Attachment E
Individual and Standard Responses to Public Comments

Public Hearing Comment Responses

F.A.P. No. NHPP-030-22(68)

ARDOT Job NO. CA0602

I-530 – Hwy. 67 (Widening & Reconst.)
(I-30 & I-40) (F)

Pulaski County, Arkansas

December 2018

U.S. Department of Transportation
Federal Highway Administration

ARDOT
ARKANSAS DEPARTMENT OF TRANSPORTATION

CONNECTING ARKANSAS PROGRAM
CAP

CONTENTS

APPENDICES

Acronyms and Abbreviations

Acronym	Definition
ADEQ	Arkansas Department of Environmental Quality
AHPP	Arkansas Historic Preservation Program
APE	Area of Potential Effect
ARDOT	Arkansas Department of Transportation
AVE	Area of Visual Effect
C/D	Collector/Distributor
CAP	Connecting Arkansas Program
CFR	Code of Federal Regulations
CNU	Center for New Urbanism
CWA	Clean Water Act
dB(A)	A-weighted decibels
EA	Environmental Assessment
EJ	Environmental Justice
EO	Executive Order
EPA	United States Environmental Protection Agency
FB	Federal Bridge
FWS	United States Fish and Wildlife Service
HOV	High Occupancy Vehicle
ICA	Imagine Central Arkansas
IJR	Interchange Justification Report
IRP	Interstate Rehabilitation Program
LEP	Limited English Proficiency
LOS	Level of Service
LRMTP	Long Range Metropolitan Transportation Plan
MARKANS	Arkansas River Navigation System
MOA	Memorandum of Agreement

mph	Miles per Hour
MPO	Metropolitan Planning Organization
MSAT	Mobile Source Air Toxic
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NHPP	National Highway Performance Program
NRHP	National Register of Historic Places
PA	Programmatic Agreement
PE	Professional Engineer
PEL	Planning and Environmental Linkages
PTOE	Professional Traffic Operations Engineer
RAN	Regional Arterial Network
ROW	Right of Way
RRM	Rock Region Metro
SDI	Split Diamond Interchange
SHPO	State Historic Preservation Officer
SPUI	Single Point Urban Interchange
TNM	Traffic Noise Model
TWG	Technical Working Group
UPRR	Union Pacific Railroad
USACE	United States Army Corps of Engineers
USCG	United States Coast Guard
ypd	Yards per Day
yph	Yards per Hour

Dale Pekar

6-15-18

Comment 1

Please identify the “similar freeways” compared on page 16 of the EA to “the segment of I-30 from I- 630 to I-40” along with their respective relevant crash data. I realize this may just be a matter of identifying the "similar freeways" in a larger table, array or publication.

Response: *See I-8 of Appendix A*

7-3-18

Comment 1

The Arkansas Highway and Transportation Department (AHTD) has proposed making a number of changes to the I-30 corridor that runs from Interstate 40 to Interstate 530. Because the "30 Crossing" project implicates numerous interests and considerations, many of the choices AHTD must make are difficult. For example, should the revamped highway remain at six lanes, or should it be expanded to eight or 10? Strong arguments exist on both sides of this question. And the same is true for many other aspects of the project. But there is at least one issue where the evidence overwhelmingly favors a particular side: The I-30/Cantrell interchange must be preserved.

One of the most fundamental principles of urban planning is that the transition between major arteries should be as seamless as possible. Failing to comply with this precept generally creates countless problems: It wastes striking amounts of commuter time, increases accidents, elevates pollution levels, undercuts business interests, and promotes traffic patterns that damage residential communities. As a result, major arteries should be directly connected absent truly compelling circumstances.

The Little Rock area is currently in full compliance with this artery transition standard. There are four major arteries in the metropolitan area--Cantrell Road, Interstate 30, Interstate 430, and Interstate 630. Under the existing design, each road is easily accessible at the five locations where they intersect:

Unfortunately, AHTD is considering eliminating the seamless transition at the fifth intersection--Cantrell Road and I-30.

AHTD is reviewing two construction proposals for entering and exiting I-30 in the downtown area. One would retain the interchange in place today. The other, known as the "split diamond

interchange," would remove the Cantrell entrance and exit and move access to the highway south to Fourth Street, Capitol Avenue, and Sixth Street. At present, there is effectively only one stoplight between Cantrell and I-30. Under the split diamond proposal, there would be four to six lights between them. Not surprisingly, such a violation of basic urban planning standards would cause numerous problems for both the local community and the broader metropolitan area.

First, travel times for commuters and others transitioning between Cantrell and I-30 would increase. This means that tens of thousands of people would spend additional time in their cars each day. How much extra? Our conservative guess is between four and six minutes per day—two to three minutes in each direction--though it could easily be more. This may not seem like much, but four minutes a day multiplied by 240 working days per year equals 16 hours per year. Six minutes a day inflates the lost time to 24 hours per year. Additionally, longer commutes will increase both gasoline usage (which costs money) and pollution. And all of these problems will be even worse if many commuters use alternative, longer paths to travel between different parts of the city, as the AHTD contemplates will happen once the Cantrell/I-30 interchange is eliminated.

Response: *Table 8 of the Environmental Assessment estimates morning travel times through the project corridor to the River Market (intersection of President Clinton and Cumberland Street) and Clinton Center from seven locations through the study area. These travel times were estimated using a traffic simulation program (VISSIM). Travel times to the River Market and Clinton Center are expected to be approximately 20% and 5% longer, respectively, with the Preferred Alternative (2B: 6-lane with C/D SDI) than with Action Alternative 2A (6-lane with C/D SPUI). The difference is primarily due to the use of the frontage roads to travel between the two ends of the Split Diamond Interchange. Despite this increase in travel times, the Split Diamond Interchange provides the benefits of better integration with the city street grid and improved usage of the frontage road system.*

Comment 2

Second, these greater travel times will impact businesses all along the Arkansas River in Little Rock because it will be more difficult to reach riverside communities like the Heights and Riverdale from North Little Rock and various other parts of the region. Moreover, since it will take longer to exit the neighborhoods adjacent to the river, residents of that area will be less likely to visit businesses in North Little Rock and other commercial districts, causing critical losses in sales, tax revenue, and jobs.

Response: *Travel to and from the Argenta area of North Little Rock to the Heights and Riverdale is most likely to use a route consisting of West Broadway Street (Hwy. 70) and Cantrell Road (Hwy. 10) and will therefore not likely be affected by the project.*

Travel to and from the McCain area of North Little Rock will only experience a delay of less than 2 minutes. This slight delay is not expected to change travel patterns to and from the Heights and Riverdale communities.

The total economic impact of the 30 Crossing Project over the 20-year period (2023 to 2043) can be generated by congestion relief, traffic safety, tourism, and maritime navigability as well as by construction and operations and maintenance activities.

Using the 2015 IMPLAN (Impact Analysis for Planning) model for Pulaski County, the economic impacts are measured in terms of employment (number of jobs supported by an industry), labor income (compensation of employees), value-added or Gross Regional Product (GRP, economic output less intermediate inputs, accounting for the additional output created at that stage of production), and local and state tax revenues. The IMPLAN analysis results for the No-Action alternative indicate that not doing the project could cost the study area 1,800 jobs and will result in reduction of labor income by $84.5 million. The reduction of GRP and tax revenues are estimated to be $153.7 and $12.3 million respectively. The Preferred Alternative (6-Lane C/D SDI Action Alternative) is expected to give rise to 3,610 jobs and $143.9 million in labor income. The project benefits are also expected to result in an increase of $276.9 million in GRP and $29.3 million in tax revenues. In addition, the economic impact of construction activities is estimated to result in short-term increase of 4,880 jobs, $281.2 million in labor income, $432.5 million in GRP, and $24.2 million in tax revenues.

Although other multimodal benefits can be realized by the project, due to the lack of data, they were not included in the results. Hence, the values shown above are considered conservative estimates.

Comment 3

Third, the split diamond will damage downtown residential communities, especially the one currently growing between Third and Ninth streets. Capitol, Fourth, and Sixth will have dramatically increased traffic, more stoplights, and less (or no) parking, making this area considerably less livable. Furthermore, the split diamond will make it harder for those living downtown to access Cantrell and the interstate when they want to travel to other parts of the metropolitan area. These problems will certainly deter people from moving into the heart of the city, slowing down--if not reversing--the rebirth of central Little Rock that began 25 years ago.

Response: *Existing, Future No Action, and Action Alternative traffic volumes on local streets in downtown Little Rock are shown in Table 1 of the Environmental Assessment. Traffic on East 6th Street is predicted to be higher than existing condition, but equal under the Future No Action and Action Alternatives. Traffic on Capitol Avenue will be higher than the existing and Future No Action conditions, but approximately the same with both the 6-lane with C/D SPUI (2A) and SDI (2B) Action Alternatives.*

Traffic on East 4th Street will be higher than the existing and Future No Action conditions under both the 6-lane with C/D Action Alternatives, the SPUI (2A) and SDI (2B). Project traffic levels on East 4th Street from Action Alternative 2B (SDI) are higher than Action Alternative 2A (SPUI). To accommodate the increase, East 4th Street will be restriped to create an additional lane in the eastbound direction between Cumberland Street and the southbound frontage road. This will require the removal of 29 parking spaces. Additional signals are proposed at the intersections of East 4th Street with River Market Avenue and Rock Street. These signals will have pedestrian phasing included.

The direct effects of these changes on public facilities, parking, and access and travel patterns along East 4th Street have been evaluated in the Community Impacts Technical Report (Appendix F of the EA) and determined to be minimal. The indirect effects of the changes along East 4th Street on socio-economic resources have been evaluated in the Indirect Effect Technical Report (Appendix A of the EA). Because the land use along East 4th Street is almost completely commercial, it is not anticipated that the changes would have an adverse indirect community cohesion impact.

Through coordination with Little Rock City Planning, three areas in downtown Little Rock were identified where growth could potentially occur in the future, and the indirect effects of the Action Alternatives on the potential for this growth were evaluated. It was determined that the type of growth likely to occur in these areas would be consistent with the future land use designation (mixed-urban).

Property values are determined and affected by multiple factors. Property values are also influenced by unquantifiable factors such crime and safety, neighborhood perceptions of the area, and market demands that fluctuate depending on time of year and dynamic economic conditions.

Comment 4

Proponents of the split diamond interchange make two arguments in defense of that proposal. Neither has merit.

They contend that moving highway access to the south will increase development in the River Market. But the area has already been growing rapidly under the present layout with the Cantrell exit and entrance. And if living downtown, parking in the city and traveling to and from downtown all become considerably more difficult, as noted above, the damage to the River Market and the surrounding area will likely be much greater than the benefits gained from having the additional walking spaces that will be created if the Cantrell entrance and exit is eliminated.

Response: *As discussed above, the Indirect Effects Technical Report (EA Appendix A) concludes that there are three areas in downtown Little Rock where growth may occur more quickly as a result of the improvement in travel time with the project. Traveling to and from downtown will become less difficult. The Preferred Alternative would result in a loss of parking in downtown Little Rock. The City has not requested a renewal of the air space agreement that allows public parking within ARDOT right-of-way (ROW) in downtown Little Rock.*

Comment 5

Proponents assert that accidents will be reduced by the split diamond because the "dangerous" intersection at Cantrell and President Clinton will have considerably less traffic, increasing pedestrian safety. That seems highly unlikely. First, according to the leading study of the intersection, the crossing at Cantrell and President Clinton only had nine auto accidents over the 10-year period of the study--less than one a year. Second, there may be only a small decrease in traffic through the intersection because each alternative travel route will require far longer travel times. Third, because of the extra stoplights drivers will need to navigate to transition between Cantrell and I-30, commuters accustomed to a speedy one-light trip may rush through the four plus new traffic lights to reach their destination, increasing accidents. Fourth, the considerable uptick in cars traveling along Fourth, Capitol, and Sixth will also likely elevate the number of accidents in the growing residential community that these streets run through. The best evidence firmly supports the conclusion that shifting highway access south from Cantrell will actually decrease safety rather than promote it.

The Third Street Merchants Association, the Downtown Little Rock Partnership, and certain other center city interests support the split diamond. Apparently they believe--wrongly in our view—that shifting the interchange south will do more good than harm for the downtown area. But even if there is some plausibility to this position, the damage to every other sector of the metropolitan area easily outweighs even the most Pollyannaish estimates of the benefits to the River Market and the immediately surrounding community. As a result, removing the Cantrell/I-30 interchange simply cannot be justified under any fair analysis of the 30 Crossing project.

It is the duty of the AHTD to consider the interests of the entire region in developing a plan for the I-30 corridor. Downtown businesses are important, to be sure. But they are only one piece of a far broader community, most of which will be irreparably damaged by the loss of the Cantrell entrance and exist. At best, shifting the interchange to Fourth, Capitol, and Sixth serves the interests of a small set of downtown businesses and a select group of residents who are fortunate enough to live within walking distance of the River Market, while hurting virtually everyone else in Pulaski County and the surrounding counties.

Response: *The intersection of President Clinton and Cumberland has the highest pedestrian traffic in the state and is one of the most dangerous intersections in the City for pedestrians for the period from 2004 to 2013, according to Metroplan's Bicycle/Pedestrian Crash Analysis 2015. It is a dangerous intersection for pedestrians. There is no statement made in the EA or any of the EA supporting documents that it is a high vehicle crash location. The reduction in vehicular traffic at this intersection, as predicted by traffic modeling, with the Preferred Alternative is expected to make this intersection safer for pedestrians. There are likely to be more traffic signals between I-30 and this intersection, but the traffic model does indicate that travel times with the Preferred Alternative will be faster than either the existing or future No Action conditions, which should lead to less driver frustration.*

Traffic on East 6th Streets will not be higher with the Preferred Alternative than with the Future No-Action Alternative. Traffic on Capitol Avenue will be higher than the Future No-Action Alternative, but still less than half the capacity of this under-utilized roadway. In downtown Little Rock, the most significant traffic increases are expected on 2nd Street, 3rd Street and 4th Street. According to FHWA's Signalized Intersections: Informational Guide, pedestrian signals reduce pedestrian collisions 15-17 percent. Additionally, the countdown feature of these pedestrian signals could reduce vehicle-pedestrian crashes caused by pedestrians trying to cross when the pedestrian walk time is near the end of its phase. Additionally, FHWA's Crash Modification Factors (CMF) Clearinghouse, a searchable online database, provides information on the expected number of crashes after implementing a countermeasure such as pedestrian signals. This information also shows a reduction in vehicle/pedestrian crashes when signals are added. For example, CMF ID 2673 shows a 24 percent reduction when an intersection is changed from yield controlled to signalized.

Also, the safety analysis shown in the EA addresses the reduction in crashes along the main lanes of the interstate. The results from the ISATe analysis do indeed indicate that the Preferred Alternative (2B: 6-lane with C/D Split Diamond Interchange) will be safer than the No-Action.

7-4-18

Comment 1

Please address the comments made by Joshua Silverstein in his editorial of November 2016 regarding the need to maintain the Cantrell Road/I-30 Interchange. These are important indirect effects which have not been adequately addressed in the EA and its appendices. I earlier input this editorial as a public comment to you. It is also available at: https://mail.google.com/mail/u/0/#inbox/16460f2c9cbd4ff0?projector=1&messagePartId=0.1.1

Response: *See responses to Comments 1-4 from 7-3-18 provided previously.*

Comment 2

Please change the wording on your electronic comment form which reads:

"The proposed Preferred Alternative is the 6-Lane with Collector/Distributor (C/D) Lanes with Split Diamond Interchange (SDI) at the Highway 10 Interchange. Please provide comments on the Preferred Alternative."

This effectively creates the misimpression that comments may only be submitted on the Preferred Alternative--and that's just wrong. Public input is not restricted to Alternative 2B.

Response: *On July 6, prior to the public hearing, the wording was changed to simply:*

"Comments/suggestions"

All comments submitted by the public, both before and after July 6, regardless of whether they pertained to the Preferred Alternative or any other alternative, were responded to on an equal basis. Comments on alternatives other than the Preferred Alternative were not ignored. These responses are included in the NEPA Public Hearing Summary: EA Appendix E.

7-10-18

Comment 1

What cost contingency was used for 30 Crossing? I already have the Cambridge Systematics Benefit Cost Analysis which was conducted earlier.

Response: *A cost contingency has not yet been set for the 30 Crossing project. Prior to issuing a final request for proposals for the design-build procurement process, a contingency in-line with industry norms will be established and will be allocated from within the project's $631.7 million budget.*

7-11-18

Comment 1

Please send me a copy any Benefit Cost Analyses, economic analyses, or cost estimates for the 30 Crossing project.

Response: *The 30 Crossing project is to be delivered under a fixed cost – variable scope design-build agreement. The Design-Builder will maximize the scope to be constructed within the limits of the funding that is allocated from the $631.7 million project budget. It is estimated that the value of the design-build agreement will be in the range of $525 - $550 million. The latest economic analysis for the project is being provided with this response.*

7-15-18

Comment 1

Page 62, Indicated epage 79/3992, Line 17. Failure to provide full disclosure of potential adverse effects if no acceptable bids meet the bid target price.

The analysis fails to disclose what project components will be deferred and the order in which they would be deferred if the project cost estimate proves to be unrealistically low: “In the event that none of the Design-Build firms are able to provide the full project scope, additional projects will be programmed and contracts will be let at a future date to complete the project scope. Any work postponed to a future date will include additional costs for inflation.”

This provision makes the entire analysis unreliable. If funding proves to be insufficient, then funding should be provided by taking it from other, lower-priority ARDOT projects. ARDOT’s willingness to do this was indicated in their letter of June 17, 2016 to Metroplan saying that if Metroplan did not agree to add lanes to the corridor, that the No Action Alternative would be selected and the funding would be spent on other projects. Clearly, ARDOT has the discretion to spend these funds where they see fit. Decision-makers cannot make an informed decision if they don’t know which components may be deferred. As written, all the mobility benefits may be illusory--the deferred components may not be completed before the project design year.

Alternatively, the project could be compartmentalized showing the beneficial and adverse effects for the various components. This would involve the use of a standard incremental analysis commonly employed on large projects.

This issue is particularly relevant given the disappointment felt by landowners in the vicinity of I-630 who maintain that promised noise-mitigation measures were never implemented on that project.

Response: *The 30 Crossing project is to be delivered under a fixed cost – variable scope design-build agreement. The Design-Builder will maximize the scope to be constructed within the limits of the funding that is allocated from the $631.7 million project budget. It is estimated that the value of the design-build agreement will be in the range of $525 - $550 million. The intent of the limits of the Environmental Assessment is to evaluate a corridor that will allow the Design-Builders the ability to maximize the currently available funding.*

Comment 2

Change in Project Area from previous analysis documents. Previous analysis documents indicated a 6.7 mile project area (PEL Linkages Report, page 4, e.g.) but this EA identifies a 7.3 mile project area (page 4). This EA also excludes work on the I-30/I-530/I-440 interchange (Appendix A, page 2, Figure 1) which had been included in the PEL analyses.

These substantive changes render the prior PEL analysis unusable as concerned parties have not been given the opportunity to submit informed comment. As this EA has documented substantial adverse unmitigated noise effects on area communities, the proper course of action would be to reopen the public involvement process and prepare a Draft Environmental Impact Statement.

Response: *The change in project limit that caused the project area to increase from 6.7 miles to 7.3 miles was on I-40 westbound west of I-30. This was a result of a mobility and safety issue that became apparent during development of the Action Alternatives in the NEPA stage. Specifically, it was decided to carry an additional I-30 northbound lane west onto I-40, to prevent vehicles in the outside lane of I-30 northbound from making an inadvertent wrong turn onto the JFK exit ramp. To correct this issue, it was decided to continue the two northbound lanes on I-30 onto I-40 westbound for a safe distance, then gradually drop the lane on I-40 westbound. The additional lane continues west on I-40 for approximately 0.7 miles.*

During the PEL, the need for improvements to the I-30/I-530/I-440 interchange was analyzed; this is the reason the PEL project limits encompass the entire interchange. As a result of traffic modeling during the PEL and NEPA stages, it was determined that the mobility and safety components of the purpose and need for the project could be addressed with widening of northbound I-530, along with relatively little ramp widening, through the interchange.

PEL studies are intended to be carried to a reasonable level of detail. This level is appropriate for a planning study, but does not need to rise to the level of detail required in the NEPA process. Both of these changes are limited refinements to the alternatives evaluated in the PEL and do not result in a change in the project impacts. The changes have no bearing on the conclusions reached in the PEL study, which remain valid. The evaluations in the NEPA study

include the expanded study area, and the public has had the opportunity to comment on the expanded study area throughout the NEPA phase, including two public meetings where the expanded study area was clearly shown.

Comment 3

Page 114, Indicated epage 131/3992, Lines 4 et seqq. and 15 et seqq. The document cherry-picks information to promote the idea that the Action Alternatives would have an “overall positive effect on the regional and local economy.” “Information obtained from City of Little Rock and North Little Rock planners indicates that the timing of five planned development or redevelopment projects along the corridor may be affected by the project.” The fact that there are no fewer than five such projects in the immediate corridor area belies the assertion that providing better mobility into and out from the corridor would benefit the regional and local economy. It is rather the case that every effort should be made to make the corridor area as attractive as possible rather than developing a project which is demonstrated to increase traffic noise to actionable levels under FHWA standards.

The statement is also of concern because it fails to address the question of greenspace development outside of the immediate corridor--the greenspace that would most likely be converted to housing and other developments if “Although these areas follow local comprehensive plans and initiatives for future growth, the increased capacity of the future facility would positively benefit the development and mobility to the areas within the proposed project limits. Therefore, the improvement in mobility and access to employment centers, businesses, residences, and public facilities would have an overall positive effect on the regional and local economy.“

The document itself explains on line 7 of the same page:

“Most of the proposed development plans are underway and are not dependent upon the construction of the proposed project, nor would they be limited should the proposed project not be built; however, there is potential for the proposed project to accelerate the rate of the development/redevelopment projects.”

What is clear in this discussion is that there are no differences in these re/development projects amongst all the alternatives--including the No-Action. Selecting the “proposed project” might affect the timing of those activities--or not. It may instead trigger re/development outside the study area-- especially with the unmitigated, actionable traffic noise increases anticipated in the Action Alternatives.

Response: *The sentence noted on lines 18 to 20 of the Draft Environmental Assessment will be omitted. The change will be reflected in an addendum that catalogues changes to the DEA made in response to public comments. It is anticipated that the increased capacity of the future facility would improve the mobility to the areas within the proposed project limits.*

Local planners were interviewed and coordinated with to determine development of green spaces and identify other development areas. These areas were discussed in the indirect and cumulative impact technical reports. From the feedback received during this coordination, the rate of development of these areas could be increased as a result of the proposed project; however, these developments are likely to occur regardless of the proposed project; therefore, the effects are not a direct result of the proposed project.

