



PLANNING AND ENVIRONMENTAL LINKAGES TECHNICAL WORK GROUP MEETING #1 COMMENT DOCUMENTATION



CA0602

Interstate 530 – Highway 67

April 2015



Arkansas State Highway & Transportation Department





CAP Deliverable QC Comment Review Form

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** AHTD/FHWA

Cmnt No.	Section/ Page No.	Reviewer	Review Comment	Response	Change Verified		Agency Verified **
					New Pg.	Initials / Date	
1	Email 7/9/14	Martello, Michael Little Rock School District	LRSD has one question. How many lanes are going to remain open during construction of the I-30 bridge.	Although it is unknown how many lanes would remain open during construction because alternatives have not been developed yet, traffic flow on I-30 would be maintained during construction. The number of lanes remaining open to traffic would depend on if the I-30 bridge is rehabilitated and/or widened or replaced. For example, if a widening alternative is recommended, it is possible that the existing 6-lane bridge could be temporarily reduced to 4-lanes during construction, assuming no shift in the centerline of the bridge and that widening would take place on both sides. The number of lanes remaining open could be different given a shift in the centerline or if widening were to occur primarily on one side. If a replacement alternative is recommended, it is possible that all six lanes could remain open while a new bridge is constructed.	N/A	JLH / 8/21/14 & 8/25/14	✓



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2	Email 7/7/14	Malone, Walter City of LR Planning and Develop.	We believe you are missing a couple National Register Districts between the River and MacArthur Park check the map on our site http://www.littlerock.org!/userfiles/editor/docs/planning/hdc/HDC%20nr%20dist%20map%202013.pdf .	The study area for the cultural resources analysis, also known as the area of potential effect (APE), was a 100-foot buffer on either side of I-30 and I-40 from the existing ROW. All historic districts within and intersecting the 100-foot APE were included in the constraints analysis and mapping. The suggested website was reviewed and the historic districts of Tuf Nut and Markham Street were identified to be located outside of the cultural resources APE, but within the larger I-30 PEL study area boundary. For mapping purposes, Tuf Nut and Markham Street historic districts were added to the constraints mapping. However, because these historic districts are outside of the APE evaluated by AHTD and the State Historic Preservation Officer (SHPO), no change was made to the cultural resources analysis included in the constraints technical report.	N/A	JLH / 8/21/14 & 8/25/14	✓
3	Email 7/7/14	Malone, Walter	We would also like to make sure you are looking at Charter Schools in or near the area, not just LRSD and NLRSD campuses.	An online search for charter schools in the study area was conducted and none were identified within the study area. In addition, the Study Team reached out the Mr. Gary Newton with Arkansas Learns to identify any existing or potential locations for future charter schools in the study area. Mr. Newton responded with the following two nearby Charter Schools, however, both were determined to be located outside of the study area: (1) eStem Public Charter School at 112 3rd Street, Little Rock, AR 72201 (0.5 mile from I-30) and (2) Little Rock Preparatory Charter School at 1616 S. Spring St., Little Rock, AR 72207 (0.8 mile from I-30). Because these charter schools are located outside of the I-30 PEL study area, no change has been made to the constraints mapping or constraints technical report.	N/A	JLH / 8/21/14 & 8/25/14	✓



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4	Email 7/7/14	Malone, Walter	If you have not talked with the Ward 1 representative Erma Hendricks (sic). It was be wise to make contact, at least informational.	The Study Team attempted to contact Ms. Hendrix on 8/14/14. A voice mail was left notifying Ms. Hendrix about the I-30 PEL Study public meeting in Little Rock and an offer was extended to visit with Ms. Hendrix one-on-one should she have questions/comments. As the City Director for Ward 1 of Little Rock, Ms. Hendrix was sent a letter notifying her of the initiation of the I-30 PEL Study and providing background details relating to the study. Additionally, Ms. Hendrix was also mailed a public officials letter notifying her of the first two public meetings planned for August 12 in North Little Rock and August 14 in Little Rock. The letter formally invited Ms. Hendrix to attend these meetings and offer her views concerning the project. The Study Team has developed a robust public, agency and local/elected official outreach program and looks forward to meeting with Ms. Hendrix.	N/A	JLH / 8/21/14, 8/25/14 & 9/8/14	✓
5	Email 7/7/14	Malone, Walter	<p>The dates for the meeting in August –</p> <ul style="list-style-type: none"> • August 7 is a Planning Commission Hearing date. The meeting would start at 4 PM and go until it is over. At this point we do not know what will be on that agenda. But if there is anything filed in the general area that would cause a conflict for those who might wish to attend either or both meetings. • August 12 is an agenda meeting of the Little Rock Board of Directors. The meeting starts at 4 PM. While this is not a public hearing, some in the area might wish to attend and of course it would be a conflict for Staff as well as the Mayor and the Director for Ward 1 (or any other Directors who might wish to attend). • August 14 is the best date. 	To reach the most stakeholders, two meetings were scheduled – August 12 in North Little Rock and August 14 in Little Rock. Both meetings were be held from 4 p.m. to 7 p.m. and presented identical information.	N/A	JLH / 8/21/14 & 8/25/14	✓



