbivorous. The analysis of turtle stomach contents revealed substantive samples of eight submergent aquatic plants, including *Myriophyllum spicatum* (Nelson 2000). The primary nesting site for this turtle is believed to be Gravine Island in Baldwin County; however, recent survey information indicates nesting takes place at other sites north of the Highway 90/98 causeway on the Big Island spoil bank along the eastern shore of the Apalachee River in Baldwin County (Nelson, 2001). Alabama red-bellied turtle hatchlings may over-winter in the nest to emerge in the early spring (March-April). Vegetative analysis of nesting sites suggests that turtles may prefer sites with some vegetation (rather than unvegetated sand). Nest predation on turtle eggs is significant from raccoons (*Procyon lotor*), fish crows (*Corvus ossifragus*), and boat-tailed grackles (*Quiscalus major*) (Nelson 2001). However, a study of nesting turtles on Gravine Island in 2002 indicated most nests were depredated by armadillos (*Dasypus novemcinctus*), fish crows, and raccoons, respectively (Godwin 2002). This turtle was collected from Chacaloochee Bay in 1992 and 1994, and appears to be widely distributed throughout most of the tributaries of the lower Mobile-Tensaw Delta, although not abundant anywhere (Nelson, 2001, Dobie 1993).

Population dynamics: Data on population status and trends are inconclusive and total population size is unknown. No conclusive data has been collected concerning population stability. Previous age class data indicated an apparent decline in the number of young turtles in the overall population between 1970 and 1983. Of 24 individuals collected from 1968 to 1970, ten were juveniles and small adults. Only one of 20 individuals collected between 1971 and 1983 was a juvenile or small adult (Service, 1990). In a 1995 survey, 24 adult females, ten adult males and 11 juveniles were captured, and 70 road-killed hatchlings that had overwintered in nests were observed on the U.S. 90/98 causeway during a 2001 mortality survey (Nelson 2001).

Status and distribution: The decline in recruitment of this species may be the result of

disturbance and predation at Gravine Island, the primary nesting site. The concentration of turtle nests on this sparsely vegetated disposal area makes them easy prey for predators. During the 1960's, domestic pigs (*Sus* sp.) were released on Gravine island and were shortly thereafter observed as aggressive predators of turtle eggs. Armadillo, fish crow, and raccoon predation is currently the most obvious cause for the decline of juveniles. The species has also been detrimentally affected by human activities at Gravine Island, including egg collection (now discontinued) and recreational use. On an overall basis, reductions in the amount of aquatic vegetation may have also had a role in the decline of species, as well as collecting for the pet trade. Alabama red-bellied turtles may also be incidentally harvested by commercial fishermen in gill, hoop, and trammel nets, by crab fishermen in crab traps, and by people towing shrimp trawls (Service, 1990).

In 1994, 23 Alabama red-bellied turtles were captured in Grand Bay, Jim's Creek, the Raft River, Chuckfee Bay, Big Bay John, Oak Bayou, Crab Creek and Chacaloochee Bay as part of a systematic sampling program to document the present distribution of the species (Nelson 2001). Trapping efforts that began in 1995 collected 47 Alabama red-bellied turtles in Gunnison Creek, Bayou Sara, upper Mobile River, Bayou Canot, Chickasaw Creek, Dead Lake, The Basin, upper Tensaw River, Big Briar Creek, Big Lizard Creek and Gravine Island (on the Tensaw River). In 1996, trapping efforts collected 82 Alabama red-bellied turtles from Bayou LaBatre in Mobile County to the Fish River in Baldwin County, and a 1997 trapping effort collected a single Alabama red-bellied turtle (a gravid female) at the mouth of the Alabama River. From May - October 1999, 161 turtles were captured at Gravine Island, of which 90 were Alabama red-bellied turtles. Data on turtle population trends are inconclusive. Although the Alabama redbelly turtle recovery plan states that the species is apparently declining and may become extinct unless recovery actions can be effectively taken to stop the decline (Service, 1990), one researcher concluded that this species appears to be the most common species of turtle along the U.S. 90/98 causeway, including Meaher State Park, the ADCNR property, and Big Island (Nelson 2001).

Discussions are underway concerning the feasibility of restoring tidal circulation patterns in the Mobile-Tensaw Delta by constructing additional breaches in the U.S. 90/98 causeway. If this occurs, the density and species composition of freshwater aquatic vegetation may change as a result of salinity changes, which may affect freshwater habitat available for this species. Impacts to this species would need to be evaluated should that project be formally proposed for construction.

Environmental Baseline

Status of the species within the action area: The Alabama red-bellied turtle is found throughout most of the distributaries of the lower Mobile-Tensaw Delta, but is not particularly abundant anywhere. However, it may be the most common species of turtle in the action area. Existing data indicates it is found primarily north of the U.S. 90/98 Causeway and since most of the action area lies south of the causeway, impacts to the turtle and its habitat may be less than if the highway was placed closer to the Causeway. However, suitable habitat does exist at the eastern terminus of the Bayway within and around D'Olive Bay, as well as, the habitats adjacent to the

Blakeley River.

Factors affecting species environment within the action area: The Alabama red-bellied turtle is threatened primarily by human activities within the action area. Fishing activities, the general presence of people and noise associated with high recreational use likely reduce nesting by the species on the limited nesting habitat within the project area. These disturbances to nesting habitat, and predation by animals have reduced reproductive success and recruitment since 1970. The alligator is probably a frequent predator of Alabama red-bellied turtles as evidenced by the high frequency of tooth scars found on the shells of young turtles (Dobie 1985). Armadillo and fish crow predation appear to be the main factors limiting nest success, a phenomenon which is aided by concentration of turtle nests on sand banks. Field research indicates the presence of fire ants in the turtle nest chambers may be a predation factor for the species.

EFFECTS OF THE ACTION

Factors to be considered

Distribution: The southern geographic distribution of this species appears to be immediately adjacent to the Mobile-Tensaw Delta, and the turtles occur in waterways that now (or formerly) enter Mobile Bay. The species is widely distributed throughout most of the tributaries of the lower Mobile-Tensaw Delta, but is not particularly abundant anywhere (Nelson 2001). The Alabama red-bellied turtle appears to be the most common species of turtle along the U.S. 90/98 causeway, including Meaher State Park, the ADCNR property, and Big Island (Nelson 2001). In this area, the State owns over 13,000 acres of mostly natural Delta habitat. Upstream of that area, over 20,000 acres of habitat have been acquired in the Mobile-Tensaw Delta by the U.S. Army Corps of Engineers (COE) under the Tennessee-Tombigbee Waterway Wildlife Mitigation Project, including Gravine Island. The ADCNR is managing these lands as part of the Mobile-Tensaw Delta Wildlife Management Area. Studies funded by these agencies are currently being conducted to develop information that will assist in management and protection of the Alabama red-bellied turtle (Service, 2000). Until such work is completed, the species population size is not known, nor are several factors related to the resilience of the turtle; therefore a recovery rate cannot be determined.

Continuation of a systematic sampling program is needed to conclusively determine several biological aspects of this species, including nesting areas, feeding habitats, food sources, major threats to biological success, population size, population structure, population sex ratio, reproductive success, and movement. Until additional research is completed, the recovery rate for the species is not determinable.

Direct Effects of the Proposed Action: Direct effects to the species could occur as a result of being crushed by work barges being lowered into the water or otherwise relocated (as well as from actions associated with this particular operation), or by equipment movement or placement in the upland staging areas. Work barges being maneuvered into place during the winter months may directly impact estivating turtles by crushing. During this period of winter estivation, the

turtle is most vulnerable because it cannot avoid the dangers of the proposed action. The potential exists for land vehicles associated with the project to crush turtles that may be traveling to and from the nest. In addition to crushing from equipment traffic, upland staging areas present potential impacts to nesting activities by restricting access to nesting areas, destroying existing nests by crushing the eggs of over-wintering turtles and the killing of hatchlings as they return to the water.

We have serious reservations about the practicality of positioning barges between the existing bridge spans without dredging. The water depth between the spans east and west of Apalachee River are extremely shallow, even at high tide. A shallow draft boat cannot maneuver between the spans in this section. We, therefore, are concerned that dredging may be required to place barges between the spans in this area. This biological opinion does not address dredging, pipeline placement, or dredged material disposal areas. If dredging is required FHWA will need to request re-initiation of formal consultation to address potential adverse effects associated with dredging activities.

Due to project-caused shading, the permanent loss of 14 acres of submerged aquatic vegetation and 6.5 acres of emergent wetlands used by the turtle and located between the existing east-west lanes of Interstate 10 will occur.

Species' Response to the Proposed Action: Based on the above discussion, adverse affects are expected, given the scope of the project area and the habitat available to the species in Upper Mobile Bay. However, there are some unknown impacts associated with bridge construction on aquatic turtles. The particular sensitivity of turtles to bridge construction is unknown. It is also unknown whether turtles would exhibit avoidance behavior near project temporary work areas.

Gulf sturgeon (*Acipenser oxyrinchus desotoi*)

Species description: The Gulf sturgeon is a subspecies of the Atlantic sturgeon (*Acipenser oxyrinchus*). It is a large, primitive, bony fish with a sub-cylindrical body imbedded with bony plates or scutes. The snout is greatly extended and bladelike with four fleshy chin barbels in front of the mouth (Vladykov 1955; Vladykov and Greeley 1963). Adults range from 1.8 - 2.4 m (six to eight ft) or more in length, with adult females larger than males. The Gulf sturgeon has a longer head, pectoral fins, and spleen than the Atlantic sturgeon. Gulf sturgeon are anadromous, with immature and mature fish annually migrating into freshwater streams. Spawning is believed to occur in stream reaches having deep water and clean (rock, gravel or sand) bottoms. The eggs are sticky and adhere in clumps or strings to snags, outcroppings or other clean surfaces. Subadults and adults spend six to nine months each year in rivers and three to six of the coolest months (September - March) in estuaries or the Gulf of Mexico. It appears that sturgeon less than two years old reside in lower reach riverine habitats and estuaries throughout the year (Foster and Clugston, 1997).

The Service and the National Marine Fisheries Service designated the Gulf sturgeon as a

threatened species under the ESA on September 30, 1991 (Service 1991). Historically, Gulf sturgeon occurred in the Gulf of Mexico from the Mississippi River to Tampa Bay, Florida (Wooley *et al.* 1982). Gulf sturgeon occurred in most major river systems from the Mississippi River to the Suwannee River, Florida.

Life History: The movements of Gulf sturgeon in the Apalachicola, Suwannee, Pearl and Choctawhatchee Rivers have been and continue to be monitored by ultrasonic and radio telemetry and by conventional fish sampling gear (Foster 1993; Carr 1983; Wooley and Crateau 1985). In general, subadult and adult Gulf sturgeon begin to migrate into rivers from the Gulf of Mexico as river temperatures increase to about 16 to 23° C (60.8 to 75.0° F). They continue to immigrate through early May, but most arrive when temperatures reach 21° C. Subadult and adult Gulf sturgeon in the Suwannee and Apalachicola Rivers generally begin downstream migration in late September and October (Service 1991). Most return to the estuaries or the Gulf of Mexico by mid-November to early December (Service 1991). Based on mark-recapture data, these young fish did not appear to venture far into the Gulf of Mexico. Tagging studies from the fall of 1996 through May 1998 in Choctawhatchee Bay showed that all age 4 fish and 78% of all sub-adult tagged Gulf sturgeon remained in Choctawhatchee Bay the entire winter. A 1993 study noted that estuarine seagrass beds with mud and sand substrates appear to be important winter habitats for Gulf sturgeon where most feeding is thought to occur. The Gulf Sturgeon Recovery/ Management Plan indicates that Gulf sturgeon less than two years old may remain in riverine habitats and estuarine areas throughout the year. Based on the above information, we believe that juvenile, sub-adult and adult Gulf sturgeon could occur within the project area during the construction of the bridges. There were two sitings of Gulf sturgeon in Mobile Bay during 2002. It is not known whether Gulf sturgeon in Mobile Bay and its drainage basin undertake similar migrations and use the estuary and rivers in a manner similar to that reported elsewhere. Evidence from incidental captures and strandings indicate that some Gulf sturgeon use Mobile Bay well into the summer (see below).

Adult fish feed almost entirely on invertebrates in the estuarine-marine environment during the three to four winter months, then enter freshwater where they do not feed for the following eight or nine months (Mason and Clugston 1993). Limited stomach analyses from Suwannee and Apalachicola River Gulf sturgeon indicate that mud and sand bottoms and seagrass communities are probably important marine habitats for Gulf sturgeon (Mason and Clugston 1993). In the spring, immigrating subadult and adult Gulf sturgeon collected from the river mouths contained gammarid and haustoriid amphipods, as well as, other amphipods, polychaete and oligochaete annelids, lancelets and brachiopods. Small Gulf sturgeon (0.5 to 4.0 kg) (1.1 to 8.8 lb) collected at the mouths of these rivers during the winter and early spring contained amphipod and isopod crustaceans, oligochaetes, polychaetes, and chironomid and ceratopogonid larvae.

Population dynamics: Tagging studies indicate sturgeon are closely associated with, and tend to return to the river where they were spawned. Due to this strong affinity, it is believed that there is very little, if any, exchange of genetic material between sturgeon in different river systems. A study of mitochondrial DNA of Gulf sturgeon from geographically distinct drainages, supports the results of these tagging studies that indicate genetic differences among Gulf sturgeon stocks

(Stabile *et al.* 1996). Based on fish tissue samples from the Pearl River and Lake Pontchartrain, DNA analyses indicate that Gulf sturgeon in that area are genetically distinct from those in other Gulf river systems (Suwannee, Apalachicola, Ochlockonee, Blackwater, and Choctawhatchee) fish tissues were analyzed (Foster 1993; Carr 1983; Wooley and Crateau 1985).

Comparison of historic information and current data indicates that Gulf sturgeon populations are substantially reduced from historic levels (Wooley and Crateau 1985). This decline was likely caused by over-exploitation and was exacerbated by damming of rivers coupled with other forms of habitat destruction and water quality deterioration (Huff 1975). Navigation activities, including dam construction, dredging, dredged material disposal and other maintenance actions could adversely affect Gulf sturgeon habitats depending on the location and timing of the activity.

Status and distribution: Gulf sturgeon range from Lake Pontchartrain in Louisiana to Tampa Bay in Florida. The fish still occurs, at least occasionally, throughout this range, but in reduced numbers from the pre-settlement era. The Gulf sturgeon is essentially confined to the eastern Gulf of Mexico. Gulf sturgeon stocks have been greatly reduced or extirpated throughout much of the historic range by over fishing, dam construction and general habitat degradation. The Gulf sturgeon has historically been of commercial importance, with the eggs used for caviar, the flesh for smoked fish, and the swim bladder yielding isinglass, a gelatin historically used in food products and glues. While historic catches peaked about the beginning of the twentieth century, they have decreased drastically since that time. The decline was initially due to over fishing, but subsequent dam construction has impacted habitat and eliminated or reduced some populations in more recent years.

Effects of the Action

Factors to be Considered: We have determined that the proposed work would not affect the Gulf sturgeon in their fresh water life stages. Sturgeon use of this area is based on information from other areas and there are no known environmental constraints that would restrict sturgeon use to a small confined part of Mobile Bay that would be affected by bridge construction. Also, ALDOT has indicated that construction methods and equipment/vessel staging activities should not block passage of sturgeon through the construction area.

Species Response to the Proposed Action: Based on the small footprint of the project area and considering the amount of total surface area available, we do not believe the proposed project would adversely affect this species. The habitat impacts resulting from this project with regards to the Gulf sturgeon will be temporary in nature. Based on the proposed action and the distribution and mobility of the Gulf sturgeon, we do not believe that any sturgeon will be taken by this proposed action.

V. CUMULATIVE EFFECTS: Cumulative effects include the effects of future State, tribal,

local or private actions that are reasonably certain to occur in the action area considered in this biological opinion. Future Federal actions unrelated to the proposed action are not considered in this section because they require separate consultation pursuant to section 7 of the Endangered Species Act. Based on the best available commercial and scientific data available for these species, the Service is unable at this time to identify cumulative impacts to these species.

VI. CONCLUSION: After reviewing the current status of the Alabama red-bellied turtle, the environmental baseline for the action area, the effects of the proposed action, and the cumulative effects, it is the Service's biological opinion that the proposed action is not likely to jeopardize the continued existence of this species. No critical habitat has been designated in the action area for this species, therefore, none will be affected. We have reviewed the proposed action in light of the aggregate effects of everything that has led to this species' current status and those things likely to affect this species in the future. Actions that jeopardize the continued existence of a species are those that reasonably would be expected to directly or indirectly reduce appreciably the likelihood of both the survival and recovery of a listed species in the wild by reducing the reproduction, numbers, or distribution of the species.

No adverse affects are expected to occur regarding the Gulf sturgeon.

VII. INCIDENTAL TAKE STATEMENT: Section 9 of the Act and Federal regulations pursuant to section 4(d) of the Act prohibit the take of endangered and threatened species, respectively, without special exemption. Take is defined as to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture or collect, or to attempt to engage in any such conduct. Harm is further defined by the Service to include significant habitat modification or degradation that results in death or injury to listed species by significantly impairing essential behavioral patterns, including breeding, feeding or sheltering. Incidental take is defined as take that is incidental to, and not the purpose of, the carrying out of an otherwise lawful activity. Under the terms of section 7(b)(4) and section 7(o)(2), taking that is incidental to and not intended as part of the agency action is not considered to be prohibited taking under the Act provided that such taking is in compliance with the terms and conditions of this Incidental Take Statement.

The measures described as Terms and Conditions below are non-discretionary, and must become binding conditions of any grant or permit issued to the Alabama Department of Transportation, as appropriate, for the exemption in section 7(o)(2) to apply. The Federal Highway Administration has a continuing duty to regulate the activity covered by this Incidental Take Statement. If the Federal Highway Administration: (1) fails to assume and implement the terms and conditions or, (2) fails to require the ALDOT to adhere to the terms and conditions of the Incidental Take Statement through enforceable terms that are added to the permit or grant document, the protective coverage of section 7(o)(2) may lapse. In order to monitor the impact of incidental take, the ALDOT must report the progress of the action and its impact on the species to the Service as specified in the below Terms and Conditions.

The Service anticipates incidental take of the red-bellied turtle will be difficult to detect because the incidental take will likely be crushing the turtle into the sediment by the barges. However,

incidental take is given for the turtles that may be found in the defined action area. Therefore, incidental take would be exceeded if the project changes the proposed use of the barges.

VIII. EFFECTS OF THE TAKE: In the accompanying biological opinion, the Service determined that this level of anticipated take is not likely to result in jeopardy to the species when the reasonable and prudent measures identified below are implemented.

IX. REASONABLE AND PRUDENT MEASURES: The Service believes that the following reasonable and prudent measures are necessary and appropriate to minimize impacts to the Alabama red-bellied turtle. These terms and conditions are non-discretionary.

1. Work areas within the defined project area should be fenced to exclude red-bellied turtles.

2. All equipment staging areas located along U.S. Highway 90/98 (Causeway) will be selected in cooperation with the Service and fenced to exclude the Alabama red-bellied turtle. Fencing shall be monitored and properly maintained for the duration of the project.

3. Work areas within the project corridor should be cleared of Gulf sturgeon and Alabama red-bellied turtles prior to placing work barges in the enclosures. Work areas that are enclosed with mesh fencing will be cleared daily of turtles or sturgeon that might have entered the area.

4. Catch barges or vehicles shall be used to collect and remove debris resulting from the modification of existing bridge structures.

5. Monitoring for dead, sick, or injured turtles or sturgeon should be conducted on a daily basis.

X. TERMS AND CONDITIONS

In order to be exempt from the prohibitions of section 9 of the Act, the Federal Highway Administration must comply with the following terms and conditions, which implement the reasonable and prudent measures described above and outline required reporting/monitoring requirements. These terms and conditions are non-discretionary.

1. In those areas where work barges will rest on the bay bottom, mesh fencing or floating silt curtain, with a maximum 2" by 2" mesh, attached to the existing support columns will be used to exclude turtles and sturgeon from the work area. This fencing will be installed prior to leap-frogging barges into place and removed when work in an area is completed.

2. Staging areas are those areas where equipment will be stored overnight or longer periods of time. These areas will be fenced using silt fencing where possible. If fencing is impossible, the areas should be surveyed and cleared before vehicles are moved and all turtles removed and released into adjacent habitats.

3. Prior to placing platform work barges in place, the work areas within the project area will be cleared of sturgeon and turtles by trained personnel familiar with the species and permitted to take these species. Turtles may either be netted and released by hand or the mesh fencing may be opened and the species allowed to leave the enclosure on its own. Alabama redbelly turtles should be sexed, aged, measured and weighed before releasing in suitable habitat outside the project area. Gulf sturgeon should only be removed from the water long enough to photograph for identification.

4. The concrete portions of the existing bridge to be removed will be placed on catch barges or vehicles and later taken into the Gulf for the creation of fish habitat structures. Determining location of these structures should be coordinated with the Alabama Department of Conservation and Natural Resources, Marine Resources Division.

5. Upon locating a dead, injured, or sick individual of an endangered or threatened species, initial notification must be made to the Fish and Wildlife Service Law Enforcement Office at the Daphne Field Office (251-441-5787). Additional notification must be made to the Fish and Wildlife Service Ecological Services Field Office in Daphne, AL at 251-441-5181. Care should be taken in handling sick or injured individuals and in the preservation of specimens in the best possible state for later analysis of cause of death or injury.

Conservation Recommendations

Section 7(a)(1) of ESA directs Federal agencies to utilize their authorities to further the purposes of the ESA by carrying out conservation programs for the benefit of endangered and threatened species. Conservation recommendations are discretionary agency activities to minimize or avoid adverse effects of a proposed action on listed species or critical habitat, to help implement recovery plans, or to develop information.

1. The Federal Highway Administration in concert with the Alabama Department of Transportation should install modified guardrails along U.S. Highway 98/90 (causeway) to prohibit red-bellied turtles access to the roadway. Turtles and other wildlife are killed annually crossing this roadway.

2. Wildlife caution/information crossing signs should be posted along the causeway to educate and alert the public to the presence of the Alabama redbelly turtle.

3. Efforts to breach the causeway with elevated roadways allowing for a return of more natural flows and flushing of the Upper Mobile Bay should be studied with regards to the benefit to the environment.

4. The impacts to submerged aquatic vegetation and emergent wetland as a result of this project should be mitigated. Mitigation should include restoration or creation of similar type habitats as close to the impact site as possible.

In order for the Service to be kept informed of actions minimizing or avoiding adverse effects or benefitting listed species or their habitats, the Service requests notification regarding implementation of any conservation recommendations.

REINITIATION NOTICE

This concludes formal consultation on the action outlined in the request. As provided in 50 CFR §402.16, reinitiation of formal consultation is required where discretionary Federal agency involvement or control over the action has been retained (or is authorized by law) and if: (1) the amount or extent of incidental take is exceeded; (2) new information reveals effects of the agency action that may affect listed species or critical habitat in a manner or to an extent not considered in this opinion; (3) the agency action is subsequently modified in a manner that causes an effect to the listed species or critical habitat not considered in this opinion; or (4) a new species is listed or critical habitat designated that may be affected by the action. In instances where the amount or extent of incidental take is exceeded, any operations causing such take must cease pending re-initiation.

We appreciate the cooperation of your staff in the preparation of this Biological Opinion. We look forward to working closely with you in implementing its provisions. If you have any questions about this opinion, please contact Bruce Porter of my staff at (251)441-5864.

Sincerely,

Larry E. Goldman
Field Supervisor

Literature Cited

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January 23, 2006

Project DPI-0030(005)
I-10 Mobile River Bridge and Bayway Widening
Mobile and Baldwin Counties, Alabama
Volkert Contract No. 911602.12

RESUME OF MEETING

DATE:	January 18, 2006
LOCATION:	Volkert & Associates, Inc., Mobile, Alabama
PURPOSE:	Coordination Meeting with U.S. Fish & Wildlife Service (USFWS)

NAME:	REPRESENTING:	TELEPHONE:
Bruce Porter	USFWS	251-441-5864
Bill Garnett	Alabama Department of Transportation (ALDOT), Environmental Technical Section	334-242-6152
John Shill	ALDOT, Environmental Technical Section	334-242-6132
Marie Kyser	ALDOT, Environmental Technical Section	334-242-6148
Lynn Heisler	ALDOT, Environmental Technical Section	334-242-6113
Buddy Covington	Volkert & Associates, Inc. (Volkert)	251-342-1070
Skeeter McClure	Volkert	251-342-1070
Carah Mason	Volkert	251-342-1070

DISCUSSION:

The agenda for the meeting is attached.

Skeeter McClure provided an overview of ongoing study efforts, public involvement activities, and the alternatives screening evaluation process. Fourteen alternatives were evaluated. Five alternatives were presented at the public meetings on June 6 and 7, 2005. Following the input from the public meetings, ALDOT identified three (3) alternatives to be studied in more detail in the Draft EIS. FHWA concurred. A map showing the locations of these three alternatives was provided to Mr. Porter.

The potential impacts associated with the Bayway widening would be the same for all three alternatives. The USFWS issued a Biological Opinion and Incidental Take Permit for the Red Bellied Turtle for Alternative A. Alternative A was the alternative studied and presented in the Environmental Assessment in 2003.

Alternatives B and C traverse habitat that was not considered in the evaluations for Alternative A. Volkert biologists have conducted a field review of the new areas to determine wetlands and potential suitable habitat for protected species. Mr. Porter has not seen the Pinto Pass area. He would like to make a site

visit with Volkert biologists to the area. ALDOT and FHWA will be notified of the site visit so they can participate if they desire.

The location of the bridge pylons in the Mobile River was discussed. Any pylons in the river would be outside of the navigation channel and would be protected from ship collisions by an armored island. Species that would need to be addressed in the Mobile River include the Gulf sturgeon and the manatee.

A proposal to recommend Alternatives B or C would require a review of the Incidental Take Permit to determine if it would have to be amended.

Volkert environmental Group, Inc.

Memo

To: Skeeter McClure

From: Paul B. Looney

CC: File – 911602.12

Date: April 5, 2006

Re: Field Review of Pinto Pass for Mobile River I-10 Bridge Alternatives

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Summary of Field Review with USFWS

Volkert Environmental Group, Inc. (Paul Looney, Buddy Covington, Henry Malec) met with ALDOT (John Shill, Tony Shaddix, and Shan Norman) and USFWS (Bruce Porter) to determine the potential for impacts to the red bellied slider in the vicinity of Pinto Pass. We were joined by representatives of Atlantic Marine, the property owner.

Mr. Porter's concern was that any impacts to the wetland in the vicinity of the Pinto Pass area, especially in the vicinity of the dike, could have impacts to nesting habitat for the turtle. Mr. Porter and I walked the area of concern and discussed habitat requirements and potential use of the area by T/E species.

After viewing the habitat in question, Mr. Porter was no longer concerned with impacts as there is no suitable nesting or foraging habitat in the Pinto Pass area. He asked whether there was any possibility for the removal of the Dike that currently blocks passage of river waters through the former pass. His idea was to cut an opening in the dike to the normal water level and allow the area to stabilize itself without cutting a large channel. He suggested that this could be considered mitigation for all potential impacts within the project boundaries in the Mobile River delta. He stated that the mitigation would be considered as a benefit to the entire area of Pinto Pass.

Atlantic Marine was interested in the potential for mitigation credits as a part of the restoration. ALDOT was amenable to the idea of cutting the dike and obtaining mitigation credit for the project impacts.

All parties agreed that the determination of no impact to T/E species in Pinto Pass was a result of the visit and discussions will follow concerning the suggested mitigation effort to be undertaken during construction of the bridge.

DRAFT

January 12, 2007

Project **DPI-0030(005)**
I-10 Mobile River Bridge and Bayway Widening
Mobile and Baldwin Counties, Alabama
Volkert Contract No. 911602.12

RESUME OF MEETING

DATE:	January 11, 2007
LOCATION:	Volkert & Associates, Inc., Mobile, Alabama
PURPOSE:	Coordination Meeting with U.S. Fish & Wildlife Services (USFWS)

ATTENDANCE:	**REPRESENTING:**	**TELEPHONE:**
Bruce Porter	USFWS	251-441-5864
Alfedo Acoff	ALDOT, Environmental Technical Section	334-242-6143
Mike Reed	ALDOT, Environmental Technical Section	334-242-6710
Bill Van Luchene	Federal Highway Administration	334-223-7370
Bill Garnett	ALDOT, Environmental Technical Section	334-242-6152
Marie Kyser	ALDOT, Environmental Technical Section	334-242-6132
Lynn Heisler	ALDOT, Environmental Technical Section	334-242-6113
Buddy Covington	Volkert & Associates, Inc.	251-342-1070
Skeeter McClure	Volkert & Associates, Inc.	251-342-1070
Paul Griggs	Volkert & Associates, Inc.	251-342-1070
Jerald Overstreet	Volkert & Associates, Inc.	251-342-1070
Steve Ricks	Volkert & Associates, Inc.	251-968-7551

DISCUSSION:

The purpose of the meeting was to update Bruce Porter of the U.S. Fish and Wildlife Services (FWS) on studies and the Draft Environmental Impact Statement (EIS) for the I-10 Mobile River Bridge and Bayway Widening project.

The three alternatives are the same as discussed at the January 16, 2006 coordination meeting and the field review with him on April 15, 2006. The draft EIS is scheduled for release this summer and a corridor public hearing will be conducted. A preferred alternative will be identified after the Public Hearing and additional studies will be conducted and presented in a Final EIS.

The Incidental Take Permit for the Red Bellied Turtle (RBT) will be reviewed for the preferred alternative to see if it needs to be modified. Mr. Porter said that FWS was being encouraged to implement fencing of portions of the north side of the Battleship Parkway to protect RBT's. The primary

populations of the RBT, about 1,500 to 1,600, live in the Mobile Delta north of the Battleship Parkway. The RBT attempts to cross Battleship Parkway to nest. Approximately 80 RBT are killed each year by traffic. The ALDOT will consider the fencing as potential mitigation for I-10 Bayway Widening impacts. A newspaper article on the RBT is expected in the near future.

The manatee and gulf sturgeon were discussed. No impacts are anticipated. Construction of the protective island around the pylon pier in the Mobile River for alternative A would likely require manatee warnings on work vessels.

The issue of strobe lights on the proposed bridge as related to bird impacts was discussed. This will need to be coordinated with the Federal Aviation Administration.

Mr. Porter said the field review was helpful and the FWS was satisfied with the coordination process thus far.

VOLKERT
& ASSOCIATES, INC.

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March 7, 2007

Mr. Bruce Porter
Fish and Wildlife Biologist
U.S. Fish & Wildlife Services
1208-B Main Street
Daphne, Alabama 36526

Subject: Contract ID No. #205
Supplemental Agreement #4
Project No. DPI-0030(005)
I-10 Mobile River Bridge EIS
Mobile and Baldwin Counties
Volkert Project No. 911602.12

Dear Mr. Porter:

During our coordination meeting with you on January 11, 2007, we discussed the studies related to the I-10 Bridge and Bayway Widening Draft Environmental Impact Statement (DEIS). We provided you with a draft resume of the meeting on January 19, 2007, via email. A copy of the resume is provided for your convenience.

The FHWA would like to include a letter from the USFWS in the Draft EIS stating that we have coordinated with you and that you agree with the methodologies that are being used. Is this possible? We will provide you with the Draft EIS for your review and comment after it is approved by FHWA. We will also invite you to participate in field reviews on the preferred Alternative after it has been identified. We will also provide you the Final EIS for review and comment.

Thank you for your interest and cooperation. Please let me know if you have any questions.

Sincerely,
VOLKERT & ASSOCIATES, INC.

N.D. "Skeeter" McClure, IV, P.E., D.WRE
Environmental Project Manager

ndm/cao
Enclosure
cc: Paul Griggs, Volkert (without enclosure)
Buddy Covington, Volkert (without enclosure)
Wade Henry, ALDOT (without enclosure)
John Shill, ALDOT (without enclosure)
Bill Van Luchene, FHWA (without enclosure)
Missi Shumer, Volkert (without enclosure)

911602.12

United States Department of the Interior

FISH AND WILDLIFE SERVICE
1208-B Main Street
Daphne, Alabama 36526

VOLKERT-MOBILE

MAR 16 2007

IN REPLY REFER TO:
07-TA-0377

March 14, 2007

Mr. N.D. McClure
Volkert and Associates, Inc.
P.O. Box 7434
Mobile, AL 36670-0434

Dear Mr. McClure:

Thank you for your letter, dated March 7, 2007, requesting that my office concur with the methodologies discussed at our last coordination meeting and proposed to be used by your company to evaluate the environmental affects associated with the I-10 Bridge and Bayway Widening project. We offer 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 of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.).

We appreciated the opportunity to meet on January 11, 2007, and discuss the upcoming Draft Environmental Impact Statement (DEIS). We agree with your methods of evaluating the project thus far and look forward to future coordination meetings as this project moves ahead.

If you have questions or comments regarding this correspondence, please call Mr. Bruce Porter at (251)441-5864 or email bruce_porter@fws.gov.

Sincerely,

William J. Pearson
Field Supervisor

Cc: Federal Highway Administration, Attn: Mr. Bill Van Luchene, 500 Eastern Blvd., Suite 200, Montgomery, AL 36117-2018

U.S. Department
of Transportation
Federal Highway Administration

Alabama Division

9500 Wynlakes Place
Montgomery, AL 36117-8515
334-274-6350

December 23, 2010

In Reply Refer To:
HDA-AL

Mr. William J. Pearson
Field Supervisor
US Fish and Wildlife Service
PO Drawer 1190
Daphne, Alabama 36526

Attention: Mr. Bruce Porter

Dear Mr. Pearson:

FHWA respectfully requests to re-initiate Formal Consultation with the USFWS in accordance with Section 7 of the Endangered Species Act for Federal-aid project DPI-0030(005), Mobile/Baldwin Counties. The project design has changed since the 2003 Biological Opinion to include the addition of Alternate B, and an increase in the vertical bridge clearance from 190 feet to 215 feet. Please find enclosed correspondence for your review and an updated project location graphic. We greatly appreciate your assistance in this matter.

Sincerely,

/s/Linda L. Guin

Mark D. Bartlett, P. E.
Division Administrator

Enclosure

cc:
ALDOT, Mr. Tony Shaddix
ALDOT, Ms. Heather Dunn

February 7, 2011

Contract No. 911602.12
Project DPI-0030(005)
I-10 Mobile River Bridge and Bayway Widening EIS
Mobile and Baldwin Counties, Alabama

RESUME OF MEETING

DATE: February 2, 2011
PURPOSE: Agency Coordination Meeting

ATTENDANCE:	**REPRESENTING:**	**E-MAIL:**
Lynne Urquhart	Federal Highway Administration (FHWA)	lynne.urquhart@dot.gov
Phil Johnson	U.S. Coast Guard (USCG)	Philip.r.johnson@uscg.mil
Nick Amberger	City of Mobile	nick.amberger@cityofmobile.org
Terry Gilbreath	Alabama State Port Authority (ASPA)	tgilbreath@asdd.com
Allen Phelps	Alabama Department of Environmental Management (ADEM)	cap@adem.state.al.us
Felicia Smith	ADEM	fsmith@adem.state.al.us
Mark Thompson*	National Marine Fisheries Service (NMFS)	mark.thompson@noaa.gov
Veronica Beech*	NMFS	veronica.beech@noaa.gov
Tom Piper	Mobile MPO	tipper@sarpc.org
Kevin Harrison	South Alabama Regional Planning Commission	kharrison@sarpc.org
Richard Johnson	City of Daphne	directorpw@bellsouth.net
Fred Small	City of Daphne	mayorsmall@bellsouth.net
Glen Cunningham	USACE, Mobile District	glen.a.cunningham@usace.army.mil
Bruce Porter	U.S. Fish & Wildlife Service (USFWS)	bruce.porter@fws.gov
Amanda Hill	Alabama Historical Commission (AHC)	amanda.hill@preserveala.org
Joseph Glazar	AHC	joseph.glazar@preserveala.org
Alfedo Acoff	ALDOT – ETS	acoffa@dot.state.al.us
Natasha Clay	ALDOT – ETS	clayn@dot.state.al.us
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David Webber	Volkert, Inc.	dwebber@volkert.com
Buddy Covington	Volkert, Inc.	bcovington@volkert.com
Skeeter McClure	Volkert, Inc.	smcclure@volkert.com
Missi Shumer	Volkert, Inc.	mshumer@volkert.com
Kenneth Nichols	Volkert, Inc.	knichols@volkert.com

* Attended via conference call.

HANDOUTS (copies attached)

- Agenda for the meeting
- Map showing proposed Build Alternatives
- PowerPoint presentation given during the meeting

DISCUSSION

I. Welcome and Opening Remarks

Mr. Don Powell, ALDOT Ninth Division, opened the meeting by welcoming the attendees. He then turned the meeting over to Mr. Skeeter McClure of Volkert. Mr. McClure stated that the purpose of the agency coordination meeting was to brief the agencies on the status of the project, including changes that have occurred since the most recent agency coordination activities and to identify any questions or concerns the agencies may have regarding the project.

II. Cooperating Agencies

Mr. McClure noted that the U.S. Army Corps of Engineers, Mobile District, and the U.S. Coast Guard are Cooperating Agencies on the Environmental Impact Statement (EIS) for the proposed project. The Federal Aviation Administration was invited to serve as a Cooperating Agency, but they declined.

III. Presentation

Mr. McClure began the presentation by giving a brief history of the project, including the purpose and need for the project, which is to relieve congestion in the Wallace Tunnel, provide additional capacity across the Mobile River, and reduce the number of hazardous materials trucks traveling through the central business district of Mobile.

The presentation also included a relatively detailed summary of coordination activities conducted with agencies and various organizations with an interest in the proposed improvements.

Mr. McClure explained that since the most recent agency coordination activities, several changes had taken place in the project. The following is a summary of changes that have occurred:

1) An additional Build Alternative, Alternative B', was developed and will be included in the Draft EIS. Alternative B' was developed to minimize potential impacts on Austal facilities, GulfQuest development at Mobile Landing, the Alabama Cruise Terminal, and the former Union Hall at Bender, which is eligible for the National Register of Historic Places.
2) The vertical clearance of the proposed bridge has been increased from 190 feet above mean high water to 215 feet above mean high water. The belief is that the 215-foot vertical clearance will better suit Mobile's shipbuilding industries and will enhance the City's ability to attract larger cruise ships.
3) A "northern route" alternative was proposed by maritime and historic interests and evaluated for its ability to meet the purpose and need of the proposed project. Traffic studies revealed that a "northern route" would not remove sufficient vehicles from the Wallace Tunnel to relieve congestion in the tunnel. In addition, a "northern route" would not provide additional capacity across the Mobile River and would not reduce the number of hazardous materials traveling through Mobile's central business district. Therefore, FHWA determined that a "northern route" would not meet the purpose and need of the proposed project, and it will not be studied in detail in the EIS.

Mr. McClure stated that the following four Build Alternatives will be evaluated in the Draft EIS: Alternatives A, B, B', and C. All of these Build Alternatives are being studied at a 215-foot vertical clearance. With the exception of Alternative A, the piers for the bridges would be constructed on land. Alternative A would have one pier in the Mobile River. The pier would be placed outside of the Federal Mobile Harbor Navigation Channel and would be constructed within a rock-armored island. All four of the Build Alternatives would include widening the existing I-10 Bayway across Mobile Bay

from four to eight lanes. Widening of the Bayway would be constructed to the inside of the existing lanes, with the exception of the easternmost eastbound lanes, which would require widening to the outside to provide a transition section for the exit ramp to US 98 in Daphne. Widening to the inside would minimize potential impacts on environmental resources. Much of the construction channels used to build the existing Bayway still exist and would be used to construct the widening.

Public involvement meetings showing the four Build Alternatives and the 215-foot vertical clearance were conducted on August 31 and September 2, 2010. The results of these meetings indicate that the majority of people who provided comments are in favor of the proposed project and recognize that the proposed project is needed to relieve congestion.

The presentation concluded with a list of the next steps in the project development process and NEPA documentation with a tentative schedule.

IV. Discussion

The following is a summary of the discussion that took place following the presentation:

1) **Bruce Porter, USFWS**: Mr. Porter stated that no new species were listed as threatened or endangered. He also stated that the USFWS would like to see the use of "leapfrogging" the barges during construction to minimize impacts. Mr. Porter also asked what type of lighting was proposed for the tops of the bridge pylons. The USFWS requests that the longest duration allowed by FAA between strobes be utilized. He believes this duration is three seconds. The strobe lights placed on bridges attract birds, resulting in mortality.

   Response:

   - ALDOT intends to use segmented barges (or "leapfrogging") to minimize impacts to environmental resources to the extent practicable.
   - Coordination with FAA has occurred and will continue throughout the design and construction of the proposed project to determine what types of strobe lights and the duration between flashes are acceptable to FAA to obtain a permit.

2) **Phil Johnson, USCG**: Mr. Johnson stated that the USCG is primarily concerned about pier locations. He also noted that separate bridge permits will be required for each river crossing (Mobile River, Tensaw River, Apalachee River, and Blakeley River). He stated that tributary crossings would be evaluated on a case-by-case basis. He also said that he would look into the existing bridge permits for the river crossings (that were obtained for construction of the existing I-10 Bayway) to see if the proposed improvements could be added as amendments to existing permits.

3) **Mark Thompson, NOAA/NMFS**: Has a submerged aquatic vegetation (SAV) survey been conducted? Mitigation may be necessary for impacts to SAV. NOAA/NMFS will also be interested in impacts to emergent marsh. Will construction methodology involve pile driving? Shading impacts will have to be evaluated. Impacts to essential fish habitat (EFH) under the Magnuson-Stevens Fishery Conservation and Management Act will also have to be considered. Does FHWA plan to de-commission any of the existing river crossings?

   Response:

   - A SAV survey was conducted in 2001. The survey concluded that the proposed project would likely impact 20 acres of SAV. The amount and location of impacts varies depending upon conditions. Pre- and post-construction surveys will be conducted to determine quantities of impacts and appropriate mitigation measures.
   - Construction methodologies include the use of segmented barges and will include pile driving.
   - Shading impacts will be evaluated in the Draft EIS.

- Impacts to EFH will be evaluated in the Draft EIS.
- There are no plans to de-commission any of the existing river crossings.