See K-17 in Appendix A

Comment 4

Page 115, Indicated epage 132/3992, Line 13. Bias in Presentation--Community Cohesion. The document concludes that "...the project would have a beneficial effect on communities due to...increased community cohesion..." without providing substantiation. Increases in speeds between distant areas does not increase community cohesion; nor do decreases in walkability and increases in noise within communities. The document needs to make clear that the only community being benefitted by the unidentified "project" is the commuting community and that communities will suffer detrimental effects associated with unmitigated, increased traffic noise in the Action Alternatives.

Response:

A summary of "local" and "commuter" trips is provided in the table below. To identify local users versus commuter users, a study area was developed. The study area is defined as I-30 between the I-30/I-40 interchange and the I-30/I-530/I-440 interchange, including I-630.

- *Local user – One whose peak hour travel*
  - *Starts and ends inside the study area*
  - *Starts inside the study area and ends outside the study area in the AM*
  - *Starts outside the study area and ends inside the study area in the PM*
- *Commuter user – One whose peak hour travel:*
  - *Starts outside the study area and ends inside the study area in the AM*
  - *Starts inside the study area and ends outside the study area in the PM*
  - *Starts and ends outside of the study area*

The table below provides a breakout of local and commuter users traveling along I-30 within the study area defined above. The local users in each peak hour are highlighted.

2041 Local and Commuter users along I-30 between the North and South Terminals During the AM and PM Peak Hour

	AM		PM	
	Volume	Percent	Volume	Percent
Starts and ends inside study area	2,800	11%	1,800	7%
Starts inside and ends outside	6,700	26%	13,050	52%
Starts outside and ends inside	13,850	53%	6,800	27%
Starts and ends outside study area	2,800	11%	3,600	14%
Total	26,150	100%	25,250	100%

Notes: AM peak hour from 7:15 to 8:15 AM and PM peak hour from 4:30 to 5:30 PM

Volumes are rounded to the nearest 50

The statement that the only community being benefited by the project is the commuting community is incorrect. In total, more than a third of traffic in the AM (37%) and PM (34%) peak hours (approximately 9,500 vehicles in the AM and 8,600 in the PM) represent local user trips. The proposed project would benefit commuters; however, it would also benefit all users of the facility including local drivers.

The community impacts of the project are discussed in Sections 3.1 and 3.2 of the EA and in EA Appendix F: Community Impacts Technical Report. The I-30 and I-40 corridors are existing facilities. Although proposed ROW is anticipated, it is not substantial and only occurs at specified locations along the corridor and would not further divide or separate any communities substantially from existing conditions. All five of the residential relocations and one of the commercial relocations are along Cypress Street in North Little Rock. Cypress Street is being extended over the UPRR railroad in order to allow Cypress Street to serve as a southbound frontage road, increasing community cohesion in this minority neighborhood. The remaining commercial relocations are along the northbound frontage road in downtown Little Rock, between 3rd and 6th Streets, along the I-30 southbound exit ramp to 4th Street, and at the Broadway Street interchange. None of these relocations would negatively affect community cohesion. Increased community cohesion is also attributed to the additional bicycle and pedestrian accommodations along 2nd Street, and on the proposed 6th Street and 9th Street overpass improvements, which are anticipated to improve east-west connectivity. Further, the

C/D roads proposed with the Preferred Alternative (2B: 6-lane with C/D SDI) would enhance connectivity between the downtown areas of Little Rock and North Little Rock.

Comment 5

--Page 98, Indicated epage 115/3992. Failure to identify areas adversely affected by traffic noise in the Action Alternatives which are not being mitigated. The document shows where noise barriers are to be installed, but fails to also disclose the locations of the noise barriers which were actionable based on projected high traffic noise levels but were found to be infeasible and/or unreasonable. There must be full disclosure, otherwise people cannot provide informed comment and decisionmakers cannot make informed decisions. Property owners need to know how their properties, and their property values, are to be affected by the increased traffic noise associated with the Action Alternatives.

Response: *The Environmental Assessment Appendix I is the Traffic Noise Report. Tables 7-1 through 7-4 of Appendix I offer a concise summary of the noise barriers that were evaluated, including the characteristics of each barrier, the effectiveness of each barrier, number of benefitted residences, cost per benefitted receptor, and whether the barrier was considered feasible and reasonable.*

Property values are determined and affected by multiple factors. Sole determination of property values caused by noise alone would be insufficient especially in the context of the proposed project which is highly urbanized along the existing I-30 corridor. A landowner's perception of the presence of noise barriers is subjective. Some landowners support the presence of noise barriers to benefit from the reduced noise levels whereas others may oppose barriers for the potential to block and change their views. Property values are also influenced by unquantifiable factors such crime and safety, neighborhood perceptions of the area, and market demands that fluctuate depending on time of year and dynamic economic conditions.

Comment 6

Page 23, Indicated epage 36/3992, Line 11. Failure to display cost-efficiency goal information. The document identifies a goal of maximizing cost efficiency but it shows no comparison of the dollarvalued costs and benefits for each alternative. The document does not even include an installation cost estimate.

Response: *The 30 Crossing project is to be delivered under a fixed cost – variable scope design-build agreement. The Design-Builder will maximize the scope to be constructed within the limits of the funding that is allocated from the $631.7 million project budget. It is estimated that the value of the design-build agreement will be in the range of $525 - $550 million.*

Comment 7

The EA fails to disclose the other projects which are not being done because this project is being done. AHTD's letter to Metroplan of June 17, 2016 stated that "if the no-build alternative is selected...the available funding would be dedicated elsewhere…." The public, especially the citizens of Arkansas, and government officials need to know what these other projects are--and they need to be identified as being part of the No-Action Alternative.

Response: *The Department has not yet developed a list of projects that would be funded in the event the No-Action Alternative is selected for the 30 Crossing project. If the No-Action Alternative were selected, the Statewide Transportation Improvement Program (STIP) would be amended to re-allocate the project funding in a manner consistent with the methodology used to develop the STIP.*

Similar to other MPOs in the state and the country, Metroplan is required, in cooperation with the State and public transportation operator (Rock Region Metro), to develop a long-range Metropolitan Transportation Plan (MTP) and a Transportation Improvement Program (TIP) through a performance-driven, outcome-based approach to planning for the metropolitan area. In formulating the MTP, the MPO shall consider factors such as economic vitality, safety, security, accessibility and mobility, environmental protection, connectivity, system efficiency, preservation, resiliency and reliability, and travel and tourism as the factors relate to a minimum 20-year forecast period. The TIP shall reflect the investment priorities established in the current MTP and shall cover a period of no less than 4 years, be updated at least every 4 years, and be approved by the MPO and the Governor or his designee. The TIP shall include, to the maximum extent practicable, a description of the anticipated effect of the TIP toward achieving the performance targets identified in the metropolitan transportation plan, linking investment priorities to those performance targets. In the central Arkansas region, these performance targets shall be established for the performance measures identified in 23 CFR 490, which are for safety, pavement conditions, bridge conditions, travel time reliability and freight.

Comment 8

Unaddressed programmatic concerns. The PEL process documents and this EA discuss other planned interstate work in the Greater Little Rock area integrally related to this project--such as work on I-30 to the south of the project area, and on I-630 immediately to the west of the project area. It is clear then, that the 30-Crossing project is but one component of a larger program of interstate expansion in the area. Accordingly the discussion of indirect and cumulative effects must be expanded accordingly. In particular, this must address the greenspace conversion, greenhouse gas, population segregation, noise effects, and other human health effects

associated with encouraging people to commute ever greater distances rather than locating in greater proximity to their places of work.

Response: *See I-12 of Appendix A*

Future transportation projects are considered as part of the cumulative impacts analysis but are separate projects and not associated with the proposed project. Cumulative effects were analyzed for community (including socioeconomic, community cohesion, public facilities, noise), historic, and water resources. An indirect effects analysis was also performed in coordination with local city planners. The improved mobility would benefit commuters; however, all users including local drivers would benefit and local businesses would benefit from increased accessibility of customers to their facilities.

See K-18 of Appendix A

Increased community cohesion is also attributed to the additional bicycle and pedestrian accommodations along 2nd Street, and on the proposed 6th Street and 9th Street overpass improvements, which are anticipated to improve east-west connectivity. Further, the C/D roads proposed with the Preferred Alternative (2B: 6-lane with C/D SDI) would enhance connectivity between the downtown areas of Little Rock and North Little Rock.

Metroplan offered their opinion on the likelihood of development in the region. The following passage, provided by Metroplan, cites significant uncertainty in forecasting growth trends:

“Broadly speaking, 30 Crossing will accentuate the region's tendency to continue developing at low density, with the bulk of residential housing growth in peripheral locations (already growing at a comparatively fast pace) from which residents commute to jobs in the central area. The project's greatest impact is expected to be along the region's northeastern vector, the US 67-167 corridor including Sherwood, Jacksonville, Cabot, Austin and Ward. This is because the project (and ongoing widening of Hwy 67/167) will reduce commuting times to major job concentrations in downtown and midtown Little Rock, south of the Arkansas River, yielding an acceleration of growth within the corridor over the short term. There could also be a secondary impact on the 1-40 corridor toward Maumelle, which has few locally-based jobs but many resident commuters. Additional growth may also happen in the East End area of Pulaski County and Southwest Little Rock where there is ample developable land. Multi-family housing growth may be boosted toward the immediate ends of the 30 Crossing project, in North Little Rock and Sherwood on the northeast as well as the southwest Little Rock/Otter Creek areas to the southwest. In the past, major freeway widenings have yielded substantial commercial/retail land

use upgrades, but a major transition is underway in retailing due to e-commerce growth, which dampens growth prospects.

The trend of slow but steady multi-family housing growth seen in recent years in downtown portions of Little Rock and North Little Rock is expected to continue. Traffic flow alterations in specific downtown locations may have localized impacts that are hard to foresee - positive and negative - though generally lesser in scale. The addition of the collector/distributor lanes will increase direct accessibility between the two cities, which could have a positive impact on housing and commercial prospects in both downtowns. The highest uncertainty involves the portion of North Little Rock directly east of 1-30. This area, which includes some of the lowest incomes and highest poverty levels in the region, may have been impacted by the division/isolation effect of the original 1-30 construction in circa 1960. The area appears ripe for redevelopment owing to its proximity to resurgent urban districts nearby; 30 Crossing may improve accessibility enough to induce renewed private investment. Alternatively, the widening could increase this district's perceptual isolation from the west side of the freeway, with continuation of poor economic prospects, especially toward the northern end. Job growth impacts of 30 Crossing are also difficult to determine. Improved accessibility might, on balance, encourage some job growth in areas with dense job concentrations, including hospitals stretching westward along 1-630. Total jobs have declined modestly in downtown Little Rock over the past ten to fifteen years (despite net housing growth); it is difficult to know if the job decline will continue.

Notes and Sources

1. Metroplan's ICA 2040 Plan, which has informed much of the analysis for 30 Crossing, was developed in the aftermath of the 2000-2010 decade - a period of fast regional growth. Traffic projections for 30 Crossing were developed with the available information at the time of their development, during the spring and summer of 2014. The Imagine Central Arkansas Plan was adopted in December 2014, with these assumptions for population growth.

2. Transportation facilities are only one of many factors impacting development trends. Other factors include the availability of city utility services, surrounding land use, developable lands, schools, access to quality of life enhancements (parks, entertainment), and the existing distribution of people and jobs. Metroplan considers each of these when developing future year socioeconomic projections for the regional travel demand model, but it is impossible to account for all factors or the inherent randomness of human behavior.

3. This analysis includes the widening of the 67-167 (future 1-57) corridor from Jacksonville to Cabot (currently underway), since this amounts to a northeastern extension of the same corridor.

4. There was a surge in multi-family housing growth in western Little Rock within a 2-mile radius of the Big Rock Interchange project in the years following this project's completion. Some of this development can be attributed to a general shift toward greater multi-family housing that followed the Great Recession, but the location correlation with the 1-630/1-430 interchange improvement is more than coincidental. It is nonetheless likely that the region's multi-family housing will see a down-shift in the immediate future, owing to rising costs in materials, construction labor shortage and rising land costs.

5. The possibility of housing growth in Maumelle may be further boosted near the new Maumelle interchange that will be constructed on 1-40, which is being funded due to a city tax increase approved by city voters during 2018.

6. The accelerated growth of Saline County, which the widening of 1-30 is thought have boosted, is documented in MetroTrends articles: (1) Economic Review and Outlook 2004, outlook section (p. 12); (2) Demographic Review and Outlook 2005, housing trends section (p. 4); (3) Demographic Review and Outlook 2005, from the population estimate section (p. 1); (4) Economic Review and Outlook 2005, from outlook section (p. 12); (5) Economic Review and Outlook 2007, from the outlook section (p. 12); and (6) Demographic Review and Outlook 2014, outlook section (p. 14).

7. This write-up reflects the experience of Metroplan staff, based on many years of experience with land use and traffic projections.

8. The TELUM land use model could be consulted for further land use insights resulting from 30 Crossing. The model demands relatively intensive inputs. Any attempt to use TELUM for 30 Crossing would require something like three months of staff work to conduct."

Comment 9

Page 92, Indicated epage 109/3992, Section 3.2. Why wasn't MacArthur Park included as a park in this section?

Response: *Section 3.4 of the EA and Appendices H1 and H2 describe the effects on parks as a result of the project. Only parks affected by the project are discussed. The project has no direct or indirect effects on MacArthur Park, including noise effects.*

Section 3.5 of the EA and Appendix I describes in the noise analysis performed for the project. Noise measurements were taken in Julius Breckling Riverfront Park, William J. Clinton

Presidential Center and Park, and MacArthur Park, for the purposes of validating the noise model. Using FHWA's Traffic Noise Model, future noise levels at 31 locations within MacArthur Park for the project alternatives were predicted. Existing and predicted noise levels within MacArthur Park are well below criteria, and there are no substantial increases as a result of the project improvements. There are no noise impacts to MacArthur Park as a result of the project.

Comment 10

The EA fails to disclose the adverse mobility effects during construction. The document needs to present a clear picture of mobility in each alternative over time--not just the projected situation in 2041. The document nowhere displays the adverse effects on mobility during the periods of multi year periods of construction in the corridor and also the period of construction on I-30 just south of the project area. This distorts the reader's perspective and makes the action alternatives look better than they actually are. Certainly people are more concerned about how their mobility will be affected over the next 5 or 10 years than in the year 2041.

Response: *Roadways are designed to handle traffic conditions expected in the design year; in this case, 20 years from the expected opening year (2041). 20 years was adopted early in the interstate program as the standard design life for federal-aid projects. It was considered a reasonable length of service in view of the system's extent, proposed budget, and available information about pavement design and future traffic growth. Traffic levels prior to the design year would be lower than in the design year. Consequently, if the roadway is able handle a higher traffic volume in the design year, it would be able to handle a lower traffic volume prior to the design year. Appendix B of the EA is the Interchange Justification Report (IJR) Traffic Results and Safety Analysis, which itself has an Appendix B, the Traffic Results Addendum. Section 6.0 of the Traffic Results Addendum describes traffic conditions expected from 2021 through 2041.*

The EA addresses temporary impacts on mobility during construction on pages 68 (with respect to disruption of access to public facilities) and 80 (with respect to community cohesion). In both cases, the EA acknowledges that temporary impacts will occur during construction. A more thorough analysis of temporary impacts during construction can be found in Appendices F (Community Impacts), G (Historical and Archaeological Impacts), H (Park Impacts), I (Noise Impacts), K (Visual Impacts), and O (Floodplain Impacts).

Comment 11

Page 105, Indicated epage 122/3992, Line 11. The document says that the Action Alternatives would cause encroachment into the Arkansas River 100-year floodplain and that it would not. The self-contradiction needs to be resolved.

“The project was evaluated to determine if any encroachment into special flood hazard areas, the 100-year floodplain, identified through Federal Emergency Management Agency Flood Insurance Rate Maps, would occur with the Action Alternatives. There were three areas in the project area where encroachment would occur: the Arkansas River, Fourche Creek, and Dark Hollow Basin. No additional floodplain encroachment will occur in the Arkansas River.” [emphases added]

Response: *Although the construction of the I-30 Bridge over Arkansas River will involve work (encroachment) in the River and adjacent floodplain, the amount of encroachment will not increase over the existing condition. There will be no additional encroachment. The large storage buildings located in the floodplain on the south and north banks will be removed, and the additional bridge piers will not result in a net increase. Floodplain modeling has been done for the Arkansas River, and the project will not result in an increase in flood elevations.*

Comment 12

Page 93, Indicated epage 110/3992, Line 31. Noise impacts to parks. The passage says, “There will be no permanent noise impacts to the parks as a result of the project.” As the project is intended to accommodate increased traffic volumes, an increased percentage of truck traffic, higher speeds, and four additional travel lanes adjacent to two parks, the reader can only ask how it is possible there will be no permanent noise impacts to the parks immediately adjacent to I-30 on the Arkansas River, and to the un-cited MacArthur Park. Traffic volume, truck traffic, and higher speeds are all associated with higher traffic noise.

Certainly it is reasonable to expect a design-year build condition noise level that creates a substantial noise increase over existing noise levels as specified at 36 CFR 772.19 Table 1. This is particularly evident as parks and residential areas have the same noise abatement criteria and the text documents up to 256 noise receptors impacted in the Action Alternatives (Table 6), and the need to provide noise barriers for residential developments. As the project allows for an open-ended period of construction (if the successful bid is in excess of the design estimate) construction noise should also be considered as being permanent.

Response:

Traffic noise was evaluated in North Shore Riverwalk Park, Julius Breckling Riverfront Park, William J. Clinton Presidential Center and Park, and MacArthur Park. This evaluation is summarized in Section 3.5 of the EA and in Appendix I of the EA. Noise impacts are considered to result from approach or exceedance of the Noise Abatement Criteria (NAC), which for parks is considered to be 67 A-weighted decibels (*dB(A)), or from a substantial increase (10 dB(A) or greater) over the existing noise level. Noise modeling was done to evaluate future noise levels in parks in the vicinity of the project. For the Preferred Alternative (Alternative 2B: 6-lane with C/D SDI), these results are shown in Tables C-1 through C-14. In no case did the future noise levels at any receptor in any of the nearby parks reach 66 dB(A) or increase more than 10 dB(A) with the traffic from the recommended Action Alternative. In addition to proximity, and traffic factors such as volume and speed, the noise model takes into account differences in elevation between the noise-generating source and the receptor being modeled. In the case of all four parks, there is a substantial difference in elevation between the noise-generating source and the receptor in the park.*

Refer to Standard Response K-2 in Appendix.

Comment 13

Page 66, Indicated epage 83/3992, Line 18. The text wrongly portrays the Action Alternatives as providing a “boost to the local economy” without any substantiation. For instance: “Improved travel times and reliability would make downtown destinations more attractive to businesses, visitors and tourists, which would provide a boost to the local economy. “This statement is speculative--unsupported by anything in the document. Any number of flourishing downtown areas in the United States and in the world have longer travel times and less reliability than those shown for the 30 Crossing No-Action Alternative. In point of fact, the downtown areas of both Little Rock and North Little Rock have blossomed during the period of time when ARDOT estimates I-30 Corridor congestion has been at its worst. A case can reasonably be made that the corridor congestion has contributed to downtown development because people are put off by the prospect of commuting to the suburbs rather than living close to the downtown area.

The empirical data suggest that increasing mobility between the downtown and the suburbs encourages development in the suburbs--not in the city proper. 2/ The Action Alternatives could be reasonably expected to trigger the development of subdivisions ever-more-distant from the city’s center, and to the city’s detriment. The document fails to explore the adverse effects associated with the conversion of greenspace such as increased energy consumption, water pollution, greenhouse gases, and the human health effects associated with relying on a car-

dominant lifestyle. Unbalanced statements such as these indicate a sense of Action Alternative boosterism rather than objective analysis.

Response: *1) The Preferred Alternative would improve accessibility in comparison to the No-Action Alternative, and improves access to local businesses which could result in economic benefits attributed to shorter travel times, easier access, and reduction of costs driving to/from commercial and retail destinations.*

2) Local planners were interviewed and coordinated with to determine development of green spaces and identify other development areas. These areas were discussed in the indirect and cumulative impact technical reports. From the feedback received during this coordination, the rate of development of these areas could be increased as a result of the proposed project; however, these developments are likely to occur regardless of the proposed project. Therefore, the effects are not a direct result of the proposed project. As found on page 21 of the Indirect Impacts Technical Report, local planners also stated that market forces and cooperation with future land use regulations are more likely to influence growth, not the proposed project.

Comment 14

Page 66, Indicated epage 83/3992, Line 29. Bias/lack of balance in presenting information. The document's lack of balance and objectivity is manifest in such statements as the following: "Travel times from area destinations such as the River Market and Clinton Center to outside the project during the afternoon peak would be several times greater than travelers currently experience." Figure 24 on page 45 (epage 58/3992) shows only a brief period of slowdown on southbound traffic from the River Market and Clinton Center. And even that delay could be avoided by simply using the access road and entering I-30 at the entrance just south of 9th street. Clearly, southbound travel times from area destinations such as the River Market and Clinton Center to outside the project during the afternoon peak would NOT be several times greater than travelers currently experience. The document ignores this fact and instead only mentions the delay associated with northbound traffic. The obvious implication of this Figure 24 is that prevailing congestion in northbound access would serve to stimulate home construction in the downtown, southern and eastern portions of Little Rock and its suburban areas to the south. Economic development would be shifted rather than stifled.

Response: *The referenced statement on Page 66, (epage 83/3992) Line 30, "travel times from area destinations such as the River Market and Clinton Center to outside the project during the afternoon peak would be several times greater than travelers currently experience" is based on Future No-Action travel times in Table 8. These travel times were estimated using a traffic*

simulation program (VISSIM). Future travel times (even to the south) are longer than existing, as the regional Metroplan model shows traffic volume growth that results in increasing congestion. Travel times under the Preferred Alternative (2B: 6-lane with C/D SDI), particularly from the River Market, are several times lower than the Future No Action Alternative travel times.

The commenter states that Figure 24 on page 45 (epage58/3992) shows only a brief period of slowdown on southbound traffic from the River Market and Clinton Center. When looking at the figure, the speed profile on the left side of the I-30 exhibit shows a slowdown of 30 mph or lower lasts from 2:00 PM to 5:00 PM and then returns from 6:30 PM and does not recover by 10:00 PM according to the model. Part of this congestion is also related to downtown congestion and gridlock, which is caused by backups on I-30 southbound and I-40 feeding into I-30 southbound, as indicated on the figure.