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6	Email 7/7/14	Malone, Walter	<p>Suggested project Goals/Principles (in addition to those you had provided)–</p> <ul style="list-style-type: none"> • No loss of east-west connectivity of the street network and non-vehicular network • Make crossings of I-30 pedestrian friendly • Minimize the real, perceived and visual barrier of the freeway • I-30 should have and provide a connection to and from downtown LR/NLR to the rest of central Arkansas • Assure connective (sic) to CATA transit center in downtown Little Rock and Greyhound station in NLR • Maintain excess (sic) to downtown LR/NLR connections (could provide one exist (sic) point on the freeway to multiple exists (sic) within the street network) • Reduce or minimize the impacts visual and otherwise to the Presidential Park & Library as well as MacArthur Park & Historic District 	Thank you for submitting the goals/principles. Many of the suggested goals are similar in concept to those identified by the Study Team and will serve to further confirm the project vision. Specific goals that may not have been previously identified will be brought forward and analyzed by the Study Team.	N/A	JLH / 8/21/14, 8/25/14 & 9/8/14	✓
7	Metropol an Letter dated 7/07/14	Casey R. Covington CARTS Study Director	<p>The long-range metropolitan transportation plan is a systems plan that balances travel demands system-wide with the approved land use scenario and the fiscal limitations of a financially constrained plan. Embedded in that plan is an investment strategy that should be used to frame the I-30 corridor planning study not vice versa. While plans are subject to change, please be advised that we are coming to the end of a two year update cycle, with a new long-range plan due to be adopted in December of this year. All of the public comment we have received to date is consistent with the current strategies in METRO 2030.2.</p>	<p>The I-30 PEL will be developed in a manner that recognizes the current funding strategies and priorities in the updated long range metropolitan transportation plan (LRMTP). Because the project has dedicated funds from the Connecting Arkansas Program (CAP) and will likely include additional federal funding for rehabilitation, the overall budget for the project is essentially constrained to those fund sources. As the project is developed, the Study Team will be focused on maximizing the amount of project that can be delivered for the established project budget. It is anticipated that the PEL Study will address phasing as well as additional other solutions that may not be fully funded at this time, but that complement the recommended solution. Those elements and recommendations will be identified and submitted to the MPO to inform future LRMTTP updates/amendments. Given the range of solutions that may result from the PEL Study, and to achieve consistency with the LRMTTP, it is anticipated that PEL Study recommendations will require future refinements/amendments to the LRMTTP and we will work closely with your team to ensure consistency.</p>	N/A	JLH / 8/21/14, 8/25/14 & 9/8/14	✓



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8	Metrop an Letter dated 7/07/14	Casey R. Covington CARTS Study Director	<p>We agree that every reasonable effort should be made to reduce the time necessary to construct this project and will do everything that we can to avoid unnecessary delay. But other than the lost purchasing power that time takes on a project of this scale, is there any other deadline against which you are working of which we are unaware? I ask because at the moment it feels rushed and as if the cart is before the horse. For example, the recent news article announcing the replacement of the I-30 bridge and the method by which traffic would be maintained certainly gave the impression that a great many decisions have already been made. I suggest that it would be more prudent for the success of the project to take enough time in the beginning to achieve a publicly supported vision for the corridor and to build alternatives from it. Better by far to do things right the first time rather than do them quickly, only to have to redo later.</p>	<p>The I-30 PEL Study Team agrees that it is top priority to develop and deliver the I-30 improvements in a manner that gets it "right the first time." The use of the PEL Study and design-build delivery for the I-30 improvements is consistent with all federal initiatives developed to expedite project delivery while maintaining strong commitments to planning, NEPA and Design-Build requirements. There were a variety of reasons that federal agencies worked to streamline and integrate their processes, most notably because of public, agency and congressional concerns that the process took too long, cost too much, and in some cases, actually hindered reasonable and timely decision making practices. Inflation, even at a relatively small annual percentage, can have a huge impact on a major project. For example, delaying the I-30 improvements by a year would decrease the purchasing power of the established budget by \$15,000,000, robbing the taxpayers of increased value for their tax dollars. The Study Team is committed to accelerated delivery to accomplish multiple FHWA EDC initiatives that span all phases of project development including: planning (PEL, GIS, CSS, IQED), design (Design-Build) and construction.</p> <p>AHTD is committed to not making decisions without appropriate levels of Project Partner and agency coordination, as well as public input, as set forth in the project's Public Involvement and Agency Coordination Plan (PIACP). The decision on the bridge replacement is ultimately an engineering/risk/return on investment decision made in parallel with the planning and NEPA processes. Contrary to previous reports, the I-30 PEL Study will consider both bridge rehabilitation and replacement.</p>	N/A	JLH / 8/21/14 & 8/25/14	✓
9	Metrop an Letter dated 7/07/14	Casey R. Covington CARTS Study Director	<p>Technical Comment – Study Area The proposed primary study area should be enlarged to include the CBD's on both sides of the river accounting for potential traffic patterns changes resulting from modifications to access points and interchanges and the impact of a potential new bridge at Chester Street. A tertiary study area supporting future NEPA analysis should be defined that considers the induced demand for continued freeway widening resulting from adding capacity to a key link and its impact on land use, financial sustainability and air</p>	<p>The study area boundary was developed based on conclusions drawn from the <i>CARTS Area-wide Freeway Study - Phase 1 Arkansas River Crossing Study (2003)</i> and updated for this PEL study as described and documented in the Methodology and Framework and Environmental Constraints Report. Although we have defined a study area for the PEL Study, if alternatives outside of this boundary meet the purpose and need and warrant investigation (i.e. Chester Street) they will not be excluded from further analyses.</p> <p>Regarding traffic patterns, the CARTS Travel Demand</p>	N/A	JLH / 8/21/14, 8/25/14 & 9/8/14	✓