4) **Glen Cunningham USACE:** When was the SAV survey conducted? Section 10 Permits will be required for impacts to SAV resulting from pile placement. He also noted that most of the impacts to water bodies will be associated with the Bayway widening.

Response:

- The SAV survey was conducted in 2001. See response to Mr. Thompson's comments in Item 3 above.

5) **Richard Johnson, City of Daphne:** What is a Record of Decision? Is that the final decision by FHWA on which alternative is to be constructed? Is Alternative B' the preferred alternative?

Response:

- The Record of Decision is the final document prepared by the FHWA documenting the agency's decision on which alternative is approved for construction.
- Alternative B' has received substantial support from the City of Mobile and the public, but a Preferred Alternative has not been identified and will not be identified until all four of the Build Alternatives and the No Build Alternative are evaluated in the Draft EIS. We expect to identify a Preferred Alternative in the Draft EIS.

6) **Fred Small, Mayor – City of Daphne**: Mayor Small noted that the City of Daphne is fully on-board with the proposed improvements. As discussed with ALDOT in other meetings, the City of Daphne is concerned about whether I-10 will be widened from four lanes to eight lanes from US 98 to east of the I-10/SR 181 interchange. The City of Daphne believes that going from eight lanes to four lanes on this segment of I-10 would be moving the bottleneck from the Wallace Tunnel to SR 181.

Response:

- ALDOT is looking at widening I-10 from US 98 to east of SR 181 from four lanes to six lanes as part of a separate project that will likely be constructed long before the proposed I-10 Mobile River Bridge project.

V. Closing

Ms. Acoff thanked everyone for attending the meeting and providing comments. Additional comments or questions may be provided directly to Volkert or routed through ALDOT or FHWA to Volkert.

Christy Overstreet

From: Covington, Buddy <buddy.covington@volkert.com>
Sent: Tuesday, October 01, 2013 9:26 AM
To: Overstreet, Christy
Subject: FW: USFWS Concurrence for DEIS 2012

Buddy Covington
Vice President
Environmental Services
Volkert, Inc
(251) 342-1070 Office
(251) 316-3854 Fax
buddy.covington@volkert.com
www.volkert.com

From: Dunn, Heather M. [mailto:dunnh@dot.state.al.us]
Sent: Monday, October 01, 2012 10:04 AM
To: 'Buddy Covington'
Subject: USFWS Concurrence for DEIS 2012

This needs to be placed in the document.

From: lynn.heisler@dot.gov [mailto:lynn.heisler@dot.gov]
Sent: Monday, October 01, 2012 10:03 AM
To: Dunn, Heather M.
Cc: Mark.Bartlett@dot.gov; Catherine.Batey@dot.gov; Acoff, Alfedo; Lynne.Urquhart@dot.gov; timothy.heisler@dot.gov
Subject: FW: Re-initiation of formal consultation I-10 BayWay Mobile

fyi

Lynn M Heisler
Environmental Protection Specialist
Federal Highway Administration, AL DIV
9500 Wynlakes Place
Montgomery, AL 36117
Office (334) 274-6372
Fax (334) 274-6352

From: Bruce_Porter@fws.gov [mailto:Bruce_Porter@fws.gov]
Sent: Friday, September 28, 2012 1:11 PM

To: Heisler, Lynn (FHWA)
Subject: Re-initiation of formal consultation I-10 BayWay Mobile

Lynn,

We realize Federal Highway Administration has requested re-initiation of our 2003 formal consultation on the I-10 BayWay widening in Mobile County, Alabama. After review of the information provided, the Service has determined the modifications made to the project will not require additional consultation. The project may be completed with protection of the initial consultation unless additional changes to plans are made that will impact listed species in a way not previously considered.

Thanks for the opportunity to review project changes.

Bruce Porter
USFWS ECOLOGICAL SERVICES-Alabama Field Office
1208-B Main Street
Daphne, AL 36526
(251) 441-5864

http://www.facebook.com/#!/usfwsalabama

ALABAMA DEPARTMENT OF TRANSPORTATION
1409 Coliseum Boulevard, Montgomery, Alabama 36130-3050

Don Siegelman
Governor

Paul Bowlin
Transportation Director

December 4, 2001

Ms. Jennifer Robinson
National Marine Fisheries Service
3500 Delwood Beach Road
Panama City, FL 32408

Dear Ms. Robinson:

RE: Project DPI-0030(005)
Mobile River Bridge/I-10 Bayway Widening
Mobile and Baldwin Counties

In response to your letter dated January 5, 2000 regarding the Essential Fish Habitat (EFH) in the 1998 generic amendment of the Fishery Management Plans for the Gulf of Mexico, we have attached Volkert and Associates, Inc. (Volkert) Essential Fish Habitat Assessment for the referenced project. It is the opinion of the Alabama Department of Transportation that the proposed project will not adversely affect any Essential Fish Habitat as set forth by the Gulf of Mexico Fishery Management Council.

We respectfully request that you address any comments to this office at you earliest convenience. We appreciate your assistance in this matter.

Sincerely,

Don T. Arkle, Chief
Design Bureau

By: _____
for Alfredo Acoff, Coordinator
Environmental Technical Section

LH
Attachment
cc: Mr. Bill Van Luchene, FHWA (w/atchs)
Mr. Larry Goldman, USFWS (w/atchs)
Mr. Paul Griggs, Volkert (w/o atchs)
Mr. Joe Bearrentine, ALDOT-ETS (w/o atchs)
file (w/atchs)

ESSENTIAL FISH HABITAT ASSESSMENT

Mobile River Bridge / I-10 Bayway Widening
Mobile and Baldwin Counties, Alabama
Project: DPI-0030 (005)
Volkert Project No. 911600.12

Prepared for:

Alabama Department of Transportation
1409 Coliseum Boulevard
Montgomery, Alabama 36130

November 2001

Prepared by:

Volkert & Associates, Inc.
3809 Moffett Road
Mobile, Alabama 36618
(251) 342-1070

Table of Contents

1.0 PROPOSED ACTION

The Alabama Department of Transportation (ALDOT) is currently studying a proposal to construct a 2200-foot-long and 190-foot-high cable stay bridge over Mobile River and to widen the existing Interstate 10 (I-10) Bayway over Mobile Bay from Mobile to Daphne, Alabama. The project will provide a six-lane bridge over the river and provide four additional lanes (two east bound and two west bound) along the Bayway.

2.0 CONSTRUCTION METHODOLOGY

As part of this project, ALDOT plans to construct the four additional lanes on the inside of the existing Bayway. The construction of the I-10 Bayway widening will be performed utilizing segmented barges traversing the area between the existing Bayway lanes. The barges can either float if sufficient water depth exists or they can rest on the bottom in shallow areas. The barge segments serve as a construction platform and are "leapfrogged" ahead using construction cranes as the construction progresses (duration of barge segments in a particular location should not exceed 30 days).

3.0 COORDINATION

An interagency coordination meeting for the project was held on February 7, 2001. Meeting participants included representatives of the National Marine Fisheries Service (NMFS), U.S. Fish and Wildlife Service (FWS), U.S. Army Corp of Engineers, Alabama Department of Environmental Management (ADEM) Coastal Section, Alabama Department of Transportation (ALDOT), and Volkert & Associates. One purpose of this meeting was to discuss potential project impacts and to explore construction methodologies that would minimize adverse impacts to the maximum extent practicable. Use of the segmented barge construction methodology was generally viewed as an appropriate way to minimize impacts.

4.0 ESSENTIAL FISH HABITAT (EFH) DESIGNATIONS

EFH is defined as all estuarine waters and substrates (mud, shell, sand, rock and associated biological communities), including the sub-tidal vegetation (seagrasses and algae) and adjacent inter-tidal vegetation (marshes and mangroves). This means those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity. Pursuant to the Magnuson-Stevens Fishery Conservation and Management Act and the 1996 Sustainable Fisheries Act, an Essential Fish Habitat (EFH) consultation is necessary for this project. According to the January 5, 2000 letter from the National Marine Fisheries Service (NMFS), the project area wetlands have been identified as EFH in the 1998 Generic Amendment of the Fishery Management Plans for the Gulf of Mexico. Additional information obtained from the NMFS listed the project area as EFH for the following species:

- Brown shrimp *(Penaeus aztecus)* – adult and juvenile
- Gray snapper (*Lutjanus griseus)* – adult and juvenile
- Gulf stone crab *(Menippe adina)* – adult and juvenile
- Pink shrimp *(Penaeus duorarum)* – adult and juvenile
- Red drum (*Sciaenops ocellatus)* – adult and juvenile
- Spanish (*Scomberomorus*) – adult and juvenile
- Spiny lobster (*Panulirus argus)* – adult and juvenile
- Stone crab *(Menippe mercenaria)* – adult and juvenile
- White shrimp (*Penaeus setiferus)* – adult and juvenile

EFH for highly migratory species includes twenty-one species. Four species are known to occur in the Mobile Bay area. They are:

- Bull shark* – juveniles – inlets, estuaries, and coastal waters less than 80 feet. Adults – inlets, estuaries, and coastal waters.

- Lemon shark* – early juveniles – inlets, estuaries, and coastal waters less than 80 feet from Tampa Bay to Mexico.
- Bonnethead shark* – juveniles – inlets estuaries, coastal waters less than 80 feet from the Florida Keys to South Padre Island, Texas and Mobile Bay.
- Blacktip shark – early juvenile, coastal waters less than 80 feet from Ten Thousand Island to Cedar Key, Florida. Late juvenile, coastal waters less than 80 feet from Florida Keys to Mexico.
- Blacknose shark – juvenile, coastal waters less than 80 feet from Florida Keys to Tampa. Adults, coastal waters less than 80 feet from Florida Keys to Terrebonne Parish, Louisiana, including Mobile Bay.
- Tiger shark – juveniles Mississippi Sound to Florida Keys, coastal waters less than 300 feet. Adults Cape San Blas, Florida to Mississippi Sound water depths 80 to 600 feet.
- Atlantic Sharpnose shark – juveniles, coastal waters less than 80 feet from Galveston, Texas to the Mississippi Sound. Adults from the Mississippi Sound to Mexico, coastal waters less than 160 feet.

* *Only species reported to commonly occur and have identified EFH in estuaries of the Gulf of Mexico.*

On September 6, 2001, the Alabama Department of Conservation and Natural Resources (ADCNR), Marine Resources Division, was contacted to determine if additional living marine resources could occur in the project area. In addition to managed species with protected EFH, species were also provided by DCNR as important living marine resources.

The following species can utilize marine, estuarine, and riverine environs during some portion of their life cycle. Salinity levels largely dictate their occurrence in riverine systems.

Gulf Sturgeon (*Acipenser oxyrinchus desotoi)*
Atlantic croaker (*Micropogonias undulates)*
Gaftopsail catfish (*Bagre marinus)*
Inland silverside (*Menidia beryllina)*
Hardhead catfish (*Arius felus)*
Spot (*Leiostomus xanthurus)*
Spotted seatrout (*Cynoscion nebulosis)*
Southern hake (*Urophycis floridanus)*
Blue crab (*Callinectes sapidus)*
Southern flounder (*Paralichthys lethostigma)*
Sand seatrout (*Cynoscion arenarius)*
Bay anchovy (*Anchoa mitchilli)*
Gizzard shad (*Dorosoma epedianum)*
Gulf menhaden (*Brevoortia patronus)*
Shiners (*Notropis spp.)*
Spotfin mojarra (*Eucinostomus argenteus)*
Silver perch (*Bairdiella chrysoura)*
Striped mullet (*Mugil cephalus)*
Spotted hake (*Urophycis regius)*
Sheepshead minnow (*Cyprinodon variegates)*

The following species are predominantly Riverine species but occasionally occur in estuarine environs.

Blue catfish (*Ictalurus furcatus)*
Channel catfish (*Ictalurus punctatus)*
American eel (*Anguilla rostrata)*
Largemouth bass (*Micropterus salmoides)*
Spotted sunfish (*Lepomis puntatus miniatus)*
Yellow bass (*Morone mississippiensis)*
Rainwater killifish (*Lucania parva)*
Striped bass (*Morone saxatilus)*
Bluegill (*Lepomis macrochirus)*
Chain pickerel (*Esox niger)*
Threadfin shad (*Dorosoma petenense)*
Black crappie (*Pomoxis nigromaculates)*
Marsh killifish (*Fundulus confluentus)*
Paddlefish (*Polyodon spathula)*
Redear sunfish (*Lepomis microlophus)*

The following species will spend nearly all of their adult life cycle in Marine environs but occasionally will occur in estuarine and riverine systems. Juveniles are likely to occur in estuarine to riverine environments. Juveniles use these systems as a refuge from finfishes and phytoplankton and zooplankton is more readily available.

Sheepshead (*Archosargus probatocephalus)*
Silver seatrout (*Cynoscion nothus)*
Crevalle jack (*Caranx hippos)*
Atlantic spadefish (*Chaetodipterus faber)*
Gulf killifish (*Fundulus grandis)*
Harvestfish (*Peprilus alepidotus)*
Gulf butterfish (*Peprilus burti)*

5.0 ASSESSMENT

The site contains brackish waters. According to Ms. Patricia Spitzer of the Dauphin Island Sea Lab, the salinity in the northern end of Mobile Bay is typically four to five parts per thousand (ppt). This salinity range is within the NMFS definition of mixing water/brackish salinity zone, which varies from 0.5 to 25 ppt. The variety of habitat present in the corridor is normally unique to estuarine environments.

The Mobile Delta consists of approximately 184,960 acres of which approximately 11,680 acres are vegetated water bottom, approximately 10,240 acres of tidal mudflats and approximately 20,480 acres of open water (depths greater than 5 feet) habitat with an average depth of 10 feet. The project corridor constitutes approximately 0.0014 percent (17.11 acres) of SAV habitat, approximately 0.001 percent (6.35 acres) of sub-tidal mudflats and approximately 0.002 percent (36 acres) of open water habitat in the Mobile Delta. Major marsh grass species are alligator weed (*Alternanthera philoxeroides),* big cordgrass (*Spartina cynosuroides*), *Phragmites communis,* hardstem bulrush (*Scirpus californicus),* and saw grass (*Cladium jamaicense).* Small, unquantified amounts of submerged vegetation such as southern naiad (*Najas guadalupenis),* wild celery *(Vallisneria spiralis),* and slender pondweed (*Potamogeton pusillus*), along with some reestablishment of widgeon grass (*Ruppia maritima),* were present in the study corridor.

6.0 BROWN SHRIMP

The Mobile Bay Estuary is designated as EFH for adult and juvenile Brown shrimp *(Penaeus aztecus).* Adults are found in shallow coastal waters. Juveniles and sub-adults prefer shallow marsh and estuarine bays. Larvae and juveniles inhabit soft, muddy areas, especially in association with plant/water interfaces. Adults are associated with terrigenous silt and muddy sand substrate (Monaco, 1989), and are prevalent farther south in Mobile Bay where the salinity is higher. Spawning is reported to occur primarily in off-shore waters deeper

than 18 meters, possibly as deep 137 meters or more. Several studies have suggested two peaks of spawning for the Brown shrimp, from September to November and from April to May in the northern Gulf of Mexico. Young Brown shrimp remain in shallow estuarine areas near the marsh-water, mangrove water interface or in sea-grass beds which provide both predator protection and feeding habitat (Lassey, D. 1983). Brown shrimp are consumed by many fin-fish species and large crustaceans. This species would likely be found in the project area among the submerged aquatic vegetation. It is not expected that this species will be adversely affected by the proposed project due to the temporary nature of impacts associated with the adopted construction methodology.

7.0 PINK SHRIMP

The Mobile Bay Estuary is designated as EFH for adult and juvenile Pink shrimp *(Penaeus duorarum)*. Pink shrimp are associated with shell sand, sand, coral-mud, or mud bottoms. Adults prefer calcareous sediments but are also found on hard sand bottoms, particularly in non-turbid waters (South Atlantic Fishery Management Council, 1981). Adults inhabit offshore marine waters with the highest concentrations in depths of 9 to 44 meters. The distribution of Pink shrimp can be limited by geographic distribution of sea-grasses within estuaries. Juveniles densities are highest in or near seagrasses, low in mangroves, and near zero or absent in marshes. There have been high densities of shrimp populations where the sea-grasses *Diplanthera wrightii* and *Zostera marina* were present. Pink shrimp are a major prey to a wide variety of fish, along with wading birds in the coastal areas. Larger, more mature adult Pink shrimp emigrate to deep off-shore waters where as small and immature shrimp tend to stay in shallow-water estuaries. This species is more prevalent off the coast of Florida but could occur in Mobile Bay around the proposed project area. Adult Pink shrimp are not likely to be affected by the proposed project due to the fact that they tend to migrate to deeper oceanic waters. After consultation with the ADCNR, Marine Resources Division, they stated that approximately 2 percent of all the shrimp caught in Alabama are pink shrimp and that they are more

abundant farther east and along the west coast of Florida. Juvenile Pink shrimp could be present in the submerged aquatic vegetation. It is not expected that this species will be adversely affected due to the construction methodology of this project.

8.0 WHITE SHRIMP

The Mobile Bay Estuary is designated EFH for adult and juvenile White shrimp (*Panaeus setiferus).* White shrimp are offshore and estuarine dwellers. Postlarval white shrimp are benthic once in nursery areas of estuaries, where they tend to seek out shallow water with muddy sand bottoms high in organic detritus or abundant marsh, and develop into juveniles. Juveniles are common to highly abundant in all Gulf estuaries from Texas to the Suwannee River in Florida. Juveniles inhabit mud bottoms or peat bottoms with large quantities of decaying matter or vegetative cover. Densities are usually highest in marsh edge and submerged aquatic vegetation, followed by marsh ponds and channels, inner marsh, and oyster reefs. Juveniles prefer low salinity waters. Adult white shrimp are demersal and generally inhabit nearshore Gulf waters to depths of less than 30 meters on bottoms with soft mud or silt. Adult white shrimp should not be affected by the proposed project since they prefer nearshore Gulf waters. Juvenile white shrimp should not be affected by the proposed project due to the construction methodology of this project.

9.0 STONE CRAB AND GULF STONE CRAB

The Mobile Bay Estuary is designated EFH for adult and juvenile stone crab *(Menippe mercenaria)* and adult and juvenile Gulf stone crab (*Menippe adina).* These two species are grouped together due to their similar habitat. The adult Gulf/stone crab can tolerate a wide range salinity but is typically found in salinities approaching full seawater. Adult Gulf/stone crabs tend to burrow under rock ledges, coral heads, dead shells, or grass clumps. They occasionally inhabit oyster bars and rock jetties and also in seagrass flats (primarily *Thalassia testudinum)* and along sides of tidal channels where they inhabit burrows that

extend up to 50 inches into the substrate. Juvenile Gulf/stone crab migrate in-shore to coastal estuaries and grow to maturity. They do not dig burrows; they will use readily available hiding places that offer close proximity to food items. Juveniles have been reported to be abundant on shell bottom, sponges, and *Sargassum* mats as well as channels and deep grass flats. There are numerous reports of large juveniles being abundant on oyster reefs. Adults and juveniles can tolerate most environmental extremes within their distribution range and are capable of surviving salinities considerably higher than or lower than 33 ppt. However, Gulf/stone crab larvae require warm water 30° C (86° F) and high salinity (30 to 35 ppt) for most rapid growth. Larval survival and growth rates decline rapidly below 25° C (77° F) and 25 ppt. No impact of this species is expected from the proposed project due to the lack of habitat (temperature and salinity) needed for the growth of this species in the project area. The juvenile species is not common in estuaries north of Cedar Key, Florida.

10.0 SPINY LOBSTER

The Mobile Bay Estuary is designated EFH for adult and juvenile spiny lobster *(Panulirus argus)*. Juvenile spiny lobster tend to congregate in macroalgae beds along rocky shorelines and may be found among large expanses of sea-grass. Most adult and late juvenile lobster aggregate in various sheltering structures in protected bays, including estuaries with high salinity. Types of shelter used by the spiny lobster include large sponges, coral heads, mangrove roots, grass-bed undercuts, solution holes, rocky outcropping or ledges, and even clumps of sea urchins. Lobster approaching maturity emigrate off-shore. Juvenile spiny lobster take refuge in both biotic (sponges, small coral heads, and sea urchins) and abiotic (ledges and solution holes) structures. In the northern Gulf of Mexico, adverse synergistic effects of reduced temperature and variable salinities probably prevent recruitment into near-shore habitats (Marx, J., Herrnkind, W. 1986). Therefore, it is not likely that this species will be adversely affected by the proposed project.

11.0 RED DRUM

The Mobile Bay Estuary is designated EFH for adult and juvenile Red drum (*Sciaenops ocellatus*). Red drum occur in a variety of habitats in the Gulf of Mexico, ranging from depths of about 40 meters offshore to very shallow estuarine waters. An abundance of juvenile red drum has been reported around the perimeter of marshes in estuaries (Perret et. al., 1980). Young fish are found in quiet, shallow, protected waters with grassy or slightly muddy bottoms (Simmons and Breuer, 1962). Subadult and adult red drum prefer shallow bay bottoms or oyster reef substrates, but tend to spend more time offshore as they age. Red drum spawn in deeper waters near the mouths of bays and inlets, and on the Gulf side of barrier islands. The proposed project should not have an adverse affect on the adult red drum since they tend to migrate offshore with age. The juvenile red drum should not be affected by the proposed project due to the construction methodology that will be used.

12.0 GRAY SNAPPER

The Mobile Bay Estuary is designated EFH for adult and juvenile Gray snapper (*Lutjanus griseus*). Gray snapper occur in almost all of the Gulf's estuaries but are most common in Florida. Adult gray snapper are demersal and mid-bottom dwellers, occurring in marine, estuarine, and riverine habitats. Adults are found up to 32 km offshore and inshore as far as coastal plain freshwater creeks and rivers. They prefer mangroves, sandy grassbeds, and coral reefs and over sandy, muddy and rocky bottoms. Gray snapper spawn offshore near reefs and shoals from June to August. Juvenile gray snapper are also marine, estuarine, and riverine dwellers that are often found in estuaries, channels, bayous, ponds, grassbeds, marshes, mangrove swamps, and freshwater creeks. They appear to prefer *Thalassia* grass flats, marl bottoms, seagrass meadows and mangrove roots. It is not likely that the proposed project will adversely affect the Gray snapper due to the construction methodology.

13.0 SPANISH MACKEREL

The Mobile Bay Estuary is designated EFH for adult and juvenile Spanish Mackerel (*Scomberomorus)*. Adult spanish are usually found in neritic (an oceanic zone extending from mean low tide level to the edge of the continental shelf) waters and along coastal areas. They will inhabit estuarine areas especially the higher salinity areas, during seasonal migrations, but are considered rare and infrequent in many Gulf estuaries. Spawning grounds are offshore and occurs from May to October. Nursery areas are in estuaries and coastal waters year-round. Juvenile spanish are found offshore and in beach surf, and sometimes in estuarine habitat. Juveniles appear to prefer marine salinity and are generally not considered estuarine dependent. Clean sand appears to be the preferred substrate for juvenile spanish. It is not likely that adult or juvenile spanish habitat will be affected by the proposed project due to the lack of habitat for this species in the project area.

14.0 CONCLUSIONS

The proposed project will impact upper intertidal habitat. Submerged grass-bed habitat could be lost by shading effects, but additional off-shore artificial reef habitat could be created in the Mobile Bay Estuary and/or the Gulf of Mexico. Of the species with EFH in the Mobile Delta, brown shrimp, juvenile pink shrimp, juvenile white shrimp, juvenile red drum, and adult and juvenile gray snapper were identified as using upper intertidal habitats such as found at this site. Impacts to these species are not expected to be significant-due to the temporary nature of construction and the limited duration that these species inhabit the project corridor during their life cycle.

Included in this document are a project location map, aerial photographs, a listing of the estuary selections, maps showing the occurrence of each adult and juvenile species in the Mobile Bay Estuary during different salinity levels throughout the year, and a profile of the I-10 Bayway canal.

15.0 MINIMIZATION AND MITIGATION

The preferred alternate will minimize new impacts by following the alignment of the existing Bayway. All construction will occur along the inside of the existing Bayway in the original construction canal. No new dredging is proposed at this time. All construction impacts will be temporary in nature and should not cause a substantial effect to waterbottoms or deep water habitat. In areas where shoaling has occurred and SAV's have colonized, there is the potential for shading effects. The Bayway widening will require the demolition and disposal of bridge rubble from the inside portion of the east and west Bayway lanes. The bridge rubble could be used as a resource in the establishment of artificial reef habitat in the Mobile Bay Estuary and/or the Gulf of Mexico to offset shading effects to SAV's. This opportunity could be explored with the permitting and resource agencies during the permitting process. Quantities and locations of artificial reef construction would be further refined during the permitting process.

16.0 REFERENCES

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APPENDIX A
NMFS MAPPING

Estuary selections by estuary:

Estuary	State	Common	Species	Lifestage	PDF
Mobile Bay	Alabama	Brown shrimp	Penaeus aztecus	Adult	Alabama\Mobile Bay\mbbsa.pdf
Mobile Bay	Alabama	Brown shrimp	Penaeus aztecus	Juvenile	Alabama\Mobile Bay\mobbsj.PDF
Mobile Bay	Alabama	Gray snapper	Lutjanus griseus	Adult	Alabama\Mobile Bay\mbgsa.PDF
Mobile Bay	Alabama	Gray snapper	Lutjanus griseus	Juvenile	Alabama\Mobile Bay\mobgsj.PDF
Mobile Bay	Alabama	Gulf stone crab	Menippe adina	Adult	Alabama\Mobile Bay\mbgsca.PDF
Mobile Bay	Alabama	Gulf stone crab	Menippe adina	Juvenile	Alabama\Mobile Bay\mobgscj.PDF
Mobile Bay	Alabama	Pink shrimp	Penaeus duorarum	Adult	Alabama\Mobile Bay\mbpsa.PDF
Mobile Bay	Alabama	Pink shrimp	Penaeus duorarum	Juvenile	Alabama\Mobile Bay\mobpsj.PDF
Mobile Bay	Alabama	Red drum	Sciaenops ocellatus	Adult	Alabama\Mobile Bay\mbrda.PDF
Mobile Bay	Alabama	Red drum	Sciaenops ocellatus	Juvenile	Alabama\Mobile Bay\mobrdj.PDF
Mobile Bay	Alabama	Spanish mackerel	Scomberomorus maculatus	Adult	Alabama\Mobile Bay\mbsma.PDF
Mobile Bay	Alabama	Spanish mackerel	Scomberomorus maculatus	Juvenile	Alabama\Mobile Bay\mobsmj.PDF
Mobile Bay	Alabama	Spiny lobster	Panulirus argus	Adult	Alabama\Mobile Bay\mobsla.PDF
Mobile Bay	Alabama	Spiny lobster	Panulirus argus	Juvenile	Alabama\Mobile Bay\mobslj.PDF
Mobile Bay	Alabama	Stone crab	Menippe mercenaria	Adult	Alabama\Mobile Bay\mbsca.PDF
Mobile Bay	Alabama	Stone crab	Menippe mercenaria	Juvenile	
Mobile Bay	Alabama	White shrimp	Penaeus setiferus	Adult	Alabama\Mobile Bay\mbwsa.PDF
Mobile Bay	Alabama	White shrimp	Penaeus setiferus	Juvenile	Alabama\Mobile Bay\mobwsj.PDF

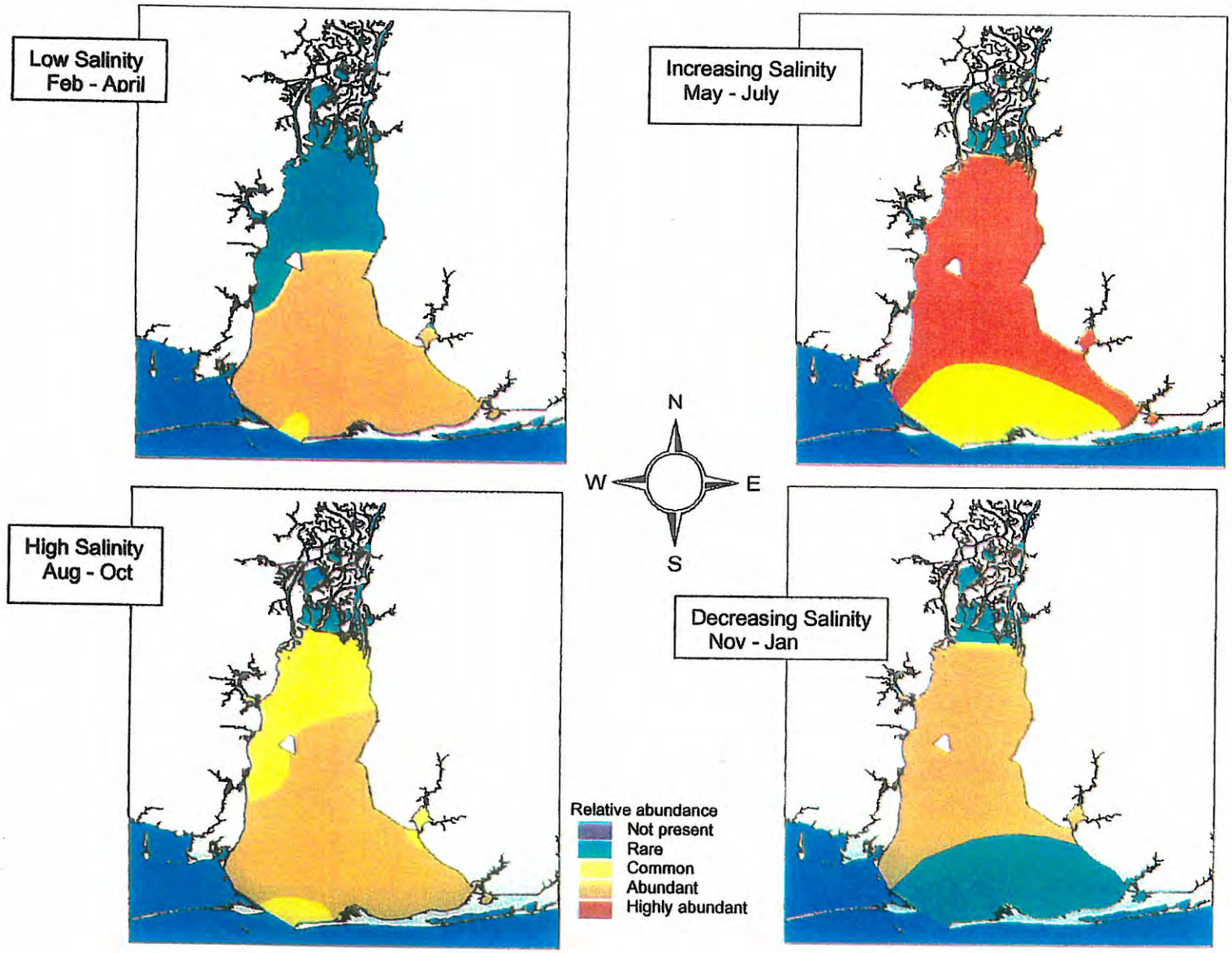
United States Department of Commerce
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
Southeast Fisheries Science Center
Galveston Laboratory
4700 Avenue U
Galveston, TX 77551-5997
(409) 766-3500