Comment 15

Failure to disclose delays associated with construction. The document goes to great lengths to detail mobility improvements in 2041 after the I-30 Corridor improvements have been made and after other improvements have been made outside the corridor--but fails to address reasonably-expected delays and detours during the multiyear periods of construction on both the interstate and the connecting roadways. Put another way, the document displays the distant-future time-saving benefits of the Action Alternatives without displaying their near-future time-losing disbenefits. The text fails to compare the 6-7 years of delay reasonably expected in the near-term against the estimated benefits in the distant future. See for instance,

--Page 68, Indicated epage 86/3992, Lines 2-6. “The No-Action Alternative would not accommodate projected future growth and the resulting increases in traffic congestion. The Action Alternatives would provide better relief than the No-Action Alternative from the congestion expected as a result of projected population growth. The Action Alternatives would improve travel conditions, enhancing safety and mobility.”

--Page 68, Indicated epage 86/3992, Lines 15-18. The No-Action Alternative would not provide any improvements in access to public facilities and would result in decreased access as congestion increases. In addition, emergency response times would not be improved and may worsen over time as a result of increasing congestion within the corridor.”

Response: *The EA addresses temporary impacts on mobility during construction on pages 68 (with respect to disruption of access to public facilities) and 80 (with respect to community cohesion). In both cases, the EA acknowledges that temporary impacts will occur during construction. A more thorough analysis of temporary impacts during construction can be found*

in Appendices F (Community Impacts), G (Historical and Archaeological Impacts), H (Park Impacts), I (Noise Impacts), K (Visual Impacts), and O (Floodplain Impacts).

Comment 16

Page 83, Indicated epage 100/3992, Line 1. Disproportionate displacement of minority and low income (EJ) populations. The document's argument that population displacements are not disproportionate because the total population of the project area is predominantly minority makes no sense. The population being displaced is predominantly EJ. The EJ population is being displaced disproportionately from the population being served by the project. The predominantly EJ inner city population is being displaced in order to allow the predominantly non-EJ, non-inner-city population to traverse the EJ neighborhoods more quickly. "These displacements would not be considered disproportionate to EJ populations, because the EJ communities are located throughout the corridor, and the total population of the project area is predominately [sic] minority."

Response: *The project improvements are almost entirely within existing ROW, resulting in very little required ROW (11.1 Acres, 5 commercial displacements; 6 residential displacements). No displacements occur south of I-630. The impacted commercial properties are located in both EJ and non-EJ census areas. Four of the five impacted commercial properties are within non-EJ census areas. The one commercial business and all the residences area within high-minority census areas. These properties would be displaced because all four action alternatives propose a continuous frontage road constructed over the UPRR on the southbound side of the I-30 facility. As proposed, Cypress Street would serve as a continuous southbound frontage road from 20th Street to Riverfront Drive. Although the frontage road is not necessary for the implementation of the project, the construction of the frontage road to connect Cypress Street north and south of the UPRR tracks would be a positive benefit to the minority community that exists to the south and north of the UPRR track, and which had been historically separated by them. It addresses the public's concern over this area lacking the one-way frontage road system.*

We understand that minority and low-income populations historically have been treated unfairly during the development of highway projects. In order to prevent such practices, NEPA studies must follow Executive Order 12898, which requires federal agencies to address disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations, to the greatest extent practical and permitted by law. The 30 Crossing project did conduct an analysis of potential impacts on these populations as directed by Executive Order 12898 and determined that this project did not disproportionately

impact any minority or low-income population. Furthermore, in order to promote nondiscrimination, minority and low-income communities were offered additional opportunities to participate in project related meetings and voice their opinions on the proposed actions.

During the PEL, four community meetings were held in October 2014 at minority venues coordinated with Marion Butler, Shorter College President Jerome Green, and a coalition of pastors of local minority churches. These meetings were held at King Solomon Baptist Church and Shorter College in North Little Rock and St. John Baptist Church and Ward Chapel AME Church in Little Rock. During the NEPA phase, a second round of open-house meetings were held in the summer of 2016 at St. John Baptist Church, King Solomon Baptist Church, and Shorter College. During the public hearing comment period in 2018, the project team worked with Senator Linda Chesterfield to present information and answer questions at a community meeting in Little Rock. Throughout the project, minority churches, organizations, and neighborhoods were notified of public meetings through hand-delivered flyers, mailings, public service announcements, newspaper ads, emails, and additional outreach efforts through the woman-owned small business and Minority Business Enterprise J Kelly Referrals in Little Rock. Efforts have also been made to have public meetings hosted by venues in minority areas, including the Horace Mann Arts and Science Magnet Middle School in Little Rock and the Friendly Chapel Church of the Nazarene in North Little Rock.

Comment 17

Page 120, Indicated epage 137/3992, Line 10. The EA misrepresents Alternative 2B as receiving the most public support and being the MPO's locally Preferred Alternative. In point of fact, AHTD used the PEL process to dismiss all alternatives except a 10-lane alternative (with an interchange option). AHTD received any number of proposals from citizens which could have been crafted into reasonable alternatives responsive to the Purpose and Need. Instead, AHTD reasoned that each recommendation (signage, public transit, through-traffic diversion, an additional bridge, etc.) taken independently could not meet AHTD's particular mobility concern and dismissed them out of hand.

Effectively, AHTD used the PEL process to dismiss all the reasonable alternatives responsive to the purpose and need statement that did not meet their pre-analysis decision to add lanes to the corridor; and only added an 8-lane alternative (with an interchange option) upon FHWA request.

Note that all the reasons described in the EA for identifying Alternative 2B as the Preferred Alternative could have been achieved without adding lanes to the corridor.

"Alternative 2B has been identified as the Preferred Alternative due to the following reasons related to the project goals:

- Improves local vehicle access to and from downtown Little Rock/North Little Rock by more directly connecting the frontage road system to the C/D lanes crossing the Arkansas River;
- Optimizes opportunities for economic development by providing a continuous frontage road system between I-630 and East 4th Street and connection to the River Market and Clinton Center areas via President Clinton Avenue, 2nd Street and 3rd Street and allowing additional green space for public use in downtown Little Rock;
- Enhances east-west connectivity, including bicycle and pedestrian connectivity, by removing the elevated ramps between President Clinton Avenue and 3rd Street and by replacing the elevated Hwy. 10 Spur with an improved at-grade 2nd Street; and
- Identified by the local MPO as the locally Preferred Alternative and has received the most public and business support.

The last bulleted statement above is directly contradicted by the following passage in Appendix B of Appendix A, page ES-7, indicated epage 279/3992 which shows that Alternative 2B was not even included in the PEL analysis.

“6-Lane with Collector/Distributor Lanes (6-Lane with C/D Lanes Action Alternatives)

- Action Alternative 2A: 6-Lane with C/D Lanes with SPUI
- Action Alternative 2B: 6-Lane with C/D Lanes with SDI

The split diamond option was not mentioned in the I-30 PEL but was added to the analysis at the beginning of the NEPA study. Regarding the last bulleted statement, it is important to remember that the leaders of Little Rock and North Little Rock, and the entire membership of Metroplan, were faced with an ultimatum from AHTD that they either agree to add lanes to the I-30 Corridor or that nothing would be done to replace the Arkansas River Bridge or do anything else to address the various design deficiencies in the original corridor construction (AHTD letter to Metroplan of June 17, 2016). AHTD’s prior decision to proceed with an expanded corridor is evidenced in their 2014 internal and 2013 external correspondence. The MPO and the public were left with a take-it-or-leave-it decision instead of being afforded the full range of reasonable alternatives.

Response:

The PEL process involved a thorough vetting of a universe of alternatives to address the identified needs of the corridor. There was an extensive public outreach component, during which all suggestions from the public were evaluated. Primary alternatives, those which had the potential to meet the project purpose and need by themselves, and complimentary alternatives, those which could contribute in conjunction with a primary alternative, were considered in this

evaluation. Each alternative was screened through a multi-level process, based on effectiveness in meeting project purpose and need, feasibility and cost, environmental impacts, and public input obtained during four public meetings and extensive outreach activities. The Level 1 screening consisted of a fatal flaw analysis during which several alternatives, including rail and bypass routes, were screened out, either because they did not meet purpose and need, or had high costs or significant environmental impacts. The Level 2 screening was a comparison of the effectiveness of six primary alternatives ranging from six lanes (no widening) to 12-lane widening. Two primary alternatives, the 8-lane General Purpose and 12-lane scenarios, were screened out in Level 2 because they did not meet project purpose and need as well as the other alternatives, or had much higher cost. The remaining primary alternatives were subjected to a rigorous comparison in Level 3. The alternative that was determined to be most reasonable and that had the highest potential to contribute to the purpose and need for the project was the 10-lane Downtown C/D. This alternative was recommended in the PEL to be carried forward into the NEPA phase.

In addition to the PEL recommendation for the primary alternative (10-lane Downtown C/D), the following complimentary alternatives were carried forward into the NEPA phase:

- *Main Lane Pavement Rehabilitation*
- *Auxiliary Lanes*
- *Frontage Road Improvements*
- *Roadway Shoulder Improvements*
- *Horizontal/Vertical Curve Improvements*
- *Intersection Improvements*
- *Bus on Shoulder*
- *Bicycle/Pedestrian Accommodations*
- *Ramp Metering*
- *Transportation System Management (TSM),*
- *Wayfinding/signage, Arterial Improvements*

PEL studies are intended to be carried to a reasonable level of detail, in this case one that identifies a general mode of transportation that accomplishes the goals and objectives of the project. This level is appropriate for a planning study, but does not need to rise to the level of detail required in the NEPA process. After extensive public outreach, the PEL recommendation was that the goals and objectives of the project could best be accomplished by an alternative that included addition of main lanes, main lane widening, C/D roads, the complimentary alternatives, and the replacement of the Arkansas River Bridge: the 10-lane Downtown C/D

alternative. During the PEL study, FHWA was involved in the review of the materials and documents produced by the study team, participated as a member of both the Technical Oversight Committee (TOC) and the Technical Working Group (TWG), attended public outreach events, and had input into the evaluation of the PEL alternatives. FHWA concurred with the PEL Study Recommendations on August 6, 2015, concurred with allowing the project to proceed into NEPA, and allowed the decisions made during the PEL Study to inform the NEPA process. Prior to the start of the NEPA process, FHWA decided to carry forward a second primary alternative that had been screened out during the PEL, the 8-lane General Purpose Alternative, into NEPA, at the request of Metroplan.

At the conclusion of the PEL, ARDOT committed to study the following design refinements to the PEL recommended alternative during the NEPA phase:

- *Improvements to the 2nd Street/Cumberland Street intersection to improve safety*
- *Improvements to the Highway 10 (Cantrell Road)/Cumberland Street intersection*
- *A corridor improvement alternative with two main lanes and three C/D lanes in each direction*
- *Widening and lengthening 6th Street and 9th Street overpasses to enhance east-west connectivity and bicycle and pedestrian mobility*

During the NEPA phase, numerous alternatives were evaluated to address the first two bullets. This analysis is detailed in Appendix C of the EA (Alternatives Analysis Technical Report), Section 4.2.2, Highway 10 Interchange Options. It was determined that the two alternatives that best met the purpose and need for the project were the Single Point Urban Interchange (SPUI) and Split Diamond Interchange (SDI), which became Action Alternatives 1A and 2A, and 1B and 2B, respectively. The 6-lane with C/D Action Alternatives (2A and 2B) were selected over the 8-lane General Purpose Alternatives (1A and 1B) because the latter alternatives left a bottleneck within the project limits (at the I-30/I-40 interchange) that would continue to contribute to the congestion and safety issues in the corridor, as documented in Section 2 of the EA. The selection of the SDI over the SPUI Action Alternatives was made based on the bulleted list provided in the comment.

Throughout the NEPA process, ARDOT has been sensitive to input received from the public, through public outreach, public meetings, and the Section 106 process. This outreach is detailed in Appendix E of the EA. Concerns voiced over impacts to the MacArthur Park Historic District during the Section 106 process resulted in revisions to the original SDI design. These revisions resulted in less traffic being diverted to the Historic District and eliminated the need for roadway improvements within the Historic District.

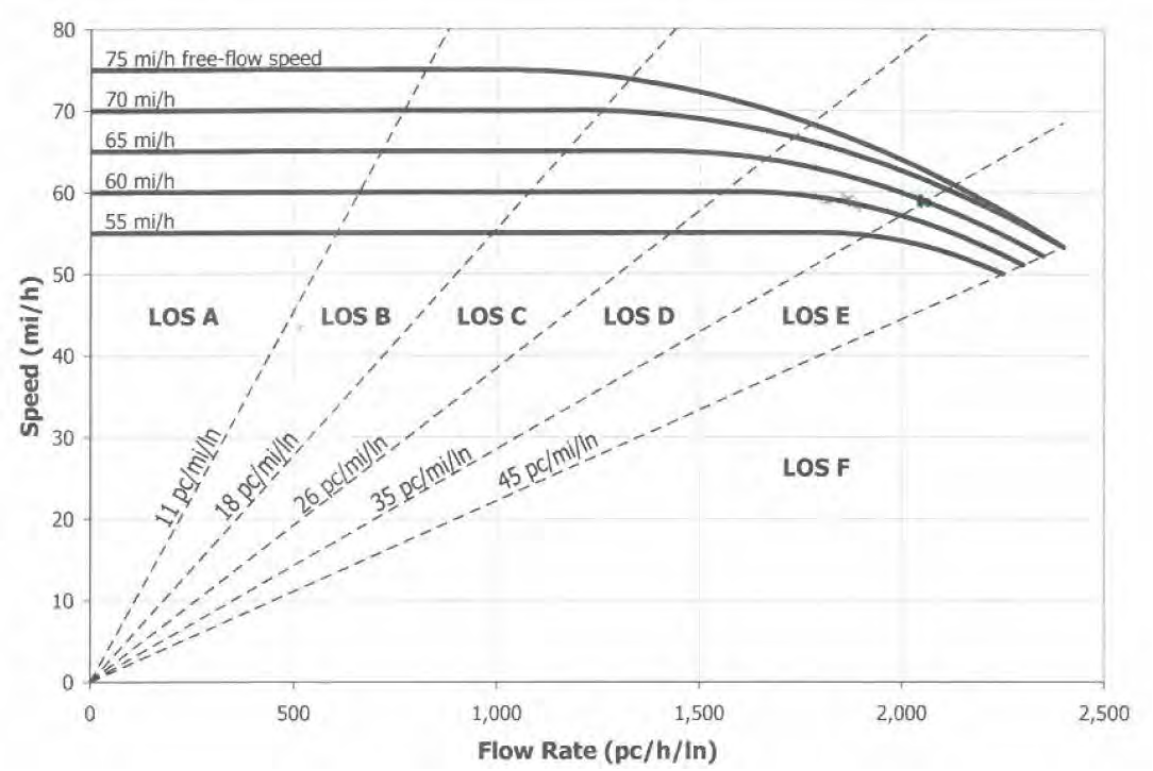
Comment 18

Misrepresentation of Safety-Speed Profiles. The speed profiles presented in the various figures (Figure 24, page 45, epage 58/3992, e.g.) misrepresent the situation as they only use the green color on those portions of the corridors in which the average speed is above the posted speed limit of 60 mph. Thus the green color is only used when the model indicates that, on average, people will be speeding. Traffic moving within ten miles of the maximum posted speed should not be identified as traveling at a less-than-optimum speed--rather it should be indicated with the best--green color.

Correspondingly, all the other lower-speed categories should be upgraded one notch as well. The color scheme should be further modified to show that a high-hazard situation exists in those situations in which vehicles are expected to be exceeding the speed limit. Using the most-favorable color to represent a hazardous situation violates standard engineering practice. For instance, tachometers are normally red-lined and red-shaded to show dangerous operational speeds. Likewise, red-shading is normally used to indicate an over-heat situation. Graphics presented in the document should conform to standard practice.

Response: *Various colors are used to show different speed ranges for the purpose of illustrating the traffic flow condition. There are two shades of green; dark green represents > 60 mph and light green represents 50 to 60 mph. Both shades of green are labeled as "Free Flow." Other colors such as yellow, orange, or red represent various degrees of congestion as noted on the figures.*

The Highway Capacity Manual, considered the national standard for evaluating traffic operations of an interstate, does not consider 10 mph below the posted speed limit as optimal. The following graph shows that for a 60 mph free-flow speed (which is the posted speed on I-30), LOS F conditions occur at speeds less than approximately 52 mph.



In uncongested conditions, there is a distribution of speeds around the posted speed limit. While speeds that far exceed 60 mph could be considered hazardous, the speeds shown as 60+ mph in the graphics are primarily in the low 60s.

Additionally, FHWA's Enhanced Interchange Safety Analysis Tool (ISATe) was used to predict the future crashes for the No-Action and the Action alternatives. This software does not use speeding as one of the factors for predicting future crashes. This corridor was compared to other 6-lane corridors in the state that do not have as much congestion and therefore more opportunities for speeding. Those corridors perform better with regard to crashes (both total and sever/fatal) than I-30. Therefore, the higher speeds shown in green on the graphic should not be changed to represent a hazardous situation.

Comment 19

Misrepresentation of Safety-Corridor Congestion. The congestion depictions in the various figures (Figure 24, page 45, epage 58/3992, e.g.) misrepresent the situation as they only use the dark-green color on those portions of the corridors in which the average speed is above the posted speed limit of 60 mph. Thus the dark-green color is only used when the model indicates that, on average, people will be speeding. Traffic moving within ten miles of the maximum posted speed should not be identified as congested traffic--rather it should be indicated with a dark-green color. All the other lower-speed categories should be upgraded one notch as well.

To do otherwise is to incorrectly portray those alternatives without ten lanes as being worse than they actually are. The color scheme should be further modified to show that a high-hazard situation exists in those situations in which vehicles are expected to be exceeding the speed limit. Using the most-favorable color to represent a hazardous situation violates standard engineering practice. For instance, tachometers are normally red-lined and red-shaded to show dangerous operational speeds. Likewise, red-shading is normally used to indicate an over-heat situation. Graphics presented in the document should conform to standard practice.

Response: *This comment is a repeat of Comment 18. See response to Comment 18.*

Comment 20

Page 16, Indicated epage 29/3992, Line 5. Failure to present information objectively. The text observes: “Crash data from 2012-2014, the most recent years available, show an average fatal and serious injury crash rate on the segment of I-30 from I-630 to I-40 that ranged from 4.09 to 17.50 per 100 million vehicle miles traveled within that time period, which is substantially higher than the statewide average for similar freeways during that time period (3.19 to 5.08 fatal and serious injury crashes per 100 million vehicle miles traveled).” The project corridor now stretches some 7.3 miles. Why then point out safety information for a single segment? It would seem the valid comparison would be to compare this I-630 to I-40 worst-case segment (line 13 on the same page: “The majority of the crashes occurred on I-30 between I-630 and I-40.”) with other worst-case interstate segments around the state.

Response: *The safety discussion in Section 1 of the EA summarizes the reasons that safety is part of the purpose and need for the project. The details of the safety analysis are found in Appendix B, the IJR Traffic Results and Safety Analysis, Appendix C (Safety Analysis). Section 1 of the EA points out that the segment of I-30 from I-630 to I-40, which is 3.0 miles of the 7.3-mile project and the most heavily used, is unsafe compared to similar freeways throughout the state. The need for safety improvements is determined by comparing crash rates against the average crash rates for similar roadways rather than the worst case safety conditions.*

The tables in Appendix B, the IJR Traffic Results and Safety Analysis, Appendix C (Safety Analysis) present safety information for the entire limits of the project and a comparison to similar facilities in the state. ARDOT calculates statewide average crash rates for different facilities annually. A comparison with the average of all 6-lane urban freeways within the state is provided in Table 2 of the EA.

Comment 21

Insufficient Crash Damage Data pertaining to lethal events. Crash damage data needs to be differentiated for fatal and non-fatal crashes, and for the timing of the events. As presented, the reader has no idea as to how congestion affects the lethality of the corridor. Does corridor congestion result in more low-speed, low-lethality rear-end collisions and fewer high-speed, high lethality accidents? Are lethal accidents more likely to occur during periods of congestion or not? Is the corridor actually safer while congested? Reducing congestion may reduce the low-lethality, rear-end collisions associated with inattentive stop-and-go driving, and increase the fatalities and serious injuries associated with inattentive high-speed driving.

Response: *Congestion is only one factor contributing to safety issues on the I-30 and I-40 corridor. The purpose and need for the project addresses many of the roadway deficiencies that contribute to an unsafe roadway, including ramp lengths that are too short, interchanges that are too close together, curves that are too sharp, left exits, and shoulders that are either missing or deficient. A predictive analysis done for the project using the software developed by FHWA, Enhanced Interchange Safety Analysis Tool (ISATe), confirmed that these deficiencies do contribute to the safety issues on the corridor and that the project improvements do reduce the potential for crashes to occur.*

With respect to congestion, KA (fatal and serious injury) crashes on this corridor were compared with other similar facilities (6-lane urban freeways) throughout the state that are not as congested as I-30. The KA rates on these less congested roadways are much lower than on I-30; therefore, reducing congestion is not likely to cause an increase in KA crashes. The ISATe results indicated that the Preferred Alternative would reduce the number of KA crashes.

Comment 22

Page 25, Indicated epage 38/3992, Line 24. Failure to provide a valid reason for eliminating from detailed study bypass routes along Pike Avenue and Chester Street. The text indicates that these alternatives were dropped because: “It was determined that these alternatives would not divert enough traffic from I-30 to resolve the congestion and safety issues and would have extensive impacts to residences and buildings along those routes.” It is unreasonable to eliminate alternatives because they fail to resolve the congestion and safety issues. None of the alternatives resolve these problems--they just address these problems in different ways and achieve different results. As stated earlier, the text does not make a case as to how these alternatives address the safety question of lethality. And no particular efforts have been made in any of the alternatives to address mobility questions associated with foul weather conditions

(precipitation, icing, e.g.) and accidents. The fact that the FHWA accepts as reasonable those alternatives which do not “resolve” mobility concerns is evidenced by FHWA’s request that an “8-Lane C/D Reasonable Alternative” be included even though it was shown to reduce mobility vis-a-vis the No-Action Alternative. Specifically, Table 5 of the PEL Level 3 Screening Methodology shows that the “8-Lane C/D Reasonable Alternative” requested by the FHWA has the same time travel from Highway 67 to the South Terminal of the I-30 corridor as that of the No-Action Alternative; that the duration of LOS (Level of Service) E or F is an identical 120 minutes for both the “8-Lane C/D Reasonable Alternative” and the No-Action Alternative; that North Bound Travel Time is actually shorter in the No-Action Alternative than in the “8-Lane C/D Reasonable Alternative”; and that the total of North Bound and South Bound travel time is shorter in the No-Action Alternative than in the “8-Lane C/D Reasonable Alternative”. It is intuitively obvious that an alternative could be developed which both addresses the various safety issues identified in the I-30 corridor AND develops a bypass route along Pike Avenue and Chester Street. Such an alternative could also include features to stimulate public transit usage and to divert through-traffic away from the city center.