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			quality.	<p>Model, provided by Metroplan, has been utilized to forecast traffic projections and understand traffic patterns on a metropolitan-wide level, not just within the study area. Vehicular traffic and transit will be evaluated holistically – determining how improvements inside the study area affect traffic and transit inside and outside of the study area. Exhibits depicting both the I-30 PEL study area (identified, for example, for the purposes of environmental constraints mapping) and the larger traffic study area will be presented at the second TWG and public meetings.</p> <p>The NEPA study area(s) will be defined during the NEPA phase of the project, which will occur subsequent to the completion of the PEL Study. During NEPA, direct, indirect and cumulative impacts are evaluated, often times requiring different study extents. Direct impacts are generally evaluated within the proposed project's direct footprint. Indirect impacts (i.e., project-induced impacts) are generally analyzed within a larger study area, called the Area of Influence (AOI). The AOI will be large enough to determine potential encroachment-alteration impacts (ecological and socio-economic) resulting from the project and project-induced growth impacts. Cumulative impacts are assessed by resource, and considered within a spatial geographic area labeled the Resource Study Area (RSA). The RSA is determined based on the environmental resources that are selected for analysis and may be a single RSA that is used for all resources or a separate RSA for each resource. The RSA will be large enough to understand the trends affecting the health of the resource yet small enough to provide practical consideration of the project's contribution to the cumulative effects.</p>			
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10	Metropol an Letter dated 7/07/14	Casey R. Covington CARTS Study Director	<p>Technical Comment – Purpose and Need</p> <p>The public should define the purpose and need and corridor vision in the initial public outreach period. This determination should be made without the preconceived purpose and need already developed. Based upon the LRMTD and comments made pertaining to the corridor, I would take exception to the current description for congestion and voter commitment as provided in the draft purpose and need.</p>	<p>The lead agency, FHWA, has the authority for and responsibility of defining the purpose and need, which has been delegated to the Study Team. We are providing the opportunity for involvement during the development of the purpose and need to the Project Partners, TWG, stakeholders and the public. Public input was sought during the first round of public meetings on the purpose and need and goals/objectives. A station was set up that included a large exhibit board with a listing of potential problems or needs for the study area that had been developed by the Study Team. The station also had an exhibit board with a listing of potential goals for the study area. The Study Team developed the initial list of problems and goals, however meeting attendees were asked to write their concerns and goals on post-it notes and add to/revise/comment on the exhibit boards or to provide their comments at any point during the comment period (through August 29, 2014).</p> <p>The draft purpose and need statement presented at TWG #1 was a high level initial summary of the issues that had been identified by the Study Team. A Purpose and Need Report will be prepared that includes additional analyses and specific information that documents the needs that have been identified. All comments will be considered and incorporated, when practicable, into the Purpose and Need Report.</p>	N/A	JLH / 8/21/14 & 8/25/14	✓
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11	Metropol an Letter dated 7/07/14	Casey R. Covington CARTS Study Director	<p>Technical Comment – Purpose and Need - Congestion</p> <p>The draft definition of congestion is far too generic and linking it to level-of-service is insufficient for this urban corridor. The question should not be framed in terms of eliminating congestion, but instead defining what level of congestion is acceptable and financially sustainable (see Level of Service discussion below). If congestion is to be used, it must be much more nuanced in order not to bias alternative selection. I would suggest dropping congestion and instead defining the purpose in terms of reliable and optimized flow.</p>	<p>The term congestion will be retained because it is familiar and easily-relatable concept to the public, and is the standard terminology used in AHTD NEPA documents. Moreover, the level of congestion on a facility, or a facilities ability to meet present and projected traffic demands, is cited by FHWA as a primary issue that may be listed and described in the purpose and need statement for a proposed action. It is understood that “congestion” is a multi-faceted concept which warrants further definition. As stated in response to comment #10, the draft purpose and need statement presented at TWG #1 was a high level initial summary of the issues that had been identified by the Study Team. A Purpose and Need Report will soon be shared that includes additional analyses and specific information that documents the needs that have been identified. After reviewing the fully developed Purpose and Need Report, then we can better determine if we are just using different terms to characterize the same transportation issue(s).</p> <p>Congestion will be measured by LOS, but also by travel time to key destinations, travel speed, VMT, VHT and average delay per motorist. The Alternatives Screening Methodology (ASM) will detail out these measures and criteria which is also under development and will be shared with the project partners, TWG, SAG and public to gain additional feedback in the near future.</p>	N/A	JLH / 8/21/14, 8/25/14 & 9/8/14	✓
12	Metropol an Letter dated 7/07/14	Casey R. Covington CARTS Study Director	<p>Technical Comment – Purpose and Need - Congestion</p> <p>In the corridor, six freeways merge and diverge within a six-mile stretch. Most of the traffic is local (i.e. within Pulaski County) and intra-regional (commuting to/from Pulaski County from within the metropolitan area) with a small percentage being inter-regional or through traffic. Different evaluation measures should be used for each of these trips. For the purposes of local traffic, for example, other solutions outside the proposed corridor may be appropriate. For inter-regional traffic, I-30 should be defined to include I-430 and I-440 that are preferred to the I-30 central corridor.</p>	<p>The Study Team designation of through versus local trips was established as trips relate to the I-30 PEL study area. For the I-30 PEL traffic analysis, a local trip was defined as any trip end with an origin or destination within the study area. A through trip was defined as both trip ends occurring outside the study area. The Study Team recognizes the importance of understanding travel characteristics - the percentages of local trips versus through trips - which will aid in the identification of transportation solutions that best meet the need of motorists. The I-30 PEL traffic analysis and evaluation measures (to be outlined in the ASM) are designed to identify the problems and best fitting solutions for the study area.</p> <p>As part of the I-30 PEL Study traffic analysis, Metroplan's 2040 daily travel demand model determined that approximately 57% of the daily I-30 traffic is destined</p>	N/A	JLH / 8/21/14, 8/25/14 & 9/8/14	✓