Mobile Bay, AL
EFH Mapping, NMFS Galveston Lab

Brown Shrimp, *Penaeus aztecus*, Adults

http://galveston.ssp.nmfs.gov/efh

Salinity Seasons
September, 1998



Mobile Bay, AL

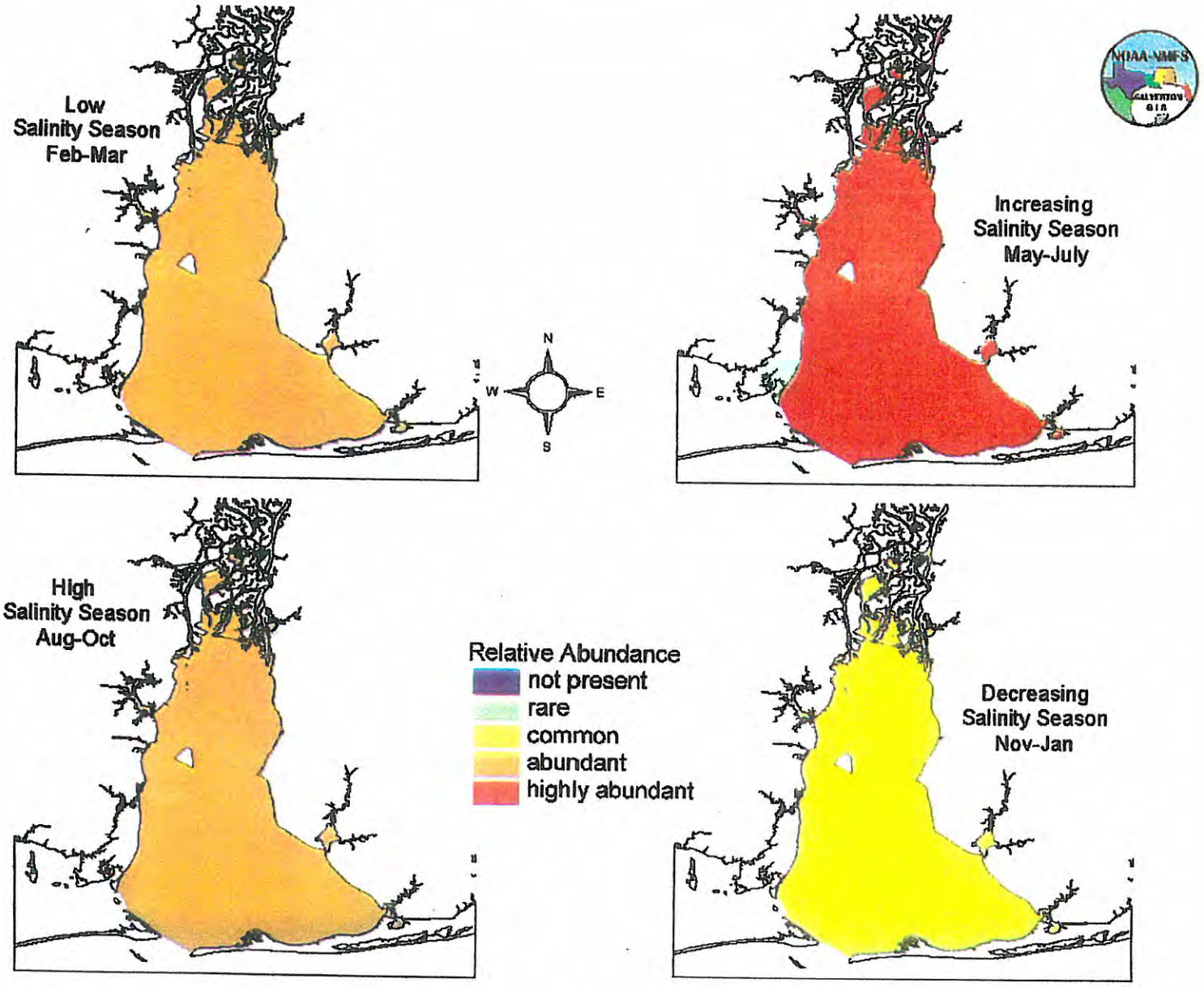
EFH Mapping, NMFS Galveston Lab

Brown Shrimp, *Penaeus aztecus*

http://galveston.ssp.nmfs.gov/efh

Juveniles

July, 1998

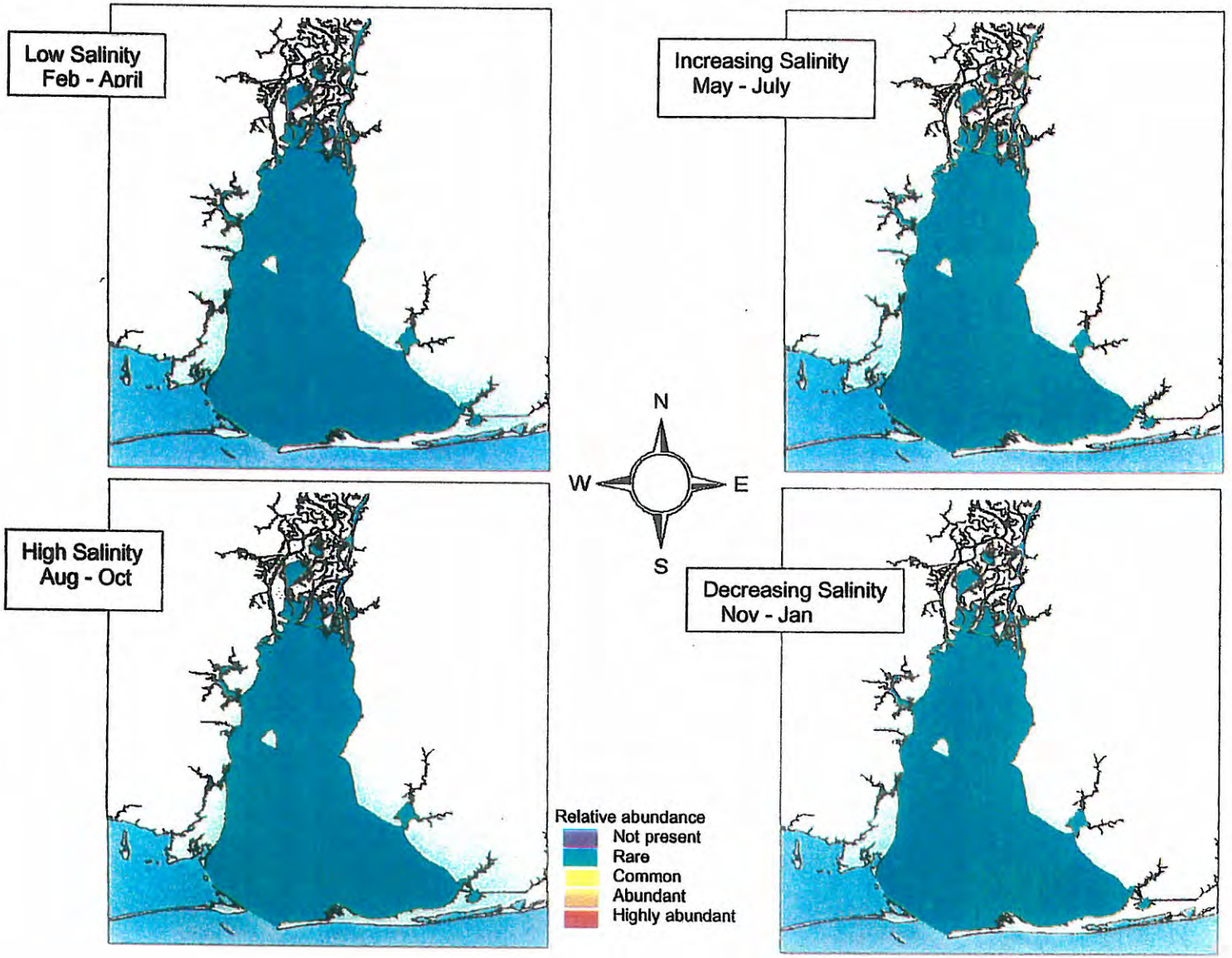


Mobile Bay, AL
EFH Mapping, NMFS Galveston Lab

Gray Snapper, *Lutjanus griseus*, Adults

http://galveston.ssp.nmfs.gov/efh

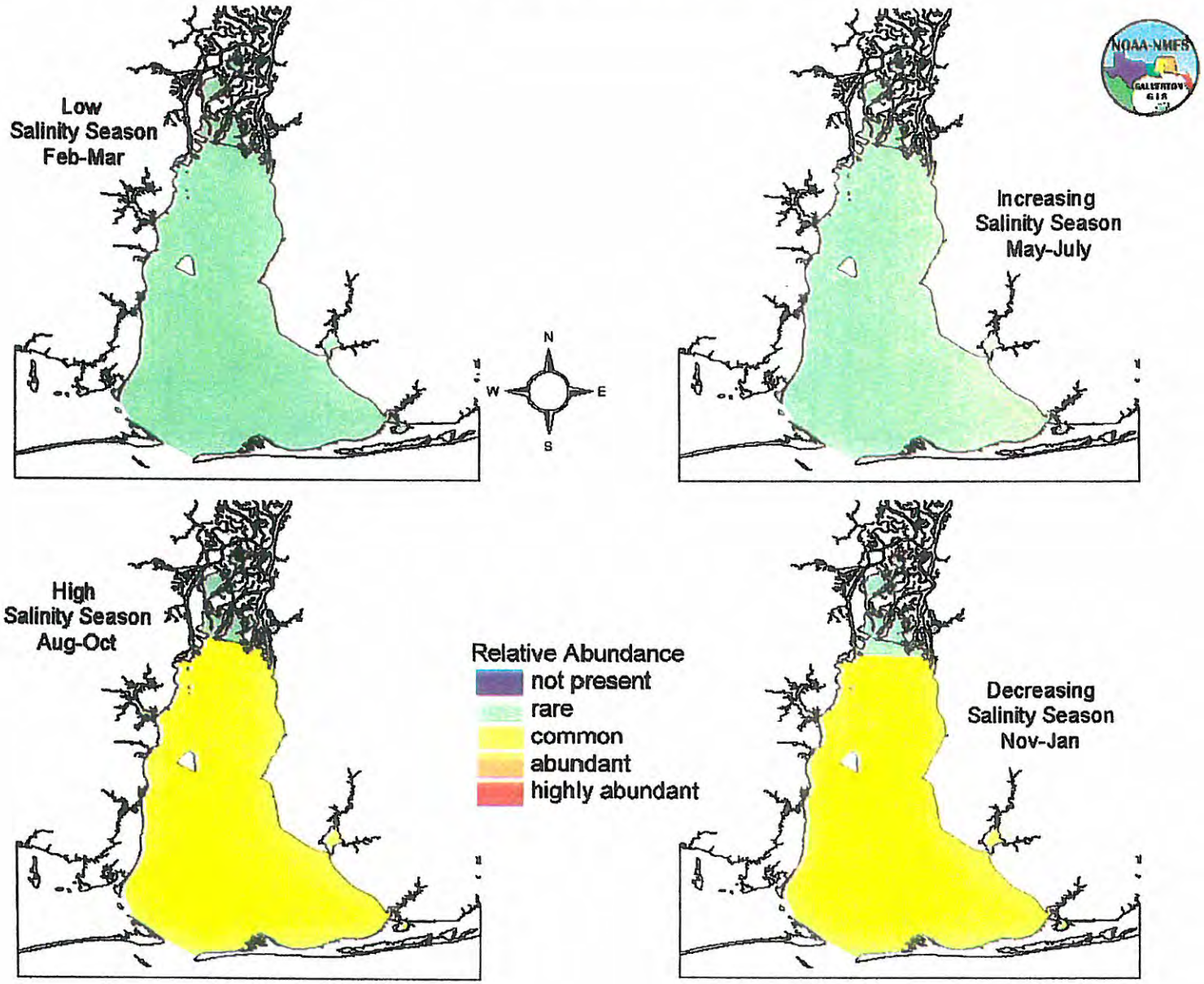
Salinity Seasons
September, 1998



Mobile Bay, AL
EFH Mapping, NMFS Galveston Lab

Gray Snapper, *Lutjanus griseus*
http://galveston.ssp.nmfs.gov/efh

Juveniles
July, 1998



Mobile Bay, AL

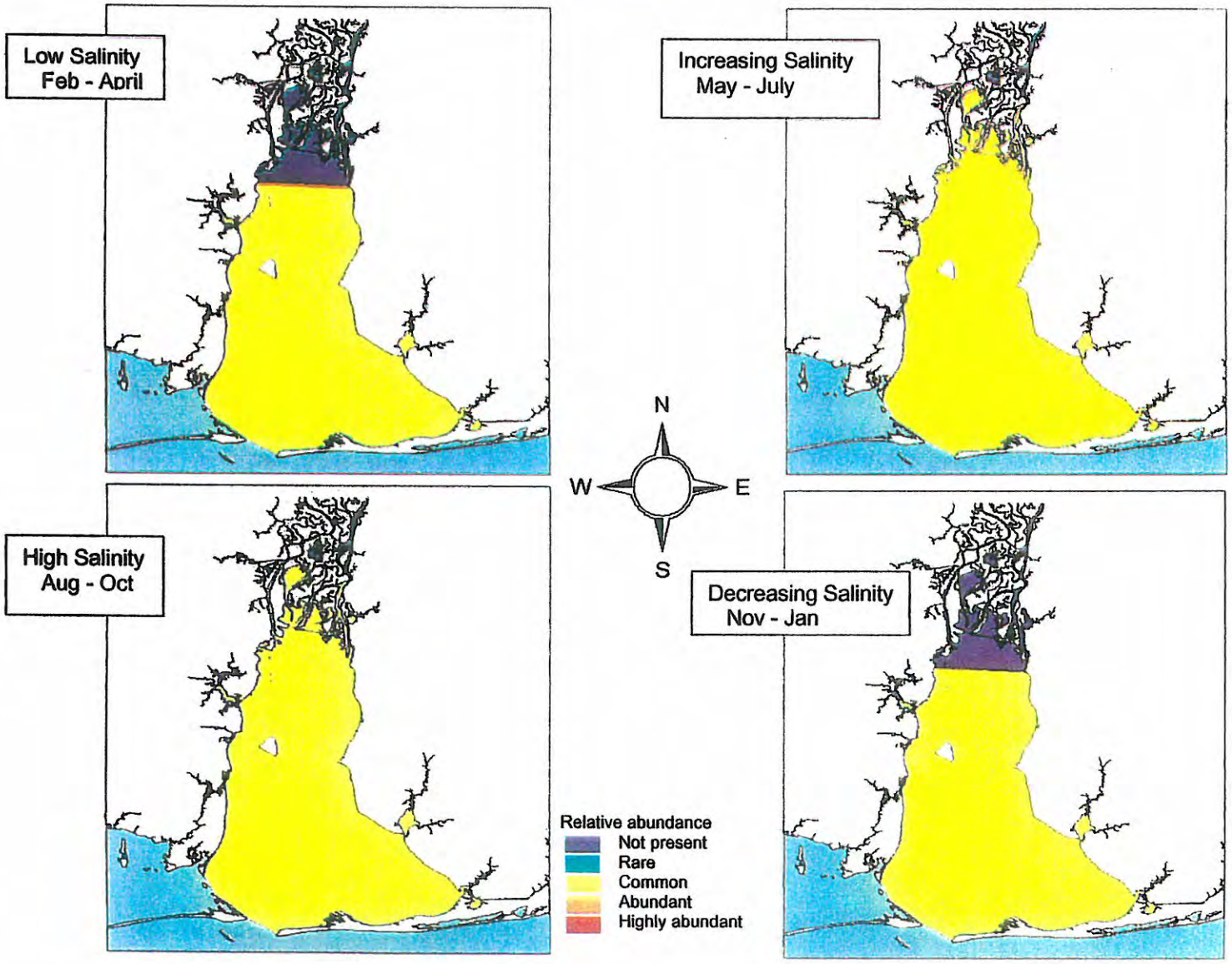
EFH Mapping, NMFS Galveston Lab

Gulf Stone Crab, *Menippe adina*, Adults

http://galveston.ssp.nmfs.gov/efh

Salinity Seasons

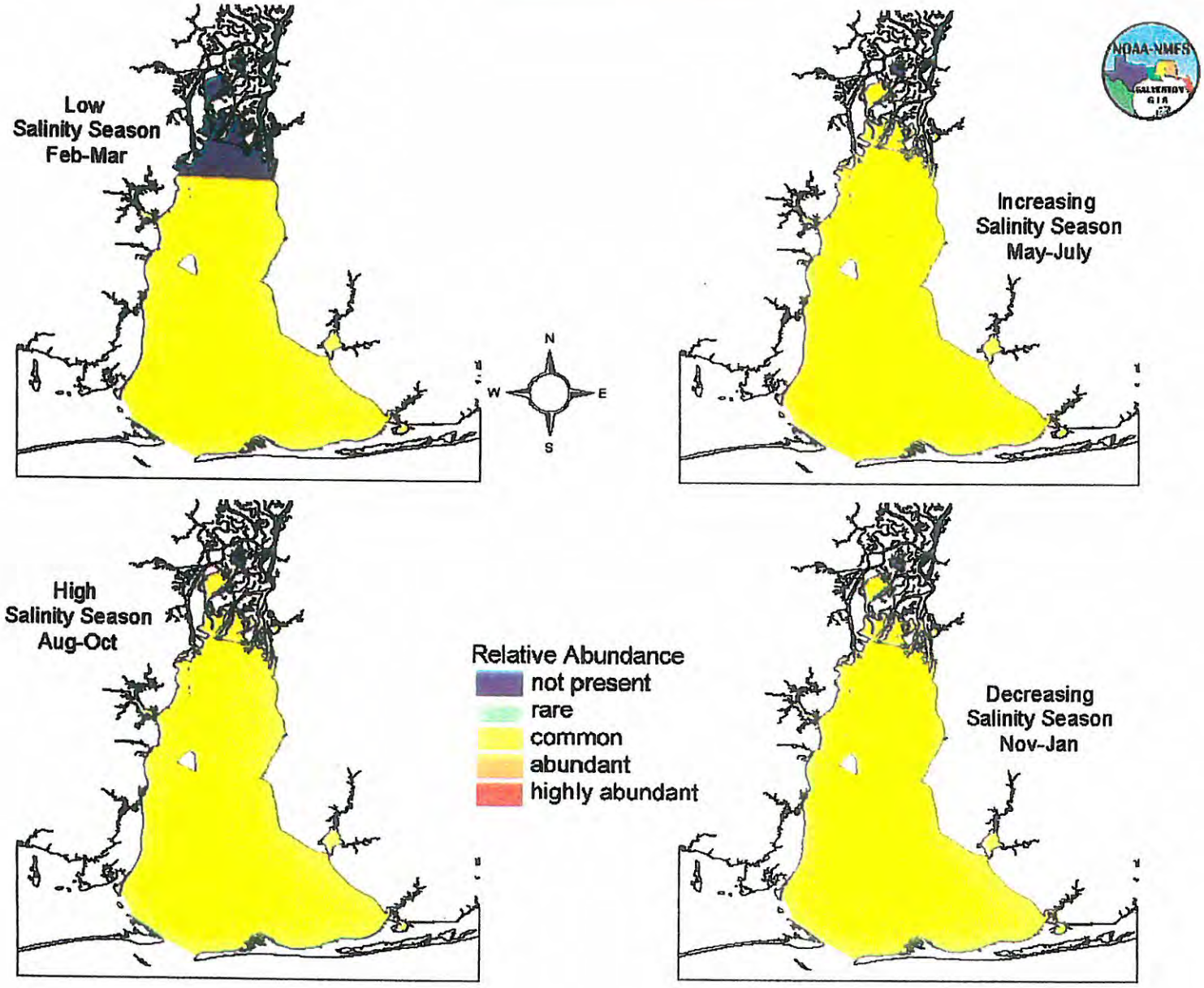
September, 1998



Mobile Bay, AL
EFH Mapping, NMFS Galveston Lab

Gulf Stone Crab, *Menippe adina*
http://galveston.ssp.nmfs.gov/efh

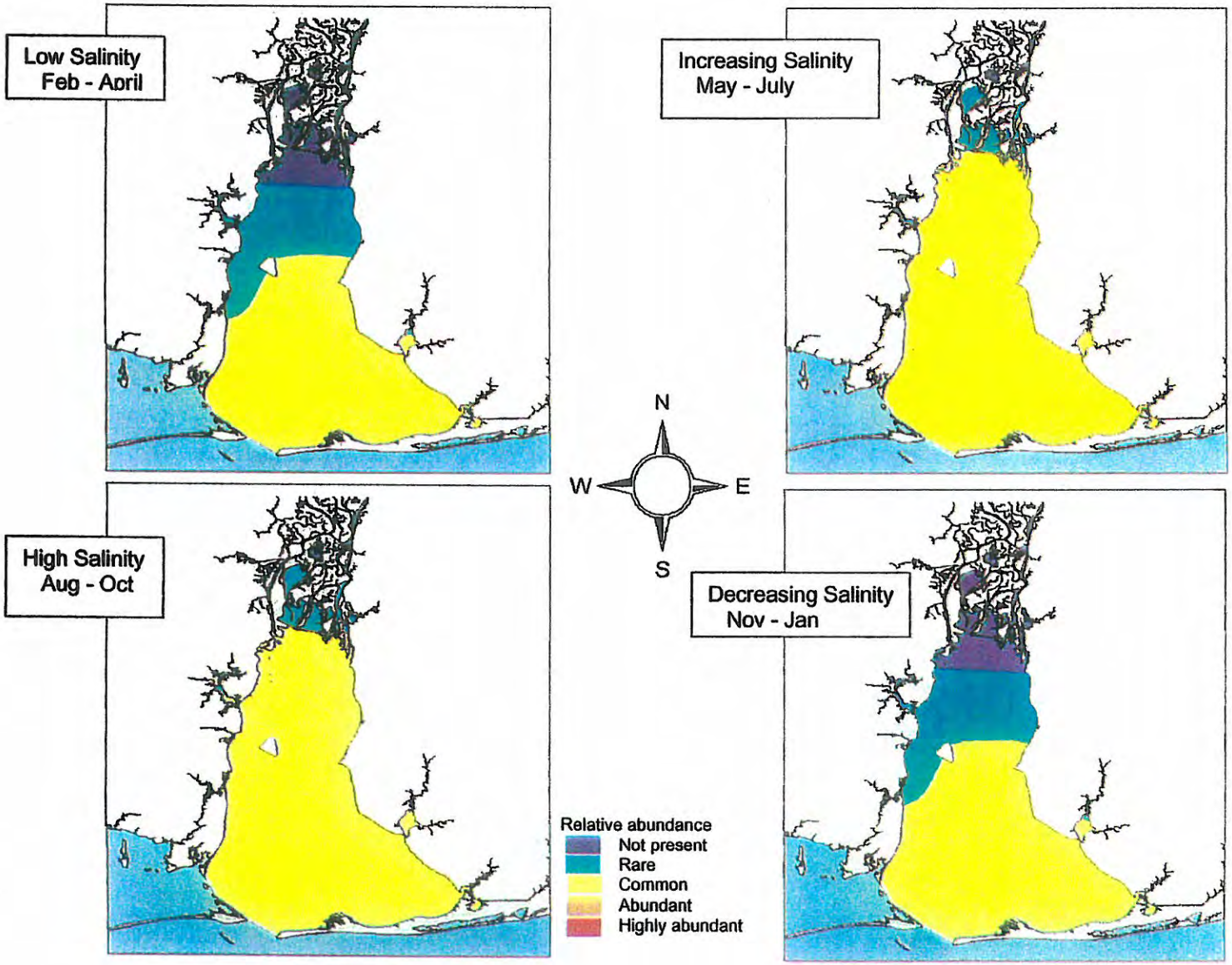
Juveniles
July, 1998



Mobile Bay, AL
EFH Mapping, NMFS Galveston Lab

Pink Shrimp, *Penaeus duorarum*, Adults
http://galveston.ssp.nmfs.gov/efh

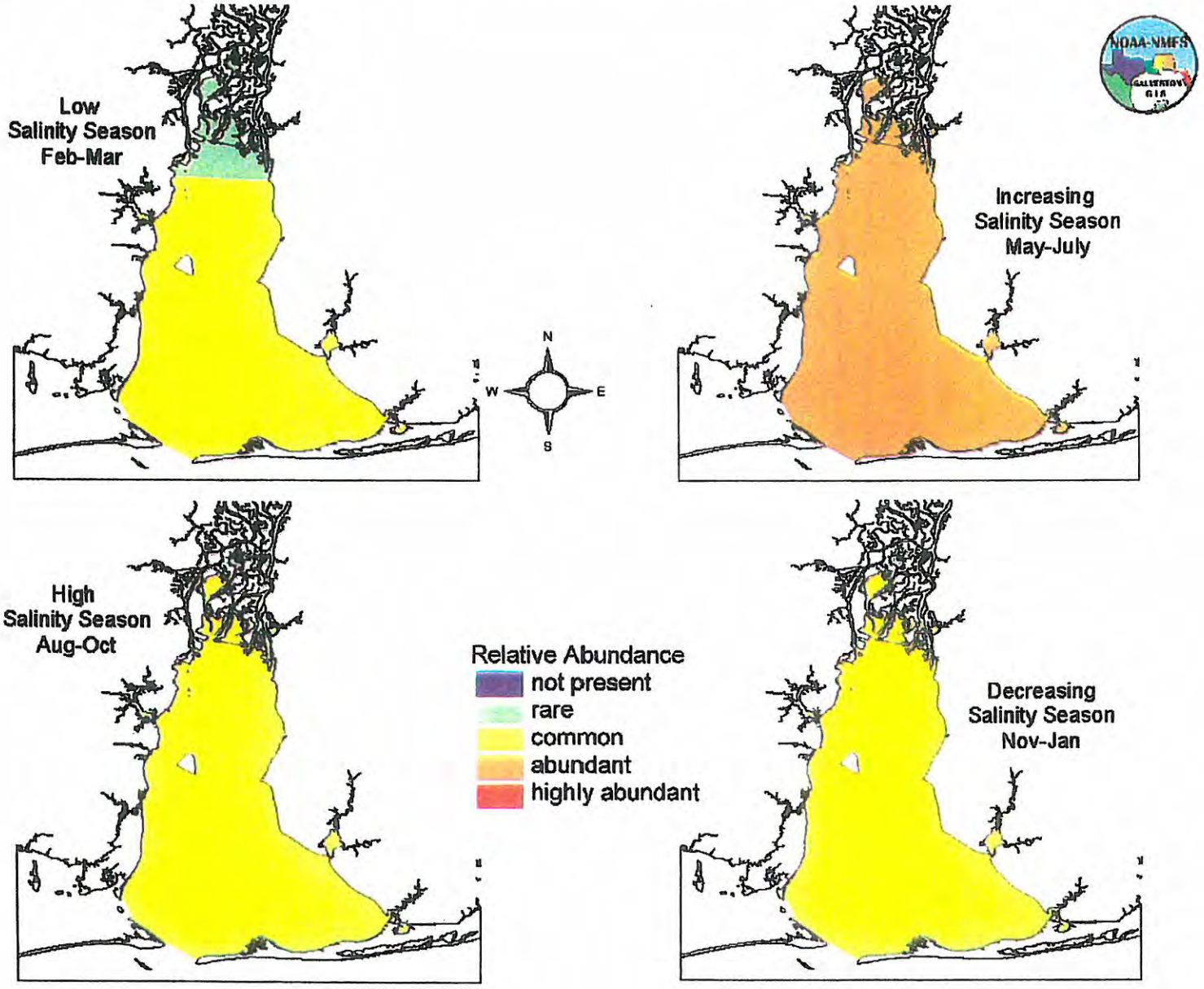
Salinity Seasons
September, 1998



Mobile Bay, AL
EFH Mapping, NMFS Galveston Lab

Pink Shrimp, *Penaeus duorarum*
http://galveston.ssp.nmfs.gov/efh

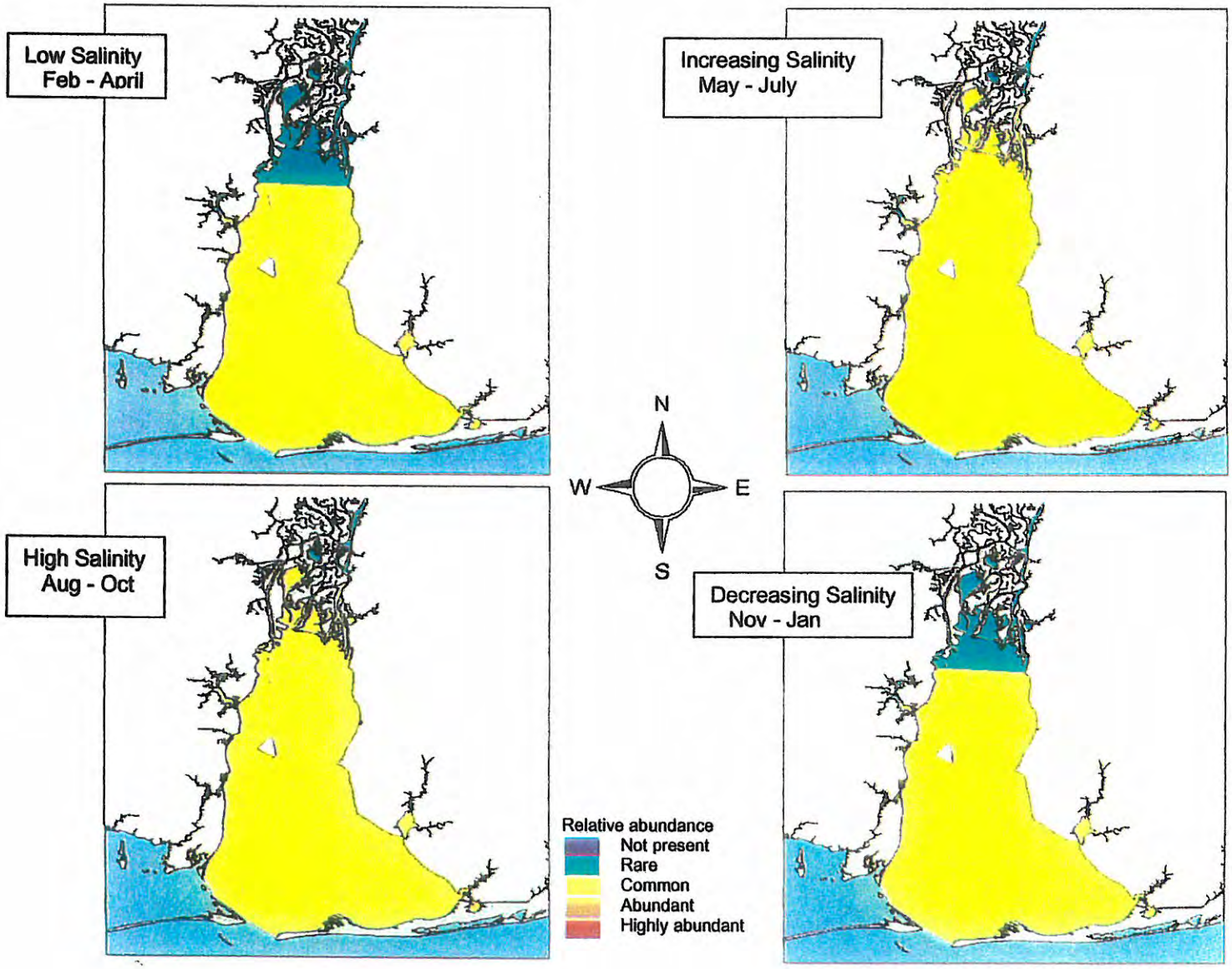
Juveniles
July, 1998



Mobile Bay, AL
EFH Mapping, NMFS Galveston Lab

Red Drum, *Sciaenops ocellatus*, Adults
http://galveston.ssp.nmfs.gov/efh

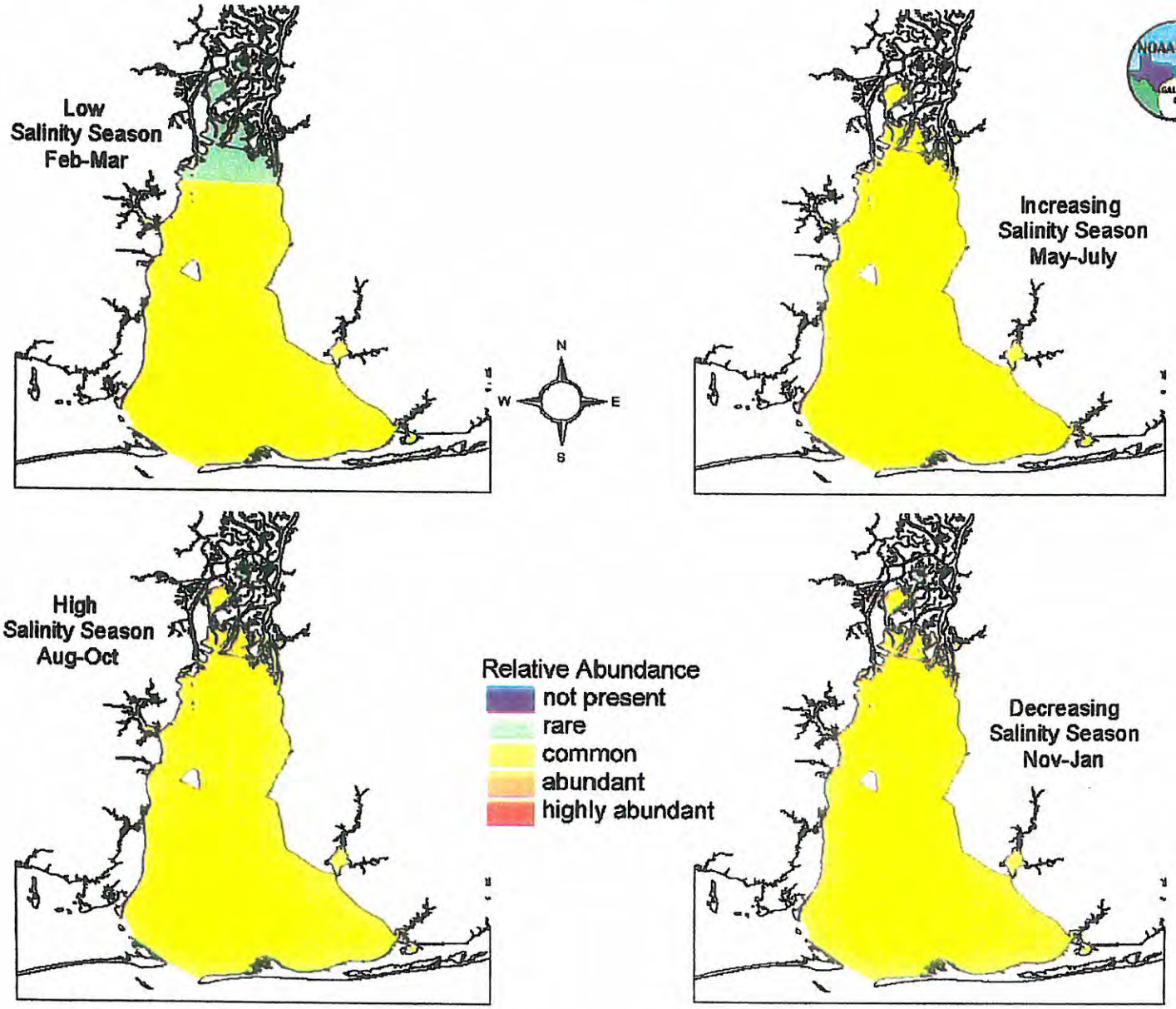
Salinity Seasons
September, 1998



Mobile Bay, AL
EFH Mapping, NMFS Galveston Lab

Red Drum, *Sciaenops ocellatus*
http://galveston.ssp.nmfs.gov/efh

Juveniles
July, 1998



Mobile Bay, AL

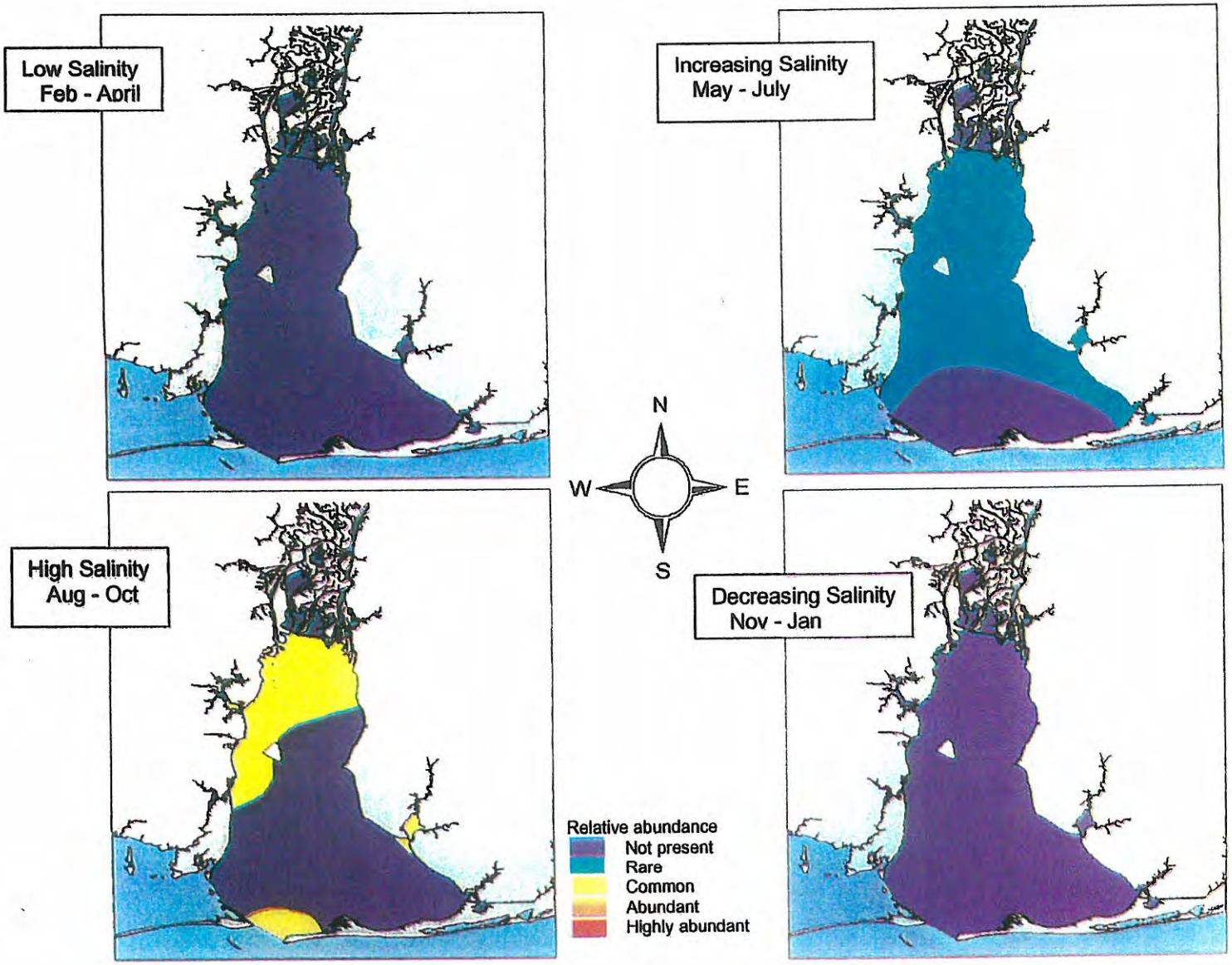
EFH Mapping, NMFS Galveston Lab

Spanish Mackerel, *Scomberomorus maculatus*, Adults

http://galveston.ssp.nmfs.gov/efh

Salinity Seasons

September, 1998

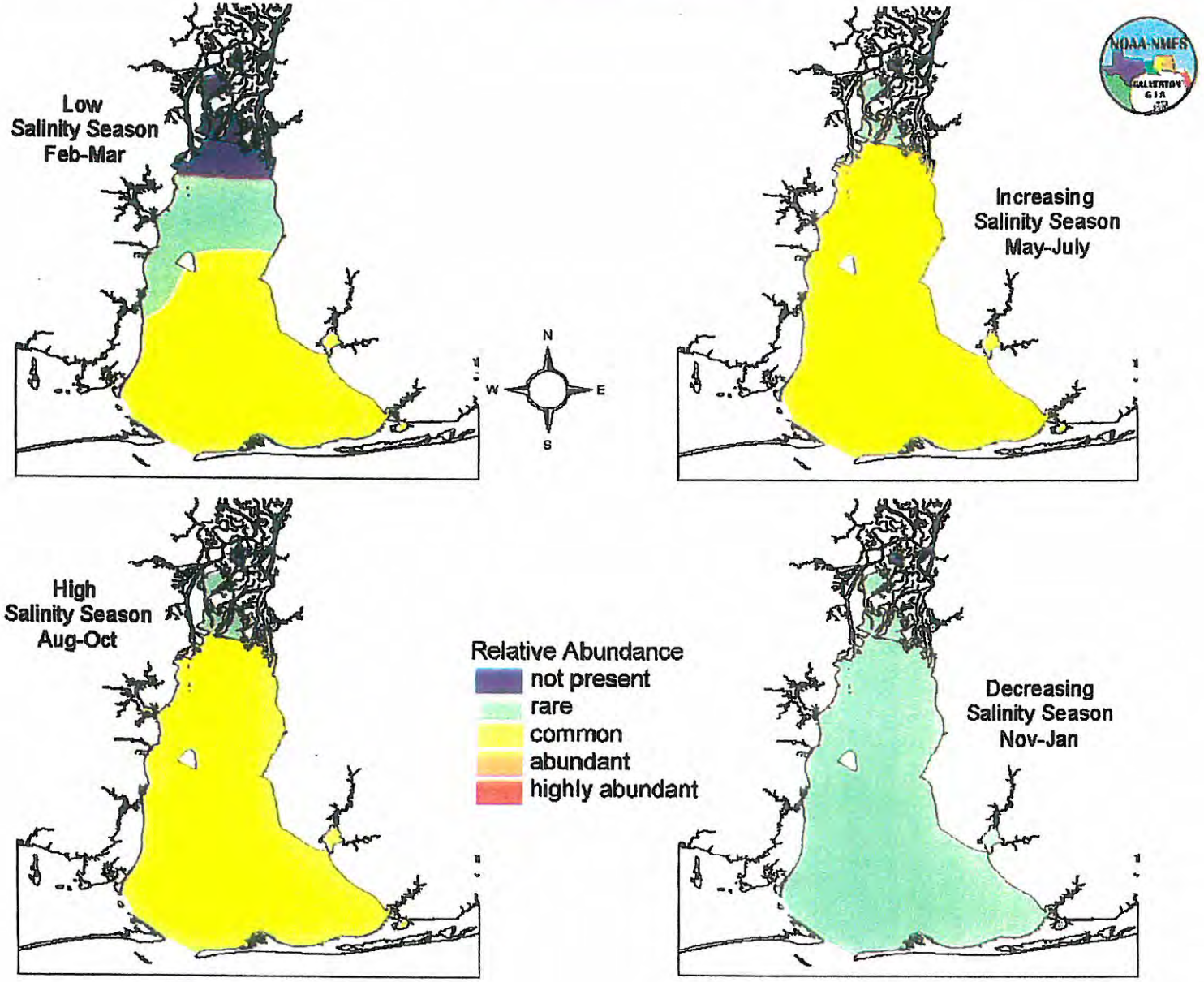


Mobile Bay, AL
EFH Mapping, NMFS Galveston Lab

Spanish Mackerel, *Scomberomorus maculatus*

http://galveston.ssp.nmfs.gov/efh

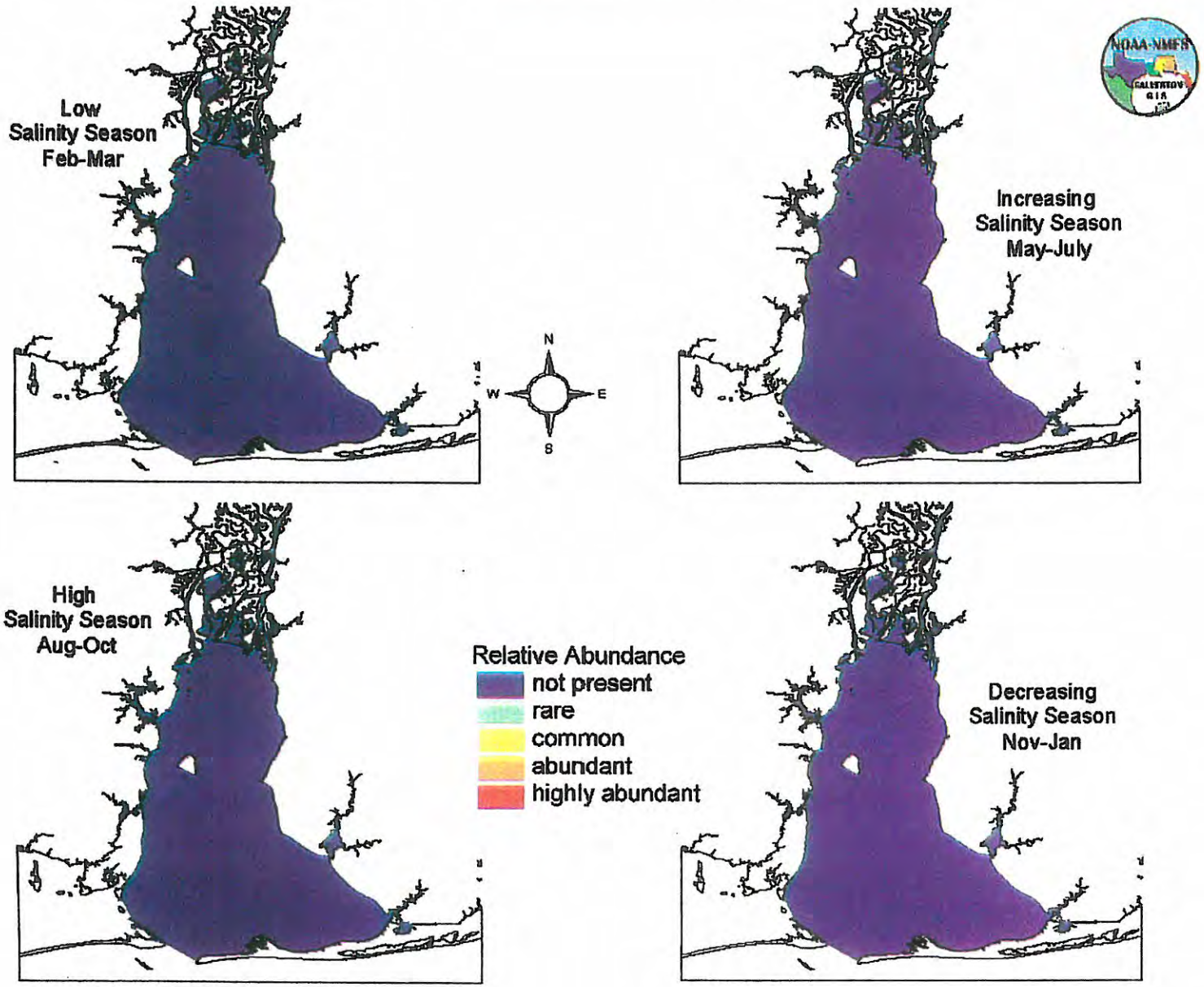
Juveniles
July, 1998



Mobile Bay, AL
EFH Mapping, NMFS Galveston Lab

Spiny Lobster, *Panulirus argus*
http://galveston.ssp.nmfs.gov/efh

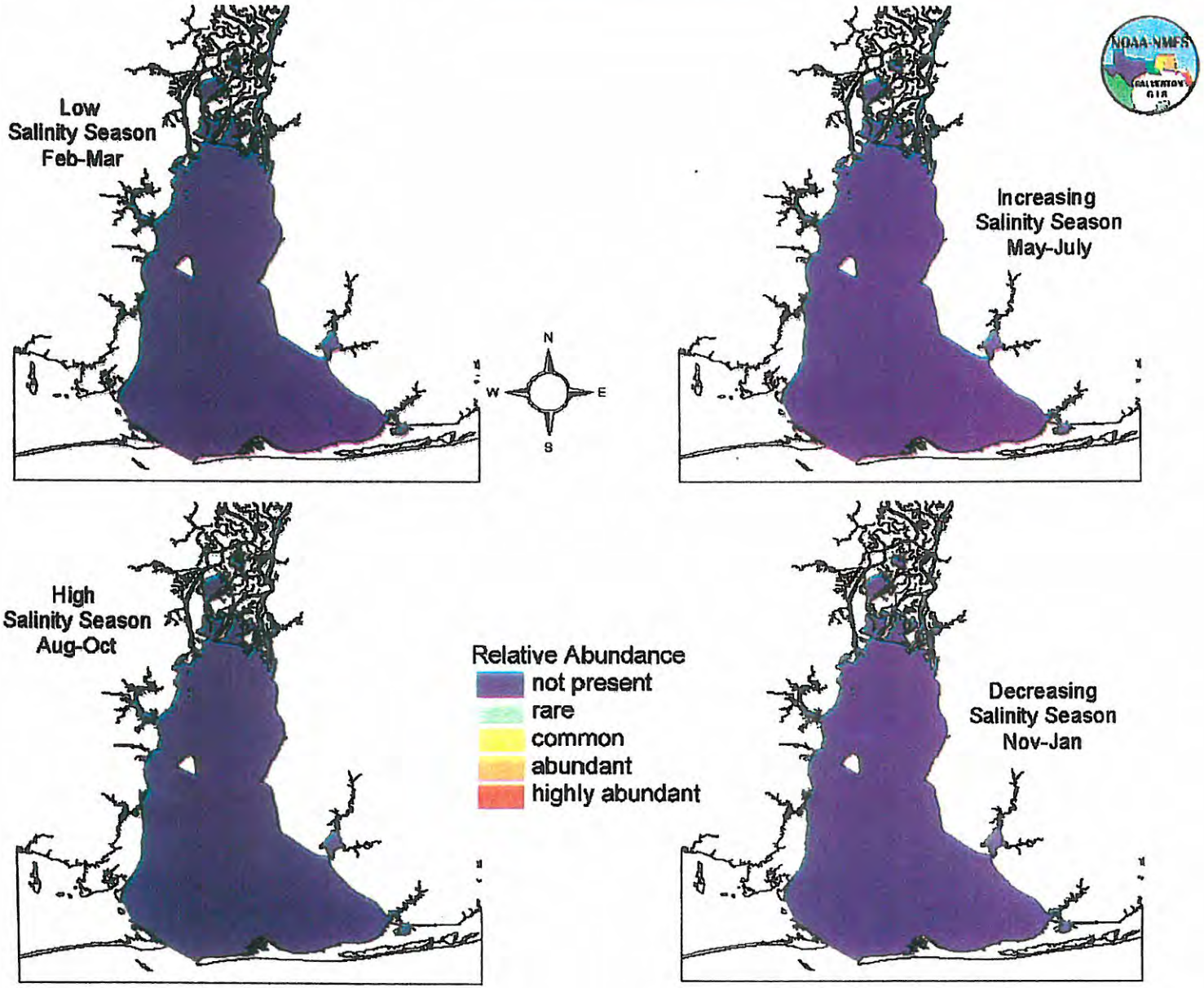
Adults
July, 1998



Mobile Bay, AL
EFH Mapping, NMFS Galveston Lab

Spiny Lobster, *Panulirus argus*
http://galveston.ssp.nmfs.gov/efh

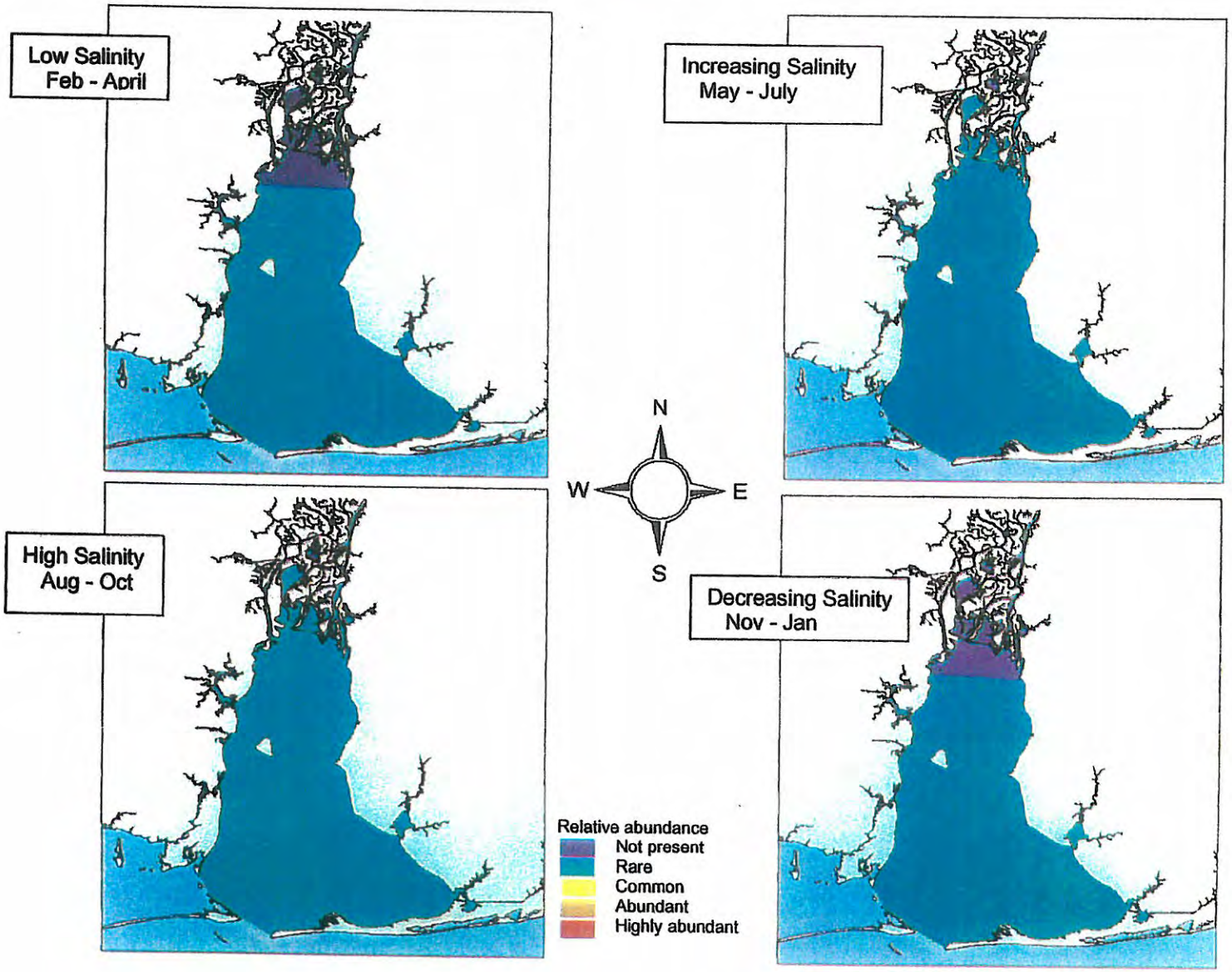
Juveniles
July, 1998



Mobile Bay, AL
EFH Mapping, NMFS Galveston Lab

Stone Crab, *Menippe mercenaria*, Adults
http://galveston.ssp.nmfs.gov/efh

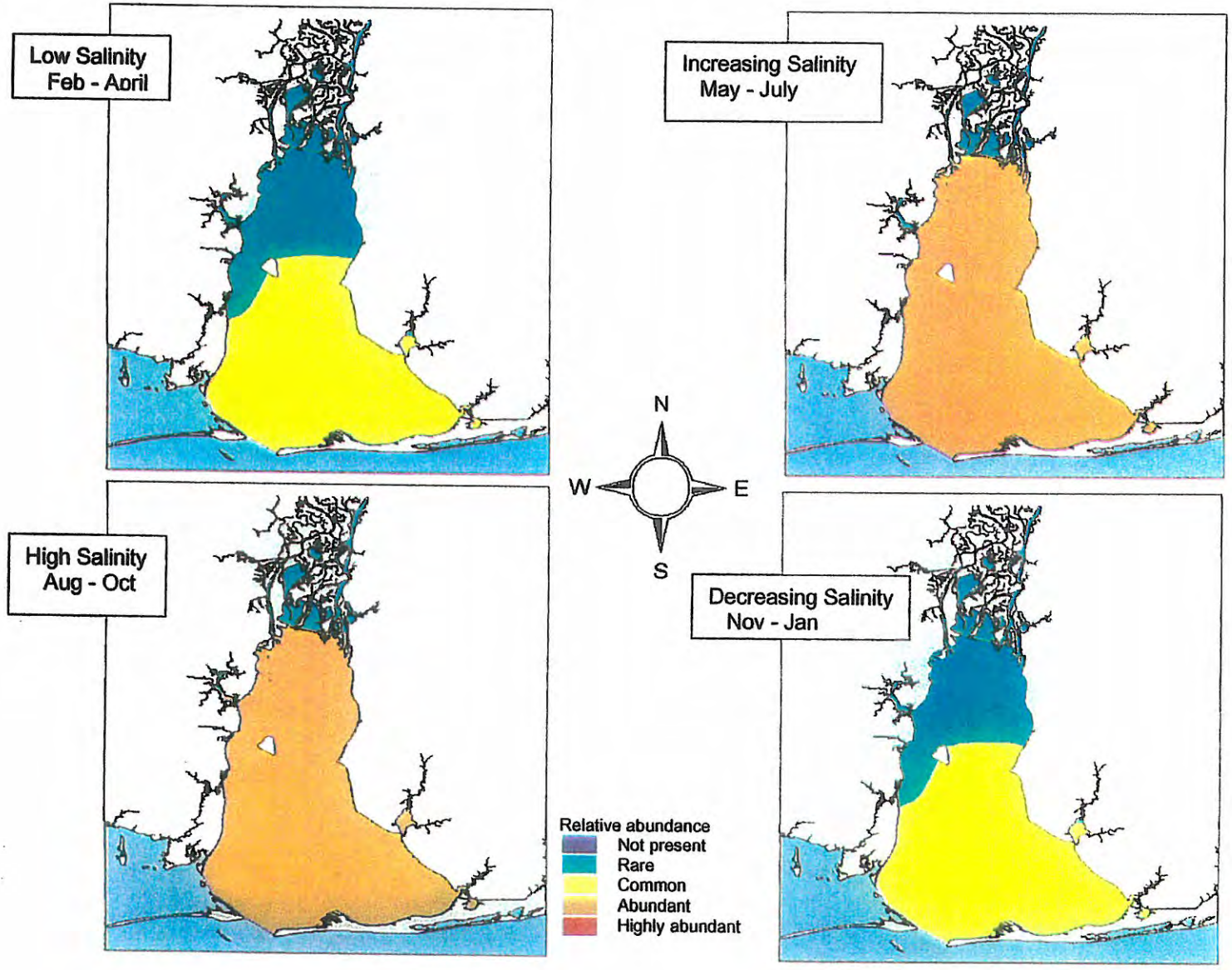
Salinity Seasons
September, 1998



Mobile Bay, AL
EFH Mapping, NMFS Galveston Lab

White Shrimp, *Penaeus setiferus*, Adults
http://galveston.ssp.nmfs.gov/efh

Salinity Seasons
September, 1998



Mobile Bay, AL

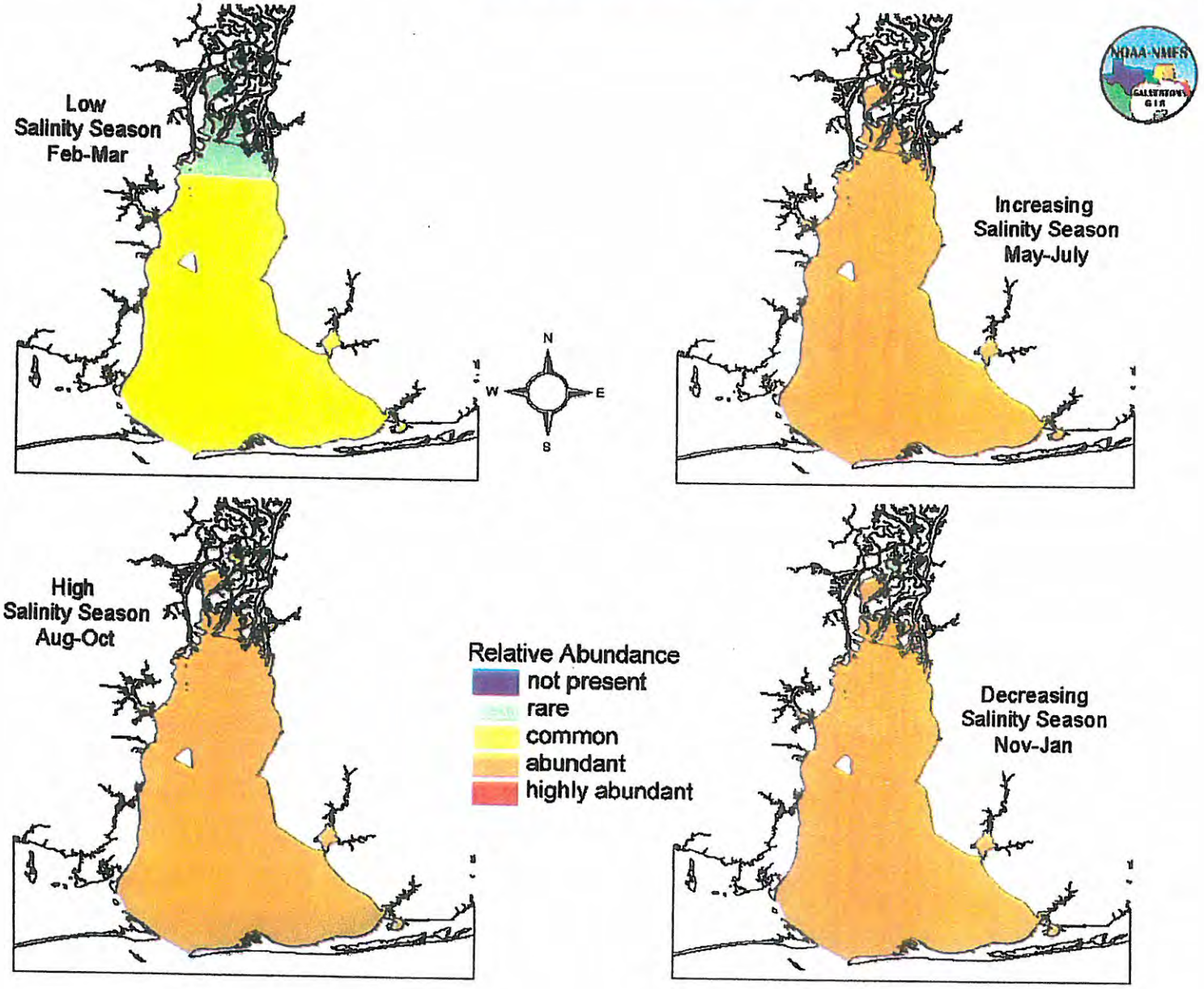
EFH Mapping, NMFS Galveston Lab

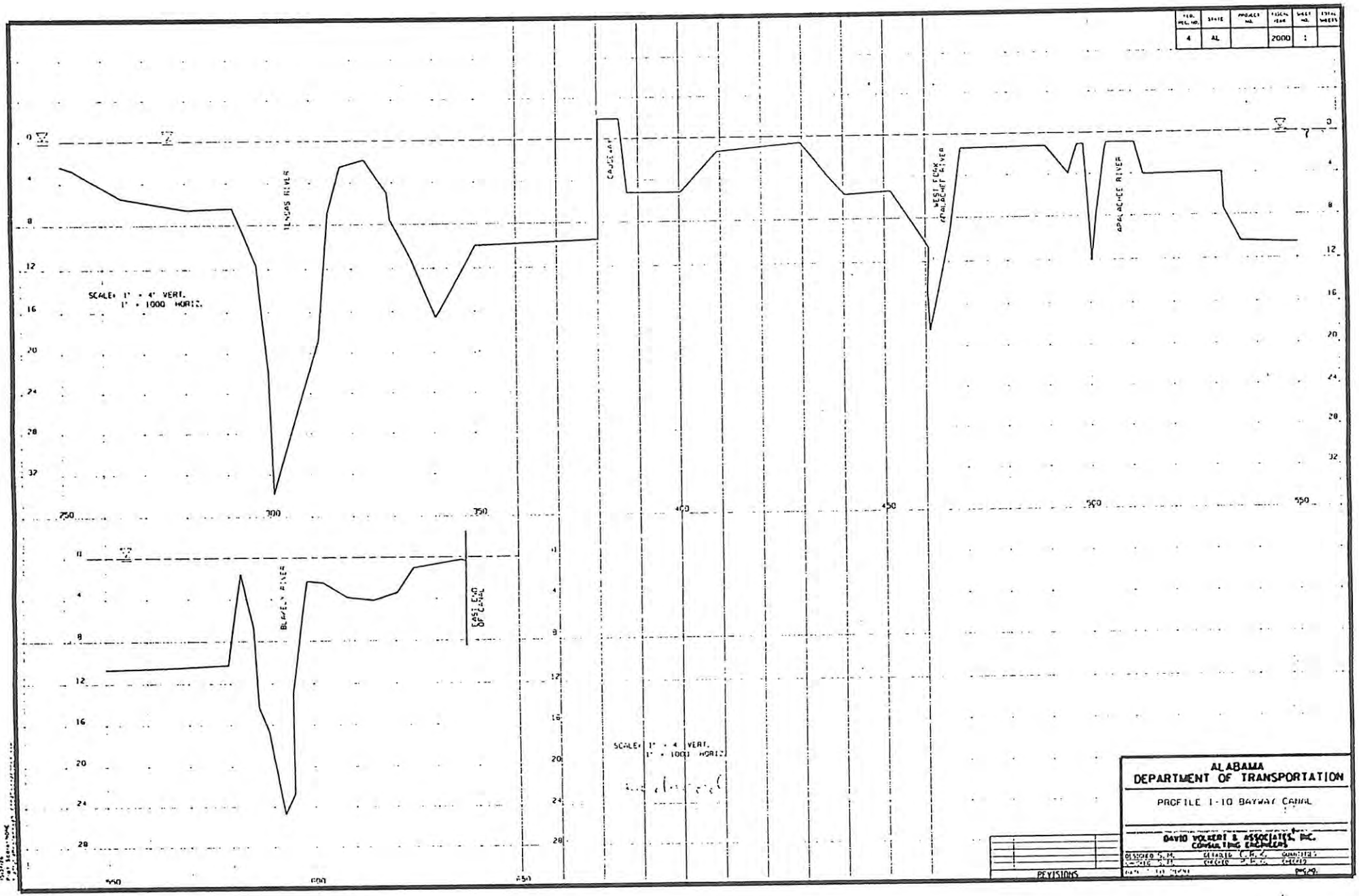
White Shrimp, *Penaeus setiferus*

http://galveston.ssp.nmfs.gov/efh

Juveniles

July, 1998





FED. PROJ. NO.	STATE	PROJECT NO.	FISCAL YEAR	SHEET NO.	TOTAL SHEETS
4	AL		2000	1	

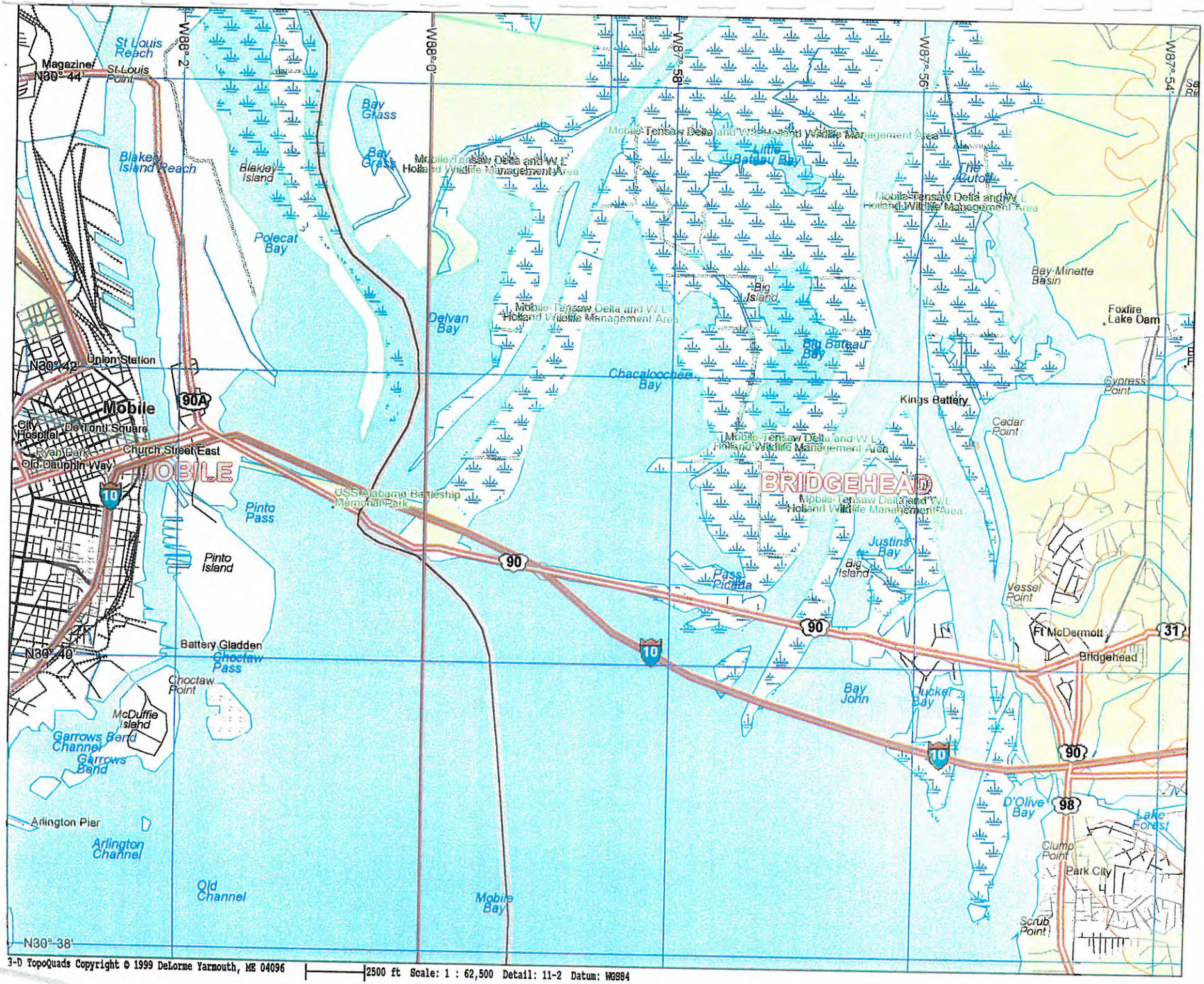
ALABAMA
DEPARTMENT OF TRANSPORTATION

PROFILE I-10 BAYWAY CANAL

DAVID VOLKERT & ASSOCIATES, INC.
CONSULTING ENGINEERS

DESIGNED S.M. DETAILED C.M.Z. QUANTITIES
CHECKED CHECKED CHECKED

REVISIONS



2500 ft Scale: 1 : 62,500 Detail: 11-2 Datum: WGS84

APPENDIX B
AERIAL PHOTOGRAPHY

WETLAND EVALUATION

1A

10' FRINGE OF PHRAGMITES

ADDSCO. RD.

ALDOT TUNNEL OPERATIONS BUILDING TO REMAIN UNDER BRIDGE

MOBILE PULLEY MARINE SERVICES

CARGILL MARKETING CO., INC.

ENOR. INCOAM RADIO STATION

1B

EMERGENT WETLAND 100'

EMERGENT WETLAND 100'

NOT TO SCALE

EMERGENT WETLAND 100'

NOT TO SCALE

EMERGENT WETLAND 100'

1"=400'

BATTLE PLANTATION

ADDSCO. RD.

US 90

I-10 EAST

I-10 WEST

ABANDONED COMMERCIAL

U.S. ARMY CORPS OF ENGINEERS DISPOSAL SITE

CAPTAIN'S TABLE SEAFOOD RESTAURANT

BEST WESTERN

PINTO

2000' SUBMERGED AQUATIC VEGETATION

LEGEND

JUNE 28, 2000

JULY 19 & 24 2001

EMERGENT

SUBMERGED AQUATIC VEGETATION

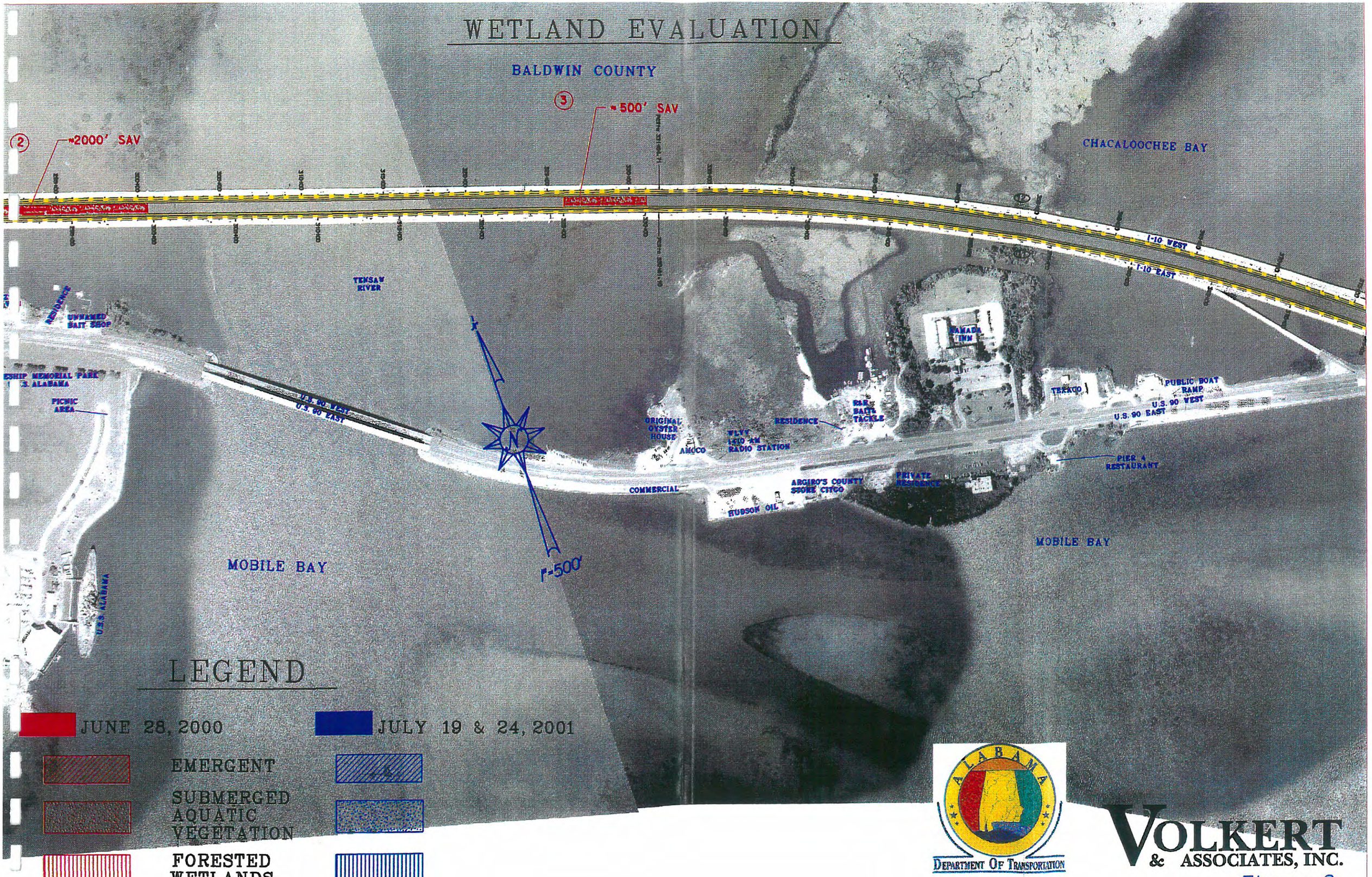
FORESTED WETLANDS

ALABAMA DEPARTMENT OF TRANSPORTATION

VOLKERT & ASSOCIATES, INC.

WETLAND EVALUATION

BALDWIN COUNTY



LEGEND

	JUNE 28, 2000	JULY 19 & 24, 2001
EMERGENT		
SUBMERGED AQUATIC VEGETATION		
FORESTED WETLANDS		

ALABAMA DEPARTMENT OF TRANSPORTATION

VOLKERT & ASSOCIATES, INC.

Figure 2

WETLAND EVALUATION

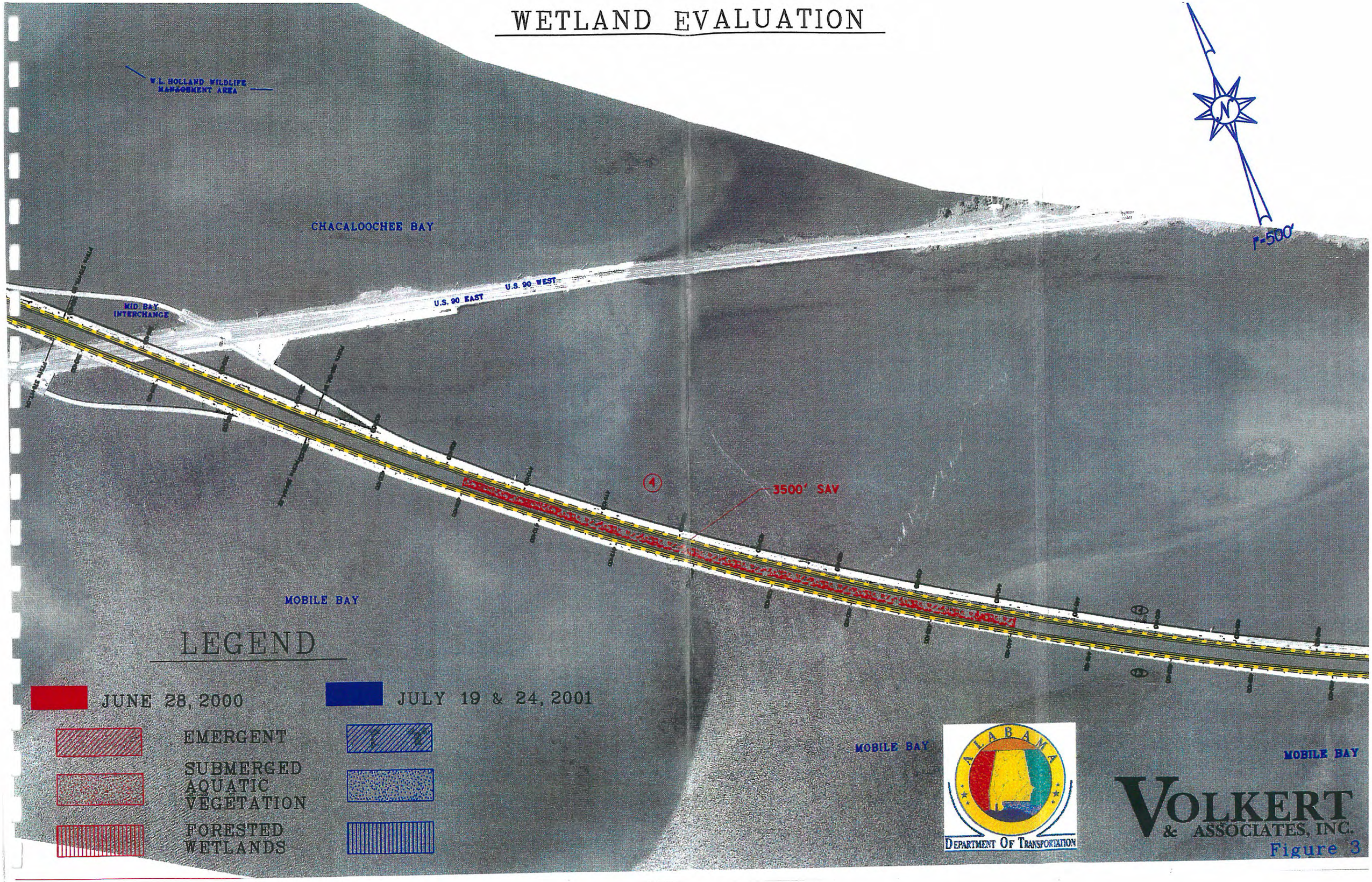
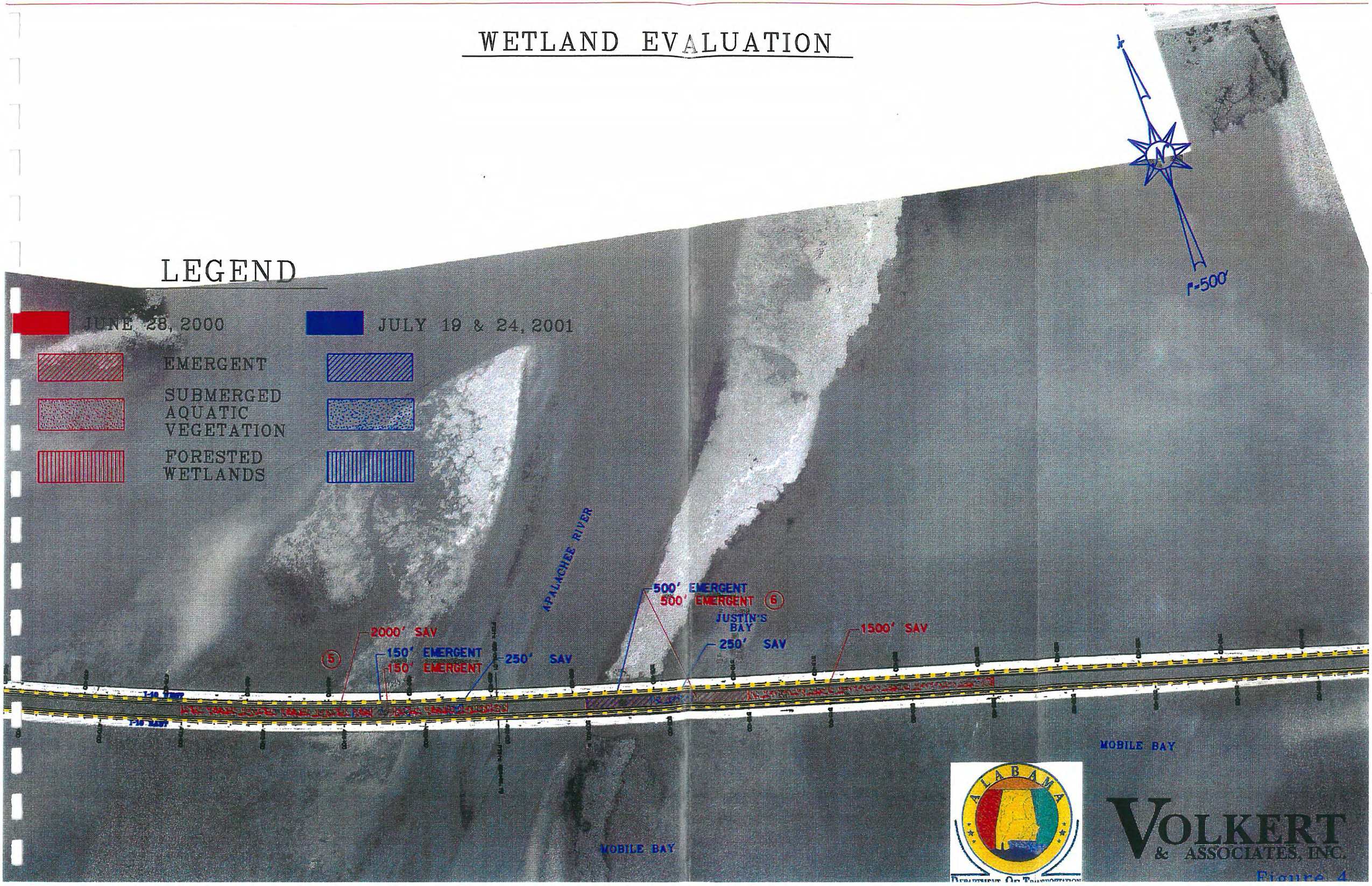


Figure 3

WETLAND EVALUATION



ALABAMA DEPARTMENT OF TRANSPORTATION

VOLKERT & ASSOCIATES, INC.

Figure 4

WETLAND EVALUATION

LEGEND

JUNE 28, 2000

JULY 19 & 24, 2001

EMERGENT

SUBMERGED AQUATIC VEGETATION

FORESTED WETLANDS

N

1"=500'

SPANISH FORT ESTATES

RESIDENTIAL

PATRICIAN DR.

BATTLESHIP PKWY.

U.S. 90

D'OLIVE CREEK

BLAKELEY RIVER

LARRY D. CONYER SCENIC OVERLOOK

FORESTED WETLAND

DUCKER BAY

MEAHER STATE PARK

7

75' EMERGENT

75' EMERGENT

225' SAV

225' SAV

D'OLIVE BAY

MOBILE BAY

ALABAMA DEPARTMENT OF TRANSPORTATION

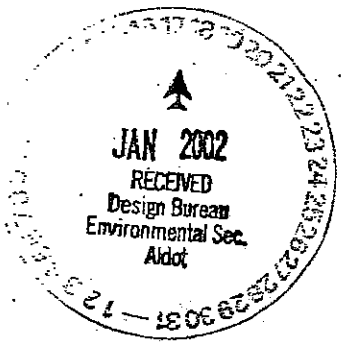
VOLKERT & ASSOCIATES, INC.

Figure 5

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE

Southeast Regional Office
9721 Executive Center Drive North
St. Petersburg, Florida 33702

January 9, 2002



Mr. Dan T. Arkle, Chief
Design Bureau
Alabama Department of Transportation
1409 Coliseum Boulevard
Montgomery, Alabama 36130-3050

Dear Mr. Arkle:

Subject: Project: DPI-0030(005)
Mobile River Bridge/I-10 Bayway Widening
Mobile and Baldwin Counties, Alabama

The National Marine Fisheries Service (NMFS) has reviewed the information provided with your staff's letter dated December 4, 2001, regarding the construction of a 2200-foot long and 190-foot high cable stay bridge over the Mobile River and the widening of the existing Interstate 10 (I-10) Bayway over Mobile Bay from Mobile to Daphne, in Mobile and Baldwin Counties, Alabama. The project will provide a six-lane bridge over the river and provide four additional travel lanes, resulting in a total of eight lanes, along the Bayway.

The construction of the I-10 Bayway widening will be performed utilizing segmented barges traversing the area between the existing Bayway lanes. The barges will float if sufficient water depth exists or they will rest on the bottom in shallow areas. The barge segments serve as a construction platform and are leapfrogged ahead using construction cranes as the construction progresses. The duration of barge segments in a particular location should not exceed 30 days. No new dredging is proposed at this time.

The Alabama Department of Transportation (ALDOT) has provided the NMFS with an Essential Fish Habitat (EFH) Assessment dated November 2001. In this assessment, the ALDOT has determined that the proposed project will not adversely affect EFH. Per discussion with your staff on December 20, 2001, the ALDOT and the Federal Highway Administration (FHWA) are working together on this project.

Based upon information in the EFH Assessment, the project corridor contains approximately 17.11 acres of submerged aquatic vegetation (SAV), 6.35 acres of subtidal mudflats, and 36 acres of open water habitat. Small unquantified amounts of SAV such as southern naiad (*Najas guadalupenis*), wild celery (*Vallisneria spiralis*), slender pondweed (*Potamogeton pusillus*), and widgeon grass

(*Ruppia maritima*) are present in the project corridor. Major marsh grass species present include alligator weed (*Alternanthera philoxeroides*), big cordgrass (*Spartina cynosuroides*), *Phragmites communis*, hardstem bulrush (*Scirpus californicus*), and sawgrass (*Cladium jamaicense*). The ALDOT has determined that the proposed project will impact upper intertidal habitat and that submerged grassbed habitat could be lost due to shading from the new travel lanes. The Bayway widening will require the demolition and disposal of bridge rubble from the inside portion of the east and west Bayway lanes. The ALDOT is proposing to use the bridge rubble in the establishment of artificial reef habitat in the Mobile Bay estuary and/or Gulf of Mexico to offset shading impacts to SAV.