Citizens and responsible officials cannot make a comparative determination as to the impacts to residences and buildings along the Pike/Chester corridor vis-a-vis those of the I-30 expansion unless the alternative is developed.

Response: *A complete description of the alternatives evaluated can be found in Appendix C (Alternatives Analysis Technical Report). The Pike Avenue extension and Chester Street extension alternatives are discussed in Section 3.2 (Alternatives Screened out During the PEL Study) of Appendix C. Neither alternative meets the purpose and need of the project.*

The purpose of this project is to increase the safety of vehicular traffic on I-30 and I-40 by correcting geometric deficiencies, improve the condition of the roadway by modernizing infrastructure and maintaining a state of good repair, improve navigational safety on the Arkansas River, correct the I-30 Arkansas River Bridge deficiencies, and reduce traffic congestion by improving mobility on I-30 and I-40. The intent of the project improvements is to provide a reliable transportation corridor between Little Rock and North Little Rock that is structurally sound and improves safety and mobility by improving the operations of the multiple interchanges in the corridor. The I-30 Arkansas River Bridge would be replaced with a new structure, correcting the functional and structural deficiencies and navigational safety issues.

The Preferred Alternative does meet the purpose and need of the project detailed above. It does resolve the congestion and safety issues on the corridor, as detailed in Chapter 2 of the EA. Construction of a bypass route at either Pike Avenue or Chester Street without making any

improvements to I-30 and I-40 would not in any way address the safety issues caused by geometric deficiencies along I-30 and I-40, would not improve navigational safety on the Arkansas River, and would not correct the deficiencies of the I-30 Arkansas River Bridge.

The suggestion is made that an alternative should be evaluated that addresses BOTH the geometric and safety issues on I-30 and I-40 AND adds a bypass route at either Chester Street or Pike Avenue. Presumably, this alternative would also involve the replacement of the I-30 Arkansas River Bridge in such a way that the navigational safety concerns on the Arkansas River are addressed. In order to address the geometric and safety issues on I-30 and I-40 the following would have to be done:

- *Interchange ramps would have to be lengthened*
- *Weaving between interchanges would have to be improved*
- *Substandard curves would have to be corrected*
- *Left exits on I-40 would have to be eliminated*
- *Shoulders would have to be widened*

Addition of a bypass route at Pike Avenue or Chester Street would not eliminate the need for any of these improvements. In order to reduce future No Action traffic volumes to current levels, a 21% reduction in traffic would be needed. The Chester Street extension was analyzed using Metroplan's Travel Demand Model and found to only divert 3.5% of the traffic volume from I-30. Even a reduction of 21%, to current levels, would not be sufficient to eliminate the existing weaving issues that contribute to existing traffic congestion and crashes in the section of I-30 between I-630 and I-40. Through traffic modeling, it was determined that the most effective solution is the addition of two C/D lanes in each direction. Consequently, construction of the Chester Street extension would not eliminate the need for any of the proposed project improvements. The alternative of constructing both the Chester Street bypass and the improvements to I-30 and I-40 needed to address the corridor safety needs would far exceed the budget for this project and would be financially infeasible.

The construction of a new bridge at Chester Street would benefit overall connectivity and mobility in the downtown area of Little Rock and North Little Rock. However, it would not eliminate the need for any of the improvements included as part of this project.

The 8-lane General Purpose Alternative was carried forward into the NEPA phase at the request of Metroplan. After thorough analysis, it was determined that the 8-Lane General Purpose Action Alternatives leave a bottleneck within the project limits, which would result in

congestion and safety issues during the AM peak hour. For these reasons, those alternatives were not recommended.

Comment 23

Failure to develop any Action Alternatives Consistent with Metroplan's decades-long restriction on expanding area interstates beyond six lanes. Normally federal agencies try to work within the existing legal framework of relevant jurisdictions, or barring that, to explain why doing so was not reasonable. The failure of the Federal Highway Administration to respect Metroplan's policy is particularly perplexing as the public submitted numerous proposals which taken together could have been developed into reasonable Metroplan-compliant alternatives. These proposals included replacing the bridge and addressing navigation concerns, connecting the frontage roads in North Little Rock, improving entrance and exit lanes, improving connections to other interstates, improved signage to better direct through-traffic around the downtown area, improved public transit, covering elevated portions of the interstate to reduce noise and icing; real-time signage re-directing traffic during accidents, and so on. The record would appear to indicate that Metroplan acceded to ARDOT's threat to do nothing in the corridor unless Metroplan agreed to allow more through-lanes. This accession was forced upon Metroplan at the last minute rather than being addressed back in 2013 (or earlier) when AHTD first decided to add lanes to the corridor.

Response: *During the PEL stage, numerous alternatives that did not violate the Metroplan 6-lane policy were evaluated, as summarized in EA Section 2.2 and EA Appendix C: Alternatives Analysis Technical Report. No alternatives were found that both kept the existing roadway width at 6 lanes and met the purpose and need for the project.*

See N-3 of Appendix A.

All comments submitted by the public during the PEL and NEPA stages were considered, including the suggestions listed above. Almost all these suggestions have become part of the improvements included under the Preferred Alternative. Covering the interstate was not included as part of the Preferred Alternative due to cost. With respect to transit, this alternative was considered in the PEL and NEPA phases.

The evaluation of transit alternatives that occurred during the PEL and NEPA phases is summarized in EA Appendix C: Alternative Analysis Technical Report. Evaluation of transit alternatives began during the PEL (see PEL Appendix D: Alternative Development and Evaluation), available at https://connectingarkansasprogram.com/interstate-30-pel-report

During the PEL screening process, transit alternatives were considered as complementary rather than as a solution that could meet the congestion relief component of the project purpose and need on their own. Light rail (Street Car) was specifically evaluated and screened on in Level 2A of the PEL. The Central Arkansas Transit Authority (CATA) Strategic Plan (10-year plan) does not include light rail improvements. Light Rail is part of CATA's long range plan; however, CATA has indicated that they would implement Bus Rapid Transit (BRT) before implementing Light Rail along future Light Rail corridors. This alternative was screened out as a result of CATA not including light rail in their 10-year Strategic Plan and the lack of a dedicated funding source identified in the Metroplan LRMTP.

A transit study conducted during the PEL Study (Attachment B to the Level 2 Screening in PEL Appendix D: Alternative Development and Evaluation) indicated that transit would not divert sufficient trips from auto to transit on I-30 in 2040 to improve driving conditions. In addition, transit alternatives would not address roadway and bridge deficiencies or navigational safety, all of which are components of the project purpose and need. ARDOT agrees that transportation challenges have to be addressed through a multi-faceted approach with solutions spanning across all modes. If regional transit agencies such as Rock Region Metro implement mass transit improvements, it will certainly contribute to improving the overall regional transportation system performance.

ARDOT has worked with Rock Region Metro on the 30 Crossing project to identify ways to accommodate transit in the corridor, and Rock Region Metro serves as a member of the 30 Crossing Technical Work Group.

Comment 24

Apparent error in modeling--emphasis on through-traffic rather than serving the downtown. The document says that less than 20% of traffic in the corridor is through-traffic, and yet it sets aside 60% of the lanes for through traffic. The remaining 80+% of the non-through-traffic (that which originates in and/or terminates within the corridor) is assigned to four lanes--less than is currently the case. The reader can only conclude that the modeling has been done wrong or that no real effort has been made to develop any reasonable alternatives that do not add more through-lanes.

Response: *Through-traffic in this context is traffic that passes through both the I-40/I-30 interchange and the I-530/I-440/I-30 interchange. Only traffic originating or destined for Broadway, 4th Street, or 9th Street uses the four lanes of the C/D system. All other traffic uses the six "through" lanes. This traffic is not solely "through traffic". There is a significant amount of traffic in the corridor that is neither through traffic nor traffic originating at or destined for*

Broadway, 4th Street, or 9th Street. This traffic contributes to the need for the six "through" lanes.

See Figure 5 in the IJR Appendix B: Traffic Results Addendum (page 10, epage 286/3992). Of all the traffic entering the I-30 corridor from the north, about 37 percent is destined for Broadway, 4th Street, or 9th Street which will use C/D lanes. Another roughly 30 percent is destined for I-630, approximately 18 percent will reach the south terminal (through traffic), approximately 8 percent of traffic is destined for North Little Rock (other than Broadway), and approximately 7 percent for Roosevelt. Therefore, the model assigns approximately 37 percent of the traffic demand to 40 percent of the capacity (on the C/D lanes) and approximately 63 percent of traffic demand to 60 percent of the capacity (on the through lanes).

Comment 25

Failure to develop an interstate double-spur interstate alternative. The document says that the boulevard alternative was dropped partially because a boulevard would not receive funding which is only available to interstate highways. One way to address this problem is to simply convert the corridor to two interstate spurs (one from the north and one from the south) terminating in the downtown area at the Highway 10 interchange.

This would virtually guarantee that through-traffic would not use the corridor and the corridor could be so designed as to better serve the needs of those who actually live, work, and recreate in the downtown area. The alternative could be optimized for serving the downtown areas rather than devoting six lanes of traffic to the less than 20% of the traffic which is travelling through the downtown areas. This alternative would also address the concerns of the Clinton Presidential Center and others that they maintain access to the interstate. Such an alternative would also include improvements to correct substandard interchange ramp lengths, weaving lengths, horizontal and vertical curves, shoulder widths, and signage. The existing left exits at the I-40 and Hwy. 67 interchanges would be eliminated and replaced with right exits. Frontage road improvements, bicycle and pedestrian enhancements, and additional open (green) space in the Hwy. 10 interchange would be included. All structurally deficient bridges within the project limits, including the I-30 Bridges over UPRR in Little Rock and North Little Rock, and the I-30 Arkansas River Bridge, would be replaced or rehabilitated. Functionally obsolete bridges within the project limits would be replaced or rehabilitated as funding allows. The I-30 Arkansas River Bridge would be replaced with a structure that meets navigational clearance requirements, as requested by USCG. The existing navigational channel would be shifted to the north to align better with the channel in the adjacent upstream and downstream bridges and the horizontal clearance in the navigation channel would be increased to 320 feet. These modifications would

accommodate existing and future navigational needs for the waterway by allowing barges to pass under the bridge more safely. The alignment of the bridge would be shifted slightly in the downstream direction to allow the bridge to be built in phases while causing minimal impacts to adjacent parks. The Highway 10 interchange would be simplified because it would be designed so as to benefit local traffic rather than through-traffic. The practicality of this alternative is established by ARDOT's reckoning that only four lanes are needed to accommodate local traffic in their 10-lane alternatives.

Response: *See H-8 of Appendix A.*

The discontinuous spur alternative as described would include all of the improvements identified as part of the Preferred Alternative, except that the segment of I-30 in downtown Little Rock would be replaced by a segment of local roadway, similar to the Boulevard Alternative, but more limited in scope.

The Boulevard Alternative was evaluated during the alternative development phase, as detailed Section 2.2 and in Appendix C of the EA: Alternatives Analysis Technical Report. It was found that this section of local roadway, with multiple, closely-spaced at-grade intersections, could only accommodate half of the traffic currently using this segment of I-30. Although through traffic, which has been identified as approximately 18% of the total traffic on I-30, would likely seek alternative routes such as I-430 or I-440, the remainder of the traffic would cause severe congestion on the boulevard section, resulting in long delays. Overall mobility in the downtown area would suffer unless additional roadways serving the downtown area such as Main Street or Pike Avenue, are improved to accommodate the additional demand caused by motorists avoiding the congested boulevard section. The boulevard section would introduce signalized intersections, which have a higher incidence of crashes, specifically rear-end collisions, than freeway sections. In addition, the transition from the freeway to the boulevard section would become a bottleneck, where rear-end collisions would be expected. The boulevard section would have provisions for bicycles and pedestrians; however, non-motorized traffic in downtown Little Rock would no longer be segregated from freeway traffic; instead, they would all use the same roadway, which is inherently more dangerous.

The discontinuous spur alternative is essentially a more limited version of the Boulevard Alternative, which has been evaluated and discussed in the EA in Section 2.2 and Appendix C. It was found that the Boulevard Alternative would increase traffic congestion and the likelihood of crashes and does not meet the purpose and need for the project.

Comment 26

Page 28, Indicated epage 41/3992, Line 9. The text provides no basis for the assertion that, "With increasing population and traffic demand and no improvements to the project area, congestion will increase and ultimately decrease safety…." Given the high incidence of rear-end and sideswipe collisions, it is altogether likely that safety features becoming commonplace on cars will work to reduce these collisions in all alternatives--including the No-Action Alternative. And any such collisions will be safer in areas with low-speed, congested traffic in the No-Action Alternative rather than in those alternatives which increase traffic speed.

Response: *Congestion is only one factor contributing to safety issues on the I-30 and I-40 corridor. The purpose and need for the project addresses many of the roadway deficiencies that contribute to an unsafe roadway, including ramp lengths that are too short, interchanges that are too close together, curves that are too sharp, left exits, and shoulders that are either missing or deficient. A predictive analysis done for the project using the software developed by FHWA, Enhanced Interchange Safety Analysis Tool (ISATe), confirmed that these deficiencies do contribute to the safety issues on the corridor and that the project improvements do reduce the potential for crashes to occur.*

With respect to congestion, KA (fatal and serious injury) crashes on this corridor were compared with other similar facilities (6-lane urban freeways) throughout the state that are not as congested as I-30. The KA rates on these less congested roadways are much lower than on I-30; therefore, reducing congestion is not likely to cause an increase in KA crashes. The ISATe results indicated that the Preferred Alternative would reduce the number of KA crashes.

Comment 27

Page 46, Indicated epage 59/3992, Line 2. The text says, "The No-Action Alternative does not relieve congestion or improve mobility." Elsewhere the text says that additional lanes are assumed to be added outside the project area before the design year of 2041 in all the alternatives. That being the case, the No-Action Alternative would be expected to show improvements in congestion and mobility and the text needs to be changed accordingly.

Response: *Congestion on I-30 outside of the project limits between the south terminal and 65th Street exists in the Future No-Action condition. Therefore, additional lanes were assumed to be added outside of the project area are on I-30 west of the south terminal to address this congestion. This is the only capacity assumed outside of the project limits. The purpose of these additional lanes is to allow for a transition area between the improved portions of I-30 north of the south terminal and the unimproved portion west of 65th Street. Additional lanes on I-30 west*

of the south terminal does not improve congestion and mobility in the study area without additional improvements because existing bottlenecks within the study area would limit the number of vehicles that can reach the additional lanes.

Comment 28

Page 6, Indicated epage 17/3992, Line 13. “Pedestrian facilities are well developed in the project area, with the two bridges closest to the I-30 Arkansas River Bridge being restricted to pedestrians and bicycles.” Actually the two bridges closest to the I-30 Arkansas River Bridge are open to pedestrians and bicycles.

Response: *These are two equivalent ways to say the same thing. It also could have been worded “these two bridges do not allow motorized vehicles.”*

7-27-18

Comment 1

The cumulative effects of traffic noise need to be addressed. I would certainly agree with the EA’s assertion on indicated epage 3973/3992 that traffic noise is not declining, but as submitted in other documents, traffic noise is expected to increase in all the alternatives, even beyond the increases which occurred when these interstates were constructed. Therefore the cumulative effects of traffic noise do need to be addressed.

--The temporal start date of 1985 for the cumulative effects analysis is much too late; it must be set to the date at which the first interstate construction in the area began. The deleterious effects of the interstates in greater Little Rock began with the construction of the interstates.

“The temporal study period is from 1985 to 2041. The temporal start date of 1985 was selected to follow the year when the last section of I-630 was completed and open to the public.” indicated epage 3974/3992

Response: *The traffic noise impacts were considered in the cumulative analysis for community resources and was evaluated in context of the overall effects on community resources. The temporal study period was coordinated between FHWA and ARDOT. The temporal study period was based on the construction of the I-630 facility and does include the impacts from the full construction of I-630. We understand that minority and low-income populations have been historically treated unfairly during the development of highway projects. The initial construction of I-30 made a profound effect on the community; however, since that time, several regulations and NEPA have been adopted in order to prevent repetition of such actions. NEPA studies must follow Executive Order 12898, which requires federal agencies to address disproportionately*

high and adverse human health or environmental effects of their actions on minority and low-income populations, to the greatest extent practical and permitted by law. The 30 Crossing project conducted an analysis of potential impacts on these populations as directed by Executive Order 12898 and determined that the proposed project did not disproportionately impact any minority or low-income population.

7-27-18

Comment 1

The Resource Study Area must be expanded to include other affected communities. Table 2-2 makes clear that the outlying communities have been affected the most by the quicker access times afforded by the interstates. It is likely that areas beyond these boundaries would likely also be affected. I can offer my personal submission that when I located to Little Rock around the year 2000 that a real estate agent tried to get me to locate to Conway! Searcy, Conway, Bauxite, Benton, Bryant have all been affected by the interstates and need to be included in the analysis. I can also share that two of my colleagues in Little Rock, out of an office of about twelve people, actually commuted daily from Pine Bluff.

Response: *Table 2-2 in the Cumulative Impacts Technical Report includes total population and percent change. It shows that Jacksonville, the farthest area from the project limits included in the study area, has the lowest percent change of all areas included in the table. Although the proposed project improvements would benefit all users, it could benefit commuters from other areas; however, it is not anticipated that substantial community impacts would result in areas outside of the study area.*

7-27-18

Comment 1

The Cumulative Effects Report does not present a balanced picture as on indicated epage 3978.

Response: *The Preferred Alternative is anticipated to have 11.1 acres of proposed ROW within the 7.3-mile corridor. No displacements or ROW acquisitions are proposed south of I-630. A majority of the proposed ROW is located in North Little Rock, east of the I-30/I-40 interchange on the south side of I-40 where no development currently exists. Five residential displacements are located in predominantly minority census area; however, these displaced rental properties are adjacent to the existing facility and would not result in a further division or separation of a neighborhood.*

Bobbie Harvin

6-22-18

Comment 1

Do you have a map of what is the plan for around the Arkansas Art Center

Response:

Bobbie,

Click the link below to download a roll plot of the proposed Preferred Alternative. You should be able to zoom into any areas you are interested in. Please note that this is preliminary and subject to change. Thanks.

Roll Plot - Proposed Preferred Alternative

Amber Patterson

6-26-18

Comment 1

Good morning,

I am requesting additional maps and plans for the I-40 project from 365 to 67/167. We own and operate our Murphy Express convenience store on W Pershing Hwy, adjacent to I-40, appearing to be within the project zone.

I have checked the Connecting Arkansas Program website; unable to locate the plans for this particular project.

Also, can will you list my information below as the property owner contact for future reference?

Response:

Amber,

Below is a link to view/download a roll plot of the proposed, and subject to change, 30 Crossing plans. If you view the roll plot, you will be able to zoom into the area.

I have included a screen shot of the area you are asking about, and at this time, any improvements are within existing Arkansas Department of Transportation right of way.

Roll Plot - Proposed Preferred Alternative

Additional materials for the public hearing are available here, and this page will be populated in the future with all materials shown at the public hearing.

https://connectingarkansasprogram.com/meetings/i-30-pulaski-county/518/30-crossing-public-hearing-july-12-2018/

Comment 2

Thank you – I really appreciate you sending this over to us.

Todd Fisher

6-29-18

Comment 1

As someone who travels this route daily, the proposed design does nothing to impact the daily bottleneck that exists between the I-630 interchange and the south terminal interchange. Due to the lane crossing that must occur between the 630E to 30W ramp and the 440/530 left exit ramp over a relatively short distance, traffic backups and accidents are an almost daily occurrence during the evening rush period. The matter is worsened by the Roosevelt onramp to 30W for those that make the jump across 3 lanes of traffic in order to make the 440 left exit less than 1/2 mile away. Proposed designs appear to add at least 1 additional lane in this area, so the issue will be further compounded by the additional lateral distance required for traffic to move and the increased volume. The same traffic flow and safety improvement goals could be accomplished simply with ramp reconfiguration and replacement of the I-30 river bridge, compared to the added cost and disruption of added right of way purchases to accommodate a 10-lane solution.

Response: *The commenter is correct that the movement from I-630 eastbound to I-440 eastbound or I-530 southbound is a difficult movement today and will continue to be a difficult movement in the future. Improvements in the corridor focused on the heaviest movement of I-30 westbound through traffic. Improvements to address the movement described would be to relocate the I-440 eastbound or I-530 southbound exits to the right side from the existing left side.*

Travel speeds (an indicator for congestion and back up) from I-630 to the south terminal interchange are shown in the Interchange Justification Report Appendix B2 – Speed Profiles, June 2018, Attachment 2. Exhibit 1C shows the I-30/I-40 Traffic Speed Profile in the PM peak for the south/west direction. The exhibit shows existing traffic operating in the section from I-630 to the south terminal in the PM peak at 40-50 mph. The Future No-Action Alternative analysis shows a significant amount of red representing speeds 30 mph or slower and congestion lasting an extended time, indicating severe gridlock as shown in the note on the Future No-Action Alternative graphic. All Action alternatives perform better than the Future No-Action Alternative indicating that any action alternative would provide a benefit to drivers compared to the No-Action Alternative in future conditions.

Curtis Williams

7-2-18

Comment 1

My property address is 1500 Geyer LR, AR 72202. Will this project affect my property?

Please advise.

Response:

Mr. Williams,
The 30 Crossing project will not affect your property at 1500 Geyer Street in Little Rock. Proposed improvements are located at the I-630 ramps and not on city streets east of the interchange.

Roderick Smithers

7-12-18

Comment 1

Noise for Philander Smith College and its neighbors

Response: *The project limits are approximately 1 mile from Philanders Smith College. No noise modeling was done outside the project limits.*

Comment 2

How do minority disadvantaged business get involved during the process?

Response: *The Design-Build contract will include a Disadvantaged Business Enterprise (DBE) goal of approximately 8% of the contract value. The work associated with this DBE goal must be accomplished by contractors who have been certified under the Arkansas Unified DBE Certification Program. Minority businesses desiring to be involved in this project should obtain or maintain DBE certification through this program.*

Comment 3

Are there any environmental issues to be considered for this project?

Response: *No significant environmental impacts have been identified.*

Lenna Hopkins

7-12-18

Comment 1

I’m concerned that I have to exit in North Little Rick to enter Downtown Little Rock heading south. If you miss the C/D lane you are cut off and have to continue to I-630 and circle back. I do like the center thru lanes for thru traffic.