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				<p>within the I-30 PEL study area (around the central business districts and abutting job centers) and 43% of the daily I-30 traffic is destined to pass through the study area. Additionally, the 2003 <i>Phase 1: Arkansas River Crossing Study</i>, noted that I-30 serves longer distance, more regional trips, whereas Broadway and Main Street serve more local trips when compared to each other. The Phase 1 Study identified the following trip length percentages for trips greater than 15 miles: I-30 carried 44% trips, Broadway carried 10% and Main Street carried 11%.</p> <p>Also as part of the I-30 PEL Study traffic analysis, the Study Team is performing a comprehensive multimodal analysis of I-30 and its effect on other transportation systems. Solutions will address highway capacity, transit, travel demand management, transportation system management, intelligent transportation systems, bicycle/pedestrian and access management needs. Improvements will also address recurring and non-recurring congestion in the corridor. To address inter-regional traffic, the I-30 traffic analysis will include I-430 and I-440 to understand their impacts on I-30 in the study area.</p>			
13	Metropolitan Letter dated 7/07/14	Casey R. Covington CARTS Study Director	<p>Technical Comment – Purpose and Need – Voter Commitments</p> <p>The voters of the State of Arkansas approved a constitutional amendment providing for a temporary half-cent sales tax and the issuance of bonds to finance improvements to four-lane highways in the state. It is a means of financing that does not rise to the level of purpose and need. The I-30 project was not on the ballot, but is a political, though not legally binding, commitment of the Arkansas Highway Commission. It should be removed from the Purpose and Need and listed in the Goals and Objectives. The final purpose and need statement should be described in the terms of the mobility of Central Arkansas citizens and include facility maintenance, rehab, and replacement (as necessary), all supported within the LRMTTP.</p>	<p>Voter commitment has been removed from the purpose and need and has been incorporated as a goal/objective of the project.</p> <p>As stated in response to Comment #15, the purpose and need will be developed in a manner that is consistent with and compatible with the goals in the LRMTTP.</p>	N/A	JLH / 8/21/14, 8/25/14 & 9/8/14	✓



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14	Metropolitan Letter dated 7/07/14	Casey R. Covington CARTS Study Director	<p>Technical Comment – Evaluation Criteria (functional objectives)</p> <p>The initial screening criteria/study focus described the corridor in terms of a "broad set" of Must Haves and Must Not Do's. In a corridor as complex as this one, functional objects must be defined up front through the public involvement process and may not be as simple as yes or no. These objectives should be stratified from critical to unnecessary to assist in evaluating which alternatives to move forward. If a simple yes or no criterion is used in defining reasonable alternatives, they should be signed off on first by all Project Partners.</p> <p>I would suggest the first operational objective focus be on the preservation of existing infrastructure (beyond just the roadway), the second on improved safety, and the third on addressing traffic flow within merge-diverge areas.</p>	<p>The evaluation criteria presented at TWG #1 was simply an overview to provide a general understating of the approach and methodology that that the Study Team would be developing. The ASM (under development) will include multiple screening levels with qualitative and quantitative measures. The ASM will be distributed to the same stakeholders as done with the purpose and need/goals to gain additional feedback.</p> <p>Before developing the ASM, the purpose and need and goals and objectives must be fully developed as it serves as the basis for alternatives screening.</p>	N/A	JLH / 8/21/14 & 8/25/14	✓
15	Metropolitan Letter dated 7/07/14	Casey R. Covington CARTS Study Director	<p>Technical Comment – Goals and Objectives</p> <p>The project goals and objectives should initiate with those from the LRMTTP and be defined by the public throughout public engagement. As a general rule, I suggest avoiding terms like "minimize" and "maximize" as they are absolutes; and absolutes are always expensive and often conflict with each other. Where appropriate I would substitute "optimize".</p>	<p>The I-30 PEL Study Team agrees that the goals as identified in the LRMTTP are important and were included in the initial draft of the goals developed by the Study Team. The goals as outlined in the existing LRMTTP include:</p> <ul style="list-style-type: none"> • economic growth; • equality of access and transportation choice; • environmental quality; • land use; • quality transportation corridors; and • funding adequacy. <p>The broad goals included in the LRMTTP correspond with the following project level goals developed by the Study Team:</p> <ul style="list-style-type: none"> • avoid/minimize impacts to the human and natural environment, including historic and archeological resources; • enhance and complement economic development; • complement other modes of transportation and planned transportation investments in the region; • allow for east-west connectivity 	N/A	JLH / 8/21/14, 8/25/14 & 9/8/14	✓