The Fish and Wildlife Service (FWS) was provided a Biological Assessment which addressed impacts to threatened and endangered species from this project in October 2001. Since this assessment contained additional information about the project, the FWS provided a copy to the NMFS. Based upon the Biological Assessment, the project corridor contains approximately 23 acres of SAV, 1.5 acres of subtidal mudflats, and 81 acres of open water habitat. Three different wetland types have been identified in the study corridor, which is the area between the two existing I-10 bridges (east bound and west bound), including forested, emergent, and SAV. SAV, including tape grass (*Vallisneria americana*) and widgeon grass (*Ruppia maritima*), is the most abundant wetland in the project corridor.

The NMFS is concerned about the accuracy of the information provided in the EFH Assessment and the Biological Assessment since statements in the two reports seem to conflict. A few examples of this include acreage of the habitats in the project corridor and the quantity and species of SAV to be impacted by the project.

The construction of the additional lanes along the Bayway will utilize the existing construction canal that was initially dredged during the construction of the Bayway in the 1970's. The SAV and mudflats are generally located in areas where shoaling has occurred in the old construction canal over the past 27 years. The ALDOT is proposing to use special construction methodologies so as to minimize the impacts to these resources during construction; however, these specific methodologies have not been detailed. Based on discussion with the FWS, large areas of the construction canal have filled in since the earlier project was completed and substantial areas of marsh have covered what was formerly an excavated open water area. The NMFS questions how the construction barges will be used in these areas, especially since no new dredging is proposed. We recommend that the ALDOT detail the specific construction methodologies that will be used to avoid and minimize impact to estuarine emergent wetlands during lane construction along the Bayway.

The NMFS also recommends that the ALDOT quantify potential impacts to forested, emergent, SAV, and subtidal bottoms from the proposed project. In the EFH Assessment and Biological Assessment, acreage estimates are given for each habitat type within the project corridor, but no specific information is provided regarding the impact to each habitat.

The NMFS also questions the mitigation discussed in the EFH Assessment. The ALDOT is proposing to construct artificial reefs as mitigation for shading impacts to SAV. The NMFS

recommends that a mitigation plan be developed that provides in-kind mitigation for impacts to the various wetland types within the project corridor. Furthermore, mitigation should be done near the impact site.

Based on information provided in the EFH Assessment, the NMFS believes that the construction of the additional travel lanes along the Bayway will have adverse impacts on SAV and estuarine emergent wetlands. SAV and estuarine emergent wetlands are highly productive areas that provide habitat and nursery grounds for a diversity of species that are economically and ecologically important. They include spotted seatrout (*Sciaenops ocellata*), mullet (*Mugil cephalus*), red drum (*Sciaenops ocellatus*), flounder (*Paralichthys lethostigma*), gulf menhaden (*Brevoortia patronus*), and blue crab (*Callinectes sapidus*). Brown shrimp (*Farfantepenaeus aztecus*) are especially concentrated in SAV areas containing widgeon grass (*Ruppia maritima*) and *Vallisneria* sp.[1] In addition to their habitat value, SAV and emergent wetlands produce and export detritus (decaying organic material) which is an important element of the marine and estuarine food webs. Through various biochemical and physical processes, SAV and emergent wetlands also help maintain water quality by removing excess nutrients and pollutants from the water column. Eliminating portions of the SAV and emergent wetland community would reduce overall fisheries productivity in the Mobile Bay.

In consideration of the wetland impacts associated with the construction of the additional lanes along the Bayway and to ensure the conservation of EFH and associated fishery resources, final action on the proposed project should require the following:

EFH Conservation Recommendations

1. The amount of proposed impact to each habitat type in the project corridor be identified including forested wetlands, emergent wetlands, SAV, and subtidal bottom.

2. A detailed description of the special construction methodologies to be used for minimizing wetland impacts during construction be provided for our review.

3. A detailed description be provided regarding what steps have been taken to avoid and minimize wetland impacts from the proposed construction of the additional lanes along the Bayway.

4. A mitigation plan be included that provides in-kind mitigation for each habitat type that will be impacted.

Please be advised that Section 305(b)(4)(B) of the Magnuson-Stevens Fishery Conservation and Management Act and NMFS's implementing regulation at 50 CFR Section 600.920(j) require your office to provide a written response to this letter within 30 days of its receipt. Your response must include a description of measures proposed by your agency to avoid, mitigate, or offset the adverse impacts of the activity. If your response is inconsistent with our EFH Conservation

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[1]Loesch, H. 1965. Distribution and growth of penaeid shrimp in Mobile Bay, Alabama. Publ. Inst. Mar. Sci. Univ. Tex. 10:41-58.

Recommendations, you must provide a substantive discussion justifying the reasons for not implementing those recommendations. If it is not possible to provide a substantive response within 30 days, the ALDOT and/or FHWA should provide an interim response to the NMFS, to be followed by the detailed response at least 10 days prior to final approval of the action.

We appreciate the opportunity to provide you with comments. Please direct related comments, questions, or correspondence to Jennifer Robinson of our Panama City Office at 850/234-5061.

Sincerely,

W. Mark Thompson for

Andreas Mager, Jr.
Assistant Regional Administrator
Habitat Conservation Division

cc:
F/SER4

cc: (email)
ADEM, Mobile
AL DCNR, Gulf Shores
EPA, Atlanta
FWS, Daphne
FHWA, Montgomery

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE

Southeast Regional Office
9721 Executive Center Drive North
St. Petersburg, Florida 33702

May 9, 2002

Mr. Brett Gaar
Assistant Vice President
Volkert & Associates, Inc.
P.O. Box 7434
Mobile, Alabama 36670-0434

Dear Mr. Gaar:

Subject: ALDOT State Number: DPI-0030(005)
Mobile River Bridge/I-10 Bayway Widening
Volkert Project Number: 911600.12
Mobile and Baldwin Counties, Alabama

The National Marine Fisheries Service (NMFS) has reviewed your letter dated April 15, 2002, requesting our concurrence with the Alabama Department of Transportation's (ALDOT) agreement to coordinate with Dauphin Island Sea Lab in selecting acceptable sites for mitigation of impacts to submerged aquatic vegetation (SAV) in Mobile Bay from the above referenced project. The ALDOT has submitted an Essential Fish Habitat (EFH) Assessment dated November 2001 and the project corridor contains approximately 17.11 acres of SAV, 6.35 acres of subtidal mudflats, and 36 acres of open water habitat.

The NMFS, by letter dated January 9, 2002, provided EFH Conservation Recommendations (CR) to the project. Included as one of the EFH CRs was that a mitigation plan be included that provides in-kind mitigation for each habitat type that will be impacted. In this regard, a mitigation plan should provide significant details to demonstrate that the effort will be successful. Specifically, information should be included addressing the site selection process, the handling and treatment of plants to be transplanted/planted, establishing replacement ratios and success criteria, monitoring, remedial actions and a contingency plan if the mitigation is not successful. For information specific to mitigation for SAV impacts, we refer you to *Guidelines for the Conservation and Restoration of Seagrasses in the United States and Adjacent Waters* by Mark Fonseca, Jud Kenworthy, and Gordon Thayer, November 1998. This document can be viewed at www.cop.noaa.gov under the Decision Analysis Series.

We understand that the Dauphin Island Sea Lab does have some experience in transplanting SAVs in Mobile Bay and, therefore, have no objections to the ALDOT agreeing to coordinate with them in developing a mitigation plan. We appreciate the opportunity to provide you with comments and

are available to review the components of the mitigation plan as they are developed. Please direct related comments, questions, or correspondence to Mark Thompson of our Panama City Office at 850/234-5061.