Response: *A significant amount of signage will be incorporated into the project to clearly mark the exit to downtown Little Rock. If the downtown exit is missed, I-630 can provide alternative access to downtown.*

Stuart Mackey

7-12-18

Comment 1

One exit at 15th Street for all traffic from WLR, SWLR, Pine Bluff coming into downtown seems limited and ripe for congestion.

Response: *The proposed interchange configuration has been checked with traffic modeling software to make sure it has adequate performance with the future traffic volumes.*

Comment 2

Why is the North Hills exit not reworked to allow traffic from warehouses south of the intersection the opportunity to head east on I-40 rather than head back into downtown NLR?

Response: *The North Hills interchange was not modified to provide access to eastbound I-40 because of the proximity of the Hwy. 67 interchange. Due to ramp spacing requirements with current design standards, access could not be provided without making extensive changes to the interchange configuration. Access is provided to eastbound I-40 off of the northbound frontage road (Locust Street), which is in proximity to the North Hills interchange.*

Aladdin Saraheen

7-12-18

Comment 1

The right of way proposed at our store could hit the underground gas tanks. Moving the tanks will be costly and possibly closes our business.

Response: *The right of way has been set to minimize impacts to the property, including avoiding impacts to the underground storage tanks. If it is later determined that the underground tanks are within the limits of the proposed right of way, modifications will be evaluated to avoid impacts to the tanks.*

Steve Holland

7-12-18

Comment 1

Steve Holland with Southern Company North Little Rock. I'm concerned about access off of Cypress Street into our building at 1201 Cypress. That's going to limit us to getting freight delivered and other things and also parking for our customers. Thank you.

Response: *The proposed improvements in front of 1201 Cypress Street are contained within the existing highway ROW. During the design phase, driveway access will be studied, and appropriate grades and pavement width will be incorporated into the design.*

Jordan Hickey

7-12-18

Comment 1

Hey, guys!

Thanks so much for the event this evening—it was very informative, and everyone I spoke with was very helpful.

That said, I had a quick question for y'all: I was reading through Appendix B of the EA report when I came across some numbers that struck me as somewhat odd, ("Table 5: Action and No-Action Travel Times" on page 24). Specifically, the numbers given for "From River Market to I-40/I-440 Interchange." Would it be possible to get the raw data that was used to reach those figures?

Thanks so much!

Response: *The travel time numbers were generated by a traffic simulation model, VISSIM. VISSIM simulates the movement of individual vehicles under a variety of traffic conditions, allowing for comparison of the effects of various roadway alternatives. Morning travel times were analyzed in VISSIM to two destinations (River Market and Clinton Center). These travel times are listed in Table 8 of the Environmental Assessment. Under the No-Action Alternative and Alternative 1A (8-Lane General Purpose Single Point Urban Interchange), travel times are affected by upstream bottlenecks (indicated by blue shading on Table 8). Under the 6-lane with C/D Single Point Urban Interchange Action Alternative (1A), a bottleneck occurs on I-40 eastbound at I-430. This bottleneck acts to "meter" the traffic eastbound on I-40, allowing vehicles to travel from the McArthur Bridge to downtown destinations more quickly.*

Under the No-Action Alternative, a bottleneck exists on I-440 westbound at I-40. This bottleneck acts to "meter" the traffic on I-440 westbound, allowing vehicles to travel from the Bankhead Drive interchange to downtown destinations more quickly.
Email from Ben Browning:

Jordan,

We are in the process of finalizing responses to comments received during the comment period of the 30 Crossing Environmental Assessment (EA). Your comment (provided below) will be responded to officially as part of the final EA, however in reviewing your comment we noted that you included a request for information. Specifically you asked for the raw data that was used to

calculate the travel times provided in the EA for the Action and No-Action alternatives. These travel times were determined from a traffic microsimulation model called VISSIM. The VISSIM model provides output of the model results in a spreadsheet format. Familiarity with and access to the VISSIM traffic simulation software is necessary to fully understand the traffic output results but we can provide the VISSIM software output for reviewing the raw date. The link below contains the data outputs of the VISSIM model. Although these outputs may not directly answer your questions about travel times, they do provide the detailed model travel time output results of the traffic modeling that was performed for the EA. Thanks!

Margaret Moore-Bland

7-12-18

Comment 1

My family has property located between the 18th and 16th hundred blocks of Locust Street (1604 Locust St., NLR, 72114). My family and I have grave concerns about the easement the ARDOT is taking the liberty of taking from our property. We were also told that a "Retainer Wall" would possibly be built in the area in front of our property. The planned or designated easement will be taking a good part of the front yard of our property. What will this do to our property value, if we decide the sale the property? We were told by ARDOT representatives that this would not have an effect on our property, but we can see clearly, that it will.

Our second concern is that there is an underground spring that flows across the highway onto our property. If a Retainer Will is the be erected, what will be the stability of that wall? Long term affect would possibly be a crumbling or decaying, splitting or racking of the wall because of the flow of the water. The water from the spring is especially noted in the fall and winter seasons. During warm or hot weather, the water stream is not as prevalent or seen or noted.

We are concerned that the ARDOT is taking privileges from the "Black Community" properties owned in that area. I took pictures of the plans shown at the last Community Meeting (July 12, 2018) at the Wyndham Riverfront (Sliver City Room) NLR, AR. I must say, that my family and I are not pleased with how the ARDOT is taking privileges without consulting or reimbursing property owners for the property being taken. It can clearly be seen that the easement space has been increased, taking and defacing parts of our properties. The Retainer Wall will certainly not add beauty to our properties either. What else can be done?

Response: *There are no proposed easements or proposed right of way in the area near 1604 Locust Street. The line work shown on the public display graphics near that location represents the existing right of way that already is currently owned by ARDOT. Any retaining wall constructed will be on the west side of Locust Street, on the opposite side of where the residence is located. The drainage issues will be evaluated at the location to make sure that the proposed improvements are properly designed.*

Belinda Burney

7-15-18

Comment 1

I have a concern that I think should be addressed. Because of the new I-30 plan, most traffic in NLR trying to access I-40 West, especially areas on the east of I-30, will travel on 13th St/North Hills Blvd. This will include 18 wheel trucks, e.g Pipe and Tube Supply on Cypress. I have witnessed 18 wheel trucks already having a hard time on these streets. Trucks that are traveling to get to the warehouses are having to swing wide to make the right turn which is stopping traffic going in both directions. I have also witnessed a truck go off the road. The street is very narrow. My concern is that there are going to be more accidents and traffic problems. . Also, heavy rain will cause the street to close. What are the plans and/or solutions to this? If they use the frontage road, to access I-40 west, would it not be difficult with the narrow curve by the bridge? I am thinking of the Pipe and Tube trucks that are carrying those huge pipes. Also, accessing the left lane to make that left to get on 40 will be difficult if you take out the access on the right. The other route on the frontage road, staying in the right lane, then turn left, instead of right toward 13th St., would also block traffic and it floods in that area. at the end of the bridge going west. Again, what about the car traffic when it floods? North Hills is almost impossible to drive through when there is a heavy rain. If traffic is re-routed to frontage road, does that mean that the trucks that are turning right on Gregory Street would use that route also, still same problem to make that left turn. Another thought, will there be traffic lights on 19th & Locust because students use that route to walk to NLRHS.

Response: *Four access routes will be available to provide access to I-40 West from the area near the Curtis Sykes interchange. Those four routes include: 1) utilizing the northbound frontage road to the North Hills Boulevard interchange, 2) utilizing 13th Street to the North Hills Boulevard interchange, 3) utilizing Main Street to the JFK interchange, and 4) utilizing the southbound frontage road to the dedicated U-turn at Broadway. The availability of three alternate routes will provide supplemental access in the event that 13th Street is not available.*

All movements within the project limits have been designed to accommodate large trucks so there should not be an issue with any trucks, including those carrying large pipes, navigating the movements at the North Hills Interchange. Flooding on 13th Street is outside of the project limits; however, drainage within the project limits, including the frontage roads, will be designed to handle the design storm event. If occasional flooding does restrict access to the North Hills interchange via 13th Street, then traffic can use one of the three other options to access I-40

westbound until the flooding has ceased. There currently is not a traffic signal at 19th Street and North Locust Street because stop signs should be sufficient at that location based on the traffic movements. The proposed improvements will accommodate a signal in the future if it is later determined to be desirable at that location. A traffic signal at 19th Street and Cypress Street is included, however, because this is a direct intersection with an interstate ramp and it would be beneficial for pedestrian safety at that location.

The current volume of traffic using the northbound entrance ramp from 15th Street is approximately 3,000 vehicles per day (vpd) or roughly 300 vehicles per hour (vph). Based on the split of I-30 northbound traffic, it is estimated that 125 vph would wish to travel to I-40 westbound. Travelers will have the option to either go east to North Hills Boulevard or to go west to Main Street to access I-40 westbound. The increase in traffic along 13th Street/North Hills Boulevard would be approximately 15 percent. With the low volume using the North Hills Boulevard Ramp (510 vpd or 51 vph ±), a signal was not warranted.

Kim Hoffman

7-16-18

Comment 1

No one denies that the I-30 bridge needs to be replaced and that several exits and entrances need to be made more safe. However, ARDOT has not provided an alternative that will accomplish just these needs. Instead, ARDOT has used the real problem of an unsafe bridge and unsafe ramps downtown as an excuse to create a concrete gulch to satisfy the needs of those who travel through our city or who only come to our city to work.

Response: *See I-9 of Appendix A.*

Comment 2

Based on the information received at the most recent public hearing, traffic on our downtown streets will increase dramatically. For those of us who live here, who enjoy walking in the downtown area, who enjoy taking our pets to MacArthur Park and the Clinton Presidential Park, this project makes walking more difficult and more dangerous. Vehicular traffic will increase dramatically outside of my window on Capitol Avenue.

Response: *See K-13 of Appendix A.*

Comment 3

The concrete gulch will separate two parts of our city that have been undergoing a tremendous and wonderful revitalization: The River Market area and East Village. The concrete gulch will make it more difficult to connect those two areas.

Response: *See K-5 of Appendix A.*

Comment 4

There will be people who move out of the new apartments and condos that have been built in recent years because of the construction noise and the increased traffic after the project is completed. Occupancy rates will go down and residential development will stop.

Response: *See K-15 of Appendix A.*

Comment 5

At least one business owner has closed his business because of the impending 30 Crossing Project (Zin Wine Bar on RiverMarket Avenue). Other business owners are likely to follow and business/retail development will stop.

Response: *No information was gathered by local planners to suggest that temporary construction would result in the relocation of businesses. The long-term benefits of improved mobility would outweigh temporary construction delays. The Little Rock Chamber of Commerce supports the Preferred Alternative in part due to their belief that downtown businesses will be benefited.*

Comment 6

The current 30 Crossing Project is based on old views of how people travel. ARDOT is projecting traffic patterns and number of vehicles 25 years out. Technology is changing the way that we travel. As more cities are removing freeways and interstates in the downtown area, why are we significantly increasing lanes through our downtown? ARDOT must surely have talented people who can devise an alternative that does not add multiple lanes and concrete downtown.

Response: *See K-10 of Appendix A.*

Comment 7

Noise pollution and air pollution will increase with the added lanes downtown. Thus, the walkability and liveability of downtown will be threatened.

Response: *See K-2 and K-8 of Appendix A.*

Comment 8

Finally, this process has been most frustrating and undemocratic. At one of the first public meetings that I attended, Scott Bennett assured all in attendance that ARDOT "would not shove this down our throats." Yes, ARDOT, for those of us who live downtown and will be impacted the most, this is exactly what you are doing. Danny Straessle stated, "This is not a vote of the people whether or not this project should go forward." This project will be close to $700 million (if not more), it will impact the downtown area for decades to come. If the people of Little Rock, and particularly those of us who live downtown, don't matter, then we have no democracy and no state or local government that respects or responds to our concerns and needs.

Response: *There was an extensive public outreach effort during the PEL study that continued into the NEPA phase.*

Among the strategies was the creation of a Technical Working Group (TWG) consisting of local, state, and federal staff, as well as representatives from local businesses, environmental advocacy groups and major regional institutions. TWG meetings were held prior to all Public Meetings, allowing the Study Team to meet with subject matter experts and incorporate their feedback prior to presenting concepts to the public.

There have been a total of four public meetings in the PEL study and two in the NEPA phase. Public Meetings 1 through 4 allowed for the PEL Study team and the public to work together to choose the alternatives that would be carried through to the NEPA phase. During the NEPA phase, the project team has continued to organize and participate in extensive informational and advisory meetings with local officials and organizations. Monthly meetings have been held with the Project Partners group, which includes the cities of Little Rock and North Little Rock, Pulaski County, Metroplan, and the FHWA. Unique presentations have been given to residents and stakeholder groups, both to inform and allow the public to ask questions and provide comments. These have included a Town Hall meeting at the Clinton Library, community meetings at churches within minority communities, one-one-one discussions with state legislators and local government officials, and various presentations to local cities, associations and boards. In 2016, more than a dozen "pop-up" stations were held in large businesses in Little Rock and North Little Rock. Staff members answered questions from the public and showed materials provided at Public Meeting 6, including the 3D video renderings. Details on the NEPA public involvement efforts can be found in EA Appendix E.

Comments received from the public at and in response to these public meetings are not ignored; rather, they have helped to shape and revise the project to reach the point of a proposed Preferred Alternative. From the very beginning, the project team has engaged with and responded to residents, stakeholders, agencies, and elected officials to keep the various entities informed and involved.

Public input is a very important part of the decision-making process that FHWA is required to follow under NEPA, but it is not the only part. FHWA must follow all policies, regulations and laws of the Federal Government and guarantee that all environmental protections are met. The process of evaluating alternatives involves many disciplines, and many agencies have input into decision. In this case, USCG and USACE have elected to be Cooperating Agencies, and to participate fully in the process. ARDOT was correct in saying that the decision would not be based on a vote by the public. The following explains the FHWA process under NEPA.

"FHWA is committed to, and required by NEPA to, the examination and avoidance of potential impacts to the social and natural environment when considering approval of proposed transportation projects. In addition to evaluating the potential environmental effects, FHWA must also take into account the transportation needs of the public in reaching a decision that is in the best overall public interest. The FHWA NEPA project development process is an approach to balanced transportation decision-making that considers those potential impacts.

It is FHWA policy (23 CFR § 771.105) that:

- *To the fullest extent possible, all environmental investigations, reviews, and consultations be coordinated as a single process, and compliance with all applicable environmental requirements be reflected in the environmental document required by this regulation.*
- *Alternative courses of action be evaluated and decisions be made in the best overall public interest based upon a balanced consideration of the need for safe and efficient transportation; of the social, economic, and environmental impacts of the proposed transportation improvement; and of national, state, and local environmental protection goals.*
- *Public involvement and a systematic interdisciplinary approach be essential parts of the development process for proposed actions.*
- *Measures necessary to mitigate adverse impacts be incorporated into the action."*

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Josh Silverstein

7-17-18

Comment 1

I strongly oppose closing Cumberland between 2nd and 3rd streets under any of the proposals involved. That is a critical access point to Cantrell and I30 for downtown resident, commuters, and others. It should be preserved.

Response: *The Single Point Urban Interchange (SPUI) Action Alternatives (Action Alternatives 1A and 2A) propose closing Cumberland Street between East 2nd and East 3rd Streets to local through traffic between East 2nd Street and East 3rd Street. Northbound traffic on Cumberland Street would access I-30 through the elevated Hwy. 10 roadway as it does now. Westbound traffic exiting I-30 using the elevated Hwy. 10 roadway would access Cumberland Street northbound as it does now. These movements are shown on Figures 19 and 20 of the EA. The purpose of allowing these movements is to provide access to the downtown Little Rock area and to Cantrell, from I-30.*

Given the traffic volumes making these movements, Cumberland Street is not wide enough to allow for two through lanes, to accommodate local traffic, in addition to the lanes needed to carry traffic to and from the elevated Hwy. 10 roadway. Widening Cumberland Street would require taking ROW from the adjacent Historic Arkansas Museum, which includes a National Register of Historic Places structure, the Jesse Hinderliter House.

The recommended Action Alternatives (Action Alternatives 2B), the Split Diamond Interchange (SDI) alternative, does not involve closure of Cumberland Street between East 2nd Street and East 3rd Street to local traffic.

Comment 2

The chart on page 58 of the EA demonstrates that there would be ***massive*** traffic increases on numerous downtown streets under the split diamond interchange. This traffic will (1) critically damage downtown neighborhoods, and (2) greatly increase commute times for countless residents and commuters.

Response: *Existing, Future No Action, and Action Alternative traffic volumes on local streets in downtown Little Rock are shown in Table 1 of the Environmental Assessment. With the recommended Action Alternative (Alternative 2B: 6-lane with C/D SDI), traffic levels will be higher than the Future No Action and Action Alternative 2A (6-lane with C/D SPUI) on East 2nd Street, East 3rd Street, East 4th Street, and on Cumberland Street between East 2nd Street and*

East 4th Street. To accommodate these traffic increases, the following improvements are recommended:

- *East 4th Street will be restriped to create an additional lane in the eastbound direction between Cumberland Street and the southbound frontage road. This will require the removal of 29 parking spaces. Additional signals are proposed at the intersections of East 4th Street with River Market Avenue and Rock Street. These signals will have pedestrian phasing included.*
- *East 3rd Street would have additional signals at the intersections of East 3rd Street with River Market Avenue, the Texas U-turn and Mahlon Martin Street. These signals will have pedestrian phasing included.*
- *East 2nd Street will be widened and improved between Cumberland Street and Mahlon Martin Street to provide two lanes eastbound and two lanes westbound. Six on-street parking spaces along East 2nd Street and 12 on-street parking spaces along Ferry Street would be removed. Additional signals are proposed at the intersections of East 2nd Street with River Market Avenue, Sherman Street, and Mahlon Martin Street. These signals will have pedestrian phasing included.*
- *Cumberland Street between East 2nd Street and East 3rd Street would be slightly widened to provide two lanes in both the northbound and southbound directions.*

The direct effects of these changes on public facilities, parking, and access and travel patterns along East 2nd Street, East 3rd Street, East 4th Street, and Cumberland Street between East 2nd Street and East 4th Street have been evaluated in the Community Impacts Technical Report (Appendix F of the EA) and determined to be minimal. The indirect effects of the changes on socio-economic resources have been evaluated in the Indirect Effect Technical Report (Appendix A of the EA). Because the land use is almost completely commercial, it is not anticipated that the changes would have an adverse indirect community cohesion impact.

Through coordination with Little Rock City Planning, three areas in downtown Little Rock were identified where growth could potentially occur in the future, and the indirect effects of the Action Alternatives on the potential for this growth were evaluated. It was determined that the type of growth likely to occur in these areas would be consistent with the future land use designation (mixed-urban). Because of the decrease in travel times under the recommended Action Alternative (2B: 6-lane with C/D SDI), it is anticipated that this growth could potentially occur more quickly with the project.

Table 8 of the Environmental Assessment estimates morning travel times through the project corridor to the River Market (intersection of President Clinton and Cumberland Street) from

seven locations through the study area. These travel times were estimated using a traffic simulation program (VISSIM). Travel times to the River Market are expected to be slightly longer with the Preferred Alternative (2B: 6-lane with C/D SDI) than with Action Alternative 2A (6-lane with C/D SPUI); however, travel times from the north to the Clinton Center are expected to be slightly shorter. The difference is primarily due to the use of the frontage roads to travel between the two ends of the Split Diamond Interchange. Despite this slight increase in travel times, the Split Diamond Interchange provides the benefits of better integration with the city street grid and improved usage of the frontage road system.

Comment 3

The estimates for traffic increases for 6th and 9th streets on pages 58-59 under the split diamond interchange are difficult to take seriously given the likely impact of the loss of the Cantrell interchange. Thus, the damage to downtown neighborhoods and the harm to commuters will be even worse than currently projected in the EA.

Response: *Existing, Future No-Action, and Action Alternative traffic volumes on local streets in downtown Little Rock are shown in Table 1 of the Environmental Assessment. Traffic levels on East 6th Street and East 9th Street are not projected to be higher under the recommended Action Alternative (2B: 6-lane with C/D SDI) than under the Future No-Action Alternative. These traffic levels were estimated using traffic simulation modeling.*

The Preferred Alternative does eliminate the direct access to Cantrell Road, but it also eliminates the direct access to 6th and 9th Streets. Of the existing traffic that is currently using the Cantrell interchange, over 50 percent is turning north to access Cantrell Road. If these same vehicles were to utilize 6th Street and 9th Streets, they would not be able to go north on Cumberland Street as this street is one-way in the southbound direction. Once the decision was made to maintain Cumberland Street as a one-way facility from Capitol Avenue to the south and the removal of the direct access from the north, the likelihood of increased traffic over the Future No-Action Alternative was eliminated. While some vehicles to/from the south may now use 6th Street and 9th Street, traffic to/from the north that no longer has a direct access will likely choose a different route.

Gina Pharis

7-18-18

Comment 1

The Little Rock Marathon takes place on the first Sunday in March every year. Our marathon weekend consists of two days of races, with a 5K & 10K on Saturday, and a marathon and half marathon on Sunday. Currently, our course on both days takes us under and over the I-30 section in and around downtown Little Rock. We cross under I-30 on Saturday at both 3rd and 4th Streets. On Sunday, we cross under I-30 on 3rd Street and cross over I-30 on 9th Street. Our race weekend attracts more than 14,000 participants annually, as well as spectators, family and well-wishers numbering above 20,000. This weekend is the largest annual event produced by the City of Little Rock, and has an economic impact of $6,000,000 annually.

We are requesting cooperation during the construction process to ensure that our event may be produced this one weekend each year causing as little disruption to the construction contractors and the race producers. If it is possible to alter or delay work schedules on those particular days, plan for work to be done in a different section of the project on the weekend in March, or whatever options there might be, the Little Rock Marathon will do everything in our power to be a cooperating and considerate partner in this endeavor.

Response: *ARDOT has provisions in the construction contract documents that will require the contractor to coordinate with ARDOT during special events. Every effort will be made to minimize disruptions to the marathon during construction.*

Tom Fennell

7-18-18

Comment 1

One would assume that any assessment of widening 30 (and 630) would begin with documenting the effects of the original construction of the I-30 and I-630 urban freeways had on Little Rock including the immense damage to historic buildings and neighborhoods and the dividing our city along racial and economic lines. The neighborhoods east of 30 and south of 630 in Little Rock suffered extreme loss of property value and still suffer from the on-going effects of this segregation of Little Rock neighborhoods. Concurrent with this loss of value in urban Little Rock was the rise in population and real estate values of outlying bedroom communities of Cabot, Conway, Bryant, Benton and other smaller towns. Also concurrent with the construction of the 30 and 630 urban freeways was a dramatic increase in single occupant vehicle use for long distance commuting encouraged by the freeways. This environmental and civic damage to these urban neighborhoods continues because of the freeways. This damage includes the on-going loss of historic properties because of the depressed real estate values imposed by the freeways in question. There was no mitigation for this damage beyond ROW acquisition and other limited efforts to “get the project through”. Little Rock, as a whole, has had stagnant population growth so any claims by ARDOT of the advantages for Little Rock as a city with this expansion are not based on the facts.