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				<ul style="list-style-type: none"> • improve vehicle access to Little Rock, North Little Rock and local attractions; and • provide bike and pedestrian friendly facilities. <p>The complete list of goals can be reviewed in the Purpose and Need Report. In addition, guiding principles presented at the TWG included context sensitive solutions (CSS) and to inform and support local, regional and state-wide transportation plans. In relation to the LRMTTP goal of funding adequacy, see response to comment #7.</p> <p>Public input was sought as discussed in response to comment #10.</p> <p>Regarding the terminology optimize vs. minimize/maximize, the Study Team agrees and has revised study goals as appropriate.</p>			
16	Metropol an Letter dated 7/07/14	Casey R. Covington CARTS Study Director	<p>Technical Comment – Goals and Objectives – Air Quality</p> <p>Central Arkansas is at risk for classification of non-attainment of national air quality standards for both ozone and particulate matter. A goal should be improved air quality. In addition to the criteria pollutants, significant research is appearing linking proximity to major roadways with negative health impacts, especially on low income, minority populations. Given that the majority of the corridor is an EJ area, it would seem appropriate to add this into air quality.</p>	<p>The proposed PEL study area is located in Pulaski County, which is an area in attainment for all national ambient air quality standards (NAAQS); therefore, the transportation conformity rules do not apply and no additional air quality analysis is required at this time. However, it should be noted that Central Arkansas is at risk for classification of non-attainment for the NAAQS for both ozone and particulate matter. Therefore, a regional goal of the MPO is to improve air quality and help maintain attainment status. While reducing automobile trips can help reduce air pollution, so can optimizing traffic flow and decreasing time spent in traffic (travel time). Under existing conditions, 70 percent of the I-30 corridor within the study area experiences severe congestion with undesirable speeds (LOS E and F), which increases to 100 percent by 2040 under no-build conditions. One of the preliminary goals of the I-30 PEL Study is to optimize traffic flow and improve mobility along I-30, which in turn would decrease the amount of fuel and traffic delays, and the concentration of pollutants emitted, with a potential for air quality improvements.</p>	N/A	JLH / 8/21/14, 8/25/14 & 9/8/14	✓

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17	Metroplan Letter dated 7/07/14	Casey R. Covington CARTS Study Director	Technical Comment – Goals and Objectives – consistency with LRMTTP The corridor alternatives should be consistent with the long-range metropolitan transportation plan.	See responses to comments #14 and #15.	N/A	JLH / 8/21/14 & 8/25/14	✓
18	Metroplan Letter dated 7/07/14	Casey R. Covington CARTS Study Director	Technical Comment – Level of Service Designing to a future level of service D in an urban corridor is financially unsustainable, ignores likely technological changes, and is just not a wise use of limited transportation funding. As previously indicated, defining corridor functional objectives and an acceptable traffic flow are more appropriate measure for the corridor. We suggest that it is reasonable to accept a level-of-service F during the AM and PM peak hours, assuming today's auto technology be included in the analyses, anticipating that improvements and deployment of autonomous or semi-autonomous vehicles well before 2040 will greatly increase carrying capacity of existing lanes. If LOS is to be used, we also suggest balancing it with other measures, i.e. travel time reliability, return on investment etc.	AHTD's current LOS standard is LOS D in urban areas during the peak hours on AHTD facilities. AHTD will consider both LOS D and E thresholds during the peak periods in the I-30 PEL Study. As a result, both LOS D and E results will be presented so that the lead agencies (AHTD and FHWA), TOC, Project Partners, TWG and public can understand the cost, engineering, environmental and other trade-offs to make an informed decision. Other measures of effectiveness will be considered in the corridor besides LOS, to the extent practicable, such as travel time to key destinations, travel speed, VMT, VHT and average delay per motorist.	N/A	JLH / 8/21/14 & 8/25/14	✓
19	Metroplan Letter dated 7/07/14	Casey R. Covington CARTS Study Director	Technical Comment – Stakeholder Input In addition to the stakeholder feedback indicated in the slides, Metroplan staff expressed a desire to consider the separation of local and through traffic, reconnecting neighborhoods, and reclaiming land for both park and economic purposes.	This input was added to the Traffic and Safety Overview exhibit board presented at the first set of public meetings and is consistent with the goals developed by the Study Team and the public. These desires will also be further explored during the CSS Visioning workshops.	N/A	JLH / 8/21/14 & 8/25/14	✓
20	Metroplan Letter dated 7/07/14	Casey R. Covington CARTS Study Director	Technical Comment – Chester Street Bridge The idea of a Chester Street Bridge has again surfaced and should be considered as part of the analysis and realm of alternatives.	Chester Street will be included in the Universe of Alternatives.	N/A	JLH / 8/21/14 & 8/25/14	✓
21	Metroplan Letter dated 7/07/14	Casey R. Covington CARTS Study Director	PIACP - Section 1.0 - Introduction Final Paragraph -Based on Metroplan traffic analyses, the primary purpose of this segment of I-30 is to provide access to the central business districts and abutting job centers, and only secondarily as a interregional corridor.	The Study Team agrees that the primary purpose of this segment of I-30 is to provide access to the central business districts and abutting job centers (local and intra-regional trips), and secondarily as an inter-regional corridor. The Study Team recognizes the importance of understanding travel characteristics - the percentages of	N/A	JLH / 8/21/14 & 8/25/14	✓