Sincerely,

for Andreas Mager, Jr.
Assistant Regional Administrator
Habitat Conservation Division

cc:
F/SER4

cc: (email)
ADEM, Mobile
AL DCNR, Gulf Shores
EPA, Atlanta
FWS, Daphne
FHWA, Montgomery

ALABAMA DEPARTMENT OF TRANSPORTATION

Design Bureau, Consultant Management Section
1409 Coliseum Boulevard, Montgomery, Alabama 36110
P. O. Box 303050, Montgomery, Alabama 36130-1050
Phone: 334-242-6178 *FAX: 334-353-6513*

Bob Riley
Governor

Joe McInnes
Transportation Director

December 21, 2010

Mr. Mark Thompson
Habitat Conservation Division
National Marine Fisheries Service
3500 Delwood Beach Road
Panama City, FL 32408

RE: Project No. DPI-0030(005)
I-10 Mobile River Bridge and Bayway Widening EIS
Mobile and Baldwin Counties, Alabama

Dear Mr. Thompson:

As you know, the Alabama Department of Transportation is preparing an Environmental Impact Statement (EIS) for construction of a new bridge over the Mobile River and widening of the existing Bayway. Extensive coordination with the National Marine Fisheries Service has taken place since the project was initiated. Previous correspondence regarding potential impacts on Essential Fish Habitat and submerged aquatic vegetation is enclosed.

The purpose of this letter is to update you on the status of the proposed project. A new Build Alternative, Alternative B', has been added as a reasonable alternative for evaluation in the EIS, and the vertical clearance over the Mobile River Navigation Channel has been increased from 190 feet to 215 feet. A map showing the four Build Alternatives under consideration is enclosed for your information. Due to the time that has elapsed since our most recent coordination activity, we respectfully request that you review previous correspondence and coordination on the subject project and provide us with any pertinent updated information that should be included in the EIS.

Please let me know if you have any questions or require additional information.

Sincerely,

William F. Adams, P.E.
State Design Engineer

By: _____
Heather Dunn for:
Alfedo Acoff, Coordinator
Environmental Technical Section

WFA/ AA/ hmd

attachments

c: Mr. Brian Ingram (w/o att.)
Mr. Vince Calametti (w/o att.)
Mrs. Lynne Urquhart (w/o att.)
DB File (w/ att.)
ETS File (w/ att.)

ALABAMA DEPARTMENT OF TRANSPORTATION

1409 Coliseum Boulevard, Montgomery, Alabama 36130-3050

Don Siegelman
Governor

G. M. Roberts
Transportation Director

June 5, 2001

Mobile District Corps of Engineers
Attention: Regulatory Branch
P.O. Box 2288
109 St. Joseph Street
Mobile, AL. 36628-0001

Re: Project DPI-0030 (5)
New I-10 Bridge and Bay-way Widening
Mobile County

Dear Sir:

The proposed project is to construct a new bridge over the Mobile River in the downtown Mobile area. The new bridge is proposed to be constructed just south of the existing I-10 tunnels and will serve as the new I-10 facility. The structure is proposed to have a 190 feet vertical clearance that will handle existing river traffic to the Alabama State Docks as well as the cruise ships that are being proposed by the City of Mobile. The new bridge is proposed to be a six-lane facility and the bay-way from the Spanish Fort Interchange to the new bridge will be widened to a six-lane facility in order to better handle existing and future traffic in a safer and more efficient manner. Small amounts of additional rights-of-way will be required to implement the project.

We plan to process this project with an Environmental Assessment (EA). A copy of this document will be forwarded to you upon approval by the Federal Highway Administration, the lead Federal Agency for this project. We are requesting that your agency become a cooperating federal agency. Further, we are requesting that you provide any input regarding the appropriate environmental documentation and the permitting process under your jurisdiction. Thank you in advance for your comments and we look forward to hearing from you at your earliest convenience. Should you require any additional information or have any questions, you may contact this office or Mr. Joe P. Bearrentine, ((334) 242-6149) the project manager for this project

Sincerely,

Don T. Arkle, Chief
Design Bureau

By: _____
Alfedo Acoff, Coordinator
Environmental Technical Section

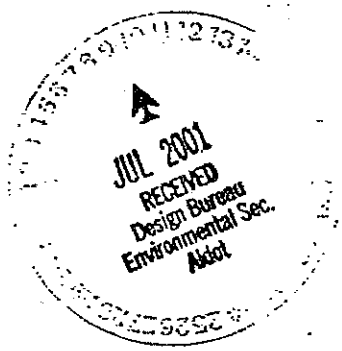
JPB
Attachment
Cc: Mr. Robert King (FHWA, Bridge Eng.)
Mr. Ronnie Poiroux (Div. Eng.)
Mr. Fred Conway (Bridge Eng.)
Mr. William Adams (Location Eng.)
David Volkert & Associates, Inc. (Consultant)
ETS File

DEPARTMENT OF THE ARMY
MOBILE DISTRICT, CORPS OF ENGINEERS
P.O. BOX 2288
MOBILE, ALABAMA 36628-0001

June 29, 2001

REPLY TO
ATTENTION OF:

Regulatory Branch
Operations Division



Ms. Alfedo Acoff
Coordinator, Environmental
Technical Section
Alabama Department of Transportation
1409 Coliseum Boulevard
Montgomery, Alabama 36130

Dear Ms. Acoff:

This is in reply to your letter dated June 5, 2001, regarding Alabama Department of Transportation (ALDOT), in cooperation with the Federal Highway Administration (FHWA), Project Number DPI-0030(5) for construction of a new bridge over the Mobile River, and widening the existing bridge over Mobile Bay. In your letter, you requested that the U.S. Army Corps of Engineers be a cooperating agency in the preparation of an Environmental Assessment for the project. You also requested that we provide input regarding the appropriate environmental documentation and the permitting process under our jurisdiction.

We are pleased to accept the offer to be a cooperating agency with FHWA as the lead agency. Until now, our involvement in this project has been through informal discussions and meetings. The latest information we have received through these sources has indicated that you would fill no "waters of the United States", and not require a dredged work canal or other dredging in order to complete the project. Because you have not made a written indication whether this plan would continue in effect, or if other plans are currently being considered, we are unable to advise on environmental documentation or the type of permit evaluation that would be required. As soon as you can provide preliminary plans showing the nature of proposed impacts to "waters of the United States", we will be able to provide further advice.

We look forward to working with ALDOT and FHWA on this project. Our point of contact will be Mr. Chuck Sumner. Please contact him directly at (251) 694-3792 should you have any questions.

Sincerely,

Ronald A. Krizman
Chief, Regulatory Branch
Operations Division

C
C
Pho
Fax #

DEPARTMENT OF THE ARMY
MOBILE DISTRICT, CORPS OF ENGINEERS
P.O. BOX 2288
MOBILE, ALABAMA 36628-0001

REPLY TO
ATTENTION OF:

February 28, 2002

Regulatory Branch
Operations Division

SUBJECT: Jurisdictional Determination Along Interstate 10 Bridge Crossing Mobile Bay - Jurisdictional Number ALJ02-00119-Y

Volkert and Associates, Inc.
Attention: Mr. Brett Gaar
316 South McKenzie Street
Foley, Alabama 36535

Dear Mr. Gaar:

Per your request, this office completed a field inspection on February 13, 2002, of the area between the two Interstate 10 bridge lanes crossing Mobile Bay from Daphne to Mobile. Specifically, the majority of the site is located in Section 36, Township 4 South, Range 1 East, Baldwin County, Alabama.

The inspection disclosed that the bridge does cross navigable waters and some portions of the proposed bridge expansion will be constructed over wetlands and submerged aquatic vegetation. Work at this site is subject to our Federal permitting authority pursuant to Section 10 of the Rivers and Harbors Act of 1899 (33 USC 403) and Section 404 of the Clean Water Act of 1977 (33 USC 1344).

Section 10 prohibits the placing of any structure in or over navigable waters of the United States and excavating from or depositing material into such waters, unless the work has been properly authorized by a Department of the Army permit. This jurisdiction extends to the ordinary high water mark, or for tidal areas the mean high tide line. However, since the project involves a bridge, the United States Coast Guard should be contacted for information regarding their regulations and jurisdiction that pertain to bridges.

Section 404 prohibits filling activities in waters of the United States, including wetlands, unless the work has been authorized by a Department of the Army permit. In general, permits which involve filling of wetland areas for nonwater-dependent activities under the present regulations are not viewed favorably by other commenting agencies.

Slab-on-grade construction, some pile-supported structures, grading, landclearing with heavy equipment, and construction of a built-up road are considered filling activities and will require a permit if located in wetlands.

Activities that involve the removing of vegetation above the ground (mowing, rotary cutting, and chainsawing) where the activity neither substantially disturbs the root system nor involves mechanized pushing, dragging, or other similar activities that redeposit excavated soil material do not require a Section 404 permit.

The approximate boundaries of wetlands, including submerged aquatic vegetation areas, located along the project corridor are correct as denoted in your "Wetland Determination and Submerged Aquatic Vegetation Survey" correspondence. However, due to the drastic change in vegetation reported between your 2000 and 2001 year survey, an inspection of the project area should be conducted prior to construction commencing.

Please be advised that this jurisdictional determination reflects current policy and regulation and is valid for a period of 5 years from the date of this letter. If after the 5-year period this jurisdictional determination has not been specifically revalidated by the U.S. Army Corps of Engineers, it shall automatically expire. Should you disagree with certain terms and/or conditions of this determination, the enclosed Notification of Applicant Options outlines the steps to take to file your objection.

Thank you for your cooperation with our permit program. If you have any questions or require further information concerning this matter, please contact Mr. Chip Dixon of the Enforcement Section at (251) 694-3873.

Sincerely,

Ronald A. Kratzman
Chief, Regulatory Branch
Operations Division

Enclosure

NOTIFICATION OF ADMINISTRATIVE APPEAL OPTIONS AND PROCESS AND REQUEST FOR APPEAL

Applicant: Volkert	File Number: AL JO2-00119-Y	Date: 2-28-02
Attached is:		See Section below
	INITIAL PROFFERED PERMIT (Standard Permit or Letter of permission)	A
	PROFFERED PERMIT (Standard Permit or Letter of permission)	B
	PERMIT DENIAL	C
	APPROVED JURISDICTIONAL DETERMINATION	D
X	PRELIMINARY JURISDICTIONAL DETERMINATION	E

SECTION I - The following identifies your rights and options regarding an administrative appeal of the above decision. Additional information may be found at http://usace.army.mil/inet/functions/cw/cecwo/reg or Corps regulations at 33 CFR Part 331.

A: INITIAL PROFFERED PERMIT: You may accept or object to the permit.

- ACCEPT: If you received a Standard Permit, you may sign the permit document and return it to the district engineer for final authorization. If you received a Letter of Permission (LOP), you may accept the LOP and your work is authorized. Your signature on the Standard Permit or acceptance of the LOP means that you accept the permit in its entirety, and waive all rights to appeal the permit, including its terms and conditions, and approved jurisdictional determinations associated with the permit.
- OBJECT: If you object to the permit (Standard or LOP) because of certain terms and conditions therein, you may request that the permit be modified accordingly. You must complete Section II of this form and return the form to the district engineer. Your objections must be received by the district engineer within 60 days of the date of this notice, or you will forfeit your right to appeal the permit in the future. Upon receipt of your letter, the district engineer will evaluate your objections and may: (a) modify the permit to address all of your concerns, (b) modify the permit to address some of your objections, or (c) not modify the permit having determined that the permit should be issued as previously written. After evaluating your objections, the district engineer will send you a proffered permit for your reconsideration, as indicated in Section B below.

B: PROFFERED PERMIT: You may accept or appeal the permit

- ACCEPT: If you received a Standard Permit, you may sign the permit document and return it to the district engineer for final authorization. If you received a Letter of Permission (LOP), you may accept the LOP and your work is authorized. Your signature on the Standard Permit or acceptance of the LOP means that you accept the permit in its entirety, and waive all rights to appeal the permit, including its terms and conditions, and approved jurisdictional determinations associated with the permit.
- APPEAL: If you choose to decline the proffered permit (Standard or LOP) because of certain terms and conditions therein, you may appeal the declined permit under the Corps of Engineers Administrative Appeal Process by completing Section II of this form and sending the form to the division engineer. This form must be received by the division engineer within 60 days of the date of this notice.

C: PERMIT DENIAL: You may appeal the denial of a permit under the Corps of Engineers Administrative Appeal Process by completing Section II of this form and sending the form to the division engineer. This form must be received by the division engineer within 60 days of the date of this notice.

D: APPROVED JURISDICTIONAL DETERMINATION: You may accept or appeal the approved JD or provide new information.

- ACCEPT: You do not need to notify the Corps to accept an approved JD. Failure to notify the Corps within 60 days of the date of this notice, means that you accept the approved JD in its entirety, and waive all rights to appeal the approved JD.
- APPEAL: If you disagree with the approved JD, you may appeal the approved JD under the Corps of Engineers Administrative Appeal Process by completing Section II of this form and sending the form to the division engineer. This form must be received by the division engineer within 60 days of the date of this notice.

E: PRELIMINARY JURISDICTIONAL DETERMINATION: You do not need to respond to the Corps regarding the preliminary JD. The Preliminary JD is not appealable. If you wish, you may request an approved JD (which may be appealed), by contacting the Corps district for further instruction. Also you may provide new information for further consideration by the Corps to reevaluate the JD.

SECTION II - REQUEST FOR APPEAL OR OBJECTIONS TO AN INITIAL PROFFERED PERMIT

REASONS FOR APPEAL OR OBJECTIONS: (Describe your reasons for appealing the decision or your objections to an initial proffered permit in clear concise statements. You may attach additional information to this form to clarify where your reasons or objections are addressed in the administrative record.)

ADDITIONAL INFORMATION: The appeal is limited to a review of the administrative record, the Corps memorandum for the record of the appeal conference or meeting, and any supplemental information that the review officer has determined is needed to clarify the administrative record. Neither the appellant nor the Corps may add new information or analyses to the record. However, you may provide additional information to clarify the location of information that is already in the administrative record.

POINT OF CONTACT FOR QUESTIONS OR INFORMATION:

If you have questions regarding this decision and/or the appeal process you may contact:

Larry (Chip) Dixon
Environmental Protection Specialist
(334) 694-3873

If you only have questions regarding the appeal process you may also contact:

Arthur L. Middleton, Jr.
Regulatory Appeal Review Officer
(404) 562-5136

RIGHT OF ENTRY: Your signature below grants the right of entry to Corps of Engineers personnel, and any government consultants, to conduct investigations of the project site during the course of the appeal process. You will be provided a 15 day notice of any site investigation, and will have the opportunity to participate in all site investigations.

Signature of appellant or agent.	Date:	Telephone number:

ALABAMA DEPARTMENT OF TRANSPORTATION
1409 Coliseum Boulevard, Montgomery, Alabama 36130-3050

Don Siegelman
Governor

Paul Bowlin
Transportation Director

April 24, 2002

Mr. William J. Schuller, P.E.
Program Manager
U.S. Department of Transportation
Federal Aviation Administration
120 North Hangar Drive, Suite B
Jackson, Mississippi 39208-2306

RE: Project DPI-0030(005)
I-10 Mobile River Bridge and Bayway Widening
Mobile and Baldwin Counties, Alabama

Dear Mr. Schuller:

During interagency coordination of the subject project with the U.S. Fish and Wildlife Service (FWS), a question was raised concerning strobe lights that will be installed on the proposed bridge.

The proposed crossing is a cable-stayed bridge with 190 feet of vertical clearance over the Mobile River navigation channel. The bridge is located in downtown Mobile just south of the existing Wallace Tunnels on I-10. There will be two mainspan pylons with a top elevation of 490 feet above mean sea level. It is our understanding that obstruction lights with strobe capability will be required at the tops of these pylons.

A representative of FWS expressed concern about migratory fowl flying into cables and bridge columns. He suggested installing strobe lights with a three-second duration on the bridge.

Are strobe lights with a three-second duration acceptable to FAA? I would appreciate your views on this matter and any other information you have related to this issue.

Thank you for your cooperation on this matter.

Sincerely,

Alfredo Acoff, Coordinator
Environmental Technical Section

Location
FHWA
Volkert
File

U.S. Department
of Transportation
**Federal Aviation
Administration**

Airports District Office
100 West Cross Street, Suite B
Jackson, MS 39208-2307
(601) 664-9900 Fax: (601) 664-9901
eMail: 7-ASO-JAN-ADO@faa.gov

April 30, 2002

Mr. Alfedo Acoff, Coordinator
Environmental Technical Section
Alabama Department of Transportation
1409 Coliseum Boulevard
Montgomery, Alabama 36130-3050

RE: Project DPI-0030(005)
I-10 Mobile River Bridge and Bayway Widening
Mobile and Baldwin Counties, Alabama

Dear Mr. Acoff:

Enclosed is an FAA Form 7460-1. Based on the height of 490 feet above mean sea level for the two mainspan pylons of the subject project, it is necessary that the FAA Form 7460-1 be filed with our office in Atlanta, Georgia. The office address is on the form. Please be sure that this form is submitted.

As to your question on the cycle time for strobe lights, the FAA Obstruction Marking and Lighting Advisory Circular (AC 70/7460-1K), indicates a range of 20 to 60 flashes per minute. This document is available on the internet through http://www.faa.gov/ats/ata/ai/index.html There will be a place on this web page that provides an opportunity to download "AC 70/7460-1K", which is the advisory circular of interest. A definitive answer to your question on strobe cycle times will need to come from Atlanta. I suggest that you include this question with your submission of the FAA Form 7460-1.

If you have any questions on this issue, please call or write me.

Sincerely,

William J. Schuller, P.E.
Program Manager

enclosure

cc: FHWA (Alabama)

ALABAMA DEPARTMENT OF TRANSPORTATION

1409 Coliseum Boulevard, Montgomery, Alabama 36130-3050

Don Siegelman
Governor

Paul Bowlin
Transportation Director

May 10, 2002

Ms. Dale Arrington
Southern Region
Southern Regional Office
Air Traffic Division, ASO-520
1701 Columbia Avenue
College Park, GA 30337

VOLKERT-MOBILE

MAY 15 2002

RE: Project DPI-0030(005)
I-10 Mobile River Bridge and Bayway Widening
Mobile and Baldwin Counties, Alabama

Dear Ms. Arrington:

Please find enclosed correspondence that was sent to Mr. Schuller, Federal Aviation Administration. Also, enclosed is his response to our inquiry and he suggested we contact your office to get an answer to our inquiry and to submit Form 7460-1.

We would appreciate an answer to our original correspondence to Mr. Schuller, which is enclosed and since, the project is not at the construction level, but at the preliminary stage we are not submitting Form 7460-1 at this time.

Thank you for your cooperation on this matter.

Sincerely,

Alfedo Acoff, Coordinator
Environmental Technical Section

Enclosures

Location
FHWA
Volkert
File

ALABAMA DEPARTMENT OF TRANSPORTATION

Design Bureau, Consultant Management Section
1409 Coliseum Boulevard, Montgomery, Alabama 36110
P. O. Box 303050, Montgomery, Alabama 36130-1050
Phone: 334-242-6178 *FAX: 334-353-6513*

Bob Riley
Governor

Joe McInnes
Transportation Director

December 21, 2010

Mr. Rans Black
Manager, Southern Region
Federal Aviation Administration
Airport Districts Office
100 West Cross Street, Suite B
Jackson, Mississippi 39208-2307

RE: Project No. DPI-0030(005)
I-10 Mobile River Bridge and Bayway Widening EIS
Mobile and Baldwin Counties

Dear Mr. Black:

The Alabama Department of Transportation (ALDOT), in conjunction with the Federal Highway Administration (FHWA), is studying a proposal to construct a new bridge over the Mobile River in Mobile County, Alabama, and widen the existing I-10 Bayway from four to eight lanes. A Notice of Intent to prepare a Draft Environmental Impact Statement (DEIS) was published in the *Federal Register* on October 20, 2003 (copy enclosed). Four Build Alternatives and the No Build Alternative are being evaluated in the DEIS. The proposed Build Alternatives (A, B, B', and C) are shown on the enclosed figure. The proposed bridge would be cable-stayed with a vertical clearance of 215 feet over the Mobile River Navigation Channel. The bridge would be located in downtown Mobile, just south of the existing I-10 Wallace Tunnels. There would be two pylons with a maximum elevation of approximately 490 feet above mean sea level.

Coordination with your office regarding required strobe lighting has occurred throughout the project development process. Copies of previous letters between your agency and the ALDOT are enclosed for your reference.

The Federal Aviation Administration has been identified as an agency that may have an interest in the project because of its jurisdictional responsibilities and special expertise that may be applied to this project. With this letter, we extend an invitation to the Federal Aviation Administration to serve as a cooperating agency in the preparation of the DEIS, in accordance with 40 CFR 1501.6 of the Council on Environmental Quality's (CEQ) Regulations for Implementing the Procedural Provision of the National Environmental Policy Act (NEPA). Please respond in writing with your acceptance or denial of this invitation.

Thank you for your interest and cooperation. Please let me know if you have any questions.

Sincerely,

William F. Adams, P.E.
State Design Engineer

By: _____
Heather Dunn for:
Alfedo Acoff, Coordinator
Environmental Technical Section

WFA/ AA/ hmd

attachments

c: Mr. Brian Ingram (w/o att.)
Mr. Vince Calametti (w/o att.)
Mrs. Lynne Urquhart, FHWA (w/o att.)
DB File (w/ att.)
ETS File (w/ att.)

U.S. Department
of Transportation
**Federal Aviation
Administration**

Airports District Office
100 West Cross Street, Suite B
Jackson, Mississippi 39208-2307

January 4, 2011

Mr. William F. Adams, P.E.
State Design Engineer
Alabama Department of Transportation
P.O. Box 303050
Montgomery, AL 36130-1050

Subject: Project No. CPI 0030(005)
I-10 Mobile River Bridge and Bayway Widening EIS

Dear Mr. Adams:

We have received your letter of December 21, 2010, inviting the Federal Aviation Administration (FAA) to serve as a cooperating agency in the preparation of the DEIS for the subject project. FAA's interest in the project is the safe and efficient use of airspace. FAA's evaluation of airspace takes place by your filing of FAA Form 7460-1. FAA's involvement in this project is limited to evaluation of airspace and any recommendations that may result from that airspace analysis. Due to FAA's limited interest in the subject project, FAA declines the invitation to serve as a cooperating agency in the preparation of the DEIS.

Your agency must file form 7460-1 for airspace evaluation of the proposed structures at your earliest opportunity. This should be well ahead of final design so that any recommendations may be taken into account. Please file a separate Form 7460-1 for each major vertical structure. You may file the form(s) 7460-1 electronically at:

https://oeaaa.faa.gov/oeaaa/external/portal.jsp

If you have questions, please contact Will Schuller 601-664-9883 or email him at will.schuller@faa.gov.

Sincerely,

Rans D. Black
Manager

cc:
Mrs. Lynne Urquhart, FHWA
Aeronautics Bureau, ALDOT

ALABAMA DEPARTMENT OF TRANSPORTATION

1409 Coliseum Boulevard, Montgomery, Alabama 36130-3050

Don Siegelman
Governor

G. M. Roberts
Transportation Director

June 6, 2001

Bridge Administration
Eighth Coast Guard District
Hale Boggs Federal Building
500 Camp Street
New Orleans, LA. 70130

Re: Project DPI-0030 (5)
New I-10 Bridge and Bay-way Widening
Mobile County

Dear Sir:

The proposed project is to construct a new bridge over the Mobile River in the downtown Mobile area. The new bridge is proposed to be constructed just south of the existing I-10 tunnels and will serve as the new I-10 facility. The structure is proposed to have a 190 feet vertical clearance that will handle existing river traffic to the Alabama State Docks as well as the cruise ships that are being proposed by the City of Mobile. The new bridge is proposed to be a six-lane facility and the bay-way from the Spanish Fort Interchange to the new bridge will be widened to a six-lane facility in order to better handle existing and future traffic in a safer and more efficient manner. Small amounts of additional rights-of-way will be required to implement the project.

We plan to process this project with an Environmental Assessment (EA). A copy of this document will be forwarded to you upon approval by the Federal Highway Administration, the lead Federal Agency for this project.

In accordance with the USCG/FHWA Memorandum of Understanding on implementing NEPA, FHWA Notice, N 6640.22, dated July 17, 1981 we are requesting that your agency become a cooperating federal agency. Further, we are requesting that you provide any input regarding the appropriate environmental documentation and the necessary clearances for the environmental documentation.

Thank you in advance for your comments and we look forward to hearing from you at your earliest convenience.

Sincerely,

Don T. Arkle, Chief
Design Bureau

By: Alfedo Acóff
Alfedo Acóff, Coordinator
Environmental Technical Section

JPB
Attachment
Cc: Mr. Robert King (FHWA, Bridge Eng.)
Mr. Ronnie Poiroux (Div. Eng.)
Mr. Fred Conway (Bridge Eng.)
Mr. William Adams (Location Eng.)
David Volkert & Associates, Inc. (Consultant)
ETS File

U.S. Department of Transportation
United States Coast Guard

Commander
Eighth Coast Guard District
Hale Boggs Federal Building

501 Magazine Street
New Orleans, LA 70130-3396
Staff Symbol: obc
Phone: 504-589-2965
FAX: 504-589-3063

16591A
June 20, 2001

Mr. Alfedo Acoff
Chief, Design Bureau
Alabama Department of Transportation
1409 Coliseum Road
Montgomery Alabama 36130-3050

Dear Mr. Acoff:

This refers to your letter of June 6, 2001, regarding the proposed project to construct a new bridge over the Mobile River in the downtown Mobile area. Your letter requests that the Coast Guard become a cooperating agency for the proposed project and to provide input regarding the appropriate environmental documentation and the necessary clearances for the environmental documentation.

As the Federal Highway Administration is the lead federal agency for the purposes of NEPA, the Coast Guard will act as a cooperating agency. We concur with your decision to process the project with an Environmental Assessment.

Guide Clearances are defined as the navigational clearances established by the Coast Guard for a particular navigable water of the United States which will ordinarily receive favorable consideration under the bridge permitting process (33 CFR Chapter 1, Subchapter J - Bridges) as providing for the reasonable needs of navigation. They are not intended to be regulatory in nature or to form a legal basis for approving or denying a bridge permit application. Under the circumstances of a particular case, greater or lesser clearances for a proposed bridge may be required or approved as meeting the reasonable needs of navigation for that particular location. For example, the particular character of the waterway and topography at the proposed location may justify a departure from the clearances specified for the waterway in the list of Guide Clearances. The Guide Clearances for the Mobile River at the proposed bridge site is a horizontal clearance of 300 feet and a vertical clearance of 125 feet above ordinary high water.

During preliminary discussion regarding this proposed project, it was determined that these clearances would not be adequate due to the increase in size and type of vessel traffic using the waterway at this location. The clearances previously proposed were to provide for a vertical clearance of greater than 200 feet. The information provided in your letter indicates the structure will have a proposed vertical clearance of 190 feet. Please include an assessment of navigation in your EA regarding the discussions of vertical clearance and how you determined 190 feet to be the recommended vertical clearance.

If we can be of any further assistance, please contact our office at 504-589-2965.

Sincerely,

MARCUS N. REDFORD, P.E.
Chief, Bridge Administration Branch
By direction of the Commander
Eighth Coast Guard District

Copy: Mr. Joe D. Wilkerson, FHWA

ALABAMA DEPARTMENT OF TRANSPORTATION
1409 Coliseum Boulevard, Montgomery, Alabama 36110

Bob Riley
Governor

Joe McInnes
Transportation Director

October 5, 2005

Bridge Administration Branch
Eighth Coast Guard District
Hale Boggs Federal Building
501 Magazine Street - Room 313
New Orleans, LA 70130-3396

Reference: Project No. DPI-0030 (005)
I-10 Mobile River Bridge
Mobile and Baldwin Counties

Dear Sir:

Our records indicate that the US Coast Guard agreed to become a cooperating agency when the referenced project was being processed with an environmental assessment. Now that we are processing it with an environmental impact statement, we respectfully request that you become a cooperating agency in this process. We will assume your cooperation in this unless we are notified by you to the contrary.

The purpose and need of this project is to increase capacity of I-10 at the Mobile River and across Mobile Bay. After reviewing both the purpose and need of the project: the reasonableness of the 14 proposed build alternatives (map enclosed); and comments from the general public, elected officials, and others, it has been determined that 3 build alternatives will be further studied in developing the EIS. Enclosed is Table 7 from the Final Phase I Screening Evaluation Report, August 2005, prepared by Volkert and Associates, listing each of the 14 proposed build alternatives and the results of the screening process. The three reasonable build alternatives are #3, #9, and a combination alternative composed of alternatives #1 and #2. These alternatives will be designated as A, B, and C in the EIS (map enclosed) and the no-build alternative will also be included.

As a cooperating agency in this project, your agency is being notified in order to seek your input into the further development of the environmental studies of the project.

Sincerely:

Don Arkle, Chief
Design Bureau

By: Alfedo Acoff, Coordinator
Environmental Technical Section

/c: Federal Highway Administration
Volkert and Associates
Mr. R. F. Poiroux
Mr. William Adams
file

December 13, 2005

Project DPI-0030(005)
I-10 Mobile River Bridge and Bayway Widening EIS
Mobile and Baldwin Counties, Alabama
Volkert Contract No. 911602.12

RESUME OF MEETING

DATE:	December 13, 2005
LOCATION:	Mobile, Alabama (Via Teleconference)
PURPOSE:	Coordination Meeting Teleconference with the U.S. Coast Guard (USCG), a Cooperating Agency

NAME:	REPRESENTING:	TELEPHONE:	E-MAIL:
Marcus Redford	U.S. Coast Guard (USCG)	504-589-2965	mredford@d8.uscg.mil
John Shill	Alabama Department of Transportation (ALDOT) – Environmental Technical Section	334-242-6132	shillj@dot.state.al.us
Wade Henry	ALDOT Location	334-242-6464	henryw@dot.state.al.us
Skeeter McClure	Volkert & Associates, Inc. (Volkert)	251-342-1070	smcclure@volkert.com
Missi Shumer	Volkert	251-342-1070	mshumer@volkert.com

DISCUSSION:

The USCG responded to ALDOT's letter dated October 5, 2005, agreeing to continue to serve as a Cooperating Agency on the I-10 Mobile River Bridge EIS. Mr. John Shill indicated that ALDOT had received the letter from the USCG.

Mr. McClure provided a brief background regarding the evolution of the I-10 Mobile River Bridge Project. An Environmental Assessment (EA) was prepared for a Build Alternative and a No Build Alternative. The EA was signed by FHWA in June 2003, and a Public Hearing was conducted. Due to maritime economic issues and historic issues, FHWA decided that it was necessary to prepare an Environmental Impact Statement (EIS) that evaluated multiple Build Alternatives for the proposed project. A Notice of Intent was published on October 23, 2003. Subsequent to the publication of the Notice of Intent, 14 potential alternatives were identified by agencies and the public through the scoping and public involvement process. Volkert conducted an Alternatives Screening Evaluation on the 14 potential alternatives to determine which alternatives were reasonable and should be studied in detail in the EIS. Five alternatives were presented to the public at Public Involvement Meetings held in June 2005. These five alternatives included four alternatives in proximity to downtown Mobile and one alternative using a northern route via the Cochrane Bridge. Subsequent to the Public Involvement Meetings, the South Alabama Regional Planning Commission conducted traffic studies/modeling on these five alternatives to determine whether they would reduce congestion in the I-10 Wallace Tunnels (which is the purpose and need for the project).

Traffic studies indicate that the northern route would not reduce congestion in the I-10 Wallace Tunnels. Therefore, the northern route was eliminated from further consideration. Additionally, Alternatives 1 and 2 in proximity to downtown Mobile were combined to create one alternative (Alternative C). The three remaining alternatives (Alternatives A, B, and C) are currently being studied in the EIS.

Mr. McClure also provided a brief description of the proposed improvements. The bridge would be six lanes with a four percent grade. Currently, the proposed vertical clearance is 190 feet. It was noted that the vertical clearance will continue to be looked at as the study progresses. In addition, the I-10 Bayway will be widened from four lanes to eight lanes to the inside.

Martin Associates, a firm specializing in maritime economic studies, is a subconsultant to Volkert to perform a maritime economic impact analysis associated with the proposed I-10 Mobile River Bridge. Martin Associates will identify and address direct impacts to maritime industries in Mobile, as well as indirect impacts such as bridge height restrictions. Martin Associates will look at the impact of a bridge on the ability of ships (and the size of ships) to use the turning basin north of the I-10 Wallace Tunnels. The firm's study will also provide input regarding whether the vertical clearance of the proposed bridge should be increased. Mr. Redford recalled previous discussions regarding heights of bridges in this area associated with the replacement of the CSX Railroad Bridge. He stated that the process will determine the necessary vertical clearance of the proposed bridge.

Mr. Redford was interested in the locations of piers for the proposed bridge and the length of the proposed spans. Mr. McClure stated that one of the primary concerns is to ensure that the spans clear the navigation channels. Mr. Redford noted that the USACE channel will dictate the size of the span required, but that it is generally best to span as much as possible. He also stated that the Guide Clearances for this area are currently outdated.

Mr. Redford stated that he had heard people question whether building a structure over industrial facilities was safe in terms of possible terrorist attacks. Mr. McClure noted that he had heard the same issue but that he had not been able to find anything in writing regarding this concern. Mr. Redford stated that he had not seen anything in writing either. Mr. Redford recommended that we coordinate with the USCG Sector Mobile (Captain of the Port/Waterway Safety/Port State Security) to discuss potential concerns regarding this issue. Mr. McClure recommended including the Mobile Harbormaster (Captain Dave Carey) in this coordination effort as well. Mr. Redford agreed.

Mr. McClure thanked Mr. Redford and ALDOT for their participation and encouraged Mr. Redford to let us know if he needed any additional information on the I-10 Mobile River Bridge EIS Project.

VOLKERT
& ASSOCIATES, INC.

www.volkert.com

3809 Moffett Road (36618)
P.O. Box 7434
Mobile, Alabama 36670-0434
251.342.1070
Fax 251.342.7962
volkert@volkert.com

May 22, 2008

Mr. David Frank
Bridge Administrator
Eighth Coast Guard District
500 Poydras Street
Room 1313
New Orleans, Louisiana 70130-3310

Subject: Contract ID No. #205
Supplemental Agreement #3
Project Nos. DPI-0030(005)
I-10 Mobile River Bridge EIS
Mobile and Baldwin Counties
Volkert Project No. 911602.12

Dear Mr. Frank:

As you are aware, an Environmental Impact Statement (EIS) is currently being prepared for the proposed I-10 Mobile River Bridge and Bayway Widening EIS. At this time, three build alternatives are under consideration, one of which was evaluated in the approved Environmental Assessment (EA) for the subject project prior to its elevation to an EIS. The U.S. Coast Guard served as a Cooperating Agency on the EA for the proposed project and has agreed to continue to serve as a Cooperating Agency on the EIS (see enclosed letter dated October 5, 2005). Enclosed is a package of information regarding coordination with the U.S. Coast Guard to date, as well as some additional information regarding potential clearances and proposed pier and pylon locations for the proposed bridge.

We will continue to coordinate with the U.S. Coast Guard regarding clearance requirements, proposed pier and pylon locations, and other considerations related to the proposed I-10 Mobile River Bridge as the corridor study and EIS develops. We appreciate your interest in this project and look forward to receiving any comments on the information provided. Should you have any questions or comments, please contact Mr. Skeeter McClure or Mr. David Webber at (251) 342-1070.

Sincerely yours,
VOLKERT & ASSOCIATES, INC.

Buddy Covington
Environmental Manager

VOLKERT

cc: Mr. Bill Van Luchene, P.E., FHWA
Mr. Robert King, P.E., FHWA
Mr. Stan Biddick, P.E., ALDOT Location
Mr. John Shill, ALDOT ETS
Mr. David Webber, P.E., Volkert & Associates, Inc.
Mr. Skeeter McClure, P.E., D.WRE., Volkert & Associates, Inc.

Project DPI-0030(005)
I-10 Mobile River Bridge and Bayway Widening EIS
Mobile and Baldwin Counties, Alabama
Volkert Contract No. 911602.12

Summary of U.S. Coast Guard Coordination and Information Regarding the Proposed I-10 Mobile River Bridge and Bayway Widening Project, Mobile and Baldwin Counties, Alabama

Date	Item	Comments
July 1997*	Excerpt from 1996 Feasibility Study – Section 6.0 and Appendix 6.0 containing correspondence regarding bridge clearances	Provides information from harbormaster and maritime industries regarding clearances
December 6, 1999	Early Coordination letter for Environmental Assessment	Sent to the attention of David Frank
June 6, 2001	Letter from ALDOT requesting USCG serve as a Cooperating Agency	
June 20, 2001	Response from USCG agreeing to serve as a Cooperating Agency	Provides some guidance on clearances and requests a discussion of bridge clearance analysis in the Environmental Assessment
June 24, 2003	Letter transmitting three copies of the approved Environmental Assessment	
June 2003	Excerpts from approved Environmental Assessment regarding piers, pylons, and bridge clearances	Includes excerpt from text as well as appendix of Environmental Assessment
October 20, 2003	Notice of Intent to prepare an Environmental Impact Statement	States that the USCG will continue to serve as a Cooperating Agency
September 27, 2004	Early Coordination letter for Environmental Impact Statement	Provided a map containing 14 potential alternatives
October 5, 2005	Letter from ALDOT requesting that the USCG continue to serve as a Cooperating Agency on the Environmental Impact Statement	
December 13, 2005	Conference Call/Coordination Meeting regarding proposed project	Marcus Redford participated in the conference call.
December 20, 2006*	Economic Impact of the Proposed I-10 Bridge on Mobile Shipyard Activity and Port of Mobile Cargo and Cruise Vessel Operations	Maritime economic study conducted by Martin Associates includes information on bridge clearances, USCG guidelines, and maritime industry activities
2008*	Map showing proposed pier and pylon locations for the three proposed Build Alternatives	

* Data not previously transmitted to U.S. Coast Guard

OFFICE OF THE GOVERNOR

DON SIEGELMAN
GOVERNOR

STATE OF ALABAMA

ALABAMA DEPARTMENT OF ECONOM AND COMMUNITY AFFAIRS

NORMAN B. DAVIS, JR.
DIRECTOR

January 4, 2002

VOLKERT-MOBILE

JAN 10 2002

Mr. N. D. McClure
Volkert & Associates
3809 Moffett Road
Mobile, Alabama 36618

Dear Mr. McClure:

ADECA has completed its review of the proposed improvements to Interstate 10 between Mobile and Baldwin counties and concurs with your proposal to limit construction to the interior side of each span. This approach will not result in a conflict with section 6(f)(3) of the Land and Water Conservation Fund Act of 1965, which restricts the use of Meaher State Park property to outdoor recreation.

Should you have any questions regarding this matter, please contact Jon Strickland at 334-242-5483.

Sincerely,

Anne Payne
Assistant Director

AP:JCS

Cc: Riley Boykin Smith

HOUSE OF REPRESENTATIVES

ALABAMA STATE HOUSE

MONTGOMERY, ALABAMA 36130

DISTRICT NO. 103
MOBILE COUNTY

JOSEPH MITCHELL, Ph.D.
465 DEXTER AVENUE
MOBILE, ALABAMA 36604
HOME 251/473-5020
DELEGATION OFFICE
251/208-5480
LEGISLATIVE OFFICE 334/242-7600
WEB PAGE:
HOUSE3@ALHOUSE.GOV

COMMITTEES:
CONSTITUTION AND ELECTIONS
CAMPAIGN FINANCE SUBCOMMITTEE,CHAIR
EDUCATION POLICY
COLLEGES AND UNIVERSITIES
SUBCOMMITTEE, CHAIR
INTERNAL AFFAIRS
MOBILE COUNTY LEGISLATION
NATIONAL/REGIONAL COMMITTEES
COUNCIL OF STATE GOVERNMENTS-
INTERNATIONAL COMMITTEE
LABOR AND ECONOMIC DEVELOPMENT,
TRANSPORTATION AND CULTURAL AFFAIRS
SOUTHERN STATES ENERGY BOARD

August 24, 2010

Duncan Joseph McInnes, Director
Alabama Department of Transportation (ALDOT)
1409 Coliseum Boulevard
Montgomery, AL 36130-3050

RE: Project No. DPI-0030 (005)
I-10 Mobile River Crossing
Mobile and Baldwin Counties

Dear Sir:

We have reviewed those materials forwarded to our offices and community regarding the proposals surrounding Project Number DPI-0030 (005), suggesting some bridge a span to incorporate U.S. Interstate Highway 10 (I-10) and to connect Mobile and Baldwin counties.

We are aware of a coalition established in Mobile that is designed, in part, to provide a context for alternatives to any construction that will impact negatively Alabama's oldest city. While we agree with the substance of alternative proposals, we oppose any new bridge construction to link Mobile County with Baldwin County; particularly as such construction will again destroy historic ethnic and cultural communities in the path of and in proximity to the "footprint" of any such bridge construction. The construction of I-10 at its approach to the Wallace Tunnel effectively eviscerated a vibrant urban working-class African-American community. The Cochran-Africatown Bridge effectively did this same thing to a northern portion of the City of Mobile. The I-165 Connector effectively ended forever residential expansion, business development and recreational enterprise development that had been denied African-American communities for nearly one hundred years secondary to industrial and marine industrial uses of land.

We are diametrically opposed to any bridge or road construction that would jeopardize the architectural and environmental continuity and integrity of any urban geographical area in the City of Mobile. We have seen only plans that negatively impact on the status

of the entire culture of this Port City and her historic African-American communities, Antebellum Diaspora and coastal panoramas. It is not lost on us that now-historic urban African-American neighborhoods and communities were founded on the periphery of bustling racially segregated urban centers or nestled as unobtrusively as possible to serve an otherwise excluded slave and indentured and domestic servants class.

We do not offer alternatives to a new bridge between Baldwin County and Mobile County. We do oppose any construction that will have as its direct or indirect result any displacement of residences, businesses, recreational interests and historic public educational facilities. Further, we oppose any road or bridge construction that would have the affect of reducing the potential for recreational and family entertainment development and business enterprise development. Such a construction would become a monolith that will inhibit the developing trends to gentrify parts of The City of Mobile that have gone blighted in the last forty years. In addition, there would be the loss of potential tax revenue secondary to the absence of taxable properties and taxable land and improvement revenues. These losses would not be recovered in the lives of our of our prodigy.