There is every reason to believe the new freeway widening will have similar effects on these neighborhoods further isolating and separating south and east Little Rock. Yet, where is the study of the demographic history of Little Rock since the freeways were built?

Response: *Cumulative Impacts are evaluated in Appendix R of the EA, the Cumulative Impact Technical Report. The Cumulative Impact Technical Report provides a detailed assessment of cumulative impacts within the Resource Study Area using the CEQ procedures for evaluating cumulative effects in NEPA documents, found in the American Association of State Highway and Transportation Officials (AASHTO) Practitioner’s Handbook, “Assessing Indirect Effects and Cumulative Impacts under NEPA” (August 2016).The present, past, and future projects included in each resource evaluation are clearly listed in Step 3 of each resource evaluation. In Step 4, the overall effects of the project, in combination with these other actions, is determined. In Step 5, mitigation of cumulative effects is considered.*

We understand that minority and low-income populations historically have been treated unfairly during the development of highway projects. The initial construction of I-30 made a profound

effect on the community; however, since that time, several regulations and the NEPA have been adopted in order to prevent repetition of such actions. NEPA studies must follow Executive Order 12898, which requires federal agencies to address disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations, to the greatest extent practical and permitted by law. The 30 Crossing project did conduct an analysis of potential impacts on these populations as directed by Executive Order 12898 and determined that this project did not disproportionately impact any minority or low-income population.

With these considerations and modifications in the analysis, the proposed project is not anticipated to contribute to the cumulative effects of the community due to the following:

1) *The Preferred Alternative is anticipated to have 11.1 acres of proposed ROW within the 7.3-mile corridor. No displacements or ROW acquisitions are proposed south of I-630. The bulk of the proposed ROW is located in North Little Rock on the south side of I-40 where no development currently exists. The five residential displacements in North Little Rock are within a predominantly minority census area; however, mitigation in the form of fair compensation of property and relocation services in accordance with the Uniform Act would be provided.*
2) *Community cohesion within minority and low-income population areas would not be adversely impacted by the proposed project. The five residential displacements are located in predominantly minority census area; however, these displaced rental properties are adjacent to the existing facility and would not result in a further division or separation of a neighborhood. Furthermore, proposed ROW acquisitions would not result in any division or further separation of any existing neighborhoods.*
3) *Improvements are included in the proposed project to minimize the east and west divisions from the original construction of I-30. Bicycle and pedestrian accommodations and improved overpass and underpass intersections would improve the walkability between the west and east sides of I-30.*

Comment 2

ARDOT has violated the mandate from the Federal Highway Administration to consider reasonable alternatives to its proposed massive freeway widening. Rather than actually studying and developing a plan that followed the approved Imagine Central Arkansas plan from Metroplan, ARDOT decided early on to only study similar versions of the same freeway expansion plan. Even though the Federal Highway Administration encouraged local highway entities to look at holistic approaches, ARDOT dismissed, and refused to study, alternatives

plans such as the Boulevard plan with a Chester Street bridge even though independent traffic studies (Smart Mobility) showed the boulevard performed as well or better than the freeway expansion. ARDOT's one sentence dismissal of this plan in the assessment is not enough to explain why ARDOT was opposed to this plan. ARDOT states they couldn't build a bridge at Chester – this is patently false as ARDOT could designate that portion of Chester as a State Highway and the property is actually for sale. They state that an 8 lane boulevard couldn't handle the traffic – it actually does handle the traffic and does it in a way to dramatically increase commerce and real estate value by operating at slower, safer, speeds.

ARDOT's task is to spend $630 million dollars in state and federal tax dollars in Little Rock to improve urban transportation. The intelligent approach would be to study the problem from the perspective of quality of life, walkability, mass transit, economics, the environment, historic resources, racial demographics and real benefits to citizens and commuters. This effort would involve scientists, historians, city planners, architects, civic groups, community groups, economists, landscape architects, etc.

The Highway Department, instead, hired highway engineers to design a bigger freeway. They came in with a mega-expansion plan four years ago and it has not changed since.

Response: *Chapter 2 of the Environmental Assessment is a summary of the alternatives analysis performed during the NEPA phase. The detailed analysis of alternatives that were evaluated throughout the PEL and NEPA phases of this study are documented in EA Appendix C: Alternatives Analysis Technical Report. A detailed analysis of the Boulevard plan is included in the document.*

Response: *See N-1 of Appendix A.*

Comment 3

The biggest problem with the EA (Environmental Assessment), however, is the "segmented" approach to looking at the impacts of freeway expansion. Rather than looking at the big picture for the whole region, ARDOT has broken up the project into narrowly divided pieces including the 30 Crossing portion which only extends a couple of blocks either side of the 30 corridor and does not address 630, 30 south to Benton, 430, 440, etc. Segmentation is an underhanded way to study the problem without dealing with the overall impact, especially financially. ARDOT has stated that the entire system expansion would cost $4 billion. ARDOT doesn't tell you this in the EA for 30 Crossing. ARDOT only tells you that this project will not solve congestion and bottlenecks – future projects will take care of those. For a state like Arkansas to spend this kind of money on one area and saddle everyone with the maintenance is a recipe for long term

hardship and financial disaster. The EA should look at the overall impact of all these expansions as a whole.

Response: *See I-12 and K-18 of Appendix A.*

Comment 4

And it won't work. This expansion will not solve congestion by ARDOT's own admission. It does not work anywhere else why should it work here. Cities across the country are re-thinking urban freeways. The mayor of Houston has said "no more freeway expansions" – they don't work! Many cities are taking out urban freeways – converting many to boulevards and arterials where slower speeds encourage business activity and walkability. Our current arrangement may be all we need in the future as autonomous vehicles, ride sharing and transit will more than make up for any future demand. ARDOT has refused to study and properly account for future transportation trends steadfastly adhering to the highway design philosophy of the 50s and 60s (even to the point of using outdated slogans about spurring new suburban development).

Response: *See H-8, I-6, and K-10 of Appendix A.*

Comment 5

ARDOT is acting in bad faith in the EA in terms of mitigating the harm the freeway expansion will do. ARDOT uses various amenities to tout their planning such as park space, landscaping, streetscapes, etc. but, in the fine print, indicate that ARDOT will not pay for any of these amenities. Taking credit for creating "recreational resources" that they do not intend to pay for is dishonest.

Response: *See K-11 of Appendix A.*

The EA and its supporting documents do not state that the green space created by the removal of the existing Hwy. 10 ramps will become a park, although that is one possibility, if the City of Little Rock elects to pursue it. The green space could be used for various recreational activities without actually becoming a park. The creation of green space is considered an aesthetic improvement and a benefit to the community regardless of how it is eventually developed. The viewshed of downtown Little Rock will be improved by the removal of the existing ramps and creation of an open area along East 2nd Street.

Similarly, the words "landscaping" and "streetscaping" are not mentioned in the EA or any supporting documents. These are not proposed as mitigation measures.

Comment 6

ARDOT stated that they were going to respond to each comment. They have not responded in any kind of appropriate way to alternative plans I have submitted. Merely saying “it won’t work” does not meet any standard. I have also submitted independent traffic studies by Norm Marshall and Smart Mobility both electronically and in person. I have yet to receive any reasonable response from ARDOT. You would think ARDOT would be interested in the best thinking and solutions but, as stated, they had a plan when they started and do not intend to let the facts get in the way.

Response: *All alternatives suggested by the public were evaluated by the study team. The detailed analysis of all alternatives that were evaluated throughout the PEL and NEPA phases of this study are documented in EA Appendix C Alternatives Technical Report.*

All comments regarding traffic modeling submitted by the public were also evaluated by the study team. For a complete description of the traffic modeling efforts on this project, see EA Appendix B: IJR Traffic Results and Safety Analysis, Appendix B – Traffic Results Addendum.

Chapter 3.0 Traffic Volumes, describes how the traffic volumes were developed. Traffic forecasts were developed based on ARDOT’s Arkansas State Highway and Transportation Department, Traffic Handbook, 2013. The handbook documents traffic forecasting data collection, and procedures as required in 23 CFR 500 Subpart B. The Traffic Handbook uses these references:

- *A Policy on Geometric Design of Highways and Streets, American Association of State Highway and Transportation Officials (AASHTO), 2011*
- *Highway Capacity Manual, (HCM 2010), Transportation Research Board*
- *Traffic Monitoring Guide, Federal Highway Administration, 2001*
- *AASHTO Guidelines for Traffic Data Programs, AASHTO 2009*
- *AHTD Technical Services Field Manual, AHTD, Planning and Research Division, Technical Services (Renamed as Traffic Information System Section in 2013), 1988*
- *Highway Performance Monitoring System Field Manual, Federal Highway Administration, Office of Highway Policy Information, 2013*
- *NCHRP Report 365 – Travel Estimation Techniques for Urban Planning, 1998*
- *NCHRP 01-37A: Development of the Guide for the Design of New and Rehabilitated Pavement Structures, 2002*

In summary, the methodology for projecting traffic with and without the improvements was reviewed by FHWA, Metroplan and ARDOT. The latest available Metroplan travel demand model was used to inform the development of forecasted traffic volumes for all future alternatives. The alternatives with more capacity do induce traffic in the corridor. These changes are represented in the text. The traffic volumes were developed using the Metroplan regional travel demand model thus incorporated regional traffic modeling.

In Metroplan's comments on the draft EA dated July 26, 2018, they state "The traffic and operational analysis provides an admirable analysis and summary of traffic impacts of the various 30 Crossing alternatives under consideration. Furthermore, staff believes that the traffic projections are reasonable and fall within an acceptable range given engineering practice."

The development of the traffic modeling for this project involved a team of nationally-recognized experts, including Professional Transportation Operations Engineers, with decades of experience modeling complex interstate projects.

Comment 7

Finally, I believe ARDOT has violated the public trust and the intent of the Federal Highway Administration process by ignoring the citizen's advisory board (RPAC) of Metroplan and ignoring the overwhelmingly negative public comments received as part of their "public comment" work. ARDOT has employed hundreds of people and spent millions of dollars to "sell" this project in carefully orchestrated "public hearings" to avoid negative feedback and suggestions for alternatives. The fact that the mayors and county judges get their road and bridge funds from ARDOT tells you all you need to know about how the Policy Board of Metroplan will vote. A rubber stamp of Metroplan for ARDOT was not what was intended by the Federal mandate to form a Metropolitan Planning Organization (MPO). Metroplan is not functioning as a responsible MPO; especially while ignoring (and now dismantling) RPAC.

Response: *ARDOT has engaged in an extensive public involvement outreach process for the 30 Crossing project. Since 2014, six public meetings, a public hearing, and a Town Hall have provided venues for the public to gather information, talk with team members, and provide input, whether in support, neutral, or in opposition of the 30 Crossing project.*

Comments, especially those that are in opposition to a project are not ignored; rather, they have helped to shape and revise the project to reach the point of a proposed Preferred Alternative. The project team also recognizes that when it comes to projects, in general, members of the public who take the time to provide comments are those who voice concerns. Comments provided by the public are a factor in the project-development process and not the sole determining factor. For the 30 Crossing project, the project has received support from a wide

range of voices, including Little Rock and North Little Rock residents, commuters, central Arkansas officials, technical agencies, and businesses located in the cities.

Regarding comments provided to Metroplan during its various comment periods, ARDOT is not responsible for addressing comments submitted to agencies outside of the Department.

From the beginning, the project team has engaged with and responded to residents, stakeholders, agencies, and elected officials to keep the various entities informed and involved. The public meetings and the public hearing were conducted per the same ARDOT policy and procedures used for projects throughout the state and have been conducted with the support of the Federal Highway Administration. Additional meetings and formats, such as the Town Hall meeting in 2015, have invited open and public feedback. In regard to Metroplan, team members have actively worked with the MPO through one-on-one meetings, project partner meetings, the sharing of information and data, and discussions with the RPAC.

Comment 8

Little Rock deserves better than the EA put forward by ARDOT. A true Environmental Impact statement is needed that looks at our region as a whole and what has happened racially, economically and demographically as a result of the urban freeways. A comprehensive study will show how we have sacrificed the neighborhoods south and east of 30 and 630 for suburban and bedroom community growth. The stagnation of population growth, decline in property values and the reality of racial red-lining in Little Rock is being perpetuated and increased by the 30 Crossing project. It is not right for Little Rock and a true EIS will bear this out.

Response: *See K-12 of Appendix A.*

Coalition of Little Rock Neighborhoods

7-22-18

Comment 1

The Coalition of Little Rock Neighborhoods heartily supports replacement of the I30 bridge across the Arkansas River, as we have stated previously. However, we strenuously object to the preferred expansion from six lanes to twelve. Nothing prevents another barge accident that again requires a bridge replacement; putting so much of our traffic in a single place risks too much. Your dismissal of adding a bridge at Chester St. failed to take that risk into account, as well as failing to consider other benefits to that approach.

Since 2013, the state has made clear its intention to add lanes to resolve the stated problems of the 30 Crossing area, regardless of whether other actions could solve problems. The state letter of 6/17/2016 flatly demanded Metroplan officials support the added lanes, and said that if that was not forthcoming, officials would get nothing for a bridge replacement or to address defects in the original construction of this interstate. Federal policy calls for fairness among all approaches considered, which has been lacking.

Response: *See H-3 and N-3 of Appendix A.*

Comment 2

The state analysis refers to needed future expansion of I630, as well as at the Baseline Rd. junction with I30, but then fails to include those expansions in cost estimates, or impacts to be anticipated. That is an overwhelming flaw in state planning to date, and now is the time to rectify that with an Environmental Impact Statement (EIS). One is badly needed, to take into account major impacts and possible damage to frontage road homes, and businesses, as well as the downtown commercial district, and historic structures. Dollar cost and benefit analysis is needed throughout this plan, and the alternatives rejected by the state. Federal highway regulations cite “segmentation” as a problem to be avoided, in which needs are found throughout a corridor but issues are discussed for only a segment of the whole. The federal policy notes “staged construction” would be suitable, once the entire corridor was identified and analyzed; however, related improvements should be evaluated as one project. Coalition members want such an evaluation.

Response: *See I-12 of Appendix A.*

Comment 3

Nor does the state proposal take into account the Induced Demand to be anticipated, when motorists are attracted to this newest stretch of highway, and how that will stimulate more suburban growth, typically. Forecasting the same residential growth near the corridor in all alternatives fails to take that known outcome into account. The state has concluded that, for 30 Crossing to be fully implemented, expansions will be required at I630 and Baseline Rd. Today's paving may stay inside your Right-Of-Way; we cannot expect that along I630. What choices will be made MacArthur Park? Or at Broadway and I630, where Mt. Holly Cemetery faces the Mosaic Templars structure? What choices will be made at Chester St. and I630, where the historic Dreamland ballroom faces Philander Smith College? Will the route at I630 and Dr. Martin Luther King Jr. Blvd, between Ark. Children's Hospital and the state Capitol grounds, bring traffic lanes up to monuments and the Ark. Supreme Court Building? What is the cumulative impact on I630 neighborhoods such as Capitol View-Stifft Station, or Forest Hills, in terms of noise and air pollution, etc.?

Response:

See I-12 of Appendix A.

The Action Alternatives do add capacity to the corridor and do induce traffic. Induced demand due to capacity improvements, and the effect that will have on growth in the study area, is discussed in Section 3.16 of the EA, "Does the Project Have Any Indirect and Cumulative Effects?", and also in Appendix A, the Indirect Effects Technical Report, and Appendix R, the Cumulative Effects Technical Report. Table 9 of the EA shows the increased volumes that are anticipated due to induced demand. The traffic volumes were developed using information from the Metroplan regional travel demand model CARTS as well as other information (EA Appendix B: IJR Traffic Results and Safety Analysis, Appendix B Traffic Results, Section 3.0).

Implementation of the project improvements does not require further expansion of either I-630 or Baseline Road. Baseline Road is well out of the project area.

Appendix B: IJR Traffic Results and Safety Analysis, Appendix B – Traffic Results Addendum, Chapter 3.0 Traffic Volumes, describes how the traffic volumes were developed. Traffic forecasts were developed based on ARDOT's Arkansas State Highway and Transportation Department, Traffic Handbook, 2013. The handbook documents traffic forecasting data collection, and procedures as required in 23 CFR 500 Subpart B. The Traffic Handbook uses these references:

- *A Policy on Geometric Design of Highways and Streets, American Association of State Highway and Transportation Officials (AASHTO), 2011*

- *Highway Capacity Manual, (HCM 2010), Transportation Research Board*
- *Traffic Monitoring Guide, Federal Highway Administration, 2001*
- *AASHTO Guidelines for Traffic Data Programs, AASHTO 2009*
- *ARDOT Technical Services Field Manual, ARDOT, Planning and Research Division, Technical Services (Renamed as Traffic Information System Section in 2013), 1988*
- *Highway Performance Monitoring System Field Manual, Federal Highway Administration, Office of Highway Policy Information, 2013*
- *NCHRP Report 365 – Travel Estimation Techniques for Urban Planning, 1998*
- *NCHRP 01-37A: Development of the Guide for the Design of New and Rehabilitated Pavement Structures, 2002*

The methodology for projecting traffic with and without the improvements was reviewed by FHWA, Metroplan and ARDOT.

Comment 4

The summary asserts this proposal "would have a positive effect on the local and regional economy" without any supporting study. Regrettably ignored is the negative impact that would be likely to affect Ninth St. structures, as well as Fourth St. structures, from the loss of free parking on the street, and in parking lots, for example, if your proposal was to be built as planned. What will employers pay for new parking?

Response:

On-street parking removals are anticipated along 2nd Street, 4th Street, and Ferry Street. No removal of on-street parking will occur along 9th Street. On-street parking removal would be required along these streets to accommodate additional lanes for 2nd Street and 4th Street. Removal of these parking options and the ramifications on the community are discussed in Sections 3.1 (Economic Effects) and 3.2 (Community Effects) of the EA, and in Appendix A (Indirect Effects Technical Report) and Appendix F (Community Impacts Technical Report).

These sections of the EA and the referenced supporting documents also detail the study that resulted in the conclusion that the Preferred Alternative would have a positive effect on the local and regional economy. To summarize, the reasons are:

- *Decreased congestion and shorter travel times would make downtown destinations more attractive to businesses, visitors and tourists, which is why the Chamber of Commerce supports the Preferred Alternative*

- *The C/D roads would increase community cohesion between Little Rock and North Little Rock*
- *Discontinuous frontage roads would be replaced with continuous frontage roads, increasing access to businesses in Little Rock and North Little Rock*
- *Pedestrian and bicycle accommodations would be improved*
- *Navigational safety on the Arkansas River would be improved, providing an economic benefit for barge traffic*
- *Geometric roadway issues on I-30 would be addressed, which would make travel to the downtown area more reliable and safer, encouraging people to visit*

See K-15 of Appendix A

Comment 5

Lacking is the cost estimate to be paid by others for this plan, such as $455,000 to the street car system if this plan was implemented.

Response: *See K-14 of Appendix A.*

Comment 6

The comment states: A troubling omission is the No-Action Alternative in charts where it shows the best result; one example is Appendix B of Appendix A, Table 12, on page 59 (epage 335/3992). Likely, this alternative would have the best result of all – if included. Federal Fairness Standards call for all possible actions to be shown together and analyzed on the same basis. An EIS is needed to achieve this.

Response:

The purpose of referenced Table 12 is to identity when congestion is expected to occur outside the project, on I-30 from 65th Street to the I-530/I-440 interchange, and on I-630 west of Louisiana Street, if the Action Alternatives are constructed. The intent of the analysis is to determine which of the Action Alternatives would cause earliest failure of these adjacent roadways. Although congestion on the adjacent roadways for the No-Action Alternative is not presented in this particular table, it is addressed in detail presented in elsewhere in EA Appendix B: IJR Traffic Results and Safety Analysis

Therefore, there are no No-Action results when discussing Interim build results. The text states "In summary, Table 12 shows that for the I-30 corridor outside improvements, both the 8-Lane GP Action Alternatives and 6-Lane with C/D Action Alternatives results indicate that I-30

congestion occurs immediately after 30 Crossing opening day from 2021 to 2026 if no improvements are made from the South Terminal to 65th Street."

Similar to this analysis, all analyses in the EA present the No-Action Alternative results along with the Action Alternative results. This is a requirement under NEPA for all environmental analyses and is not limited to Environmental Impact Statements.

Federal Fairness Standards is an Federal Communications Commission (FCC) policy that required licensed radio and television broadcasters to present fair and balanced coverage of controversial issues by devoting equal air time to opposing viewpoints. Although the standards were revoked in 1987, NEPA regulations require the following of FHWA:

> *"Alternative courses of action be evaluated and decisions be made in the best overall public interest based upon a balanced consideration of the need for safe and efficient transportation; of the social, economic, and environmental impacts of the proposed transportation improvement; and of national, state, and local environmental protection goals."*

Comment 7

Information is offered on noise pollution where mitigation is proposed, but not for areas where noise barriers were actionable, yet rejected for some reason; the public should have ALL this information.

Response: *See K-2 of Appendix A.*

Comment 8

What's the cost to the community from construction delays in travel times and obstructions along this corridor for the years this will be under construction? Provide an EIS.

Response: *See M and K-12 of Appendix A.*

Comment 9

The proposal says less than 20 percent of corridor traffic is through traffic, yet it devotes 60 percent of the lanes for through traffic. The remainder gets four lanes in future compared to six lanes today. The suburban commuter motorist outweighs local traffic; furthermore, this proposal displaces minority and low-income residents of the corridor so that majority population commuters can move more quickly through these areas. The Coalition objects to this.

Response: *Through-traffic in this context is traffic that passes through both the north terminal (I-40/I-30) and the south terminal (I-530/I-440/I-30). Only traffic originating or destined for Broadway, 4th Street, or 9th Street uses the four lanes of the CD system. All other traffic uses*

the six "through" lanes. A great amount of traffic in the corridor that is not "through-traffic" either originates at, or is destined for, Broadway, 4th Street, or 9th Street.

See Figure 5 in the IJR Appendix B: Traffic Results Addendum (page 10, epage 286/3992). Of all the traffic entering the I-30 corridor from the north, about 37 percent is destined for Broadway Street, 4th Street, or 9th Street, which will use CD lanes. Another roughly 30 percent is destined for I-630, about 18 percent will reach the south terminal (through traffic), about 8 percent of traffic is destined for North Little Rock (other than Broadway Street), and about 7 percent for Roosevelt Road. Therefore, the model assigns about 37 percent of the traffic demand to 40 percent of the capacity (on the CD lanes) and approximately 63 percent of traffic demand to 60 percent of the capacity (on the through lanes).