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			Overemphasis of the interregional nature of the corridor traffic, which we have seen or heard several times from the study team, will tend to bias the alternatives considered.	local trips versus through trips - which will aid in the identification of transportation solutions that best meet the need of motorists. The I-30 PEL Study traffic analysis is designed to identify the problems and best fitting solutions for the study area. See Comment #12 for additional details relating to the I-30 PEL Study traffic analysis.			
22	Metroplan Letter dated 7/07/14	Casey R. Covington CARTS Study Director	PIACP - Section 1.2 & 1.4 - Informed Consent The term "informed consent" is used throughout the document without a clear definition of what this is or what it means for Project Partners. This term should be defined and shared with Project Partners to determine if it meets their expectations.	The definition of informed consent was presented in a letter to Mr. Jim McKenzie (Metroplan) from Mr. Jerry Holder (CAP Project Manager), dated July 14, 2014. A Project Partner meeting was held on July 28, 2014 and the topic was not raised by attendees. It can be discussed at a future meeting if more clarification is required.	N/A	JLH / 8/21/14 & 8/25/14	✓
23	Metroplan Letter dated 7/07/14	Casey R. Covington CARTS Study Director	PIACP - Section 1.3 - Study Team As indicated in Metroplan's initial response to the PEL agreement, each partner should be afforded the opportunity to participate on the Study Team. Without representation, the process is discounted as a true partnership.	The Study Team is made up of the lead agencies overseeing the project (FHWA and AHTD) and the consultant team hired to complete the study on behalf of the lead agencies. The PEL process is a collaborative and integrative approach – one that sets forth the active engagement of agencies, elected officials, and other stakeholders. In accordance with the PEL initiative, Metroplan, the Cities of Little Rock and North Little Rock, and Pulaski County have been designated as Project Partners in the PEL process along with AHTD and FHWA. The Project Partners are integral to the PEL process. The Study Team has and will continue to meet with the Project Partners throughout the PEL process to facilitate collaboration, provide project updates, coordinate on information prior to presentation to the TWG and public, and gather input/comments on key PEL milestones/deliverables as outlined in the I-30 PEL Framework and Methodology. As a Project Partner, Metroplan (and the other Project Partners) has the opportunity to have a proactive working relationship with the Study Team.	N/A	JLH / 8/21/14 & 8/25/14	✓
24	Metroplan Letter dated 7/07/14	Casey R. Covington CARTS Study Director	PIACP, Section 1.4 - Technical Oversight Committee The CARTS Study Director is responsible for the Long-Range Metroplan Transportation Plan (LRMTP) and the consideration of results of the PEL study in its adoption. The inclusion of the CARTS Study Director on this committee will expedite the consideration of study recommendations in regional planning documents.	The Technical Oversight Committee includes representatives from various technical disciplines from the lead agencies (FHWA and AHTD). The TWG includes local, state, and federal agency staff. Based on these designations, the CARTS Study Director has been invited to be a TWG member to facilitate coordination with the MPO on inclusion of the PEL in the LRMTP and to garner a proactive relationship.	N/A		✓
25	Metroplan	Casey R.	PIACP - Section 2.2 - Social Media	Language in first paragraph of PIACP Section 2.2 has	PIACP,	JLH /	✓