Summary

We diametrically oppose the building of Project No. DPI-0030 (005), I-10 Mobile River Crossing, Mobile and Baldwin Counties for the several reasons stated above.

Sincerely,

Joseph C. Mitchell, Ph.D.

Mobile County Health Department

Major General William C. Gorgas Clinic

251 N. BAYOU STREET P.O. BOX 2867 MOBILE, ALABAMA 36652-2867 (251) 690-8158 FAX (251) 432-7443

Bernard H. Eichold II, M.D., Dr.P.H., F.A.C.P.
Health Officer

August 16, 2012

Mr. John R. Cooper, Director
Alabama Department of Transportation
1409 Coliseum Boulevard
Montgomery, AL 36110

RE: Project DPI-0030(005) – I-10 Mobile River Bridge and Bayway Widening EIS

Dear Mr. Cooper:

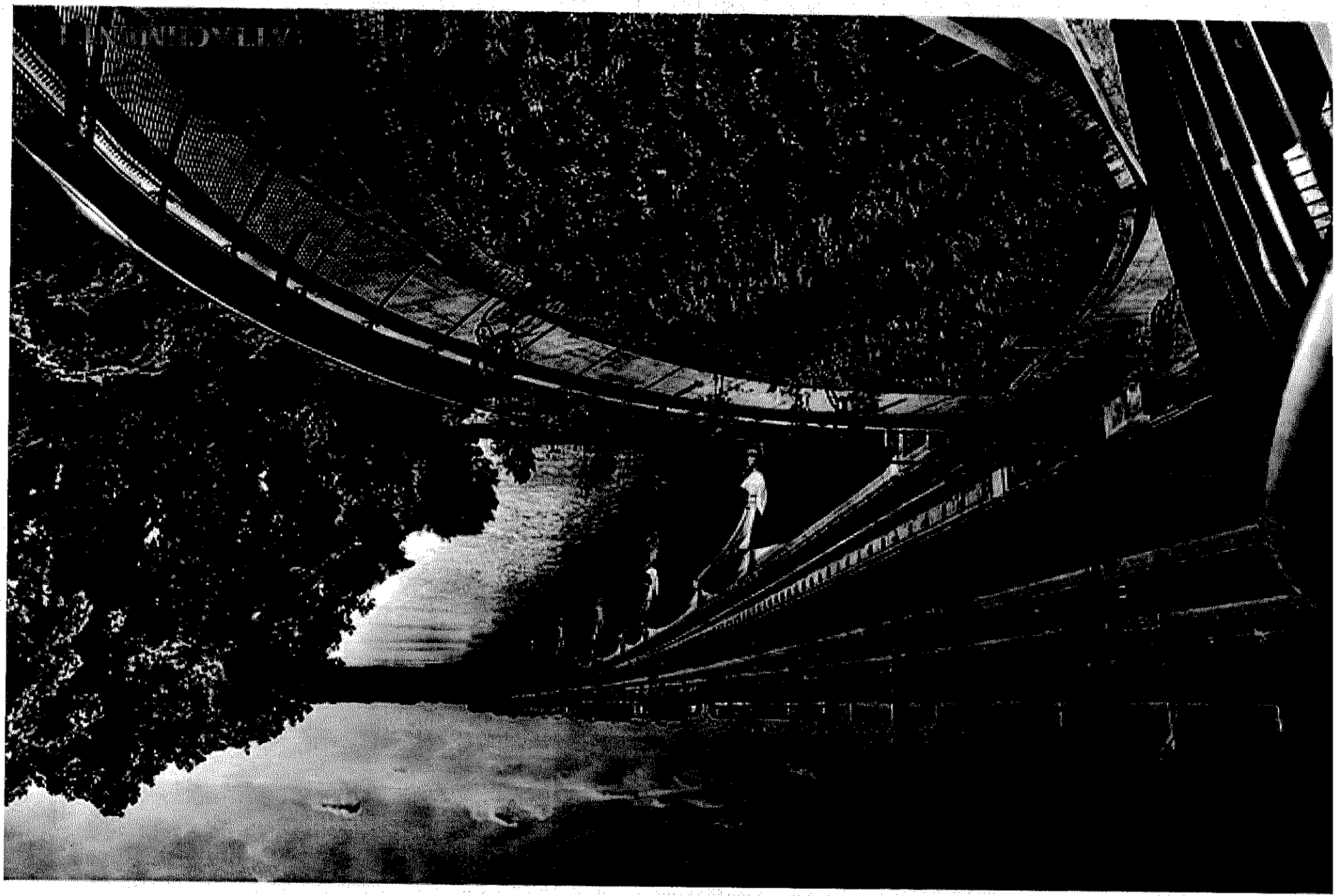
As Health Officer of Mobile County, I have serious concerns regarding, noise, air quality, road water discharge, and a failure of the Alabama Department of Transportation (ALDOT) to include a safe pedestrian/bike path similar to that seen on the I-95 Woodrow Wilson Bridge (Attachment 1). The proposed high level bridge will have a negative impact on the peace and tranquility of Cooper Water Front Park, James Seals Park, national historic landmarks and the Church Street East National Historic District. The runoff from the roadway needs to be filtered before discharged into the bay. In order to reduce bottom shadow and protect against storm surge, the Bayway should be elevated to the height of the new I-10 Lake Pontchartrain Louisiana crossing. Since Mobile is the second oldest city in America and the planned river crossing is in downtown, could Parsons Corporation from Baltimore, MD, who helped design the Woodrow Wilson Bridge, be consultants to ensure aesthetics are appropriate for the area? Will the Environment Impact Statement (EIS) study air quality as it relates to urban sprawl with higher traffic counts per hour in this mixed use neighborhood? Why is a mass transit (light rail corridor) not included in this project since forty (40) percent of the existing I-10 tunnel traffic is local? On high ozone days how will ALDOT limit vehicular traffic in order to protect the health of the public? If done properly could this structure not only be functional but also a significant tourist attraction? Since there have been recent changes in the leadership of ALDOT would now be the time to reconsider a new tunnel?

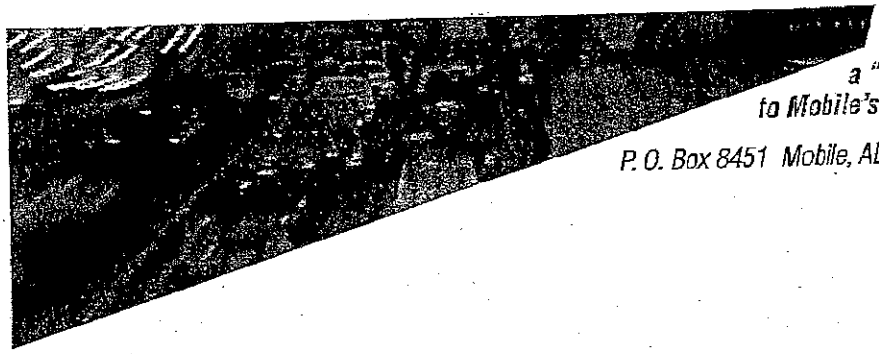
Sincerely,

Bernard H. Eichold II, M.D., Dr.P.H., F.A.C.P.
Health Officer

BHE:vw
Att.

cc: Mr. William F. Adams, P.E. Design Bureau Chief
Ms. Heather Dunn, Assistant Environmental Coordinator/Noise & Air
Mr. Vince Calametti, P.E., Ninth Division Engineer





KEEP MOBILE MOVING

a "better, quicker, cheaper" solution to Mobile's traffic congestion

P. O. Box 8451 Mobile, AL 36689 251-470-1755 Fax 251-473-1066

May 9, 2007

Mr. Don Arkle
Alabama Department of Transportation
1409 Coliseum Boulevard
P.O. Box 303050
Montgomery, Alabama 36130-3050

Dear. Mr. Arkle:

On behalf of *Keep Mobile Moving*, I thank you for taking the time to participate in the meeting on May 7, 2007 with our consultant, Street Smarts, and representatives of your organization, the City and County.

We all understand need to balance the importance of the Port of Mobile to the region's and the State's prosperity and wellbeing and the need to have a free flow of traffic and commerce. I am often reminded of John Lehman's recent statement to the Mobile *Press-Register*, "Mobile has the potential to be the premier entrée port on the Gulf Coast." He went on to comment that, "Mobile should not sacrifice a strategic asset (the Port) to solve a current problem (traffic)."

As you are aware, *Keep Mobile Moving* is concerned that a bridge in any of the currently proposed locations south of the Cochrane-Africatown Bridge would have the potential to hamstring the future growth of our city and port, not to mention the harm it would cause to the vibrant maritime industry that has long served as a mainstay to the State's economy. The harm would be felt during the five-plus year construction cycle, as well as after the bridge is completed.

We were extremely pleased in the approach offered at the meeting. Based on agreement reached during, and in discussions after, the meeting, a meeting will be arranged soon among Street Smarts, ALDOT and SARPC. That group will revisit assumptions and rerun the models to determine if changes to the proposed alternatives are needed to have it meet the projected traffic load in 2030. This will allow the Northern Route alternative to reenter "the mix" so consideration can be given to the cost and economic impacts of all the proposed routes.

If you have any questions, please contact *Keep Mobile Moving* at the address or phone shown above, or the email addresses below.

Thank you,

Jack Edwards
cc: Governor Bob Riley

Bruce Croushore, Bender: 251-431-8020, brucec@bendership.com
Walter Meigs, Atlantic Marine: 251-690-7061, walterm@atlanticmarine.com

ALABAMA DEPARTMENT OF TRANSPORTATION

1409 Coliseum Boulevard
P.O. Box 303050
Montgomery, Alabama 36130-3050

Telephone: 334/242-6311 - Fax No.: 334/262-8041

Bob Riley
Governor

Joe McInnes
Transportation Director

May 24, 2007

Mr. Jack Edwards
Keep Mobile Moving
P. O. Box 8451
Mobile, Alabama 36689

Dear Mr. Edwards:

We have received and reviewed the February 14, 2007, report titled "Independent Analysis of I-10 Bridge Project and of Alternatives" which was prepared for *Keep Mobile Moving* by Street Smarts of Duluth, Georgia. We appreciate your consultant's effort in data collection, analysis and evaluation of alternatives. We also appreciate the opportunity afforded to members of our staff to meet with representatives of *Keep Mobile Moving* and Marsha Anderson Bomar of Street Smarts on May 7, 2007, to discuss the Street Smarts findings and recommendations. Attached you will find our questions and comments concerning this report. In addition to our comments, we have attached a letter from Kevin Harrison, South Alabama Regional Planning Commission (SARPC) Transportation Planning Department, concerning their review of the traffic modeling and assumptions.

As was stated at the meeting, we welcome Ms. Bomar's participation in the alternatives development process. Your position is clear that a northern alternative is desirable to lessen impacts to the port and maritime industries. With Ms. Bomar's assistance, we will work with SARPC to determine if a northern alignment alternative can solve congestion in the tunnel. After we complete this process we will make ourselves available for a meeting to discuss our findings.

We understand that making the right decision is important to the City of Mobile, to the people who live there and to the traveling public.

Sincerely,

D. W. Vaughn, PE
Chief Engineer/Deputy Director

DWV/DTA:sfw
copy: Mr. Don Arkle
Mr. Ronnie Poiroux
The Honorable Sam Jones
File

Comments concerning Independent Analysis of I-10 Bridge Project and of Alternatives prepared by Street Smarts for Keep Mobile Moving

The following comments and questions are offered to reach a better understanding of the proposed improvements recommended in the above referenced report.

Traffic Volumes and Projections

1. There are only two places, other than the Government Street/Bankhead Tunnel, to cross the Mobile River: I-10 and Cochran-Africatown Bridge. The ALDOT New I-10 Bridge traffic projections show an increase of 48,560 vehicles that cross the river in 2030. The Street Smarts Proposal shows an increase in river crossings of only 37,500. There are 11,000 less trips across the Mobile River under the Street Smarts Proposal. It would appear that there are less trips due to the lesser capacity provided in the Street Smarts proposal [i.e.; 4-lane tunnel and 4-lane Cochran-Africatown Bridge verses 4-lane tunnel, 4-lane Cochran-Africatown Bridge and new 6-lane I-10 bridge]. What is the economic impact associated with these fewer trips?
2. How much I-65 traffic north of I-165 is traversing I-65 to I-10 and now going through the I-10 tunnel to I-10 east? The license plate study noted that 20% of the traffic on I-65 north was headed for I-10 east (and vice versa) but do we know how much of that traffic is currently already using the Cochran-Africatown Bridge and how much is going through the tunnel?

Capacity Analysis

1. It is ALDOT's position and practice that decisions concerning capacity should be made based on a detailed analysis as provided for in the Highway Capacity Manual (HMC). This includes a detailed operations analysis using percent (%) of trucks, grades, clearances and obstructions. This is a practice that has been endorsed by FHWA. The Florida Level Of Service Tables (hereinafter referred to as Florida LOS Tables) provide general numbers that can be used for planning purposes but are not intended to be used in an alternatives analysis or for design.
2. It is noted that, using the Florida LOS values, the Street Smart solution suggests that the existing congestion on I-10 and on I-65 and all future congestion caused by growth over the next 23 years can be handled by adding one lane in each direction on I-65 between I-10 and I-165. This assertion should cause questions concerning the use of the Florida LOS values considering the amount of congestion that already exists.
3. The tunnel will operate at a LOS E and will be approaching capacity in 2030 based on the Street Smart solution and using Florida LOS Tables. The actual operations may be worse when analysed using HCM procedures. What can be done to alleviate congestion in the tunnel in 2030 if only the Street Smart solution is implemented? Will a bridge be necessary at that time?
4. On page 20, the Street Smarts report discusses "Alternates A and B to connect to I-10 far enough north of Virginia Street to allow weaving to and from the interchange." This weave has never been provided for in any preliminary layouts for Alternates A, B or C. The eastbound on-ramp to I-10 from Virginia Street and the westbound off-ramp to Virginia Street from I-10 have always been to and from the I-10 Bridge only and will not allow a movement to or from the I-10 Wallace Tunnels. The maximum grade used in planning for all three alternatives for the Bridge is 4%. All horizontal and vertical

curvature for the three bridge alternatives have also been designed by Volkert using 70 mph freeway design criteria.

General Comments

1. It was noted that other cities, such as Atlanta, are diverting truck traffic away from the downtown congested areas It was stated in the report that the diversion can add as much as 35 miles to a trip. It is believed that the reference to 35 miles is the total length of the trip but does not exclude the length that would otherwise have been traveled. Based on some quick internet route planning programs, it would appear that traveling I-285 compared to I-75 through town would add about 6 miles to a 20 mile trip. Traveling I-285 in lieu of I-85 through town would add only 3 miles to a nearly 28 mile trip In Mobile, the rerouting of I-10 around I-65/I-165 would add 8.5 miles to a 7.5 mile trip. The Mobile truck diversion is more drastic as it more than doubles the length of the trip. Has Keep Mobile Moving considered the economic cost of diverting truck traffic an extra 8.5 miles?
2. On Page 14 it is noted that in the Alternatives Screening Evaluation (Volkert, 2005) that 11,000 to 18,000 vehicles per day are diverted from the Wallace Tunnel to the Cochran-Africatown Bridge under the northern alignment scenarios. Street Smarts assert that these volumes do not include the traffic that could be diverted from I-65. The traffic projections in the Alternatives Screening Evaluation were produced by the regional traffic model maintained by the South Alabama Regional Planning Commission (SARPC). SARPC should be consulted to determine if the volume diverted included traffic from I-65.
3. On Page 17 the report notes that the establishment of the Choctaw Point container port will increase truck movements within Mobile. If the I-10 bridge is not built, how will the truck traffic from the Choctaw Point facility access I-10 east?
4. The truck diversion argument made on Page 18 states that truckers are more concerned with predictability than overall time. Adding 10-15 minutes of travel time would be insignificant. This argument is only valid when comparing the truck diversion to the existing congested tunnel. A comparison should be made between the new bridge and the rerouting plan. The new bridge will provide predictability and save 10-15 minutes over the rerouting plan.
5. It is ALDOT's belief that a detailed analysis using the HCM will show that an additional lane in each direction is needed on I-65 under the New I-10 Bridge Alternate and two additional lanes are needed in each direction under the Street Smarts proposal. The second additional lane will come at an extremely higher cost due to rebuilding interchanges and additional rights of way required. Based on information from our consultant; one additional lane will cost $50 million, and two additional lanes will cost $244 million.
6. An additional suggestion in the Street Smarts report (page 28) is to reconstruct the I-10 Wallace Tunnel approaches at a cost of $75M. This improvement has been previously studied, with plans prepared by ALDOT for improvements which appear to be not as extensive as visualized in the Street Smarts report. The ALDOT plan was estimated to cost $60 M over 15 years ago. Current construction and ROW costs for improvements as visualized in the Street Smarts report would be much greater. Maintenance of traffic, staging of construction, direct impacts on the Church Street East Historic District, and a long term major disruption of the I-10 Corridor traffic during construction will be major impacts associated with this project.

South Alabama Regional Planning Commission

Tim Russell, Chairman • Samuel L. Jones, Vice-Chairman
William J. Lovett, Secretary • Larry W. White, Treasurer • Russell J. Wimberly, Executive Director

March 22, 2007

Mr. Paul Griggs, Assistant Vice President
Volkert & Associates
3809 Moffett Road
Mobile, AL 36618

Dear Mr. Griggs:

Thank you for giving me the opportunity to review the Independent Analysis of the I-10 Bridge Project and Alternatives developed by Street Smarts for Keep Mobile Moving. I have several comments regarding the conclusions of said analysis. First let me say that the following views and opinions are of the South Alabama Regional Planning Commission's Transportation Planning Department, not of the Mobile Metropolitan Planning Organization's members or members of the South Alabama Regional Planning Commission.

We found that for the most part the data collection techniques utilized are sound, and some of the recommendations we support, particularly the Regional Intelligent Transportation System. That being said, other recommendations seemed to be unsubstantiated.

The study emphasized the significance of the volume of traffic traveling south on I-65 to Baldwin County via I-10. Any traveler due east of Mobile County headed south on I-65 going to anywhere in Baldwin County, most likely would travel on SR 225 or US 59 and would not travel through Mobile to get to Baldwin County. As matter a fact, they would be signed that way. There is no license plate study locations conducted on I-65 between I-10 and I-165. We are not disputing their data or their data collection methods as we feel they were conducted soundly; however, the volume anticipated on I-65 southbound to Baldwin County is minuscule at best. Appendix F of the study showing the results from the license plate survey, suggests that Site 1 to Site 4 had a capture volume of 9086 vehicles, with 289 vehicles making the Site 1 to Site 4 movement; that is 2.9% of the sample. Page 7 of the report indicates that it is "ALDOT's assertion that about 20% of the traffic that travels I-65 south is bound for I-10 on the east side of Mobile Bay,". I do not dispute this percentage if the reference point is on I-65 between US 90 and I-10 but it should not be taken out of context. That 20% includes commuters with destinations to US 90, Airport Blvd, Dauphin St, Spring Hill Ave and US 98. It is projected that these commuters will continue to travel south on I-65 to I-10 to Baldwin County. According to the US Census in 2000, over 10,000 people lived in Baldwin County and worked in Mobile County. That is over 20,000 vehicles a day and the average annual growth rate of ADT on the Bayway between 2000 and 2005 is higher than anticipated at 2.8%.

Also, while we concede that rerouting truck traffic with no local origin or destination (through trucks) over the Cochran Bridge would improve traffic congestion conditions at the tunnel, it would be at the cost of the trucking industry. A 9.5 minute (page 11, I-10 east of Wallace tunnels to I-10 west of Wallace Tunnels) increase in time, for 8000 trucks (page 18) a day, @ $72.65 per truck hour (according to a 2005 study by the Texas Traffic Institute) equates to an annual cost to the economy of $33,588,516 (for a seven day average). Being as Mobile was one of the worst bottlenecks for the

trucking industry according to the I-10 Freight Corridor Study, I see problems with re-routing through trucks to the north.

The analysis recommends widening I-65 between I-10 and I-165 at a cost of $50 million, "sourced" from Volkert's Alternatives Screening Evaluation. The cited $50 million excludes cost estimates for the required interchange modifications, bridges over roadways, right of way acquisition, and relocation of required new frontage roads (additional costs, Exhibit 7, Alternate 5, Volkert's Alternatives Screening Evaluation). That project would be significantly higher than $50 million. Furthermore, this section of I-65 from I-165 to I-10 is not in the current MATS Long Range Transportation Plan and currently is not eligible for any sort of federal funding. Our visual inspection indicates that there is not "sufficient room" for additional lanes to interstate standards, and service roads and ROW on at least one side of I-65 would need to be included in the cost estimate. $50 million is a low cost estimate for widening I-65 and that project should not be included with the cost of the bridge project (page 32).

The Study states on page 14, fourth paragraph that "The Volkert Evaluation referenced transportation modeling work performed by the SARPC and assumed that about 18,000 vehicles would divert to the Cochran-Africatown Bridge if no new bridge were built on I-10". This statement is omitting critical text. The model suggesting the 18,000 vehicles using the Cochran Bridge had dramatic improvements being tested to the northern route. So "yes", if the Bayway was 8 lanes, the Cochran Causeway and the Cochran Bridge had a direct connection to the Bayway, were widened and at interstate standards, and I-65 was increased to 10 lanes, the model showed only 18,000 trips out of the projected 104,000 would take the northern route to get to their destination throughout Mobile County, rather than be squeezed through a tunnel with a capacity of 55,600. In other words, the time waiting to go through the tunnel was greater for 18,000 vehicles and their trips took an alternative path to their destination. Our capacity of the tunnel may differ because our capacities are calculated using federal guidelines for LOS D at 55 mph (posted tunnel speed), not 65 mph.

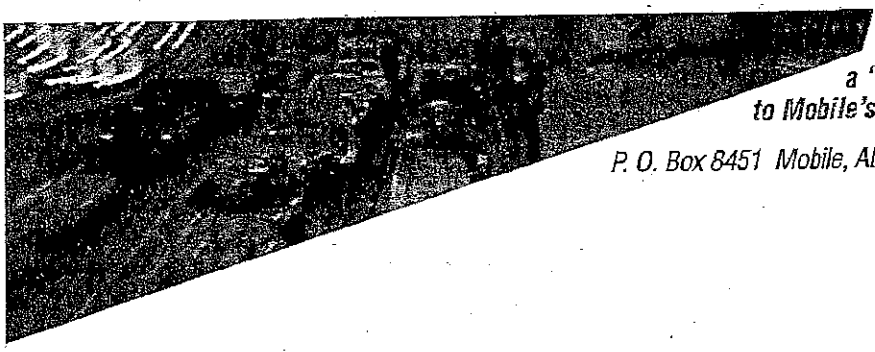
Also, although we support any effort to increase safety in the Wallace Tunnels, it needs to be known that the reconstruction of the western I-10 approaches to the Wallace Tunnel suggested in the analysis, encroaches into the Church Street East Historic District which is a nationally registered historic district (4F protected).

We appreciate the time and effort taken to privately analyze this set of alternatives. However, we still support an alternate for a new facility crossing the Mobile River; additional capacity is needed. The analysis presented some good ideas, but generally when a route choice is presented to a traveler, time savings is preferential and time is relative to distance (T=60D/S).

Sincerely,

Kevin Harrison
Director, Transportation Planning

cc: Mr. Ronnie Poiroux, ALDOT
Mr. Skeeter McClure, Volkert and Assoc.
Mr. Buddy Covington, Volkert and Assoc.
Mr. Russell Wimberly, SARPC



KEEP MOBILE MOVING
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August 20, 2007

Mr. Don Vaughan
Chief Engineer/Deputy Director
Alabama Department of Transportation
1409 Coliseum Boulevard
P.O. Box 303050
Montgomery, Alabama 36130-3050

Dear Mr. Vaughan:

On behalf of *Keep Mobile Moving (KMM)*, I again thank you and the Department for your willingness to work with us to demonstrate that the alternative Mobile River crossing we offered based on the work of Street Smarts is viable and should be included in the Environmental Impact Statement (EIS) analysis. Marsha Bomar of Street Smarts has met with Mr. Harrison of SARPC and I believe some of your staff in an effort to resolve the capacity differences. Those discussions are ongoing.

Following the May meeting in ALDOT's Mobile offices, you wrote to me with a series of questions/concerns concerning the Street Smarts report. That letter also contained a letter from Kevin Harrison, SARPC's Director, Transportation Planning, to Volkert dated March 22, 2007. We asked Street Smarts to respond to the issues raised in those letters. Their response is contained in the memo enclosed with this letter. We believe these answers verify that the alternative solution proposed by *Keep Mobile Moving* will handle the traffic requirements for the designated planning period, thus justifying inclusion in the EIS.

There are two items that I believe merit further comment. First, your letter recognized that the cost to reconfigure the western end of the Wallace Tunnel is subject to debate. That is a part of the reason that *KMM* decided, after careful consideration, not to include that project in its package as a Core Project. And, as you know, we made the same decision concerning the Western Loop. Whether that was a wise decision, especially in the light the recent positive developments in South Alabama (TK plant, Choctaw Point container facility, Alabama Motorsports Park) is, in my view, worth further discussion in the community and at ALDOT.

Secondly, your letter and attachments asked several questions about the cost impact of the *Keep Mobile Moving's* proposal and how would the *KMM* proposal handle future traffic flows. These questions are normally addressed as part of the EIS associated with a project.

Bruce Croushore, Bender: 251-431-8020, brucec@bendership.com
Walter Meigs, Atlantic Marine: 251-690-7061, walterm@atlanticmarine.com

It does not, in my judgment, appear logical or equitable to ask us to evaluate those potentially downside economic impacts when under the current constraints of the ALDOT process, the economic impact of the proposed bridge(s) on the entire waterfront and maritime industry in Mobile cannot be considered. This reemphasizes the concerns that I and others expressed by letter to Mr. McInnis in November 2004, requesting that the northern route be included in the EIS.

I look forward to reaching resolution on the outstanding technical issues so the route *KMM* has proposed will be included in the EIS and we can jointly work toward a viable solution that alleviates traffic congestion on the area highways and protects the economic viability of Mobile.

It is my understanding that the EIS process has been held in abeyance until Street Smarts' solution is fully analyzed and understood. Please confirm this fact.

Yours truly,

Jack Edwards

Jack Edwards

Enclosed: StreetSmarts Memo dated 24 July, 2007

cc: Governor Bob Riley
Mayor Samuel L. Jones
Mr. Don Arkel
Mr. Ronnie Poiroux

MEMORANDUM

TO: Keep Mobile Moving

FROM: John Karnowski, P.E., PTOE

Cc: Marsha Anderson Bomar, Street Smarts

SUBJECT: Response to ALDOT Comments on Street Smarts Study

DATE: 24 July 2007

Street Smarts received comments from the Alabama Department of Transportation regarding our study entitled "Independent Analysis of I-10 Bridge Project and of Alternatives", February 14, 2007 ("the Street Smarts analysis" or "the Street Smarts study"). The comments included in a letter from ALDOT to Keep Mobile Moving dated May 24, 2007, are summarized below in italics along with our responses in bold text.

TRAFFIC VOLUMES AND PROJECTIONS

1. Traffic volumes shown in the Street Smarts study crossing Mobile River are 11,000 vehicles per day less than the ALDOT study.

The volumes shown in Figure 6 of the Street Smarts study for the Cochran-Africatown Bridge did not add back the existing traffic volume on the C-A Bridge. The new volume would be about 50,000 vehicles per day (vpd) and would result in an LOS D under the methodology used within Street Smarts' analysis.

2. How much I-65 traffic north of I-165 is traversing I-65 to I-10 and now going through the I-10 tunnel to the east? How much is currently using the Cochran-Africatown Bridge versus the tunnel?

From the license plate study, we determined that as much as 20% of the traffic that is on I-65, north of I-165 can be seen on I-10 east of the Mobile River. In general, about 5-8% of the traffic is using the tunnels and the other 12-15% is using the Cochran-Africatown Bridge. This fluctuates throughout the day and, presumably, throughout the year.

CAPACITY ANALYSIS

1. ALDOT's position is that the DOT uses the Highway Capacity Manual (HCM) to conduct level of service analysis, including detailed operations analysis using percent of trucks, grades, clearances, and obstructions. The Florida DOT method is useful for planning purposes but not for alternative analysis. [Related comment] *2. Concern over*

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the results of the analysis using the Florida DOT methodology considering current levels of congestions.

The FDOT method provides a way to estimate levels of service based on daily traffic volume for all types of roadways with different characteristics. For example, their methodology accounts for highways with 2 traffic signals per mile in a suburban area or freeways with an interchange every 2 miles.

For this project, the FDOT method is appropriate because we compared facilities of similar types to each other. While factors such as truck percentages, grades, and other LOS-reducing variables are important, every facility has those issues and the FDOT methodology assumes those less-than-ideal conditions.

The HCM methodology suggested by ALDOT for computing levels of service on freeways is based on NCHRP Report 387. This is the same source that SARPC uses to calculate levels of service (*source: Kevin Harrison, SARPC*). NCHRP 387 presents methods for long-range transportation planning and sketch planning for major investment studies. *(Source: NCHRP Report 387, 1997)*

Street Smarts compared the FDOT methodology to the HCM methodology and presents this information below. If Street Smarts had used the HCM values instead of the FDOT values, the levels of service would have been better, not worse, than those shown in the Street Smarts study. It is important to note that the HCM tables are for hourly traffic volumes instead of average daily traffic volume. Tables similar to the one used in Street Smarts study were developed for the various freeways studies. The table below was used in the Street Smarts study.

	Freeway Level of Service				
Lanes	A	B	C	D	E
4	22,000	36,000	52,000	67,200	76,500
6	34,800	56,500	81,700	105,800	120,200
8	47,500	77,000	111,400	144,300	163,900
10	60,200	97,500	141,200	182,600	207,600

Based on FDOT Table 4-1 Methodology; from Street Smarts study.

The tables on the following page are the conversion of the peak one-hour thresholds in Exhibit 23-2 of the HCM (2000 edition) to daily traffic volumes for I-65, I-10, and the Cochran Freeway for three different K-factors (the percentage of daily traffic that occurs during the peak hour). The K-factors are from the ALDOT's traffic count website and are specific to each of the three facilities. We assumed a base free flow speed of 65 MPH and then made adjustments for the number of lanes and spacing of

interchanges. (It is acknowledged that the posted speed on some freeway sections may be higher or lower than 65 MPH; for the purpose of comparing one method to another, we used a free-flow speed of 65 MPH for the whole freeway system.)

For example on I-65, the per lane, per hour volume threshold for LOS D is 2090 vehicles per hour at a free-flow speed of 65 MPH. If there are three lanes (in each direction), the side friction from other traffic would tend to reduce the free-flow speed to 62 MPH. There are about 1¾ interchanges per mile between I-10 and I-165 and at that spacing the free-flow speed further reduces to 56 MPH. At 55 MPH, the volume threshold for LOS D is 1910 vehicles per hour, per lane. If you multiply 1910 vehicles by six (6) lanes and divide by the K-factor of 10% (i.e., 10% of the traffic occurs during the peak hour on I-65 according to ALDOT's count database), you get a capacity of 114,600 vehicles per day.

I-65	Freeway Level of Service				
Lanes	A	B	C	D	E
4	24,000	39,600	57,200	76,400	90,000
6	36,000	59,400	85,800	114,600	135,000
8	50,400	82,800	119,600	157,200	182,000
10	66,000	108,000	156,000	202,000	230,000
Assumption: K=10%, 1.75 interchanges / mi					

Source: HCM 2000, Exhibit 23-2 LOS Criteria for Basic Freeway Segments.

I-10	Freeway Level of Service				
Lanes	A	B	C	D	E
4	21,818	36,000	52,000	69,455	81,818
6	32,727	54,000	78,000	104,182	122,727
8	45,818	75,273	108,727	142,909	165,455
10	60,000	98,182	141,818	183,636	209,091
Assumption: K=11%, 1.35 interchanges / mi					

Source: HCM 2000, Exhibit 23-2 LOS Criteria for Basic Freeway Segments

Cochran	Freeway Level of Service				
Lanes	A	B	C	D	E
4	22,000	36,000	52,000	67,333	76,667
6	34,250	56,250	81,000	102,750	116,250
8	47,333	78,000	112,000	139,333	156,667
10	59,167	97,500	140,000	174,167	195,833
Assumption: K=12%, 1 interchange / 2 mi					

Source: HCM 2000, Exhibit 23-2 LOS Criteria for Basic Freeway Segments

The proposed I-10 bridge will have a long, steep approach with a significant number of trucks but there does not appear to be any inclusion of this constraint in the ALDOT capacity analysis. Likewise, the Wallace Tunnel has its own capacity-reducing issues: trucks, horizontal and vertical curvature, and merging traffic; this is why Street Smarts recommends re-configuration of the approaches to improve the overall LOS beyond what the planning-level results showed. When comparing facilities in an alternatives analysis, planning-level capacity analysis is appropriate; it is an estimate of traffic conditions. The regional model also provides an estimate of traffic. Since not every road nor every condition is included in the model, these methods are used so that facilities can be judged against one another.

3. What can be done to alleviate congestion in the tunnel in 2030 if only the Street Smarts solution is implemented? Will a bridge be necessary at that time?

It is possible that some other solutions will be needed in the future. Traffic desiring to cross the Mobile River will continue to rise. The region needs to determine what is in the best interest of the community and seek to design a road network that fits those interests. This may include a re-route of I-10, additional improvements to the north of the City, more tunnels, an increase in waterborne traffic (short sea freight and passenger/car ferry service), expansion of the rail system, or other improvements not yet identified in 2007. If conditions are found to exist where these other improvements are needed, it would be expected that a detailed impact analysis would be undertaken at that time. Street Smarts' study retained the same parameters as used by ALDOT and its consultants, i.e., projected traffic counts through 2030, in an effort to enable an apples-to-apples comparison.

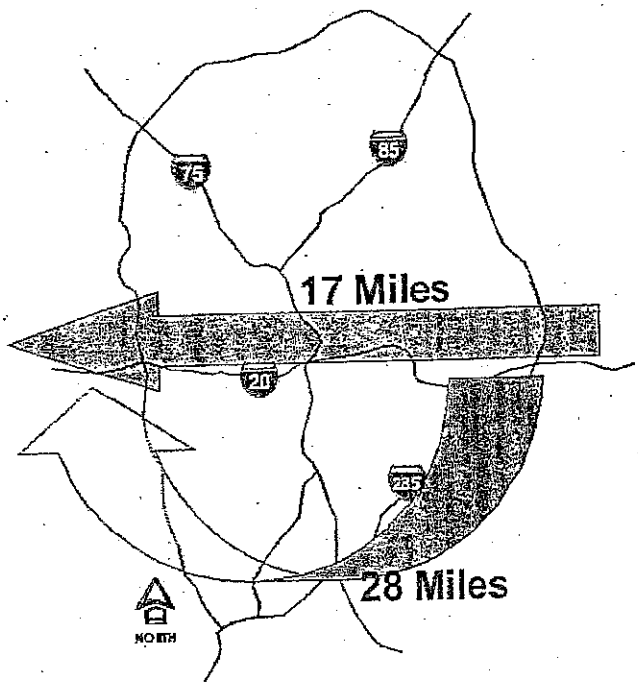
4. Street Smarts discusses a weave between the proposed Virginia Street access and the bridge. The preliminary layouts do not include access to the tunnels. The maximum grade used in planning for all three scenarios is 4% and the design speed is 70 mph freeway design.

The "weave" discussed in Street Smarts' analysis is actually a merging of traffic from Virginia Street onto the bridge and not access to the tunnel. Presumably, the traffic is moving relatively slowly or from a stop condition at the Virginia Avenue on-ramp and must merge on an uphill slope with freeway-speed traffic. The problem identified is principally for trucks that will not be able to reach freeway speeds on their way up the bridge. We estimate that the majority of trucks will reach about 35 mph on the upslope. Given the volume of trucks on this corridor, this will result in a de factor truck lane and greatly reduce the capacity of the bridge.

GENERAL COMMENTS

1. Has Keep Mobile moving considered the economic impact of diverting truck traffic an extra 8.5 miles?

According to the trucking industry, they are more interested in travel time reliability. Traveling incrementally longer routes is acceptable if the route functions reasonably. The drivers need the route published as the specified route so they can be paid for the mileage. If that is done, the extra distance is acceptable. The diversion suggested is not extreme for trucks serving non-local trips. From the example in the Street Smarts study for I-285 in Atlanta, a truck traveling on I-20 west from the east side of Atlanta, would divert an extra 11 miles if it took the south loop (the least congested and quickest route) around the city instead of traveling through the heart of the city. The following graphic illustrates this path.



2. SARPC model should be consulted to determine if the volume diverted to the Cochran-Africatown bridge under the northern route alternatives included traffic from I-65.

SARPC provided "Select Link Analysis" figures that graphically show how traffic traverses within the area under various build scenarios. It depicts the amount of traffic that is assigned to a given path and the results are still being studied.

3. If the I-10 bridge is not built, how will the truck traffic from the Choctaw Point facility access I-10 east?

There is no specific consideration given for Choctaw Point in either the Volkert study or the Street Smarts study. Since the Volkert study did not address the Choctaw Point, it was not included in the Street Smarts study. The study recommendation is for all trucks without an origin or destination downtown to be re-routed around the downtown core.

4. The truck diversion argument in the Street Smarts study is only valid when comparing to the current congested tunnel. A comparison should be made between the new bridge and the rerouting plan. The new bridge will provide predictability and save 10-15 minutes over the rerouting plan.

While it is true that the new bridge will create more capacity and a straighter/shorter path through the City, the northern route plan recommendation was made to identify a reasonable alternative for further consideration.

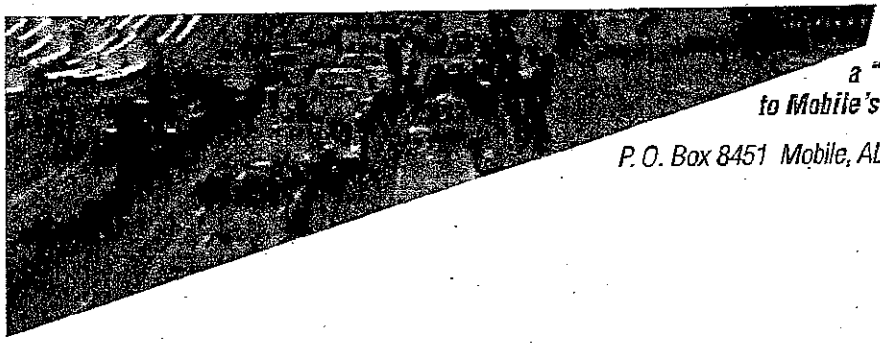
5. ALDOT believes that an additional lane on I-65 in each direction is needed under the New I-10 Bridge Alternative and two lanes are needed in each direction under the Street Smarts proposal. The difference in cost is $194M.

The Street Smarts study concluded that eight lanes are sufficient in 2030 on I-65. In the SARPC response to the Street Smarts alternatives, the highest volume on I-65 in 2030 was 104,000 vehicles per day with the Cochran Causeway option (Alternate 3 in the SARPC study). This volume of traffic should be well within acceptable ranges for an eight lane facility. (See the I-65 table on page 3 of the memorandum – eight lanes at LOS D capacity is 157,200 veh/day.)

6. The cost shown in the Street Smarts analysis to rebuild the I-10 Wallace Tunnel approach is $75M. Current costs and ROW costs for the proposed changes would be much greater. The project would also have long term, major disruption to I-10 traffic.

The alternative in Street Smarts' study is just one option. Other solutions which address the problem may be more feasible to build and with less impact. One such solution may be to only improve the eastbound entrance and leave the westbound departure essentially as it is today. Another option is to reduce the number of bridges and roads on the west side of the tunnel and re-route downtown traffic to the Henry Aaron Loop.

This option should be more fully explored in much the way the I-10 Bridge project is being study – through the E.I.S. process.



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September 28, 2007

Mr. Don Vaughan
Chief Engineer/Deputy Director
Alabama Department of Transportation
1409 Coliseum Boulevard
P.O. Box 303050
Montgomery, Alabama 36130-3050

Dear Mr. Vaughan:

On behalf of *Keep Mobile Moving*, I want to update you on where we are in working with SARPC to demonstrate that the alternative Mobile River crossing (the Northern Route) we offered based on the work of Street Smarts is viable and should be included in the Environmental Impact Statement analysis. As I reported in my August 20th letter to you, Marsha Bomar of Street Smarts has met with Mr. Kevin Harrison of SARPC face-to-face and by phone several times since the May meeting at ALDOT's office in Mobile.

The core issues discussed and evaluated in those meetings were; can enough traffic be diverted to the Northern Route? and what is the carrying capacity of the Wallace Tunnels while maintaining an acceptable Level of Service (LOS)? Based on the discussions during the latest meeting with SARPC, held in Mobile on August 28th, it is now clear that enough traffic can be diverted to the Northern Route so that the residual traffic can move through the Wallace Tunnels at an acceptable LOS.

The latest meeting was attended by Russ Wimberly and Kevin Harrison (SARPC), David Webber (Volkert), Marsha Bomar and John Karnowski (Street Smarts) and several representatives of *KMM*. We have attached Mr. Karnowski's synopsis of the meeting.

Everyone involved in this review acknowledges the particular weaknesses of the model being used by SARPC, especially its characteristic of only diverting traffic to alternative routes when the calculated wait time exceeds the projected travel time for an alternative route. Essentially, a congestion problem must develop before traffic will reroute. *KMM*'s position, especially as related to trucks, is that traffic can and must be proactively diverted to prevent congestion. Even with these model anomalies, Mr. Harrison made great efforts to manually load traffic and was able to demonstrate that by properly loading the Northern Route, traffic volume through the Tunnels would reduce to an acceptable LOS.

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Walter Meigs, Atlantic Marine: 251-690-7061, walterm@atlanticmarine.com

Thus, the Northern Route must now be considered a "Reasonable Alternative," since it is practical from a technical and economic standpoint, makes common sense, and satisfies the Purpose and Need as originally developed for the project.

With this accomplished, we look forward to working further with the Department in evaluating the actual roadway expansions, diversions and changes necessary to achieve the projected traffic flows. We are also available to you to assist in gathering the information needed and called for by the National Environmental Policy Act for inclusion in an Environmental Impact Statement to evaluate the Northern Route, the three current alternatives, and the "No-Build" alternative.

Before closing, we should remind ourselves that the Need and Purpose for this project were determined about a decade ago and all of us at *KMM* are concerned that proceeding with a billion-dollar bridge project without an up-to-date assessment of the region's traffic projections and future highway needs, especially in light of a decade of economic development, would do a disservice to Mobile, the Gulf Coast and the Nation's interstate system.