Comment 10

The study uses the River Market and Clinton Presidential Library as destinations when accessibility is considered, yet these sit adjacent to the corridor, tilting the beneficial result. Major employers such as UAMS are identified, yet are a distance away, and not part of the accessibility analysis. Provide an EIS.

Response: *There were 14 travel time routes during the AM and 14 travel time routes during the PM to/from both the River Market and Clinton Center, for a total of 28 travel time runs. Travel time analysis focused on differences of the alternatives as they relate to the I-30 corridor.*

Robert Walker

7-12-18

Comment 1

In the Environmental Assessment Appendix L, 5.4 commonly encountered condition, is 5.4.1 Aerial deposited lead, Lines 11 to 14 identify lead as a contaminant within 30 feet of the roadway. There is no recommendation to evaluate this danger or plans to mitigate it.

Response: *Appendix L is an Initial Site Assessment, meant to identify potential sources of contamination in the project vicinity. An evaluation of soils in the project area for lead has not been performed.*

Studies have shown that the major pathways for human exposure to lead in soil is either through direct contact with lead-contaminated soil, or through the air, by exposure to airborne dust particles. Most lead from leaded gasoline is bound to large soil particles which do not migrate very far from the roadway. Soils removed from the project area will not be deposited in residential areas.

The remainder of lead from leaded gasoline is bound to small dust particles. The construction contract will include provisions for dust control that will prevent dust from migrating outside the highway ROW.

7-23-18

Comment 1

The highway department does discriminate. It follows the national pattern of routing urban interstates through low income and minority neighborhoods disrupting them and degrading their quality of life.

Response: *The project improvements are almost entirely within existing ROW, resulting in very little required ROW (11.1 Acres, 5 commercial displacements; 6 residential displacements). The impacted commercial properties are located in both EJ and non-EJ census areas. Four of the five impacted commercial properties are within non-EJ census areas. The one commercial business and all the residences area within high-minority census areas. These properties would be displaced because all four action alternatives propose a continuous frontage road constructed over the UPRR on the southbound side of the I-30 facility. As proposed, Cypress Street would serve as a continuous southbound frontage road from 20th Street to Riverfront Drive. Although the frontage road is not necessary for the implementation of the project, the*

construction of the frontage road to connect Cypress Street north and south of the UPRR tracks would be a positive benefit to the minority community that exists to the south and north of the UPRR tracks, and which had been historically separated by them. It addresses the public's concern over this area lacking the one-way frontage road system.

We understand that minority and low-income populations historically have been treated unfairly during the development of highway projects. In order to prevent such practices, NEPA studies must follow Executive Order 12898, which requires federal agencies to address disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations, to the greatest extent practical and permitted by law. The 30 Crossing project did conduct an analysis of potential impacts on these populations as directed by Executive Order 12898 and determined that this project did not disproportionately impact any minority or low-income population. Furthermore, in order to promote nondiscrimination, minority and low-income communities were offered additional opportunities to participate in project related meetings and voice their opinions on the proposed actions.

During the PEL, four community meetings were held in October 2014 at minority venues coordinated with Marion Butler, Shorter College President Jerome Green, and a coalition of pastors of local minority churches. These meetings were held at King Solomon Baptist Church and Shorter College in North Little Rock and St. John Baptist Church and Ward Chapel AME Church in Little Rock. During the NEPA phase, a second round of open-house meetings were held in the summer of 2016 at St. John Baptist Church, King Solomon Baptist Church, and Shorter College. During the public hearing comment period in 2018, the project team worked with Senator Linda Chesterfield to present information and answer questions at a community meeting in Little Rock. Throughout the project, minority churches, organizations, and neighborhoods were notified of public meetings through hand-delivered flyers, mailings, public service announcements, newspaper ads, emails, and additional outreach efforts through the woman-owned small business and Minority Business Enterprise J Kelly Referrals in Little Rock. Efforts have also been made to have public meetings hosted by venues in minority areas, including the Horace Mann Arts and Science Magnet Middle School in Little Rock and the Friendly Chapel Church of the Nazarene in North Little Rock.

See K-16 of Appendix A.

Comment 2

The highway department has noted the presence of lead in soils adjacent to urban interstates. These soils will be distributed with any construction putting this lead back into the air to drift. There are no plans to assay the damage this causes or to mitigate it.

Response: *Studies have shown that the major pathways for human exposure to lead in soil is either through direct contact with lead-contaminated soil, or through the air, by exposure to airborne dust particles. Most lead from leaded gasoline is bound to large soil particles which do not migrate very far from the roadway. Soils removed from the project area will not be deposited in residential areas.*

The remainder of lead from leaded gasoline is bound to small dust particles. The construction contract will include provisions for dust control that will prevent dust from migrating outside the highway ROW.

Comment 3

The highway department relies on air quality monitoring stations distant from the urban interstates to reassure all that air pollution from automobiles is not a significant problem. Monitoring should be conducted roadside between citizens and the source of the pollution. Relying on distant monitoring stations is incorrect and invalid risking harm to citizens living near interstates.

Response: *Air quality monitoring is the responsibility of the Arkansas Department of Environmental Quality (ADEQ). ADEQ's annual plan for its ambient air monitoring network has been approved by EPA. The monitoring network is designed and operated to protect the citizens of Arkansas from the adverse effects of air pollution and to monitor compliance with the National Ambient Air Quality Standards for carbon monoxide, ozone, lead, particulate matter, nitrogen dioxide, and sulfur dioxide. The 30 Crossing project is located in an area that has been in attainment of the 6 criteria pollutants in the National Ambient Air Quality Standards (NAAQS) for the past 25 years.*

Air quality monitoring is the responsibility of the Arkansas Department of Environmental Quality (ADEQ). ADEQ is required to submit an Ambient Air Monitoring Network Annual Plan to the Environmental Protection Agency (EPA) every year. The review contains details about ADEQ's ambient air quality monitoring network and a discussion of how network design and performance satisfy EPA's monitoring requirements for each criteria pollutant. The six EPA-designated criteria pollutants are carbon monoxide, lead, ozone, particulate matter, nitrogen dioxide and sulfur dioxide. Monitoring requirements vary by pollutant, but are based upon a

combination of factors including population data, previous design values, and metropolitan area boundaries.

The network plan provides the framework for the establishment and maintenance of an air quality surveillance system that represents ADEQ's commitment to protect the health and welfare of the citizens of Arkansas through ambient air quality monitoring. The network employs the latest and best technology that is commercially available and allows ADEQ to communicate the data collected as quickly and accurately as possible. Any proposed changes to the network identified during the annual review process are included in the plan.

The 2017-2018 Ambient Air Monitoring Network Annual Plan was submitted to EPA on July 10, 2017, and was approved by EPA on October 3, 2017. Further, ADEQ maintains its ambient air monitoring network in accordance with the quality assurance requirements of 40 CFR Part 58, App. A, designs its network in accordance with App. D, and locates its sites to meet all requirements of App. E. ADEQ operates numerous air monitors at various monitoring sites throughout the State of Arkansas.

The ambient air monitoring networks are designed to meet three basic monitoring objectives. The appearance of any one objective in the order of this list is not based upon a prioritized scheme. Each objective is important and must be considered individually.

- ***(a)*** *Provide air pollution data to the general public in a timely manner. Data can be presented to the public in a number of attractive ways including through air quality maps, newspapers, Internet sites, and as part of weather forecasts and public advisories.*
- ***(b)*** *Support compliance with ambient air quality standards and emissions strategy development. Data from Federal Reference Method, Federal Equivalent Method, and Air Resources Monitor monitors for NAAQS pollutants will be used for comparing an area's air pollution levels against the NAAQS. Data from monitors of various types can be used in the development of attainment and maintenance plans. State or Local Air Monitoring Stations, and especially National Core station data, will be used to evaluate the regional air quality models used in developing emission strategies, and to track trends in air pollution abatement control measures' impact on improving air quality. In monitoring locations near major air pollution sources, source-oriented monitoring data can provide insight into how well industrial sources are controlling their pollutant emissions.*

(c) *Support for air pollution research studies. Air pollution data from the National Core network can be used to supplement data collected by researchers working on health effects assessments and atmospheric processes, or for monitoring methods development work.*

ADEQ's annual plan for its ambient air monitoring network has been approved by EPA. The monitoring network is designed and operated to protect the citizens of Arkansas from the adverse effects of both point and mobile-source air pollution at the statewide level.

Further, the 30 Crossing project is located in an area that has been in attainment of the six criteria pollutants in the National Ambient Air Quality Standards (NAAQS) for the past 25 years. And, Pulaski County has remained in attainment of the ozone NAAQS for more than three decades despite continued lowering of the standard over time (based on redesignation to attainment in 1984). [Source: Working Draft of the Repeal of Regulations for the Control of Volatile Organic Compounds for Pulaski County Technical Support Document]
https://www.adeq.state.ar.us/air/planning/streamlining/pdfs/removal-voc-pulaski-county.pdf

Comment 4

The highway department standards for noise pollution were written by the department. They are self serving. There are set far too high based on false assumptions.

The normal noise levels in an urban environment are well known. The highway department should use these levels as normal. Any excess noise due to urban interstates should be eliminated with new construction.

Response: *ARDOT noise standards are based on FHWA standards used nationwide and based on the latest research on impacts from traffic noise.*

Comment 5

Addition of more lanes of impervious concrete will increase the frequency and severity of flash floods off the highway department right of way.

Response: *The project includes the construction of ponds to compensate for both the additional fill, and the increase in runoff due to increased impervious surface, in the flood-prone areas of Dark Hollow and Fourche Creek. A conveyance system will be constructed to carry runoff from the remainder of the project to the Arkansas River.*

Ellen Fennell

7-24-18

Comment 1

First and most importantly, ARDOT has not offered any palatable alternatives to their massive expansion plans, only offering, initially, an 8-lane expansion as opposed to a 10-lane expansion. Then at later meetings offering a 10-12 lane expansion. We, the public, asked that they study the possibility of solving I-30 congestion using an Enhanced 6-lane plan, within the parameters of Metroplan's Imagine Central Arkansas. (A Chester Street, or Bond Street Bridge, along with serious beefing up of arterials and use of freeways ringing the city for through traffic makes this a feasible solution. Chester Street could be made a highway and the land needed is for sale presently.) This study has never been done by ARDOT. To add multiple layers of confusion, after the initial meeting, ARDOT rolled out a 12-lane plan that they started calling a "6 plus 4," thereby misleading the public with both their language, and by not saying how many lanes the plan actually included.

Response: *See N-1, H-3, and H-4 of Appendix A.*

Comment 2

At the April 26, 2016 meeting, ARDOT provided a platform to an all-volunteer group of young design professionals for a 30 minute presentation on how the proposed Crossing could be dressed up. It was unclear to the audience that none of the amenities would be funded by ARDOT and that any improvements would be the City's responsibility, also any congestion on city streets likely to be caused by ARDOT's mammoth freeway as it dumps into the heart of the city.

At the same meeting, ARDOT denied the public the opportunity to ask questions of the presenters and instead herded participants into a large room across the hall that contained multiple confusing exhibits. Again, not a cooperative tactic. This is the same tactic they used at this most recent meeting. Herd people into a room to look at exhibits, where questions cannot be asked and answered in a group setting. Not a public hearing or comment opportunity at all.

The comment form that meeting goers were given to fill out at initial public meetings offered several multiple-lane build options, the only other option being a No Build. There was no explanation of what No Build meant or represented. Did it mean no bridge replacement? No one knew. So communication appeared to be designed on many levels to keep the public from

getting questions answered, confuse the public as to the true nature of what was being proposed and to shut down the study of any alternatives not blessed by ARDOT.

ARDOT has been overheard at meetings threatening local officials with the loss of funding for decades to other regions of the state. At the first meeting we attended, Director Scott Bennett, told the public, “We are not going to cram anything down anyone’s throat.” Yet, officials have been told if Little Rock does not acquiesce, ARDOT will take all their funding to Northwest Arkansas. He again made this threat in an April 16, 2017 letter to Metroplan.

Response: *ARDOT places a high value on public involvement throughout project development. There is a published ARDOT Public Involvement Handbook that provides guidance for public meetings and hearings that adheres to federal requirements in accordance with 23 CFR 771.111. All notifications for this project were provided in English and Spanish and Spanish-speaking staff were on hand at the public hearing. ARDOT has utilized several different approaches to public involvement and after many years of project development experience have elected to host their public involvement meetings using the Open House format because it stimulates the most participation from the general public. Some of the rationale and reasoning behind the chosen Open House format is provided below:*

- *Open houses provide an informal, casual, and friendly atmosphere. People drop by at their convenience, get the information that interests them, and stay as long as they wish. With this format, more people get better information related to their area of interest. Informality encourages participants who are intimidated by formal meetings to attend and give input. The short time required for participation also attracts and encourages participation from people who do not want to sit through long public meetings.*
- *Participants have many opportunities for questions and for detailed answers from experts who know the project details inside and out. One-to-one conversations between agency staff and participants encourage information exchange and foster courtesy and attentiveness. The most recent public hearing was staffed with multiple experts in all areas of the project development to ensure the public had multiple staff to discuss issues of concern.*
- *Participants have direct interaction with staff who might not otherwise be readily available. Making our technical staff available shows an agency is open to community input. It allows for an informal exchange of information, with everyone learning from each other. People can receive immediate responses to questions about issues. Having our technical staff available reduces misinformation and rumor.*

- *A project can be broken into smaller pieces to enhance understanding. For example, during the recent public hearing we divided the project in ways that would allow the public to interact with technical experts in traffic, environmental studies, and design and therefore get immediate responses to questions. If we had a forum where one individual was allowed to ask one question at a time, not nearly as many people would have their specific concerns addressed. The format allows plenty of time for people to see displays and documents close-up with technical staff available to answer their questions.*
- *Comments are formally recorded. People can comment orally before a designated staff person or court reporter, or they can write opinions on comment forms at the time of the meeting or after the event and return them prior to the announced deadline.*

Comment 3

Due to the size, expense and nature of the project (in the heart of Little Rock's urban, primarily minority and historic urban core), ARDOT should be conducting an Environmental Impact Statement that will consider all ramifications from this massive project. ARDOT has not taken a comprehensive look at the project and, in fact, does not have the funding in hand to adequately address the problems the expansion will create. The expansion they propose will create bottlenecks outside of the extremely short 6.7-mile "project area." These bottlenecks will require "fixing" in the next few years. So, after initial great expense, AHTD is planning to come back to ask for even more money to fix the new bottlenecks they created with this "fix". The cost of this by their estimation has been estimated at $4 billion. This is a perfect example of segmentation of the project. ARDOT has NOT studied the impacts on the entire area that will be affected by this 7-mile "fire hose" that will burst onto arterials outside of that segment producing traffic congestion that ARDOT will be forced to come back and fix later. Please make ARDOT present an environmental impact statement on the full $4 Billion project.

Response: *See I-12, K-12, and K-18 of Appendix A.*

Comment 4

The city, sadly, seems largely unaware of the severe congestion problems that massive freeway expansion will foist on downtown streets. ARDOT however, will be long gone, leaving the city to deal with these problems with inadequate resources. This does not meet the Cooperative nor the Comprehensive test.

Response: *See I-5 of Appendix A.*

Comment 5

Norman Marshall of Smart Mobility, Inc., has pointed out errors in methods of calculations of traffic projections by ARDOT. It appears that ARDOT came up with what they wanted, then fiddled with the traffic projections to back up the design they had already picked. If we had not hired Smart Mobility, no one would have ever known the difference, something we believe ARDOT was counting on. Norm Marshall's two study documents pointing out errors in modeling have as yet, not been addressed by ARDOT.

Response: *There are two types of traffic modeling. The first, macroscopic travel modeling, was performed by Metroplan with their best available model at the time. This model and the forecasts were approved by FHWA when the Long-Range Transportation Plan was approved. ARDOT used this information as well as other information to develop the traffic forecasts for the IJR and EA. The second type, microscopic travel modeling was performed by the consultant team. The team used the FHWA Traffic Analysis Toolbox, Volume III: Guidelines for Applying Traffic Microsimulation Modeling Software (2004). This is the latest available standard available for microsimulation modeling. Our micro-simulation models were reviewed and approved by FHWA's Resources Center in Atlanta as well as ARDOT. The models were also reviewed by Metroplan.*

Comment 6

The pressure on Metroplan to drop their 6-lane highway policy so ARDOT can ram their I-30 Crossing plan through has been shameful. Decades of conscientious work by Metroplan with laborious input by many citizens is being thrown out in ARDOT's rush to embrace a 1960's solution to urban congestion. Metroplan was steamrolled by ARDOT, as are the citizens who have tried to counsel a more moderate and fact-based approach to the problem of urban congestion in our town.

Response:

See N-3 of Appendix A.

All analyses in the EA present the No-Action Alternative results along with the Action Alternative results. NEPA regulations require the following of FHWA:

"Alternative courses of action be evaluated and decisions be made in the best overall public interest based upon a balanced consideration of the need for safe and efficient transportation; of the social, economic, and environmental impacts of the proposed transportation improvement; and of national, state, and local environmental protection goals.

Throughout the PEL and NEPA phases of this project, the study team has evaluated every alternative suggested by the public to determine its effectiveness in meeting the purpose and need for the project. The purpose of this project is to increase the safety of vehicular traffic on I-30 and I-40 by correcting geometric deficiencies, improve the condition of the roadway by modernizing infrastructure and maintaining a state of good repair, improve navigational safety on the Arkansas River, correct the I-30 Arkansas River Bridge deficiencies, and reduce traffic congestion by improving mobility on I-30 and I-40. The intent of the project improvements is to provide a reliable transportation corridor between Little Rock and North Little Rock that is structurally sound and improves safety and mobility by improving the operations of the multiple interchanges in the corridor. The I-30 Arkansas River Bridge would be replaced with a new structure, correcting the functional and structural deficiencies and navigation safety issues.

The close proximity of five high volume interchanges (Hwy 67/I-40, I-40/I-30, I-30/Broadway, I-30/Hwy. 10, and I-30/I-630) and a major river crossing in the 30 Crossing corridor introduces a complex interdependence between each of these major transportation components. Due to this interdependence, improvements to the geometric and structural deficiencies of any one component relates directly to the other components in close proximity to it. Although the Arkansas River Bridge is the most critical component of the 30 Crossing project, corrections to its structural and geometric deficiencies tie directly into the improvements of the components adjacent to it. The major geometric deficiency for all of the interchanges and the River bridge is insufficient space and distance necessary to safely perform the merging and weaving maneuvers that are typical when traveling through and beyond a major interchange. The result of the similar deficiencies and close proximity of each interdependent component is that operational improvements for each component blend into those adjacent to it resulting in an increase of capacity throughout the project.

Comment 7

See Quapaw Quarter Comments and Responses.

Danny Lewis

7-25-18

Comment 1

Evening, how will the I-30 Bridge and lane expansion effect my property/home at the corner of 10th and Barber St.? Will there be a buyout?

Response: *The project improvements fit within the existing right of way, so no new right of way is required at that location.*

Pat Riley

7-25-18

Comment 1

My primary critique of the current Arkansas Department of Transportation (ArDOT) plan to substantially widen I-30 through downtown Little Rock is that it either willfully or by oversight fails to recognize the systemic nature of the interrelated roadways that serve central Arkansas. The problem that ArDOT is presumably striving to fix is a moderate delay in travel time during rush hour traffic along the 6.7 miles of the corridor under study. In searching for a solution the questions should include: 1) Why is the problem occurring? 2) Is the problem likely to get worse over time? And 3) What collateral impact will a given solution have regarding interconnected roadways?

Response: *Chapter 1 of the EA documents the Purpose and Need for the project.*

See also I-9 of Appendix A.

Chapter 3 of the EA documents the Project Effects.

Comment 2

In 1995, Metroplan (Central Arkansas' regional planning authority) produced Metro 2020, which articulated the vision of "widening all freeways in the metro area to six through lanes" by 2020. As of November 2016, with the completion of widening I-40 from Conway to LR, that goal was achieved. Consider the following interconnected 6-lane highways that serve Central Arkansas: I-30 (Benton to I-40), I-430 (entire corridor), I-630 (entire corridor), I-440 (entire corridor), I-40 (Conway to US 67/167) and US 67/167 (I-40 to Jacksonville). After 20 years and more than a billion dollars this interconnected system is finally and impressively balanced.

In just the past few years there have been significant improvements in our highway system. Projects recently completed include: widening I-40 to 6 lanes (I-430 to Morgan Maumelle, the Big Rock interchange (I-430/I-630), an additional lane from I-430 west onto I-30 east, the widening of nearly four miles of Cantrell Road (Highway 10), the addition of an on-ramp from Cantrell to I-430 North), the replacement of the Broadway Bridge and a renovation project along almost 3 miles of I-440.

What is the impact of all of these improvements on the I-30 study area? Well, we don't know yet because so many of them have so recently been completed. We do know that during all of these many projects at least some traffic was diverted from the roadways under construction to the 30 Crossing study area exacerbating the delays on that stretch and inflating its traffic

counts. Now that all of those projects have ended and the system is (finally) in balance it would be prudent to first see how the completed roadway system envisioned by Metroplan performs before starting a new project.

Response: *The team used the Metroplan travel model to inform the analysis of future conditions. The model included the improvement projects that are recently completed and projects that are committed with funds. In addition to existing traffic conditions, the team is looking at traffic in the 2041 design year.*

See I-13 of Appendix A.

Comment 3

What is the rush to begin this project? Is it because the traffic along the 30 Crossing study area has significantly increased? According to the ArDOT, the traffic over the I-30 Bridge reached 121,000 vehicles per day in 1999.

Below are the traffic counts for the I-30 bridge over the past ten years:

Daily Average Traffic Counts across I-30 Bridge*

2007 124,600

2008 122,000

2009 120,000

2010 124,000

2011 121,000

2012 117,000

2013 119,000

2014 114,000

2015 120,000

2016 123,000**

2017 125,000**

*http://ahtd.maps.arcgis.com/apps/webappviewer/index.html?id=8deb09579210490bafb97bd03c3c07

92

** Broadway Bridge closed during parts of 2016/2017

In almost 20 years the traffic counts within the study area have remained essentially unchanged and that's with non-stop construction occurring on connected roadways throughout this time frame. What is the evidence that this situation will change now – now that the system is finally completed and in balance?