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	an Letter dated 7/07/14	Covington CARTS Study Director	<p>Conflicting information is provided on the purpose/use of Social Media, at one point Twitter is described as a form of two-way communication encouraging public comment. Later it is added that comments posted on Twitter will not be included or evaluated as part of the PEL Study decision-making process. While I understand the challenges of social media, if it is an endorsed form of communication by AHTD then comments should be considered or its role reevaluated.</p>	<p>been revised to read, "AHTD and its consultants will utilize the AHTD Twitter account to broadcast PEL Study information..."</p> <p>The following information has been deleted from the last paragraph, "However, comments posted on Twitter will not be included or evaluated as part of the PEL Study decision-making process."</p>	Sec. 2.2, Pg. 5	8/21/14 & 8/25/14	
26	Metropol an Letter dated 7/07/14	Casey R. Covington CARTS Study Director	<p>PIACP - Section 4.0 -Public Meetings</p> <p>The public involvement plan should be revised to include an initial comprehensive visioning process that is led by the public, not the public reacting to pre-prepared material. This should be done in a minimum of two public meetings where the first focuses on the purpose and need, functional objects, and broad corridor visioning and the second should constitute a design charette that includes land development considerations. Only after these two meetings and the consent of all partners should the project move to more detailed alternatives development consistent with public meeting #2. While I assume this to be the case as it is standard AHTD practice, all public meeting material should be made available on the project website with ample opportunities for public comment.</p>	<p>Multiple public meetings will be held throughout the PEL process. All material presented at the public meetings will be in draft form, providing a baseline for residents to make decisions and provide input. At the first series of public meetings, a station was set up with blank aerial roll plots. The goal of this station was to seek public input and suggestions of their vision for I-30. The public will also have the opportunity to provide comments and express their vision on comment sheets at the public meeting or through other outlets during an official comment period following the meeting (mail in comment sheets, email, twitter and/or phone). All comments received from the public and other stakeholders during the designated comment period will be addressed and resolved, to the extent practicable, in a formal comment-resolution process.</p> <p>A Stakeholder Advisory Group (SAG) will also be established to ensure early and ongoing decision making throughout the study. The SAG's role will be to make recommendations and/or provide key information and materials to the Study Team. The SAG will include twelve representatives, with the Mayors of Little Rock and North Little Rock each appointing four, as well as four selected by the Pulaski County Judge. SAG members will provide a one-of-a-kind perspective to the areas of interest each represents within the community, allowing the Study Team to gather valuable input. The SAG will meet regularly throughout the PEL process.</p> <p>In addition, one visioning workshop will be conducted with stakeholders during the PEL process, and another visioning workshop will be held during the NEPA/Schematic phase. During the first visioning</p>	N/A	JLH / 8/21/14, 8/25/14 & 9/8/14	✓



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				<p>workshop, and with an understanding of the purpose and need and goals and objectives of the PEL Study, stakeholders will have the opportunity to incorporate their ideas and priorities for the I-30 corridor. From this visioning workshop, renderings of possible solutions that preserve and enhance aesthetic, historic and community resources will be developed. During the NEPA/Schematic phase, a second visioning workshop will be held with stakeholders that examines potential CSS and design concepts in greater detail. Based on stakeholder feedback and available funding, CSS/aesthetic guidelines will be developed following this second visioning workshop and included in the design-build request for proposals, pending AHTD approval.</p> <p>The I-30 PEL PIACP and Framework and Methodology have been revised to include information related to the CSS visioning workshops and SAG.</p> <p>All materials will be available on both the AHTD and the www.connectingarkansasprogram.com websites.</p>			
27	Metroplan Letter dated 7/07/14	Casey R. Covington CARTS Study Director	<p>PIACP - Communication Plan and Protocol To the extent possible, Metroplan will observe the plan as drafted. However, given the policies of our organization and absent an acceptable PEL Agreement, should a situation arise that conflicts with the proposed Protocol, Metroplan will act according to our policies while notifying the AHTD CAP Administrator/Public Information Office.</p>	Comment noted.	N/A	JLH / 8/21/14 & 8/25/14	✓
28	Metroplan Letter dated 7/07/14	Casey R. Covington CARTS Study Director	<p>PIACP - Communication Plan and Protocol I would further request that Project Partners be given the opportunity to participate in the planning, material review, and promotion of the initial public meeting with significant time allowed for the adjustment of material as necessary.</p>	Materials are provided to the Project Partners in advance of the TWG, and public meetings. Material review time will vary based upon established Project Partner, TWG and public meeting dates; therefore flexibility and understanding of fluctuating and sometimes abbreviated review periods is appreciated.	N/A	JLH / 8/21/14 & 8/25/14	✓
29	Email dated 07-09-14	Ann Marie Early [mailto:amearly@uark.edu]	We have a great interest in the impact that this project may have on the archeological sites in the Little Rock/North Little Rock metropolitan area. People have lived in this part of the state for the last 12,000 years, and remains of their settlements, cemeteries, defensive works, and transportation vehicles survive under the modern built landscape, just as they do in every urban area in this country. Your documents don't	<p>A preliminary archeological investigation was conducted by AHTD archeological staff and included a records check of the Arkansas Archeological Survey (AAS) for previously recorded archeological sites. In addition, several maps and references were also checked as part of this preliminary assessment, as listed below:</p> <ul style="list-style-type: none"> The 1986 Little Rock, North Little Rock, and McAlmont 7.5" topographic quad maps -examined for cemeteries, likely historic structures and landforms conducive to 	N/A	JLH / 8/21/14 & 8/25/14	✓