Thank you for you interest and cooperation. *KMM* looks forward to meeting with you and others on October 15, 2007.

Yours truly,

Jack Edwards

Enclosed: StreetSmarts Memo dated 30 August, 2007

cc: Governor Bob Riley
Mayor Samuel L. Jones
Mr. Joe McInnis
Mr. Don Arkel
Mr. Ronnie Poiroux
Mr. Russ Wimberly

MEMORANDUM

TO: Keep Mobile Moving

FROM: John Karnowski, P.E., PTOE

Cc: Marsha Anderson Bomar, Street Smarts

SUBJECT: Synopsis of SARPC Meeting on 28 August 2007

DATE: 30 August 2007

In attendance at the meeting were Russ Wimberly, Kevin Harrison, David Webber, Tom Bender, Ron McAlear, Bill Fister, Paul Jones, Steve Perry, Marsha Anderson Bomar, and John Karnowski

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At our meeting at SARPC on 28 August 2007, Street Smarts discussed our traffic projections and capacity analysis with Russ Wimberly and Kevin Harrison of SARPC and David Webber of Volkert & Associates. The discussions centered around the 2030 projected volume in the Wallace Tunnels under the Northern Route alternatives scenario (i.e., improved tunnel approaches, Cochran-Africatown freeway, truck re-route policy, and enhanced ITS), as well as the operational capacity of the Tunnels.

In the recent traffic projections performed by Kevin Harrison, the traffic volume in the tunnels would be approximately 74,000 vehicles per day in 2030 under the Northern Route scenario. Street Smarts predicted 72,900 in our Independent Analysis of I-10 Bridge Project and of Alternatives, 14 February 2007. However, in Kevin's model scenario, the Cochran-Africatown freeway is assumed to be six-lanes wide and I-65 would be 10 lanes wide. Street Smarts assumed a four-lane Cochran-Africatown Freeway and only eight lanes on I-65.[1] The rational for the assignment of traffic through the tunnels is sufficiently similar and the numbers are comparable. It was our understanding that Kevin agreed that the 2030 traffic projections are in the range of 70,000-75,000 vehicles per day in the Tunnels.

With regard to the capacity of the tunnels, there was much discussion about what values should be used. ALDOT defines the planning methodology to be used to determine which road segments are candidate for improvement. The assumptions used in the capacity determination are critical to the result and can make a significant difference in the analysis. It is important to note that capacity analysis is based on the peak 15 minutes of the day and adjusted to a peak one-hour of a day. Then to arrive at a daily traffic volume, one must know what

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[1] We do not believe the difference in roadway width assumptions materially impact the volume projections.

percentage of the daily volume is from the peak hour volume and adjust the one-hour volume to a 24-hour volume.

SARPC's MATS model documentation assumed a 4-lane freeway has an LOS D at 55,600 vpd. They assumed that the peak hour traffic is 10% of the daily traffic volume (K-factor) and trucks are about 15% of the total traffic volume. *Source: MATS 2030 Transportation Plan, 23 Feb 2005, pg 3-1.*

Street Smarts reviewed count data on ALDOT's count website for I-10 west of the tunnels as well as ALDOT daily count data taken in the Tunnels, recorded at the Tunnel maintenance facility in Mobile. The data indicate a very different percentage of peak hour traffic. Instead of 10% used in the SARPC model, the value is about 8% on typical days (i.e., days where the volume is the same as the average volume). This means that the traffic volume is spread out more evenly throughout the day and the daily traffic volume can be much higher and still meet the capacity constraint. If one used the same methodology as SARPC but used 8% rather than 10%, the LOS D threshold would be 69,500 instead of 55,600. *(Calc: 55,600 x 0.10 ÷ 0.08)*

The SARPC methodology is good for comparing facilities across an entire network of roads and is not intended to examine any one road segment in detail.) We used the Highway Capacity Manual (HCM) Chapter 23 (Basic Freeway Segments) and calculated the **current** capacity of the tunnel with all available roadway and traffic characteristics. Using that methodology and the correct K-factor of 8%, the LOS D threshold is 58,700 vpd.

Using the same HCM methodology, we considered the improved conditions. Instead of 15% trucks, we assumed 5% trucks. We also assumed improved approach geometrics and no Water Street interchange adjacent to the Tunnels. The results were that the LOS D threshold is 74,000 vpd.

We believe that it is prudent to use the HCM methodology for the Tunnels before the Northern Route option is dismissed. It is more indicative of real-world conditions. The implication for this project is that the projected volume and LOS D volume (for the improved conditions) are approximately the same. This is actually an improvement over the current level of service, which is an E.

One topic that was not discussed at the meeting on 28 August was SARPC's assertion that I-65 should be 10 lanes wide and the Cochran-Africatown freeway should be six lanes. This is a significant point because of the costs involved and it still needs to be discussed. Street Smarts' analysis (and subsequent reanalysis) shows that there is sufficient capacity to handle the projected traffic across the Cochran-Africatown Bridge. It is Street Smarts' view that I-65 needs to be widened only to eight lanes, which is much more feasible than ten lanes.

Project DPI-0030(005)
I-10 Mobile River Bridge
Mobile and Baldwin Counties, Alabama
Volkert Contract No. 911600.10

SUMMARY OF MEETING

DATE:	Tuesday, October 15, 2007
TIME:	1:00 pm
PLACE:	City Smarts Room in Mobile, AL
SUBJECT:	Discussion of Northern Alternate Proposed by Keep Mobile Moving

ATTENDANCE:

Mayor Sam Jones	City of Mobile
Bob Chappell	Chamber of Commerce
Al Stokes	City of Mobile
Bill Metzger	City of Mobile
Don Arkle	ALDOT
William Adams.	ALDOT
Ronnie Poiroux	ALDOT
Don Vaughn	ALDOT
Mark Bartlett	FHWA
Bill VanLuchene	FHWA
Kevin Harrison	SARPC
Russ Wimberly	SARPC
John Karnowski	Street Smarts
Marsha Bomar Anderson	Street Smarts
John Murphy	Mobile County
Joe Ruffer	Mobile County
Chip Drago	Press Register
Henry Sewell	Thompson Engineering
Tom Bender	Bender Ship Building
Walter Meigs	Atlantic Marine
Randy Delchamps	
Bruce Croushore	Bender Ship Building
Ann Bedsole	NTHP
Steve Perry	KMM
Paul Jones	ORCA
Tony Pogey	
Paul Griggs	Volkert & Assoc.
David Webber	Volkert & Assoc.
Skeeter McClure	Volkert & Assoc.
Buddy Covington	Volkert & Assoc.

The meeting was a back and forth dialogue. The following is a summary of views and opinions expressed by the participants. The meeting was not recorded so the positions attributed to various individuals may or may not reflect their official positions. They should be considered in context of the statements, opinions or assertions of their preceding comments.

Mayor Jones began the meeting by introducing Don Vaughn. Mr. Vaughn stated that ALDOT has met with Street Smarts and participated in traffic modeling studies. ALDOT has reviewed the study by Street Smarts and would like to offer their comments.

Don Arkle
In the May meeting, ALDOT was tasked with reviewing data by Street Smarts to agree upon a method of traffic modeling. The point of contention in the May meeting was how much traffic would be diverted from the Wallace Tunnel to the Northern Route. The first order of business is for ALDOT to understand the

improvements recommended by Street Smarts for the Northern Route. It is ALDOT's understanding that the following improvements are recommended by Street Smarts:

1. Cochrane Bridge to remain as a four lane.
2. One additional lane in each direction on I-65.
3. Force all through trucks to take the Northern Route.
4. Widen the I-10 Bayway.
5. Enhanced ITS in the area.
6. Improved approaches to I-10 west of the Wallace Tunnel.
7. Elimination of the Water Street interchange.
8. A freeway facility from I-10 to I-165.

John Karnowski
Something different has to happen with the Water Street exit.

Don Arkle
The following statistics and definitions were discussed to relate the capacity of the Wallace Tunnel.

1. The SARPC ran 8 different traffic models with different scenarios for the Northern Route.
2. Alternate 6 was considered the "best case" for the Northern Route because it assumed all truck traffic would use the Northern Route. A total of 20,000 vehicles was diverted manually in the traffic model to the Northern Route. This 20,000 vehicles was diverted to mimic 8,000 trucks being diverted from the tunnel to the Northern Route. Alternate 6 assumed a freeway between I-10 and I-165, a six lane Cochrane Bridge and two additional lanes in each direction on I-65.
3. The alternate 6 traffic model had 74,000 vehicles per day in tunnel with diversion of traffic to the Northern Route.
4. Street Smarts has done capacity analysis which says that 74,000 vpd in the Wallace Tunnel will provide a LOS of D.
5. The term K factor is used to convert average daily traffic to an hourly volume. We use the hourly volume to design facilities. The 30th highest hour of the year is typically used in design.
6. K factor is different between every other day congestion and once every two weeks.
7. Street Smarts used a K of 8% to make the 74,000 vpd achieve a LOS of D.
8. ALDOT used a K factor of 10%. This is based upon the continuous count information generated from their counting equipment in the tunnel. This produces an LOS of F.
9. Traffic was stopped for over an hour on 57 separate occasions in 2006. These were stops related to traffic congestion. The average annual daily traffic in the Wallace Tunnel in 2006 was 66,000 vpd.
10. Traffic was also stopped due to 66 traffic accidents in the tunnel. This totals 123 occasions in 2006 where traffic was stopped on I-10, or 33% of days.
11. Street Smarts has proposed adding one lane in each direction on I-65. ALDOT believes that two lanes in each direction is required when traffic is re-routed to accommodate for future congestion.

Tom Bender
The May, 2007 meeting was to get this route put into the EIS. It is not uncommon that a K factor of 8% is considered. A bridge over the city could deter commerce. After the last meeting, he felt as though the traffic would work out.

Don Arkle
Any alternate in the EIS must meet the purpose and need.

Tom Bender
Economic impact to the city could qualify as the routes now not meeting the purpose and need.

Marsha Bomar Anderson
John Karnowski developed the 8% K factor by reviewing days that the average daily traffic of 66,000 was achieved.

Joe Ruffer

His office views the tunnel. He sees backup every day. The back ups are due to the I-10 traffic. Mr. Ruffer sees no real change in the traffic problems by doing interchange work at the Water Street interchange..

Mark Bartlett
One thing they did not include is additional use of the ITS system. In addition to trucks – you could sign for cars to go around.

Marsha Bomar Anderson
Deletion of trucks will improve traffic flow and reduce accidents.

Ronnie Poiroux
If all trucks are re-routed to I-65, the capacity of I-65 will be compromised.

Tom Bender
A more thorough investigation needs to be done on the Northern Route. He thinks that this is feasible and that they had reached that goal. A little money to study a 4th alternate is worth our time.

Don Arkle
We have studied the alternate already. We have tried a different alternate. Based upon the process we are using, it does not work.

Mark Bartlett
What volume would work?

Don Arkle
A little less than today's volume, possibly around 60,000 vpd. We would have to close down ramps in the downtown area to achieve this. The impact of this solution would not be acceptable.

Bruce Croushore
Do we want to use a decade old purpose and need with the economic growth in the region? The ALDOT approach does not look at the entire network, it only looks at one spot.

Don Arkle
We didn't just study a bridge downtown. We studied 14 alternates to relieve congestion in the Wallace Tunnel.

William Adams
The local Metropolitan Planning Organization (MPO) comes up with a project based on the overall study of an area. The long range plan includes the entire Mobile area and the project to relieve congestion in tunnel is part of that overall plan.

Kevin Harrison
We are updating a 20 year plan. The bridge has been in the Mobile MPO plan for 20 years. We are probably underestimating traffic that crosses the river on a daily basis.

Sam Jones
Hwy 90 traffic is backed up into Government Street when the Wallace Tunnel is congested. They had to go up to Washington Ave. to get into the Bankhead Tunnel.

Don Arkle
I-10 through the Wallace Tunnel is not working right now.

Ronnie Poiroux
I-10 has been identified as one of the nine major freight corridors in the United States. Traffic on I-10 is only going to increase.

Tom Bender

Can we force traffic with signs to move to an alternate route? About $200,000 to study another alternate is not unreasonable. The impact of a bridge is enormous to the maritime industry.

Don Arkle
The FHWA needs to make a decision on what to study.

Ronnie Poiroux
Cochrane Bridge route has been studied in our 14 alternate screening analyses.

Don Arkle
Previous analysis was based on traffic modeling we have studied over the last couple of months.

William Adams
We have studied all the traffic and came to the same conclusion.

Ann Bedsole
We must consider ITS on US 43 at the same time as on I-10. Signs on I-65 directing southbound traffic to I-165 would help out. 66 days in which traffic backed up to accidents and 57 days back up for congestion,
there are ways to reduce the number of accidents.

William Adams
I predict that 1/2 of the 66 days of backup due to accidents were a result of congestion. I-65 is already signed to take I-165 to I-10 east.

Ronnie Poiroux
Accidents occur due to congestion.

Don Arkle
ALDOT agrees that ITS is needed. ALDOT is investigating ITS now in this corridor.

Bruce Croushore

We will talk about the I-10 freight study when ALDOT makes a recommendation to FHWA. We also need to study the separation of truck and auto traffic for safety. We also need to consider cargo transfer by water rather than truck.

Kevin Harrison
The next update of the SARPC traffic model will include freight.

Sam Jones
Is there a time cycle on the end of EIS process and relief of congestion?

Don Arkle
The time period is dependent upon getting funds available. This meeting is supposed to help get this process completed.

Sam Jones
Any alternate that shuts down ramps into the City would be disastrous for the City of Mobile. Two tunnels kills Mobile. He does not know what the alternate is. He knows it is getting worse every day on I-10. We need to move in some direction. We currently are not doing anything to solve the problem. We have had a lot of growth and the current system is broken right now.

Mark Bartlett
In the NEPA process all alternates are not studied at the same level. There was consideration given to the economic impact of the bridge.

Don Arkle

The NEPA process defines purpose and need. All reasonable alternates must solve the problem that has been identified. We look at all impacts – economic and environmental. There is a balancing act between cost and environmental process. We must obtain local support.

Mark Bartlett
In the beginning of the process, we look at a wide range of alternates. We only study the alternates that meet the purpose and need in the EIS. Is it reasonable to take away access to downtown Mobile? We must talk further on how this alternate was considered. He has not heard enough today on how this alternate will meet the purpose and need.

Kevin Harrison
Bay Bridge road was shown as interstate from I-165 to I-10 in the Street Smarts Northern Route alternate.

Sam Jones
We cannot put a six lane interstate on Bay Bridge Road and impact that community. The community would object.

John Karnowski
They recommended a four-lane freeway with interchanges between I-65 and I-10.

Bruce Croushore
Is the disruption on I-10 due to the Water Street interchange.

Marsha Bomar Anderson
It is due to disruption of the removal of access to Water Street.

John Karnowski
The Street Smarts report recommends that the entrance on west side of tunnels would be moved and relocated. The influence of Water Street is tremendous on operations of tunnel. Moving the ramp is advantageous to tunnel operations.

Bruce Croushore
What is the air draft of the bridge?

Paul Griggs
A minimum of 190'.

Tom Bender
We are not considering economic impact in the purpose and need. No bridge got eliminated for things that weren't considered. Originally, we should not have proceeded with a $1B project without considering a no bridge alternate.

Mark Bartlett
What type of diversion is required to take place in order for the purpose and need to be met?

Kevin Harrison
The only way the Northern Route will work is if you cut off all access from Michigan Ave. to east of the tunnel on I-10. This would get I-10 down to 60,000 vpd. It is hard to model ITS to validate to annual average daily traffic since ITS typically affects hourly traffic.

Marsha Bomar Anderson
How do we get this alternate back into the document?

Don Arkle
Right now, they have the same options. Can we handle more traffic with these existing conditions? Tunnel will "bulge at the seams" until it shuts down.

Tom Bender
These are all foreigners on a Friday causing congestion. We need to use a K of 8% instead of 10%. The impact of the bridge is big when you consider that it boils down to something so small.

Steve Perry
The bridge cost is approximately $1 billion. This is a lot of money to spend and we know we are impacting the shipping industries. To make a decision based upon the assumption used without looking at economic impact concerns him. We need to look at how this will affect the economy.

Ann Bedsole
She is an advisor for the National Trust for Historic Preservation. All downtown landmarks are in the area of the study. They are concerned about the impact of the bridge. She is concerned about the continuation of this 300 year old city. We exist because we are a port. If we do anything to endanger that, we cannot do that. Are we looking at the whole picture and economic impact? We cannot consider everything unless it is in the EIS. Northern Route has been studied by downtown merchants long before this. Please include the Northern Route in this study.

William Adams
Economic impacts of bridge alternate have been studied.

Don Arkle
We have to solve the problem with the alternate.

Bruce Croushore
Without the Northern Route there is not community consensus.

Don Vaughn
Mr. Vaughn closed the meeting with the following points:

1. This meeting was a good discussion on the project.
2. There are probably things that we did not consider fully.
3. This has given us the opportunity to study these issues again.
4. We are looking at the economic impact of any alternate.
5. We will look at economic benefits, positives and negatives.
6. We must go back to purpose and need. We must relieve congestion in the tunnel.
7. We must further evaluate comments from today.
8. This route will be considered in every way.
9. FHWA has been working with us to solve this problem.
10. If there is anything further to add, please do so within the next 3 or 4 weeks.
11. ALDOT will address all of this in the environmental document.
12. These are legitimate concerns that ALDOT will study.

Mark Bartlett
The project depends on the City to have this discussion. We must look at all reasonable alternates. The study has merit only if all reasonable alternates are studied for the project.

U.S. Department of Transportation
Federal Highway Administration

Alabama Division

500 Eastern Blvd., Suite 200
Montgomery, AL 36117-2018

February 6, 2008

In Reply Refer To:
HDA-AL

Mr. D. J. McInnes
Director
Alabama Department of Transportation
Montgomery, Alabama

Attention: Mr. D. W. Vaughn

Dear Mr. McInnes:

We have reviewed Mr. Vaughn's letter requesting inclusion of the Northern Route Alternative in the I-10 project in Mobile. In that letter, Mr. Vaughn stated that numerous individuals and groups support the study of this alternative and have provided additional studies to support the benefits of making improvements to Interstate 65 and the route leading up to the existing crossing at the Cochran-Africatown bridge. As you know, the Northern Route was included and analyzed in the initial screening phases of the Draft EIS. However, due to the alternative's high cost and failure to meet the stated purpose and need (P&N), it was eliminated from consideration. While we understand that the locals have proposed some enhancements to the alternative, we are reluctant to agree with your proposal to include the alternative without some clarification of what features have changed to allow this alternative to satisfy the project's purpose and need, thus warranting advancing the alternative for further study.

The following items have been discussed and would need to be clarified or finalized prior to deciding to consider the alternative any further in the DEIS.

- **What is the K factor for the project?** Much discussion has revolved around the capacity of the tunnel and the appropriate K factor to be used on Interstate 10. To date, all alternatives included in the document have used the same K factor, based on State normal procedures. The studies provided by the supporters of this enhanced alternative have advanced a different K factor for consideration. It should be noted that all alternatives included and evaluated in the DEIS will need to be considered utilizing a consistent K factor.

- **What modifications will be required to the Interstate System in the proposed alternative?** In the discussions with the consultant hired by the locals, there was some confusion surrounding what modifications would be required in the vicinity of the tunnel. Specifically, there were assumptions related to closing, modifying, or relocating several of the downtown interchanges and ramps that clearly need to be evaluated and well defined before including the alternative.

- **What diversion assumptions are being used?** To become a viable alternative, the enhanced alternative assumes that all commercial through traffic as well as a large number of passenger cars would be diverted off Interstate 10 to proceed along the alternate route. These assumptions will need to be clarified and made consistent with the traffic projections of the planning models used by the Metropolitan Planning Organization. A full and detailed discussion of the use of Intelligent Transportation Systems will need to be provided if the alternative relies on the technology to realize the needed diversion. Given the proposal diverts mainline traffic from Interstate 10, it is likely that the route would need to be designated as a bypass route around Mobile, and the State would need to request that the new route be added to the Interstate System.

- **What improvements will be necessary on US 98 to handle the increased traffic and still maintain access to the industrial areas of the corridor?** Portions of the existing route along US 98 are heavily industrialized and have considerable direct, permitted access to the roadway. A conceptual freeway design should be developed that will be capable of handling the increase traffic at the same time as maintaining the committed level of access to these industrialized areas. This design advanced by the supporters cited that the route would be widened to six lanes, and additional capacity would be needed across the Cochran Bridge. Please specify how many lanes of travel along the corridor will be necessary, including any widening or improvements needed to the bridge.

- **How many lanes will be added on Interstate 65 as a result of the additional traffic from the alternative?** Currently, the Long-Range Plan states that two additional lanes are planned along Interstate 65. The number of lanes necessary for widening I-65 to the north and ramp modifications necessary to accommodate the widening should be clearly defined in any proposal, if warranted. In addition, the interchange at Interstate 10 and Interstate 65, as well as the interchange at Interstate 65 and Interstate 165 should be evaluated to determine if the current design and capacity of the ramps is adequate to handle the proposed traffic projections. If not, the alternative should be evaluated to determine if using these corridors would be appropriate.

We look forward to working with you and your staff to decide to advance the alternative beyond the screening phase in the draft environmental impact statement (DEIS) once we have the above information regarding this enhanced alternative.

Sincerely yours,

Mark D. Bartlett

Mark D. Bartlett, P. E.
Division Administrator

MOVING THE AMERICAN ECONOMY

KEEP MOBILE MOVING
a "better, quicker, cheaper" solution to Mobile's traffic congestion
P. O. Box 8451 Mobile, AL 36689 251-470-1755 Fax 251-473-1066

March 12, 2008

Mr. Joe McInnes, Director
Alabama Department of Transportation
1409 Coliseum Boulevard
P.O. Box 303050
Montgomery, Alabama 36130-3050

Dear Joe,

We appreciate the opportunity to address questions and issues raised by Mr. Mark Bartlett as part of our commitment to continue helping the greater Mobile community solve its traffic congestion problem.

We all recognize that things have changed dramatically since this project began. To address Mobile's future highway needs, the traffic impacts of the ThyssenKrupp plant, the Choctaw Point container terminal and the Northrop-Grumman/EADS tanker project must be considered. Additionally, capacity issues with the proposed bridge; lack of a regional approach; consideration of economic impacts of a new bridge, including disruption during construction, need to be considered: These all indicate that continuing to pursue only a new bridge without carefully considering projected traffic flows is not in Mobile's or Alabama's interest.

We feel strongly that a phased implementation of the recommendations based on Street Smarts' study should start now. Some, such as a regional ITS system, are relatively low cost and without question will be beneficial regardless of the ultimate solution.

As I indicated in my letter to you on February 26th, we have had our consultants, Street Smarts, review the questions in Mr. Bartlett's letter. I have attached our responses to his questions, addressing each individually.

Please contact me if you have any questions concerning our responses. We will be happy to make the necessary technical people available to you, your staff and Mr. Bartlett as you may desire.

Yours truly,

Jack Edwards

Enclosure: (Response to Questions raised by FWHA)

cc: Mayor Samuel L. Jones
Mr. Mark D. Bartlett

Bruce Croushore, Bender: 251-431-8020, brucec@bendership.com
Walter Meigs, Atlantic Marine: 251-690-7061, walterm@atlanticmarine.com

Keep Mobile Moving
Response to Questions raised by FWHA
Letter from M. Bartlett to J. McInnes 2/6/08

Note: Page numbers reference the Street Smarts report dated 14 February, 2007 (enclosed)

FHWA Question:

What is the K factor for the project? Much discussion has revolved around the capacity of the tunnel and the appropriate K factor to be used on Interstate 10. To date, all alternatives included in the document have used the same K factor, based on State normal procedures. The studies provided by the supporters of this enhanced alternative have advanced a different K factor for consideration. It should be noted that all alternatives included and evaluated in the DEIS will need to be considered utilizing a consistent K factor.

***KMM* Response:**

It is usual to use a consistent K-Factor to analyze an entire highway, such as I-10 in Alabama, and in a planning study, a regionalized K-factor might be used to compare one facility to another. However, a detailed capacity analysis of one or more specific roadways would typically use the Highway Capacity Manual and more specific individualized factors (e.g., peak hour factors, driver population factors, truck percentages, grade and lane widths, in addition to K-factors). In the case of the Wallace Tunnels, Street Smarts' quantified how much traffic the facility can handle on an average day based on the Manual and the specific factors – recognizing that all the capacity calculations are performed for one hour and then expanded to apply to a full day

FHWA Question:

What modifications will be required to the Interstate System in the proposed alternative? In the discussions with the consultant hired by the locals, there was some confusion surrounding what modifications would be required in the vicinity of the tunnel. Specifically, there were assumptions related to closing, modifying, or relocating several of the downtown interchanges and ramps that clearly need to be evaluated and well defined before including the alternative.

***KMM* Response:**

In its study, Street Smarts recommended realignments to the west end of the Wallace Tunnels approaches (p. 28). Since the time those recommendations were made, the Downtown Mobile Alliance commissioned Volkert & Associates perform a conceptual study to determine the feasibility of reclaiming for development and reuse the property under the existing elevated on and off ramps for I-10 at Water Street. The Volkert proposal would eliminate the Water St. ramps from the interchange and construct a new diamond interchange at Canal Street several hundred yards to the west. Street Smarts agrees with Mr. Bartlett that additional work will be needed to show the suitability of the proposed plan (i.e., a traffic study along with environmental assessments). However, the changes proposed by Volkert, probably further modified after additional study, should improve the western approach to and exits from the Tunnels such that the

design speeds can be increased and therefore the capacity increased. The enhanced geometry will offer the added benefit of reducing the number of traffic incidents.

FHWA Question:

What diversion assumptions are being used? To become a viable alternative, the enhanced alternative assumes that all commercial through traffic as well as a large number of passenger cars would be diverted off Interstate 10 to proceed along the alternate route. These assumptions will need to be clarified and made consistent with the traffic projections of the planning models used by the Metropolitan Planning Organization. A full and detailed discussion of the use of Intelligent Transportation Systems will need to be provided if the alternative relies on the technology to realize the needed diversion. Given the proposal diverts mainline traffic from Interstate 10, it is likely that the route would need to be designated as a bypass route around Mobile, and the State would need to request that the new route be added to the Interstate System.

***KMM* Response:**

The Street Smarts study would only mandate that through trucks be re-routed. (p. 11). No allowances were made for diversion based on ITS-informed driver options, changes in driver behavior, or other factors that may reduce traffic in the Wallace Tunnels. Any benefit accruing from those factors would be above and beyond the rerouted truck traffic. The SARPC planning numbers took into account truck traffic rerouting by way of normalizing trucks to passenger car equivalent. Some minimal rerouting of regional passenger cars was done in its model. The SARPC model did not include ITS in its routing assignments. Whether the designation of a by-pass route around Mobile would be needed in a situation where only a portion of the traffic stream (through trucks) is re-routed mandatorily is a policy matter best left to the State of Alabama.

FHWA Question:

What improvements will be necessary on US 98 to handle the increased traffic and still maintain access to the industrial areas of the corridor? Portions of the existing route along US 98 are heavily industrialized and have considerable direct, permitted access to the roadway. A conceptual freeway design should be developed that will be capable of handling the increase traffic at the same time as maintaining the committed level of access to these industrialized areas. This design advanced by the supporters cited that the route would be widened to six lanes, and additional capacity would be needed across the Cochran Bridge. Please specify how many lanes of travel along the corridor will be necessary, including any widening or improvements needed to the bridge.

Keep Mobile Moving
Response to Questions raised by FWHA
Letter from M. Bartlett to J. McInnes 2/6/08

***KMM* Response:**

The Street Smarts proposal included a limited access highway between I-10 and I-165 with frontage roads, as needed (p. 25). The path of the roadway, referred to as the "Cochrane-Africatown Freeway", will be along a new alignment on the south end of the corridor, to the immediate east of some of the industrial sites. On the northern and western ends, the alignment is close to the current alignment. Street Smarts did not propose increasing the capacity of the Cochrane-Africatown Bridge, although it did acknowledge that the bridge could be redesigned or even widened to increase its capacity and efficiency. Street Smarts also recommended consideration of building a parallel span and of replacing the exiting bridge with a new one.

FHWA Question:

How many lanes will be added on Interstate 65 as a result of the additional traffic from the alternative? Currently, the Long-Range Plan states that two additional lanes are planned along Interstate 65. The number of lanes necessary for widening I-65 to the north and ramp modifications necessary to accommodate the widening should be clearly defined in any proposal, if warranted. In addition, the interchange at Interstate 10 and Interstate 65, as well as the interchange at Interstate 65 and Interstate 165 should be evaluated to determine if the current design and capacity of the ramps is adequate to handle the proposed traffic projections. If not, the alterative should be evaluated to determine if using these corridors would be appropriate.

***KMM* Response:**

The Street Smarts study concluded that I-65 would need to be eight (8) lanes wide (four in each direction) between I-10 and I-165. (p. 27). There are segments that are already eight lanes wide. The interchanges at I-65/I-165 and I-65/I-10 were evaluated and found to be acceptable. Volkert's Alternatives Screening Evaluation acknowledged that widening of I-65 between I-165 and I-10 would be required to reduce congestion even if traffic from I-10 is not diverted to I-65 (Volkert, August 2005, p. 7).

Copied 4-29-08 Sylvia

To: File
Copy: Biddick
Acoff

Linnea W. Adams

ALABAMA DEPARTMENT OF TRANSPORTATION
1409 Coliseum Boulevard
P.O. Box 303050
Montgomery, Alabama 36130-3050

Bob Riley
Governor

Telephone: 334/242-6311 - Fax No.: 334/262-8041

Joe McInnes
Transportation Director

April 18, 2008

Mr. Jack Edwards
Keep Mobile Moving
P. O. Box 8451
Mobile, AL 36689

APR 22
RECEIVED
Design Bur/Admin.

Dear Mr. Edwards:

RE: Project DPI-0030(5)
Mobile County
I-10 Mobile River Bridge

Thank you for your March 12, 2008, response to the issues raised by FHWA on the referenced project. We will need more detailed information in order to address these issues and I recommend that we meet to discuss the "specifics" of the required information. We will be contacting you soon to schedule a meeting.

Sincerely,

D. W. Vaughn, PE
Chief Engineer/Deputy Director

DWV:sfw
copy: Mr. Joe McInnes
The Honorable Samuel L. Jones
Mr. Mark Bartlett
bc: William Adams

APR 2008
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DESIGN BUREAU
ENVIRONMENTAL SEC.
ALDOT

ALABAMA DEPARTMENT OF TRANSPORTATION
1409 Coliseum Boulevard
Montgomery, Alabama 36110

Telephone: 334/242-6311 • Fax No.: 334/262-8041

Bob Riley
Governor

Joe McInnes
Transportation Director

November 14, 2008

ENV
Copied 11-26-08

Mr. Jack Edwards
Keep Mobile Moving
P. O. Box 8541
Mobile, AL 36689

Dear Mr. Edwards:

DPI-0030(005) Mobile County
I-10 Mobile River Bridge

Thank you for the time and interest you and the group, Keep Mobile Moving (KMM), have invested in the I-10 Mobile River Bridge project. We always appreciate input from groups like yours that have the potential to improve the quality and value of the decisions we make on projects. However, after careful consideration, we have concluded that the suggested northern alternative is not a viable solution for satisfactorily increasing capacity for the current and projected traffic crossing the Mobile River and will not be carried forward in the Environmental Impact Statement.

Based on the information and comments provided by KMM, the Department does not see where further study of this particular alternate is warranted. We have reviewed the original traffic projections provided by the regional planning commission and the changes suggested by KMM. We have concluded that the northern alternative would not attract enough traffic to alleviate the congestion in the tunnels and provide an acceptable Level of Service in the design year. The additional length of this route would require higher build costs, higher user costs, and more environmental impacts to the Mobile area.

Let me again thank you for your involvement in this project. I know we are both deeply concerned with the future of Mobile and realize that there is a great need for action to resolve the traffic issues this project addresses. We will continue to move forward with the three remaining alternatives to try and reach a solution that will best serve the traveling public and also meet the needs of the City of Mobile. I ask that you and your group remain active participants in this project as we complete the environmental document and seek funding for the ultimate construction of this much needed project.

Sincerely,

D. J. McInnes
Transportation Director

DJM/DWV/WFA/WDH:la
cc: Governor Bob Riley
Mr. D. W. Vaughn
Mr. Vince Calametti
Mr. Mark D. Bartlett, PE
Ms. Ann Bedsole
File

Interoffice MEMO

Contract No. 911600.12 / 911600.10

Project DPI-0030(005)
Mobile River Bridge, I-10
Mobile and Baldwin Counties, Alabama

TO: File

FROM: Skeeter McClure

DATE: December 21, 2000

SUBJECT: Coordination with ADEM Coastal Programs

1. A December 16, 1999 letter from ADEM to ALDOT recommended consultation with ADEM's Coastal Programs' staff on the proposed Mobile River I-10 Crossing and Bayway Widening. This consultation has been initiated.

2. A meeting was held on July 31, 2000 with Mr. Brad Gane and Mr. Allen Phelps of the ADEM Coastal Programs' staff. This was an orientation meeting and an information briefing describing the proposed project was presented. The ADEM staff provided the following observations, concerns, and guidance concerning the proposed project:

   a. Projects that provide regional benefits are provided special consideration by ADEM. A transportation project, such as the proposed I-10 improvements, would provide regional benefits as well as system-wide benefits and thus would receive special consideration.

   b. Impacts to wetlands and/or Submerged Aquatic Vegetation (SAV) are a concern but probably not a "show stopper." Mitigation will be required. Mitigation for marshes and sea grasses cannot be accomplished by monetary contributions (in-lieu fee). ADEM has the authority and responsibility to determine acceptable mitigation.

   c. Dredging and disposal activities associated with redeveloping a construction channel in shallow areas represent one of the biggest environmental challenges for the proposed Bayway widening. The type of dredging and disposal measures utilized can influence the type and severity of impacts.

   d. Best Management Practices (BMPs) will be required. Silt curtains or other barriers to control sediment movement should be considered. Turbidity implications for sea grasses are an area of concern to ADEM.

   e. Water quality monitoring will likely be required. Turbidity must not increase more than 50 NTU above background conditions.

f. D'Olive Creek may represent an opportunity for environmental restoration/mitigation. Captain Hal Pierce, Retired, is a good resource person on D'Olive Creek.

g. The proposed project will require two certificates from ADEM:
Coastal Certification
Section 401 of Clean Water Act Certification

3. On November 15, 2000, Skeeter McClure called Mr. Gane to discuss a construction methodology that would eliminate the necessity for dredging for construction of the Bayway widening. The methodology utilizes segmented barges as a construction platform. In water of sufficient depth the barges float; in shallow areas the barges rest on the bottom. Barge segments are tied together to form a working platform and can be relocated as the construction progresses. Therefore, any impacts are of temporary nature.

4. Mr. Gane stated he would need to know more details, but in general, it appeared this methodology would have much less impact than dredging and disposal activities. He stated that a SAV inventory should be conducted in the shallow areas in order to quantify the amount of SAV present and to determine the densities, types, and habitat values of the SAVs. This information is needed to assess and quantify potential impacts and to determine appropriate mitigation, if required.

5. Mr. Gane stated that regional benefits of the project should be documented.

6. In response to a question concerning ADEM's policy/position on the potential water quality implications of runoff from bridge surfaces, Mr. Gane said he would have to check and get back to us.

7. Mr. Gane believed D'Olive Creek had experienced significant hydrological changes associated with highway construction. This area offers an excellent opportunity for restoration/mitigation measures. ADEM may have programs that could be used to support efforts in this regard. The U.S. Army Corps of Engineers also has environmental restoration programs that might could be used in conjunction with ALDOT and ADEM programs.

8. A draft of this memo was provided to ADEM Coastal Programs. Comments provided by a telephone conversation with Mr. Allen Phelps on December 21, 2000 were incorporated into this memo. Consultation with ADEM Costal Programs will continue as the project develops and more details become available.

rcm

c: Malcolm Beasley
Brett Gaar
Brad Gane, ADEM Coastal Programs
Paul Griggs
Kyle Parker

911600 FILE

February 19, 2001

Contract No. 911600.12

Project DPI-0030(005)
Mobile River Bridge, I-10 Crossing
Mobile and Baldwin Counties, Alabama

RESUME OF WORKSHOP

DATE: February 7, 2001
LOCATION: Government Plaza, Mobile, Alabama
PURPOSE: Interagency Coordination Workshop

ATTENDANCE: **AFFILIATION:** **TELEPHONE:**
See attached list of attendees.

DISCUSSION:

The meeting was opened by Mr. Don Arkle, ALDOT Design Bureau. He welcomed everyone and explained that the purposes of the workshop were to update the agencies on the project activities to date; to share information on internal conclusions that had been reached; to answer questions about the project; and to seek comments, issues, or concerns from the agencies. All attendees introduced themselves and stated their agency affiliation.

Mr. Paul Griggs, Volkert & Associates, Inc. (Volkert), provided a project overview including a discussion of the purpose and need, status of ongoing studies, present alignments and configurations, renderings of the bridge and an overall description of the study area.

Mr. Skeeter McClure, Volkert, presented a discussion of previous coordination activities. He also described the study area. All construction, with the exception of two areas (one on the west and one on the east banks of the Mobile Area), will be conducted within existing ALDOT Rights-of-Way (ROW). Pictures of the 1970's construction channel were presented to illustrate current conditions. The construction channel was dredged to a minimum depth of nine feet and a one hundred twenty-five foot width. A bottom profile taken at high tide in June 2000 revealed that shoaling had occurred in a number of areas, especially adjacent to the rivers which flow through the Bayway. Approximately 1.6 miles of the 7.4-mile construction channel was 3 feet or less in depth. Patches of submerged aquatic vegetation (SAV) and emergent aquatic vegetation were observed in many of the shallow reaches.

Early agency coordination revealed concerns about impacts that would be associated with potential dredging and disposal activities if the construction channel was reestablished. In order to avoid these impacts a construction methodology that did not require dredging was sought and a viable approach was found. The following represents the approach for constructing the Bayway widening:

a. No dredging will be performed.
b. The Bayway will be widened to the inside (two additional lanes on each side plus a shoulder)
c. A construction methodology utilizing segmented barges would be utilized. (The barges can either float if sufficient water depth exists or can rest on the bottom in shallow areas. The barge segments are "leapfrogged" ahead using the construction cranes as the construction progresses. Duration of barge segments in a particular location should not exceed 30 days.)

The workshop was opened for comments, concerns, or questions. The following relate to environmental issues on the project.

- The National Marine Fisheries Service (NMFS) requested information showing the locations and types of SAV and emergent vegetation that are in the project ROW.
- NMFS inquired about bridge runoff - Best Management Practices (BMPs) will be used to control runoff and sediment during construction. A Stormwater General Construction Permit will be required from the Alabama Department of Environmental Management (ADEM) Coastal Programs. Bridge and Bayway surface runoff will be discharged to the ground or water below through scuppers (holes) located at intervals along the roadway shoulders after construction is completed. This is the current practice for the existing Bayway.

A decision has been reached not to pursue a toll plaza for the bridge. The plaza would have been constructed over water and would have been a fairly expansive structure.

There were several questions concerning alternative traffic movements; the 20 year projected project life; and when construction would be initiated. Responses were provided and rationales were discussed. It is anticipated that a Draft Environmental Assessment (EA) will be completed in Fall 2001. Agency input is important to this process. Appreciation was expressed to all attendees. Continued coordination and open dialogue were encouraged.

mdm
Attachment

E:\PROJECTS\900\91600\DOCS\interagency coordination workshop minutes.doc

I-10 Interagency Workshop
February 7, 2001
9:00 a.m.

Name	Representing	Phone
N.D. "Skeeter" McClure	Volkert	(334) 342-1070
Pat McCloud	ALDOT	(334) 242-6633
Bert W. Steen	USFWS	(334) 441-5181
Joe Bearrentine	ALDOT	(334) 242-6149
Terry Robinson	ALDOT	(334) 242-6476
Bill Van Luchene	FHWA	(334) 223-7379
Allen Phelps	ADEM- Coastal Programs	(334) 432-6533
Don Arkle	ALDOT Design	(334) 242-6164
William Adams	ALDOT Location	(334) 242-6488
Kyle Parker	Volkert	(334) 342-1070
Bill Garnett	ALDOT Environmental	(334) 242-6152
Chuck Sumner	US Army Corps of Engineers (Corps)	(334) 694-3792
Lynn Heisler	ALDOT Environmental	(334) 242-6113
Jennifer Robinson	NMFS	(850) 234-5061
Paul Looney	Volkert	(334) 342-1070
Russell Holland	Volkert	(334) 342-1070
Paul Griggs	Volkert	(334) 342-1070
Jackie Glasgow	ALDOT	(334) 470-8220
Steve Hrabovsky	Corps	(334) 690-2872
Brett Gaar	Volkert	(334) 968-7551

EASTERN SHORE MPO

BALDWIN COUNTY SATELLITE COURTHOUSE
1100 FAIRHOPE AVENUE
FAIRHOPE, ALABAMA 36532
TELEPHONE: (251) 990-4640
FAX: 251-580-2590
WWW.EASTERNSHOREMPO.ORG

July 24, 2013

VIA U.S. MAIL:
Vince Calametti, P.E.,
Ninth Division Engineer
1701 West I-65 Service Rd, West
Mobile, Alabama 36618-1109

Re: MPO Letter of Support for the I-10 (Mobile River) Bridge

Dear Mr. Calametti:

The Eastern Shore MPO Policy Board is pleased to issue this letter supporting and endorsing the proposed I-10 (Mobile River) bridge project. As you know, Baldwin County is one of the fastest growing counties in the State of Alabama and ranks among the fastest growing counties in the entire nation. From 2010 to 2011, the Daphne-Fairhope-Foley area ranked second in the nation for the largest population increase in "micro areas."

The Eastern Shore MPO planning area is home to just under half of the entire population of Baldwin County, a large portion of which commute to Mobile on a daily basis. Members of the ESMPO Policy Board recognize that the proposed I-10 bridge will provide a much needed relief to the congestion currently experienced on I-10 between Baldwin County and Mobile County. The Policy Board expresses its full support and urges ALDOT to expedite the proposed I-10 bridge because it also provides valuable evacuation routes and it is extremely important to get this project done. The ESMPO looks forward to assisting ALDOT in advancing this project.