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			<p>mention archeological resources, but they will certainly be some of the resources affected by any development that includes ground disturbing- or riverine construction- activities as this project goes forward. I hope that we can play a part in the fate of those resources as the PEL study moves ahead.</p>	<p>holding archeological sites</p> <ul style="list-style-type: none"> • Reviewed historic topographic quad maps (1891, 1935, 1944, 1954, and 1961) • Reviewed Sanborn Fire Insurance maps (1886, 1889, 1892, 1897, 1913, and 1939). • Reviewed General Land Office maps for Township 1 North, Range 12 West, Township 2 North, Range 12 West and Township 2 North, Range 11 West • Reviewed 1936 Pulaski County Highway map • Reviewed the 2006 Panamerican Consultants, Inc. remote-sensing survey of the Arkansas River in the Little Rock for submerged cultural resources • Researched historic routes • Conducted preliminary “windshield” survey performed by AHTD archeological staff <p>In order to protect the sites from looting and further destruction, all archeological site information and locations are not subject to the Freedom of Information Act and are not to be distributed to the public. Accordingly, none of the archeological sites identified were included on the constraints mapping. However, the detailed constraints technical report, to be included as part of the PEL Study, will identify the results of the above described preliminary archeological analysis by AHTD. Additionally, a more detailed archeological analysis will be conducted during the NEPA phase of this project, once an alternative has been recommended from the PEL Study.</p> <p>The Study Team looks forward to working with your organization on the preservation of archeological sites.</p>			
30	Email dated 06-09-14	Vence L. Haggard Regional Administrator Federal Railroad Administration	<p>Rail-Freight Issues When Considering Environmental and Development Impacts Studies</p> <p>Freight rail corridors should be considered essential transportation infrastructure which must be protected and preserved to safely transport essential commodities throughout the nation. Trains operate 24 hours a day, seven days a week. There are no federal or state restrictions which limit the hours available for the safe operations of railroads or for the length and weight of trains. Trains operate in an industrial environment using the nation’s interconnected</p>	Information provided and issues mentioned will be considered throughout the PEL process, including during the development of alternatives and the alternatives screening process, and continued through the NEPA phase once a recommended alternative has been identified.	N/A	JLH / 8/21/14 & 8/25/14	✓



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		<p>system of railroad tracks and rail facilities such as rail yards, stations and loading facilities. The Federal Railroad Administration (FRA) has concerns for any actions or development which might impact railroad safety and safety at highway-rail grade crossings, Some examples of this include roadway development resulting in the shortening of roadway storage areas between tracks and adjacent traffic intersections or roadway changes which may result in high-profile crossings. FRA also recommends careful review of any development which might result in encroachment to railroad corridors that could affect the safety and/or efficiency of rail transportation. Other factors, generally related to proximity to rail corridors or railroad grade crossings, may impact the health, quality of life or transportation mobility in communities. These factors should also be carefully reviewed. The following is a list of issues which may be important to review:</p> <p>Encroachment on freight-rail corridors:</p> <ul style="list-style-type: none">• New at-grade crossings over railroad sidings and passing tracks affect a railroad's ability to manage operations such as having trains pass each other or safely holding trains for other reasons without creating community conflicts such as blocked crossings;• Clearance adequacy of grade separation bridges over railroad tracks must allow for multi-modal double stack trains; <p>Other Highway-Rail Grade Crossing and Pedestrian Safety Concerns and Train Noise Abatement:</p> <ul style="list-style-type: none">• The Federal Railroad Administration supports efforts by state and local agencies and railroads to close redundant crossing of convenience. FRA also discourages the proliferation of new at-grade crossings. Grade separations are encouraged whenever possible new crossings are required to avoid collisions, traffic congestion, emergency vehicle delays or business access problems caused by passing trains and blocked crossings.				
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		<ul style="list-style-type: none">• Pedestrian and bicycle access should be considered when crossings are closed;• Pedestrian access should be considered in the design or re-design of new at-grade crossings as well as in the design of grade separations:• Providing either safe, legal pedestrian access or fencing to prevent illegal railroad trespassing should be considered in situations where access across the tracks is needed and or used by pedestrians to access businesses, schools, recreational facilities or other frequented locations;• New development near highway-rail grade crossings should avoid residential or commercial driveways within 100 feet of at-grade crossings whenever possible;• Quiet zones should be established by public authority designation using FRA recommended "Supplemental Safety measures (SSMs)" whenever possible at all crossings;• Local jurisdictions are responsible for funding the construction of noise sound barriers or the establishment of quiet zones. Railroads are not required to pay for such noise abatement strategies. <p>Proximity to rail-freight tracks or rail facilities:</p> <ul style="list-style-type: none">• Housing units should be set back from railroad tracks as far as possible to avoid safety concerns which may result from rail operations including derailments, collisions, or possible hazardous materials incidents;• Proximity to railroad tracks and rail yards or other rail facilities such as stations should also be considered for noise, light pollution from rail yards, vibration and diesel fumes from industrial machinery and locomotive engines, security issues and attractive nuisance liability before building hospitals, any type of residential housing, vibration sensitive operations such as high-tech factories, schools, children's playgrounds or				
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			anything that might induce children to trespass across tracks.				
31	Received at TWG Meeting 6/26/14	North Little Rock School District	A new school facility is planned to be constructed in North Little Rock, located near the existing North Little Rock High School Football Stadium, south of I-40 and west of I-30.	Change made. Notation of the new school has been added to the constraints report.	Const. Rpt. Sec. 3.3.1	JLH / 8/21/14 & 8/25/14	✓