The Eastern Shore MPO also encourages ALDOT to consider adding a multi-modal path to the I-10 bridge if such an addition can be made without hindering the feasibility of the project. The MPO believes that a prominent multi-modal path connecting Mobile and Baldwin Counties would be beneficial to the residents and business owners of both counties.

Thank you for your work and attention to the I-10 bridge project.

Sincerely,

Commissioner Bob James, Chairperson

cc:
Jim Doolin via email
Cal Markert via email
File

Alabama Department of Transportation
Ninth Division
Mr. Ronnie Poiroux, P.E.
1701 West I-65 Service Road North
Mobile, Alabama 36618-9986

ALABAMA DEPARTMENT OF TRANSPORTATION
Project DPI-0030(005)
I-10 Mobile River Bridge and Bayway Widening
Environmental Impact Statement (EIS)
Mobile and Baldwin Counties

Bob Riley
Governor

March 2006 Newsletter

Joe McInnes
Transportation Director

How Much will the Bridge Cost?

Preliminary estimated total costs shown in the table to the right were developed for all 14 of the potential alternatives. These costs were presented at the June 2005 public involvement meetings. Costs were based on the following major items: widening of the I-10 roadway; approach bridges; main span bridges; widening of the I-10 Bayway; anticipated right-of-way acquisition; new interstate construction; interchange modifications; I-65 widening; pier protection; new interchanges; and other features associated with the various alternatives.

Preliminary Costs

Alternative 1: $603 million*	Alternative 8: $973 million
Alternative 2: $660 million*	Alternative 9: $620 million*
Alternative 3: $617 million*	Alternative 10: $2.93 billion
Alternative 4: $1.55 billion	Alternative 11: $1.15 billion
Alternative 5: $973 million	Alternative 12: $1.05 billion
Alternative 6: $972 million	Alternative 13: $1.3 billion
Alternative 7: $1.41 billion	Alternative 14: $760 million

* Alternatives to be evaluated in Draft EIS . Alternative 3 was renamed Alternative A. Alternative 9 was renamed Alternative B. Alternatives 1 and 2 were combined to create Alternative C.

Anticipated Schedule:

- Circulate Draft EIS for Public and Agency Review and Comments: October 2006
- Conduct Public Hearing: November 2006
- Circulate Final EIS for Public and Agency Review and Comments: May 2007

Special Studies to be Conducted

Special studies will be conducted as part of the EIS process. Martin and Associates, a firm specializing in maritime economics, will evaluate the potential direct and indirect (bridge height restrictions) impacts of the alternatives to the maritime industry, including shipbuilding and repair operations, the cruise industry, and other port activities. The University of South Alabama will investigate and document the potential direct and indirect impacts of the alternatives on cultural resources, including historic properties. An air quality analysis, noise study, a hazardous materials assessment, and other environmental studies will be accomplished by Volkert. Wilbur Smith Associates will evaluate the feasibility of initiating a toll to finance the proposed project.

Screening the Alternatives: A Five Step Process

Agencies and the public identified fourteen potential alternatives for the I-10 Mobile River Crossing. The National Environmental Policy Act guidance states that only reasonable alternatives need to be evaluated in an EIS. The fourteen (14) potential alternatives identified by the agencies and public represent a "range of alternatives" that includes both reasonable alternatives that must be explored and objectively evaluated in an EIS, as well as other alternatives that can be eliminated from detailed study with a discussion of the reasons for their elimination. Alternatives must be based on something tangible and must satisfy the purpose and need for the project. In order to be reasonable, alternatives must also be feasible from technical and economic standpoints and make common sense.

Based on this guidance, a screening process was developed to evaluate the fourteen alternatives and determine which ones were reasonable and should be carried forward for detailed studies in the EIS. A five-step approach was utilized to screen all fourteen alternatives. To help ensure that alternatives evaluated were afforded equitable treatment, each alternative was carried through the entire five-step process, and an *Alternatives Screening Evaluation Report* was prepared.

The screening process consisted of the following five steps:

- Ability to meet the purpose and need;
- Technical/practical and feasible considerations;
- Economic costs/savings;
- Estimated construction costs;
- Overall assessment of reasonableness (including environmental resources, cultural resources, relocations, maritime interests, and environmental justice issues).

In addition, the South Alabama Regional Planning Commission conducted computer model runs to project 2030 traffic for Alternatives 1, 2, 3, 5, 6, 9, and 11 utilizing their Mobile Area Transportation Study TRANPLAN Model. According to the model results, Alternatives 1, 2, 3, and 9 (downtown alternatives) would achieve the primary purpose and need of reducing congestion in the Wallace Tunnel. Alternatives 5, 6, and 11 (northern alternatives using the Cochrane-Africatown Bridge) would not divert sufficient traffic to alleviate congestion in the existing I-10 Wallace Tunnel and therefore would not meet the purpose and need.

Nine alternatives (Alternatives 4, 5, 6, 7, 8, 10, 12, 13, and 14) were determined not to be reasonable for a number of reasons, including the following: does not meet the purpose and need for the project; not technically or practically reasonable; unreasonable economic costs; high construction costs; potential for major impacts to environmental resources; would not divert sufficient traffic from the Wallace Tunnel.

Public involvement meetings were held on June 6, 2005 in Mobile and June 7, 2005 in Spanish Fort to present the alternatives and the screening process to the public and to obtain public input. Five alternatives (1, 2, 3, 9, and 11) were presented at the public involvement meetings. Based upon the results of the alternatives screening evaluation process and the public involvement meetings, conclusions regarding the reasonableness of alternatives were made. Alternatives 3, 9, and a combination of 1 and 2 were identified as reasonable alternatives to be studied in detail in the EIS. These alternatives were renamed as Alternatives A, B, and C. Alternatives A, B, and C are shown on Figure 2 of the insert to this newsletter.

Traffic projections indicate that congestion in the Wallace Tunnel will worsen as traffic volumes through the tunnel increase.

A Brief Background

Old City Hall is a National Historic Landmark listed on the National Register of Historic Places.

In 1999, the Alabama Department of Transportation contracted with Volkert & Associates, Inc., to conduct a corridor study and prepare an Environmental Assessment (EA) on the proposed project. The EA studied Alternative 3, the northernmost alternative from the Feasibility Study completed in 1997, and the No Build alternative in detail. FHWA signed the EA on June 9, 2003; the EA was circulated for public review and comment; and Public Hearings were held in August 2003 in Mobile and Daphne. Following approval of the EA, controversy existed regarding the potential impacts of the proposed bridge on cultural resources and potential impacts to the maritime industry. Due to concerns expressed, including visual impacts of the bridge on historic properties, including a National Historic Landmark (Old City Hall), the FHWA issued a Notice of Intent to prepare an EIS for the project. As discussed on the previous page, an alternatives screening process has been conducted, and environmental and engineering studies on the reasonable alternatives are currently underway.

Purpose and Need

The purpose and need of the project primarily consists of two components: 1) provide additional capacity for traffic utilizing I-10 between Canal Street in Mobile and the US 98/I-10 interchange in Daphne and 2) accommodate vehicles transporting hazardous materials. The four lanes of the Wallace Tunnel and I-10 Bayway are currently the primary constraints to traffic flow along I-10 in Mobile and Baldwin Counties. Travelers along this route during the summer season or during peak hour traffic experience the frustrating stop-and-go traffic back-ups in the vicinity of the Wallace Tunnel. A summary of traffic data for the Wallace Tunnel is shown on Figure 1 (see insert). Figure 1 illustrates the actual Average Daily Traffic (ADT) counts for the Wallace Tunnel from its opening day in 1973 to 2005. The figure also displays projected traffic volumes through 2030. The Wallace Tunnel reached a Level of Service F (LOS F) capacity at 63,000 ADT in 2004. Congestion will be exacerbated as traffic volumes increase over time.

Hazardous materials are currently prohibited from using the Wallace Tunnel. Consequently, vehicles with hazardous cargo travel a detour length of 10.5 miles through the Mobile Central Business District via Water Street. In 2003, an average of 350 hazardous material trucks per day were detoured around the tunnels. By 2020, this average is projected to increase to 470 trucks per day. A new bridge would eliminate the hazardous materials detour which would result in reduced truck travel time representing an estimated cost savings of $1 million per year, as well as a reduced risk for accidental spills, decreased noise, and improved air quality in the Central Business District.

The Visual Appearance of A Bridge—A Matter of Perspective

The Ravenel Bridge in Charleston, South Carolina, was designed to blend with the city's historic traits.

Would a tall bridge in proximity to downtown Mobile be an eyesore or a spectacular visual attraction? The answer could well be in the "eye of the beholder." The historic city of Charleston, South Carolina, is celebrating its new bridge that is similar in size and appearance to the proposed I-10 Mobile River Bridge. The following observations have been made regarding the new Ravenel Bridge in Charleston:

- "The new Arthur Ravenel Jr. Bridge opened on July 16, 2005—four years after breaking ground, one year ahead of schedule and on budget. The structure's 575-foot-high towers and bright white cables have changed Charleston's skyline. With eight lanes and a 12-foot-wide bicycle and pedestrian lane that offers a spectacular 200-foot-high view of the Charleston Harbor and peninsula, the bridge has become a major tourist attraction" (Source: *SAME Military Engineer*, November-December 2005).
- "The main goal of the architectural design is to create a timeless landmark that will praise and pay homage to the historic city of Charleston and Mount Pleasant" (Source: *www.donaldmacdonaldarchitects.com, 10/27/05*).
- " . . . the new bridge will evoke a sail motif over the river to compliment the nearby harbor and waterfront park" (Source: *www.donaldmacdonaldarchitects.com, 10/27/05*).

Mobile's new cruise terminal is operational, and the RSA Tower is expected to be complete in 2006. (Graphic provided by Thompson Engineering)

Changes for Downtown Mobile and Its Waterfront

Downtown Mobile and its waterfront are a composite of historic and modern structures. The following actions independently and collectively do, or would, contribute to the overall visual appearance of downtown Mobile and its waterfront. The $20 million cruise ship terminal, parking deck, and gangway at Mobile Landing were placed in operation in October 2004, to accommodate the Carnival *Holiday*. The RSA Battle House Tower, under construction, will be the tallest building in Alabama, at 745 feet, when completed. The estimated completion date is 2006. Other actions being planned or considered include the maritime center and welcome center adjacent to the Mobile River at Mobile Landing; the pedestrian bridge from Church Street across Water Street to Mobile Landing; the pedestrian ferry terminal at Mobile Landing; Water Street Landing condominium and retail complex, including three condominiums towers. Across the Mobile River, Austal USA opened its 120-foot-high ship shed in November 2005. Therefore, the visual setting for a proposed I-10 Bridge is diverse and dynamic.

I-10 Wallace Tunnel Congestion is not Just a Local Issue

Eight state Departments of Transportation (DOTs) recently conducted a National I-10 Freight Corridor Study. ALDOT joined with DOTs from California, Arizona, New Mexico, Texas, Louisiana, Mississippi, and Florida to analyze current and projected freight movements; assess how the current and future freight volumes impact national and local transportation systems; and develop strategies for improving freight flow along the I-10 corridor.

> **"**The I-10 Tunnel in Mobile is a major bottleneck and presents a threat to public safety, as well as to the vitality of the local, regional, and national economy." *(Source: The National I-10 Freight Corridor Study, 2003)*

The following findings are particularly relevant to the need to alleviate congestion in the I-10 Wallace Tunnel:

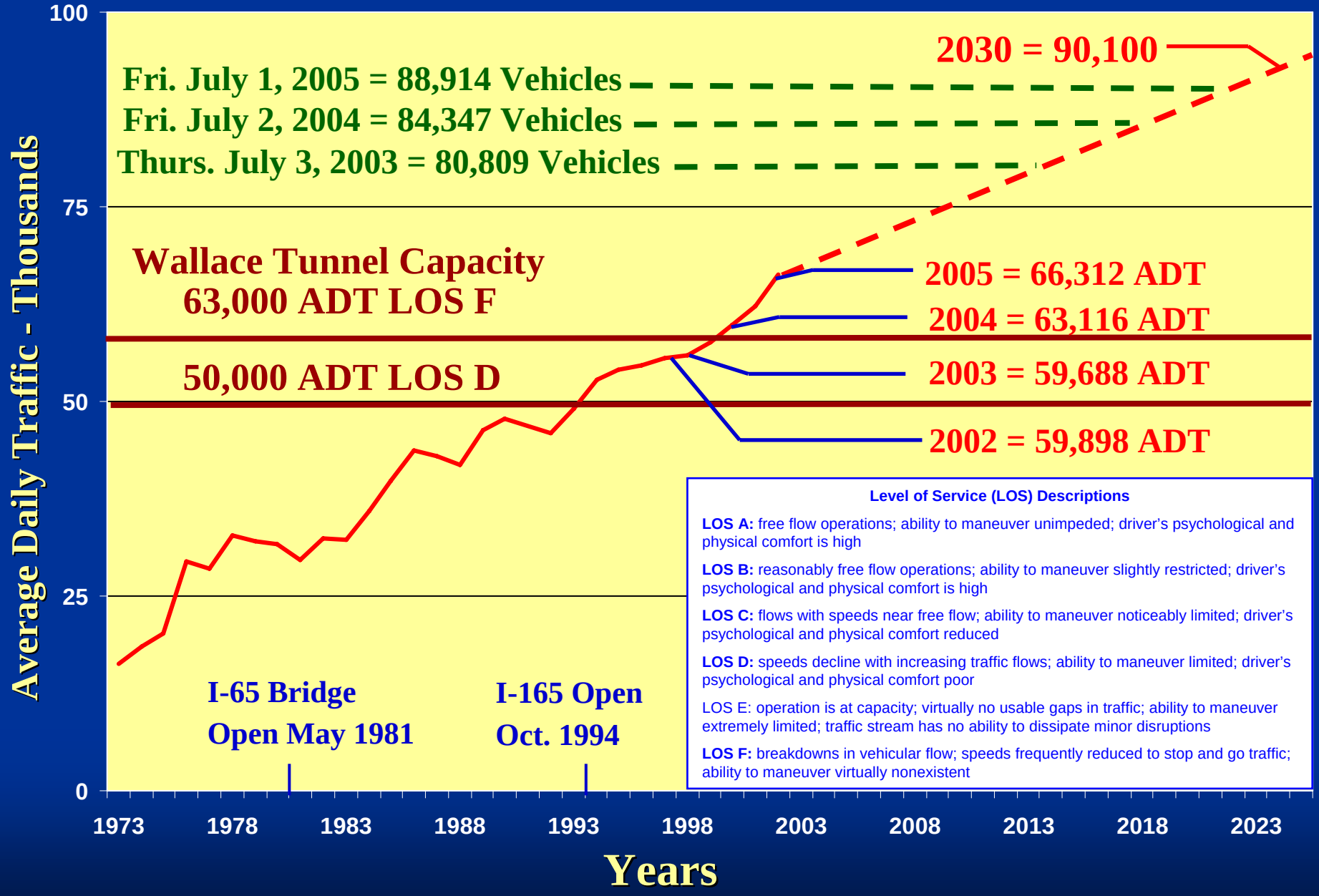
- Freight transportation is central to the performance of the U.S. economy, and a key contributor to U.S. competitiveness in the global marketplace.
- The continued trend toward a service economy, where reliability is essential, will increase the volume of freight traffic on highways at a projected pace nearly twice that of automotive traffic by 2025.
- Highways are essential to the efficiency of other freight transportation system elements, including ports, inland waterways, and railroads.
- Increasing capacity in high-volume corridors is the single best method for lowering highway congestion.
- Issues related to the demand for freight transportation transcend urban and state jurisdictions.

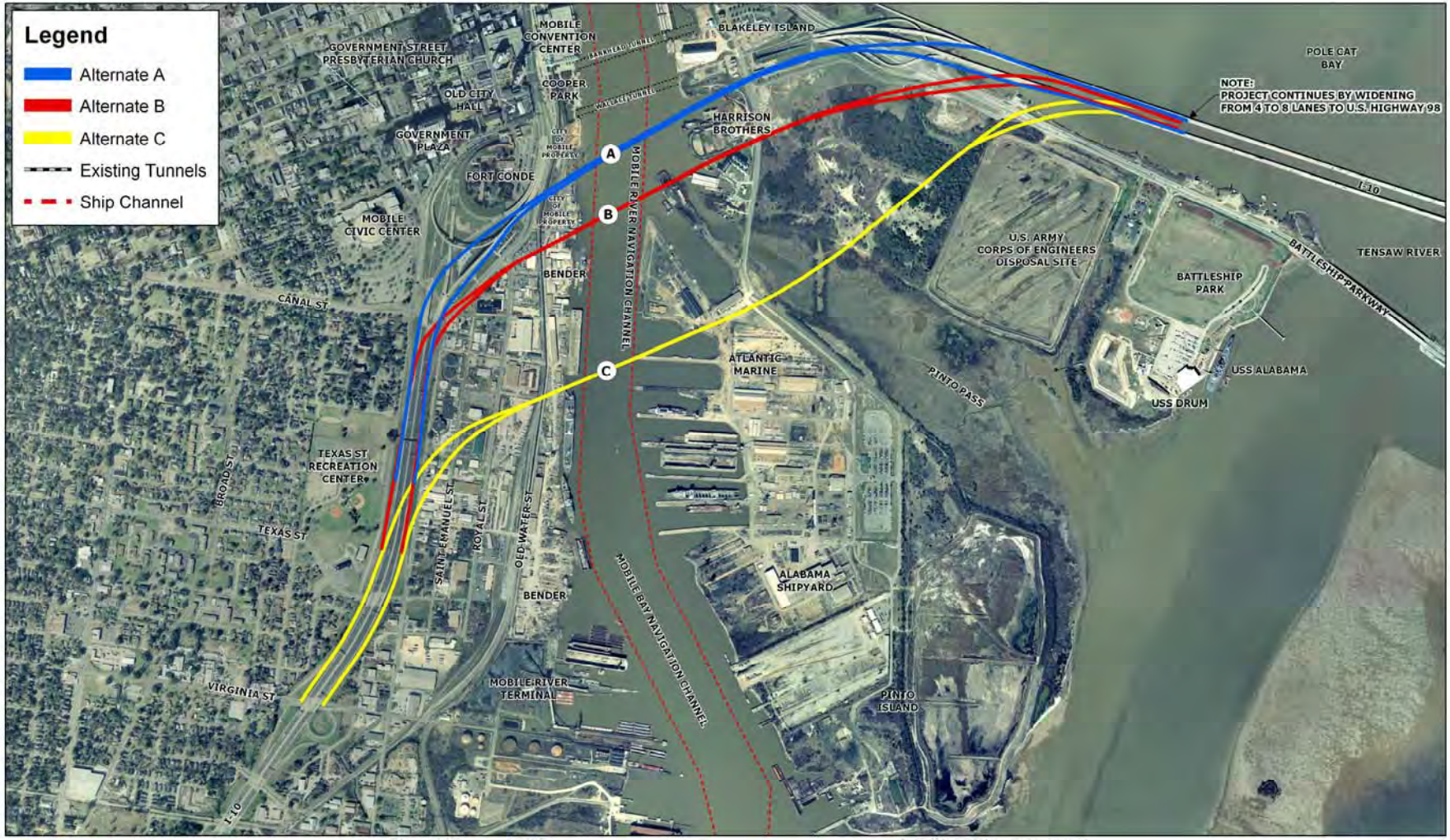
In its 2005 report to the USDOT on Transportation Infrastructure (Meeting the Needs for Economic Growth), the University of Alabama in Huntsville, Office for Economic Development stated: "The efficient and effective movement of freight is a critical component in the transformation and growth of the Alabama economy."

Please send comments to:

Mr. Ronnie Poiroux, P.E.
Division Engineer
ALDOT, Ninth Division
1701 West I-65 Service Road North
Mobile, Alabama 36618-9986

Figure 1: Wallace Tunnel Traffic 1973-2030





VOLKERT & ASSOCIATES, INC.

0 500 1,000 2,000 Feet

1 inch equals 1,000 feet

Note: This map is for presentation use only and not to be used for construction purposes.

Figure 2
Mobile River I-10 Bridge
Reasonable Alternatives
PROJECT DPI-0030(005)

From:	Kevin Harrison
To:	"Skeeter McClure"
Cc:	"Buddy Covington"; "David Webber"; henrymalec@aol.com; "Overstreet, Christy"; Tom Piper
Subject:	RE: Public Involvement meetings for TIP and LRTP that included the proposed I-10 MRB and Bayway Widening
Date:	Friday, September 27, 2013 4:12:15 PM
Attachments:	bridge.docx

Please a find attached information concerning public involvement as it pertains to Mobile MPO and the I-10 Mobile River Bridge and the Mobile TIP And LRTP. Please let me know if there is anything else you need. Thank you.

Kevin A. Harrison, PTP
Director, Transportation Planning
SARPC
110 Beauregard St. Suite 207
Mobile, AL 36602
251.706.4635

March 19th, 1997 The Mobile Transportation Improvement Program (TIP) was modified in a publicly advertised Mobile MPO meeting, to include a Special Innovative Project for Feasibility Study for I-10 Mobile River Bridge. This item on the agenda was published in the Mobile Press for a minimum of two weeks.

June 11th, 1997 Volkert presented I-10 Mobile River bridge project to the Mobile MPO at a publically advertised meeting

October 20th, 1997 I-10 Bridge Feasibility Study Draft and Public Meeting at Government Plaza 5:30-7:30 PM. The full draft document was available to public and advertised as such at various places around Mobile County for over a month (starting September 23, 1997).

February 23, 2000, Mobile MPO adopted the 2025 Long Range Transportation Plan (LRTP) which included the I-10 Mobile River Bridge. The document was advertised and available for public review for 30 days at numerous areas within the study area.

February 16th 2005 Public meeting was held concerning the 2030 LRTP which included the I-10 Mobile River Bridge. During this time the document was out for public review at almost 40 locations around Mobile County. The document was adopted at a publically advertised meeting by the Mobile MPO on February 23rd, 2005.

June 1, 2005 The Mobile 2030 LRTP was modified to include a small section of SR188 (exclusive of the bridge). This LRTP included the I-10 Mobile River Bridge and publically advertised and available for 30 days prior to adoption on June 1, 2005.

September 7, 2005 Adoption of FY 2006-2010 Transportation Improvement Program (TIP) in a publicly advertised Mobile MPO meeting. This item on the agenda was published in the Mobile Press for a minimum of two weeks and document was available for review at almost 40 places around Mobile County. The FY2006-2010 TIP included projects for I-10 Mobile River Bridge FR W of Broad St to E of SR16 US90 @ Spanish Fort:[100041588 PE $1,000,000], [100016575 UT $2,700,000], [100043177RW$2,000,000], [100016411CN $180,000,001] These projects remain in the TIP today, and in one form or another been included in every TIP that is out for public review and advertised since.

March 7, 2007 The Mobile MPO staff conducted and publically advertised Open House which was just an informative public meeting as to what the MPO does, federal funding, state funding and projects included the TIP and LRTP. This Open House included dialogue concerning the I-10 Mobile River Bridge.

August 29th, 2007 the Mobile MPO FY 2008-2012 Transportation Improvement Program was adopted. Prior to that is published in the Mobile Press for a minimum of two weeks that documents were available for review at almost 40 places around Mobile County. This TIP included projects for I-10

Mobile River Bridge FR W of Broad St to E of SR16 US90 @ Spanish Fort: :[100041588 PE $1,216,653], [100016575 UT $3,284,963], [100043177RW $2,433,306], [100016411CN $260,607,052]

April 17th 2008 The Mobile MPO staff conducted and publically advertised Open House which was just an informative public meeting as to what the MPO does, federal funding, state funding and projects included the TIP and LRTP. This Open House included dialogue concerning the I-10 Mobile River Bridge.

April 8th, 2009 The Mobile MPO staff conducted and publically advertised Open House which was just an informative public meeting as to what the MPO does, federal funding, state funding and projects included the TIP and LRTP. This Open House included dialogue concerning the I-10 Mobile River Bridge.

January 10, 2010 the Mobile MPO FY 2008-2012 REBALANCED Transportation Improvement Program was adopted. Prior to that is published in the Mobile Press for a minimum of two weeks that documents were available for review at almost 40 places around Mobile County. This TIP included projects for I-10 Mobile River Bridge FR W of Broad St to E of SR16 US90 @ Spanish Fort: :[100041588 PE $1,124,864], [100043177RW $4,064,650]

February 3rd, 2010 Public meeting was held concerning the 2035 LRTP which included the I-10 Mobile River Bridge. During this time the document was out for public review at almost 40 locations around Mobile County. The document was adopted at a publically advertised meeting by the Mobile MPO on February 24rd, 2010.

August 10, 2011 the Mobile MPO FY 2012-2016 Transportation Improvement Program was adopted. Prior to that is published in the Mobile Press for a minimum of two weeks that documents were available for review at almost 40 places around Mobile County. This TIP included projects for I-10 Mobile River Bridge FR W of Broad St to E of SR16 US90 @ Spanish Fort: :[100041588 PE $1,124,864], [100043177RW $4,064,650]

April 13th, 2011 The Mobile MPO staff conducted and publically advertised Open House which was just an informative public meeting as to what the MPO does, federal funding, state funding and projects included the TIP and LRTP. This Open House included dialogue concerning the I-10 Mobile River Bridge.

June 6th, 2012 High Priority Funding (HPP) project 100058679 ROW I-10 Mobile River Bridge Protective Acquisition of two properties: 257 S. Royal St. and 265 and S. Water St. $3,8000,000 This was advertised including a memorandum to the Press Register concerning items on the MPO meeting agenda. These properties were adopted in a publically advertised meeting of the Mobile MPO on June 6th, 2012

RUSSELL THOMPSON BUTLER & HOUSTON, LLP

June 27, 2014

Vince Calamutti

Mr. John R. Cooper, Director
Alabama Department of Transportation
P.O. Box 303050
Montgomery, Alabama 36130-3050

RE: Interstate 10 (I-10) Mobile River Bridge / Bay Way Widening Project

Dear Mr. Cooper:

I am writing to express my support for the proposed I-10 Mobile River Bridge project. As South Alabama wrestles with ever increasing traffic congestion along the Interstate 10 corridor, this major bottleneck continues to threaten public safety, as well as the vitality of our local and regional economy.

While many years have been spent assessing the need for the I-10 transportation enhancement, it is vitally important that we continue working in pursuit of this needed infrastructure improvement. Interstate 10 serves the southern tier of the United States by providing the main east-west link in the Interstate Highway System. Viewed by many as a regional asset, we must solve the serious economic, environmental and transportation problems caused by the overwhelmed I-10 Bridge.

As a weekend visitor to Baldwin County, I must plan my trips around the expected east bound traffic congestion each Friday and again the westbound traffic on Sunday afternoon. This is not a very productive or efficient use of time. I also have acquaintances from Louisiana who constantly complain about the delays they experience traveling to our gulf coast. Over time, I have little doubt that this serious congestion will have a negative economic impact on the tourism industry in this state.

3605 Springhill Business Park, Mobile, Alabama 36608
251.473.5550 P 251.473.8026 F RTBH.COM

There are few decisions more critical to the region's future than those related to planning and funding for the I-10 Mobile River Bridge!

Sincerely yours,

Mike Thompson

Michael C. Thompson, CPA, CCIFP
Partner

MCT:lgn

RUSSELL THOMPSON BUTLER & HOUSTON, LLP

June 30, 2014

Governor Robert Bentley
600 Dexter Avenue
Montgomery, AL 36130

RE: Interstate 10 (I-10) Mobile River Bridge /
Bay Way Widening Project

Dear Governor Bentley:

I am writing to express my support for the proposed I-10 Mobile River Bridge project. As South Alabama wrestles with ever increasing traffic congestion along the Interstate 10 corridor, this major bottleneck continues to threaten public safety, as well as the vitality of our local and regional economy.

While many years have been spent assessing the need for the I-10 transportation enhancement, it is vitally important that we continue working in pursuit of this needed infrastructure improvement. Interstate 10 serves the southern tier of the United States by providing the main east-west link in the Interstate Highway System. Viewed by many as a regional asset, we must solve the serious economic, environmental and transportation problems caused by the overwhelmed I-10 Bridge.

As a weekend visitor to Baldwin County, I must plan my trips around the expected east bound traffic congestion each Friday and again the westbound traffic on Sunday afternoon. This is not a very productive or efficient use of time. I also have acquaintances from Louisiana who constantly complain about the delays they experience traveling to our gulf coast. Over time, I have little doubt that this serious congestion will have a negative economic impact on the tourism industry in this state.

3605 Springhill Business Park, Mobile, Alabama 36608
251.473.5550 P 251.473.8026 F RTBH.COM

There are few decisions more critical to the region's future than those related to planning and funding for the I-10 Mobile River Bridge!

Sincerely yours,

Mike Thompson

Michael C. Thompson, CPA, CCIFP

MCT:lgn

OFFICE OF THE GOVERNOR

ROBERT BENTLEY
GOVERNOR

STATE CAPITOL
MONTGOMERY, ALABAMA 36130

(334) 242-7100
FAX: (334) 242-3282

STATE OF ALABAMA

July 2, 2014

Mr. Michael C. Thompson
Russell, Thompson, Butler, & Houston, LLP
3605 Springhill Business Park
Mobile, AL 36608-1239

Dear Mr. Thompson:

Thank you for contacting my office regarding the I-10 Mobile River Bridge/Bay Way Widening Project.

I have directed my staff to forward your correspondence to Mr. John Cooper, Director of the Alabama Department of Transportation. I am confident that Mr. Cooper and his staff will review your concerns and respond accordingly.

Should you have any additional questions or comments, please contact Mr. Cooper at (334) 242-6311. Again, thank you for sharing your concerns with me.

If I can be of assistance to you in any other matter, please do not hesitate to contact my office.

Sincerely,

Robert Bentley

Robert Bentley
Governor

RB/pb/dr

CC: Alabama Department of Transportation

Vince Calamotti

Mr. John R. Cooper, Director
Alabama Department of Transportation
P.O. Box 303050
Montgomery, Alabama 36130-3050

RE: Interstate 10 (I-10) Mobile River Bridge / Bay Way Widening Project

Dear Director Cooper,

On behalf of Thompson Engineering, Inc., we are writing to express our support for the proposed I-10 Mobile River Bridge project. As South Alabama wrestles with ever increasing traffic congestion along the Interstate 10 corridor, this major bottleneck continues to threaten public safety, as well as the vitality of our local and regional economy.

While many years have been spent assessing the need for the I-10 transportation enhancement, it is vitally important that we continue working in pursuit of this needed infrastructure improvement. Interstate 10 serves the southern tier of the United States by providing the main east-west link in the Interstate Highway System. Viewed by many as a regional asset, we must solve the serious economic, environmental and transportation problems caused by the overwhelmed I-10 Bridge.

Personally, the congestion has had an adverse effect in several instances. One I can think of in particular, happened on a Friday evening around 5:30pm (rush hour traffic) on my way home from the office in Mobile to my residence in Daphne. It was raining and I had just come out of the Wallace Tunnel heading east on the Bay Way. I had a blowout right around the mile marker in front of the Battleship. The wrecker sent to assist and tow my vehicle couldn't get to me for almost two hours due to the traffic. You cannot imagine how frazzled I was, having to sit, helpless, on the side of the Bay Way waiting, as traffic sped by.

Almost any day of the week, including Saturday and Sunday in the summer time, guarantees a half hour trip across the bay in either direction will become a two hour endeavor. Rush hour usually begins about 3:00 in the afternoon. If it is a holiday weekend, you can guarantee you will be sitting in traffic for at least three hours to get through the Wallace Tunnel to get across the bay.

My drive across the bay to work is only 26 miles. However, it takes me almost an hour to travel, regardless of whether I choose to take the Bay Way or the Causeway. Once there was an accident on the Bay Way and the Causeway became so congested, I had to take Hwy 225 up to I-65 to get around. This was a significant amount of miles, time, and gas out of the way.

Having to go into the office later or leave the office earlier just to avoid the congested traffic results in less productivity, higher levels of stress and inefficiency, and very unhappy residents.

There are few decisions more critical to the region's future than those related to planning and funding for the I-10 Mobile River Bridge!

Sincerely yours

Carole Huseman
Assistant Controller

OFFICE OF THE GOVERNOR

ROBERT BENTLEY
GOVERNOR

STATE CAPITOL
MONTGOMERY, ALABAMA 36130

(334) 242-7100
FAX: (334) 242-3282

STATE OF ALABAMA

July 8, 2014

Ms. Carole Huseman
Assistant Controller
Thompson Engineering, Inc.
2970 Cottage Hill Road, Suite 190
Mobile, AL 36606-4749

Dear Ms. Huseman:

Thank you for contacting my office regarding the I-10 Mobile River Bridge/Bay Way Widening Project.

I have directed my staff to forward your correspondence to Mr. John Cooper, Director of the Alabama Department of Transportation. I am confident that Mr. Cooper and his staff will review your concerns and respond accordingly.

Should you have any additional questions or comments, please contact Mr. Cooper at (334) 242-6311. Again, thank you for sharing your concerns with me.

If I can be of assistance to you in any other matter, please do not hesitate to contact my office.

Sincerely,

Robert Bentley

Robert Bentley
Governor

RB/pb/dr

CC: Alabama Department of Transportation

Alabama AGC
Associated General Contractors of America
Mobile Section
754 Downtowner Loop West, Mobile, Alabama 36609
Telephone 251-344-8220 Fax 251-342-5575 Email charlotte@agcmobile.org
www.ALAGC.org www.theconstructioncenter.org

June 30, 2014

Governor Robert Bentley
600 Dexter Avenue
Montgomery AL 36130

RE: Interstate 10 (I-10) Mobile River Bridge / Bay Way Widening Project

Dear Governor Bentley,

As we approach the 4th of July holiday – South Alabama becomes ever mindful of the inevitable congestion at the I-10 Tunnel!!! On behalf of AlabamaAGC - Mobile Section, I am writing to express the Association's *continued* support for the proposed I-10 Mobile River Bridge project. As South Alabama wrestles with ever increasing traffic congestion along the Interstate 10 corridor, this major bottleneck continues to threaten public safety, as well as the vitality of our local and regional economy.

While many years have been spent assessing the need for the I-10 transportation enhancement, it is vitally important that we continue working in pursuit of this needed infrastructure improvement. Interstate 10 serves the southern tier of the United States by providing the main east-west link in the Interstate Highway System. Viewed by many as a regional asset, we must solve the serious economic, environmental and transportation problems caused by the overwhelmed I-10 Bridge.

Since I represent Mobile County as well as Baldwin County I spend a great deal of time driving to and from Baldwin County. Trying to get out of Mobile on Fridays when many Mobile residents travel to the Beaches has become a traffic nightmare and is extremely non-productive. Sooner or later this traffic problem will have a negative economic effect – loss of tourism, loss of industry (new and existing) and loss of residents. There are few decisions more critical to the region's future than those related to planning and funding for the I-10 Mobile River Bridge!

I implore you to do what you can to move this project forward.

Sincerely yours,

Charlotte Kopf
Manager
Mobile Section, AlabamaAGC

OFFICE OF THE GOVERNOR

ROBERT BENTLEY
GOVERNOR

STATE CAPITOL
MONTGOMERY, ALABAMA 36130

(334) 242-7100
FAX: (334) 242-3282

STATE OF ALABAMA

July 2, 2014

Ms. Charlotte Kopf, Manager
Alabama AGC - Mobile Section
754 Downtowner Loop West
Mobile, AL 36609-5504

Dear Ms. Kopf:

Thank you for contacting my office regarding the I-10 Mobile River Bridge/Bay Way Widening Project.

I have directed my staff to forward your correspondence to Mr. John Cooper, Director of the Alabama Department of Transportation. I am confident that Mr. Cooper and his staff will review your concerns and respond accordingly.

Should you have any additional questions or comments, please contact Mr. Cooper at (334) 242-6311. Again, thank you for sharing your concerns with me.

If I can be of assistance to you in any other matter, please do not hesitate to contact my office.

Sincerely,

Robert Bentley

Robert Bentley
Governor

RB/pb/dr

CC: Alabama Department of Transportation

MOBILE, AL
2485 Burden Lane
Mobile, AL 36617
251.473.6000

BATON ROUGE, LA
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BEAUMONT, TX
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Beaumont, TX 77705
409.729.4444

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July 1, 2014

Mr. John R. Cooper, Director
Alabama Department of Transportation
P.O. Box 303050
Montgomery, Alabama 36130-3050

RE: Interstate 10 (I-10) Mobile River Bridge / Bay Way Widening Project

Dear Mr. Cooper,

On behalf of S&S Sprinkler Company, I am writing to express our support for the proposed I-10 Mobile River Bridge project. As South Alabama wrestles with ever increasing traffic congestion along the Interstate 10 corridor, this major bottleneck continues to threaten public safety, as well as the vitality of our local and regional economy.

While many years have been spent assessing the need for the I-10 transportation enhancement, it is vitally important that we continue working in pursuit of this needed infrastructure improvement. Interstate 10 serves the southern tier of the United States by providing the main east-west link in the Interstate Highway System. Viewed by many as a regional asset, we must solve the serious economic, environmental and transportation problems caused by the overwhelmed I-10 Bridge.

A number of our employees live in Baldwin County and commute to Mobile every day. Often they are late arriving to work due to accidents on the Bayway or in the tunnels and congestion on the Causeway, as it is the only alternate route. Many times they are delayed in making it home after work due to the same issues. These employees dread driving home the day before a holiday as they already know it will be long, slow ride.

It is incredibly unproductive to be tied up needlessly in traffic. Sooner or later this traffic problem will have a negative economic effect such as loss of tourism, loss of industry, and loss of residents. There are few decisions more critical to the region's future than those related to planning and funding for the I-10 Mobile River Bridge.

Sincerely,

Parks Moore
CEO

MOBILE, AL
2485 Burden Lane
Mobile, AL 36617
251.473.6000

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14054 Jefferson Highway
Baton Rouge, LA 70817
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SERVICES Automatic Fire Sprinkler | Fire Suppression | Alarm & Notification | Integrated Security Systems

July 1, 2014

Governor Robert Bentley
600 Dexter Avenue
Montgomery, Alabama 36130

RE: Interstate 10 (I-10) Mobile River Bridge / Bay Way Widening Project

Dear Governor Bentley,

On behalf of S&S Sprinkler Company, I am writing to express our support for the proposed I-10 Mobile River Bridge project. As South Alabama wrestles with ever increasing traffic congestion along the Interstate 10 corridor, this major bottleneck continues to threaten public safety, as well as the vitality of our local and regional economy.

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Sincerely,

Parks Moore
CEO

OFFICE OF THE GOVERNOR

ROBERT BENTLEY
GOVERNOR

STATE CAPITOL
MONTGOMERY, ALABAMA 36130

(334) 242-7100
FAX: (334) 242-3282

STATE OF ALABAMA

July 8, 2014

Parks Moore
CEO
S&S Sprinkler Company, LLC
PO Box 7453
Mobile, AL 36670-0453

Dear Parks:

Thank you for contacting my office regarding the I-10 Mobile River Bridge/Bay Way Widening Project.

I have directed my staff to forward your correspondence to Mr. John Cooper, Director of the Alabama Department of Transportation. I am confident that Mr. Cooper and his staff will review your concerns and respond accordingly.

Should you have any additional questions or comments, please contact Mr. Cooper at (334) 242-6311. Again, thank you for sharing your concerns with me.

If I can be of assistance to you in any other matter, please do not hesitate to contact my office.

Sincerely,

Robert Bentley

Robert Bentley
Governor

RB/pb/dr

CC: Alabama Department of Transportation

thompson
ENGINEERING

Governor Robert Bentley
600 Dexter Avenue
Montgomery AL 36130

June 30, 2014

RE: Interstate 10 (I-10) Mobile River Bridge / Bay Way Widening Project

Dear Governor Bentley:

On behalf of Thompson Engineering, Inc. I am writing to express our support for the proposed I-10 Mobile River Bridge project. As South Alabama wrestles with ever increasing traffic congestion along the Interstate 10 corridor, this major bottleneck continues to threaten public safety, as well as the vitality of our local and regional economy.

While many years have been spent assessing the need for the I-10 transportation enhancement, it is vitally important that we continue working in pursuit of this needed infrastructure improvement. Interstate 10 serves the southern tier of the United States by providing the main east-west link in the Interstate Highway System. Viewed by many as a regional asset, we must solve the serious economic, environmental and transportation problems caused by the overwhelmed I-10 Bridge.

It is embarrassing as a Mobile resident to hear all of the negative remarks about the I-10 Interstate Highway bottle neck at Mobile, Alabama and not be able to state a positive fact about the action being taken about the resolution of the problem. This bridge has been studied to death and what we need is action now! If the various organizations controlling the fate of this project said tomorrow it is approved and funded it would take 3-5 years to open the new bridge and accompanying roadway widening. How much aggravation, time wasted which calculates into productivity and dollars for commercial vehicles traveling this route, and time that could be spent in quality of life time for vacationers and local residents do we have to stand to get this project underway? This traffic nightmare will only get worse as time moves forward and traffic counts increase.

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A THOMPSON HOLDINGS COMPANY

There are few decisions more critical to the region's future than those related to planning and funding for the I-10 Mobile River Bridge!

Sincerely yours,

Paul W. Klotz

Manager of Business Development

Thompson Engineering, Inc.

Happy 4th of July!

OFFICE OF THE GOVERNOR

ROBERT BENTLEY
GOVERNOR

STATE CAPITOL
MONTGOMERY, ALABAMA 36130

(334) 242-7100
FAX: (334) 242-3282

STATE OF ALABAMA

July 8, 2014

Mr. Paul W. Klotz
Manager of Business Development
Thompson Engineering, Inc.
2970 Cottage Hill Road, Suite 190
Mobile, AL 36606-4749

Dear Mr. Klotz:

Thank you for contacting my office regarding the I-10 Mobile River Bridge/Bay Way Widening Project.

I have directed my staff to forward your correspondence to Mr. John Cooper, Director of the Alabama Department of Transportation. I am confident that Mr. Cooper and his staff will review your concerns and respond accordingly.

Should you have any additional questions or comments, please contact Mr. Cooper at (334) 242-6311. Again, thank you for sharing your concerns with me.

If I can be of assistance to you in any other matter, please do not hesitate to contact my office.

Sincerely,

Robert Bentley

Robert Bentley
Governor

RB/pb/dr

CC: Alabama Department of Transportation