Response: *The reason that I-30 traffic has stopped growing beyond 125,000 is because the traffic demand has reached the capacity of the facility and it has been at capacity since at least 2007, according to the study team. That is why traffic conditions have worsened and peak travel periods have lengthened, as detailed in Section 1.4 of the EA. Consequently, the congestion portion of the need for the project is not based on a future traffic projection; the congestion and the safety issues that come with congestion exist now and have existed for more than 10 years.*

Comment 4

Recently developed but widely available technology is likely to incrementally improve traffic flows. Anyone with a smart phone and Google maps can now get real time traffic data to optimize route selection. Everyday commuters can use this technology to avoid congestion and reliably choose the quickest route. The universal availability of optimized routing strongly argues for developing a robust street network filled with multiple alternative routes rather than focusing major resources on a single roadway.

Technology is and will continue to change transportation in ways that are difficult to predict. Some of those ways are likely to make ever-wider freeways obsolete. Disruptive technologies like ride-sharing, self-driving cars; enhanced delivery services (including drones) are here or coming soon and their impact will be immense.

Response: *There are many new emerging technologies available to ARDOT today and in the future to address traffic. Emerging technologies were addressed in EA Appendix B, IJR Traffic Results and Safety Analysis, Appendix B Traffic Results, Attachment 6 Planning for Emerging Technologies for the 30 Crossing Project. In summary, many new technologies are focused on safety.*

States and communities are dealing with an unprecedented amount of potential change as they plan for their transportation needs. Within their next planning horizon, states and MPOs need to decide how best to address the increasing deployment of emerging technologies such as automated, connected, electric and shared-use vehicles (ACES) and complementary technologies. As with many technologies in their infancy, there is uncertainty about likely outcomes and how to plan for them. Appendix B6 to EA Appendix B (IJR Traffic Results and Safety Analysis), titled Planning for Emerging

Technologies, addresses some of these questions. The report looks at the following questions:

- *What are the transformative emerging technologies?*
- *What factors could delay or accelerate the impact of these technologies?*
- *How can we best manage competing demand and interest of numerous and varied stakeholders?*
- *What does a smart city look like?*

The report concludes that planning for the future should include the installation of a communications backbone. The deployment of traffic surveillance and monitoring intelligent transportation system (ITS) infrastructure will allow the operational efficiency of the improved roadway corridors to maximize the return on investment for the planned improvements. The traditional ITS deployment of traffic surveillance cameras, vehicle flow monitors and dynamic message signs will allow for traffic incidents to addressed in a more efficient manner.

Alternative means of travel using "for hire" vehicles are referred to as transportation network companies (TNCs). TNCs are changing the way people get around but they come with both pros and cons. TNCs provide more options for people which is a good thing but their use may increase vehicle miles traveled as TNC drivers circulate around looking for customers. The New York Times recently published an article titled Uber Hit With Cap as New Your City Takes Lead in Crackdown, (August 8, 2018). New York became the first major American city on Wednesday to halt new vehicle licenses for ride-hail services, dealing a significant setback to Uber in its largest market in the United States. "this action will stop the influx of (Uber) cars contributing to the congestion grinding our streets to a halt." There is still much to learn from TNC and their impact on the transportation system.

Developing and evolving aspects of transportation technology are being considered in the development of the 30 Crossing project. It is anticipated that these technologies will be a standard part of traveling in the coming decades. Consideration of Intelligent Transportation System (ITS) technologies and congestion management strategies are ongoing. These considerations, will enable ARDOT to respond efficiently in adapting and retooling roadways to accommodate new technologies. An assessment of these technologies is presented in EA Appendix B: IJR Traffic and Safety Analysis, Appendix B-6 – Emerging Technologies. The conclusion of the analysis is that any improvement in traffic congestion due to the conversion of

a large percentage of the vehicle fleet into connected and autonomous vehicles is probably at least 30 years in the future.

Comment 5

None of this is to say that I-30 along the study area should not be improved. However, the solution offered by ArDOT, which doubles the number of lanes at the bridge while eliminating half of the on/off ramps in downtown LR (from 2 to 1) doesn't make good sense.

It is well understood that significantly widening one stretch of roadway "induces" demand causing that roadway to be favored over alternative routes. This phenomenon has predictable residual effects. For instance, according to ArDOT's modeling, the widening within the study area would immediately shift traffic delays to I-30 south of the study area and I-630 to the west. The resultant congestion would only be relieved by widening those adjacent roadways (while this impact is acknowledged by ArDOT, those projects have not been scheduled or budgeted for). According to a Metroplan estimate, the total cost to rebalance the integrated roadway system within Central Arkansas after doubling the width of I-30 in the study area would be $4 billion!

Response: *See I-12 of Appendix A.*

There are existing congestion issues on the adjacent segment of I-630. Congestion in the westbound direction is caused by lack of existing capacity between I-30 and Cumberland Street and poor geometry on the I-30 to I-630 ramp. Congestion in the eastbound direction is caused by the eastbound I-630 ramps to northbound and southbound I-30. Each of these ramps has a lane reduction from two lanes to one lane and poor geometry where it merges onto I-30. As shown in Chapter 2.3 of the EA, congestion is projected to become much worse in the future with the No-Action Alternative. Based on the 2010/2040 CARTS Travel Demand Model information provided by Metroplan during the NEPA process, the Future No-Action daily traffic volume on I-630 between Cumberland Street and I-30 is expected to increase approximately 8% from 2010 to 2040. During peak hours, travelers currently avoid the eastbound I-630 congestion by exiting at East 15th Street, and using College Street through Hangar Hill to either reach downtown destinations or access I-30 at East 6th Street. These travel patterns were brought to the attention of the study team during the PEL public outreach activities, and guided the development of alternatives to address these issues.

The Preferred Alternative will improve traffic congestion on the segment of I-630 from I-30 to Cumberland Street. I-630 westbound congestion will be improved by the addition of a lane from I-630 to Cumberland Street and improvement of the ramp geometry. I-630 eastbound

congestion will be relieved by correcting the lane reduction from two lanes to one lane on the I-630 to I-30 southbound and northbound ramps and improving the merge geometry onto I-30.

Based on the 2010/2040 CARTS Travel Demand Model information provided by Metroplan during the NEPA process, under the Preferred Alternative, the future daily traffic volume on I-630 between Cumberland Street and I-30 is expected to increase 20% from 2010 to 2040, which is 12% higher than the increase noted above under the Future No-Action Alternative. It is important to realize that this increase in traffic results from the removal of the downtown bottleneck on I-30 and the removal of the I-630 eastbound bottleneck due to the Preferred Alternative improvements. Vehicles current avoid the downtown I-30 bottleneck by using alternate routes through downtown Little Rock, such as the Broadway and Main Street Bridges, and avoid the eastbound I-630 bottleneck by using the bypass routes of East 15th Street and College Street. With the removal of these bottlenecks, the CARTS model shows that 12% of the daily traffic volume will choose to use the I-30/I-630 route rather than the local bypass routes. The CARTS model shows the difference in projected traffic on I-630 between the Future No-Action and Preferred Alternative quickly dissipating from 12% at Cumberland Street to 3% at the Marshall Street/Dr. Martin Luther King Driver interchange, as vehicles avoiding the congested sections in the Future No-Action condition re-enter I-630.

The results from the traffic simulations performed for this project show that, compared to existing and Future No-Action Alternative conditions, the Preferred Alternative improves morning and evening traffic congestion in the eastbound direction on the adjacent segment of I-630, as well as traffic congestion in the westbound direction in the afternoon. Under existing and Future No-Action conditions in the morning, the downtown bottleneck on I-30 is so severe, that traffic avoids it by using alternative routes, reducing the traffic reaching eastbound I-630.

ARDOT does not currently have plans to improve I-630 from I-30 to the west. Due to current and anticipated mobility concerns on the corridor, the Highway Commission has provided approval for a future study of this portion of I-630; however, a date has not yet been set for this study to commence. If, at some future date, ARDOT conducts a study of this section of I-630, that study would be conducted in the context of previously identified commitments and constraints. Any recommendations resulting from such a study would also have to be evaluated through the environmental process to determine the possible environmental impacts. The improvements to I-30 and I-40 being proposed under the Preferred Alternative will not make a study of I-630 improvements any more or less likely.

ARDOT is currently studying the need for and feasibility of improvements to I-30 from Benton to the I-530/I-440 interchange. The limits of the study for this corridor were selected based on the

general commuting patterns and freight movement in the region and beyond. The major issues include traffic demand currently exceeding capacity at various points along this 23-mile corridor, such as the area between 65th Street and the I-530/I-440 interchange. The I-530/I-440 interchange is where I-30 serving downtown Little Rock and North Little Rock, I-440 connecting to I-40 east, and I-530 connecting to Pine Bluff, converge. Between 65th Street and the I-530/I-440 interchange, the mixture of commuter and freight traffic has limited opportunity to cross Fourche Creek. Farther to the west, I-30 is a critical interstate link serving the southwest central Arkansas region as well as connecting central Arkansas to northern Texas. Thousands of intercity motorists and freight providers rely on I-30 to travel between eastern and southwestern Arkansas and beyond. Although I-30 west of the I-530/I-440 interchange will continue to be congested, the Preferred Alternative is expected to improve the current traffic flow condition on the adjacent section of I-30, particularly during the morning peak, by relieving the bottleneck occurring due to weaving just north of the I-440/I-530 interchange.

Comment 6

Furthermore, the induced demand along I-30 will result in a significant increase of vehicles entering and exiting the freeway in downtown Little Rock. That increase in traffic will predictably create additional strain on the downtown LR grid. Eliminating one of two exits/entrances to I-30 in downtown LR will substantially exacerbate the problem. This is a serious traffic issue that ArDOT does not address because it lies outside of its study area.

Response: *See I-5 of Appendix A.*

Comment 7

Lastly, according to a consulting report authored by Norm Marshall, a nationally renowned expert on transportation system design/analysis, widening I-30 as envisioned by ArDOT would not improve overall traffic conditions system-wide. Mr. Marshall input travel data from Metroplan into a dynamic traffic modeling program (ArDOT uses a static traffic modeling program) and found that the “6-Lane with C/D Lanes alternative would increase both regional vehicle miles traveled (VMT) and regional vehicle hours traveled (VHT) relative to the No Build alternative in 2040”. In other words “there would be no improvement in regional congestion over doing nothing at all.” (Emphasis added).

Response: *For a complete description of the traffic modeling efforts on this project, see EA Appendix B: IJR Traffic Results and Safety Analysis, Appendix B – Traffic Results Addendum.*

ARDOT used a dynamic model (Metroplan’s Regional Travel Demand Model CARTS) to inform the estimation of traffic volumes within the roadway network in the study area. A microsimulation

model (VISSIM) was used to simulate the specific traffic conditions (delays, queues, etc.) that result as those volumes are introduced at specific roadway locations.

The table below shows the regional Vehicle Miles Traveled (VMT) and Vehicle Hours Traveled (VHT) figures for the existing condition, Future No-Action and Action Alternatives. The Preferred Alternative (6-lane with C/D SDI) does show the next to highest regional VMT among the Action Alternatives. Due to the better congestion relief provided, the Preferred Alternative induces a higher demand on the facility than the 8-lane Action Alternatives or No-Action Alternative. This is a result of an increase in drivers seeking out and preferring to use the less congested facility over more congested alternative routes within the region, which results in a higher VMT. However, VHT is the next to lowest among the Action Alternatives and the No-Action, for the same reason. Less congestion results in less time spent in traffic, reducing delays for the motorists. These figures support the conclusion of the Environmental Assessment, that the 6-lane with C/D Action Alternatives best meet the congestion relief element of the Purpose and Need for the project.

	Existing	*Future No-Action Alternative*	*8-lane General Purpose SPUI Action Alternative*	*6-lane with C/D SPUI Action Alternative*	*8-lane General Purpose SDI Action Alternative*	*6-lane with C/D SDI Action Alternative*
VMT (miles)	*22,248,077*	*29,514,116*	*29,568,715*	*29,621,280*	*29,571,578*	*29,618,575*
VHT (hours)	*631,571*	*895,098*	*893,677*	*891,953*	*893,576*	*892,130*

Chapter 3.0 Traffic Volumes, describes how the traffic volumes were developed. Traffic forecasts were developed based on ARDOT's Arkansas State Highway and Transportation Department, Traffic Handbook, 2013. The handbook documents traffic forecasting data collection, and procedures as required in 23 CFR 500 Subpart B. The Traffic Handbook uses these references:

- *A Policy on Geometric Design of Highways and Streets, American Association of State Highway and Transportation Officials (AASHTO), 2011*
- *Highway Capacity Manual, (HCM 2010), Transportation Research Board*

- *Traffic Monitoring Guide, Federal Highway Administration, 2001*
- *AASHTO Guidelines for Traffic Data Programs, AASHTO 2009*
- *AHTD Technical Services Field Manual, AHTD, Planning and Research Division, Technical Services (Renamed as Traffic Information System Section in 2013), 1988*
- *Highway Performance Monitoring System Field Manual, Federal Highway Administration, Office of Highway Policy Information, 2013*
- *NCHRP Report 365 – Travel Estimation Techniques for Urban Planning, 1998*
- *NCHRP 01-37A: Development of the Guide for the Design of New and Rehabilitated Pavement Structures, 2002*

In summary, the methodology for projecting traffic with and without the improvements was reviewed by FHWA, Metroplan, and ARDOT. The latest available Metroplan travel demand model was used to develop traffic for all future alternatives. The alternatives with more capacity do induce traffic in the corridor. These changes are represented in the text. The traffic volumes were developed using information from the Metroplan regional travel demand model thus incorporated regional traffic modeling.

In Metroplan's comments on the draft EA dated July 26, 2018, they state "The traffic and operational analysis provides an admirable analysis and summary of traffic impacts of the various 30 Crossing alternatives under consideration. Furthermore, staff believes that the traffic projections are reasonable and fall within an acceptable range given engineering practice."

The development of the traffic modeling for this project involved a team of nationally-recognized experts, including Professional Transportation Operations Engineers, with decades of experience modeling complex interstate projects.

Comment 8

So what should be done instead of the ArDOT plan? I personally favor an in-depth exploration of adding a bridge at Chester Street and making improvements along Pike Avenue to I-40. This approach would redirect substantial traffic off of I-30 while simultaneously increasing property values along that section of riverfront and across that entire stretch of road.

Response: *See H-3 of Appendix A.*

Comment 9

As for 30 Crossing, my first suggestion would be to monitor traffic for another two years to see what benefits are derived from the recent completion of six lanes throughout the system. In the meantime, ArDOT should fully develop plans for improving traffic flows with the least amount of systemic disruption. Perhaps that plan would increase shoulder width while adding at most two lanes (one in each direction) while maintaining the Cantrell Road exit. The combination of a bridge at Chester Street and the addition of two lanes along I-30 should have the effect of relieving traffic congestion with minimal negative impact.

Response: *See I-9 and G of Appendix A.*

The Preferred Alternative includes shoulder improvements and the provision of six lanes on I-30 and I-40. In the downtown area, two additional C/D lanes are added in each direction to provide for local traffic between Little Rock and North Little Rock.

Central High Neighborhood

7-26-18

Comment 1

We live near - and south of - I-630, and use I-30 often. We are concerned that the draft Environmental Assessment prepared for the I-30 Crossing project does not adequately analyze alternatives to the current proposals. We represent the south side of I-630, which forms the racial and class dividing line through the heart of our city. It is obvious to us that downtown highways broke the inner city and built the suburbs. This was, and remains, their intent.

We lost in the building of this dividing line. We do not want to lose again when enlarged highways solidify it further, after years of disruptive construction. For over 50 years, there has been almost no new private residential construction in our historic neighborhoods south of the interstate – while increasingly remote exurban developments race ahead, subsidized by new roads. This tide must turn.

We see no possibility for benefit, and a great risk of suffering further harm, from 1950's style plans that ease the already well-established pathways of white flight from the inner city. These segregationist plans are perfectly suited to continue the region's already far too efficient systems of separating white from black, poor from prosperous, Democrat from Republican. The social, environmental, economic and political impacts of I-30 crossing have not been adequately weighed in the thousands of pages of documents prepared by the Highway Department.

These proposed highway "improvements" risk encouraging further depopulation of our already too empty neighborhoods. They will make our homes, institutions and businesses less desirable, by making them less accessible to a less attractive downtown, and encouraging the highway fed sprawl, which destroyed our neighborhoods in the first place. We have suffered decades of loss of property values, on ours, the "wrong" side of I-630. The current plans seem pre-programmed to bring further loss of property values, when we are finally just beginning to see some increases.

These plans fail to provide for alternatives of improved public transportation, bike paths or any investments whatsoever to foster human scale, urban regeneration that will make more highways, less necessary. They have been deceptively oversold, with Highway Department encouraged public presentations, showing beautiful pictures of parks that will never be built, just as they were never built above I-630. There are good historic reasons for our suspicion. These cannot be ignored.

The power brokers behind this boondoggle will throw us under their steamrollers, as before. They are not defending our interests, as they have not over the decades. We will pay with continued poverty, empty houses and vacant lots. They will win with fat construction-related contracts and new, wasteful developments far from us. This is the plan. The big money is behind it. And city leadership refuses to protect us, afraid to raise challenges to the Chamber of Commerce status quo.

The Highway Department presents the impacts of the downtown I-30 widening in a contrived vacuum. The assessment ignores the fact that I-30 Crossing is part of a much broader set of planned expansions to the regional highway system, including widening I-630 to ten lanes and turning Rte 67 into an interstate linking Little Rock to St. Louis. Intentionally ripping this assessment out of the true planning context is designed to obscure impacts of what is really going on with the broader system.

The Highway Department is impermissibly using a “divide and conquer” approach of looking piecemeal at what are, in fact, much larger plans. This leaves the current assessment unable adequately to consider the true long-term direct, indirect and cumulative impacts of the I-30 crossing project on historic areas. These real impacts need to be studied now, in the real planning context, so that we can know what to expect from this massive expenditure of our tax dollars.

We already know the devastation that poorly planned highways brought our neighborhoods. We may own the wrong side of these tracks, but our existing property rights matter too. Or at least they should. We want the Highway Department to show us clearly that we will not again suffer, as we have in the past. The Department is trying, yet again, to pave even more broadly through the highway damaged heart of downtown. Your goal is to carry more people, faster, away from downtown - and from us. Please tell us, what we are really in for?

If we must suffer again for this “progress”, tell us how, based on careful analysis, sound projections and historical data. Then develop plans with realistic and adequately funded ways to compensate for, and mitigate against, what will, yet again, be taken from us by this State action. Give us more than pretty pictures of parks that will never be, lining massive, unneeded highways that will degrade where we live, purely to benefit others.

Response:

See I-12 of Appendix A.

The purpose of this project is to increase the safety of vehicular traffic on I-30 and I-40 by correcting geometric deficiencies, improve the condition of the roadway by modernizing

infrastructure and maintaining a state of good repair, improve navigational safety on the Arkansas River, correct the I-30 Arkansas River Bridge deficiencies, and reduce traffic congestion by improving mobility on I-30 and I-40. The intent of the project improvements is to provide a reliable transportation corridor between Little Rock and North Little Rock that is structurally sound and improves safety and mobility by improving the operations of the multiple interchanges in the corridor. The I-30 Arkansas River Bridge would be replaced with a new structure, correcting the functional and structural deficiencies and navigation safety issues.

The project will benefit commuters traveling to and from work in Little Rock and North Little Rock, but it will also benefit the communities of Little Rock and North Little Rock. The effects of the project on the community are discussed in Sections 3.1 (Economic Effects) and 3.2 (Community Effects) of the EA, and in Appendix A (Indirect Effects Technical Report) and Appendix F (Community Impacts Technical Report). These sections of the EA and the referenced supporting documents also detail the study that resulted in the conclusion that the Preferred Alternative would have a positive effect on the local and regional economy. To summarize, the reasons are:

- *Decreased congestion and shorter travel times would make downtown destinations more attractive to businesses, visitors and tourists, which is why the Chamber of Commerce supports the Preferred Alternative*
- *The C/D roads would increase community cohesion between Little Rock and North Little Rock*
- *Discontinuous frontage roads would be replaced with continuous frontage roads, increasing access to businesses in Little Rock and North Little Rock*
- *Pedestrian and bicycle accommodations would be improved*
- *Navigational safety on the Arkansas River would be improved, providing an economic benefit for barge traffic*
- *Geometric roadway issues on I-30 would be addressed, which would make travel to the downtown area more reliable and safer, encouraging people to visit*

This project is not one segment of a larger project. It has its own independent utility.

I-630 eastbound congestion in the morning and afternoon peak hours will be relieved by the Preferred Alternative, as the capacity of the I-630 eastbound to I-30 northbound ramp will be improved. I-30 northbound congestion in the morning and afternoon peak hours will be relieved by the Preferred Alternative, which relieves the bottleneck occurring due to weaving just north of the I-440/I-530 interchange.

There are other independent projects proposed in the project area. Section 3.16 of the EA and Appendix R of the EA (Cumulative Effects Technical Report) evaluates the cumulative effects of this and other reasonably foreseeable projects on several resources, including communities. The conclusion of the analysis is that the cumulative impact of these projects on communities is expected to be minimal.

There is no intent to harm minority or low-income (Environmental Justice) neighborhoods. The project improvements are almost entirely within existing ROW, resulting in very little required ROW (11.1 Acres, 5 commercial displacements; 6 residential displacements). No displacements are anticipated to properties south of I-630. The impacted commercial properties are located in both Environmental Justice (EJ) and non-EJ census areas. Four of the five impacted commercial properties are within non-EJ census areas. The one commercial business and all the residences area within high-minority census areas. These properties would be displaced because all four action alternatives propose a continuous frontage road constructed over the UPRR on the southbound side of the I-30 facility. As proposed, Cypress Street would serve as a continuous southbound frontage road from 20th Street to Riverfront Drive. Although the frontage road is not necessary for the implementation of the project, the construction of the frontage road to connect Cypress Street north and south of the UPRR tracks would be a positive benefit to the minority community that exists to the south and north of the UPRR tracks, and which had been historically separated by them. It addresses the public's concern over this area lacking the one-way frontage road system.

We understand that minority and low-income populations historically have been treated unfairly during the development of highway projects. In order to prevent such practices, NEPA studies must follow Executive Order 12898, which requires federal agencies to address disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations, to the greatest extent practical and permitted by law. The 30 Crossing project did conduct an analysis of potential impacts on these populations as directed by Executive Order 12898 and determined that this project did not disproportionately impact any minority or low-income population. Furthermore, in order to promote nondiscrimination, minority and low-income communities were offered additional opportunities to participate in project related meetings and voice their opinions on the proposed actions.

During the PEL, four community meetings were held in October 2014 at minority venues coordinated with Marion Butler, Shorter College President Jerome Green, and a coalition of pastors of local minority churches. These meetings were held at King Solomon Baptist Church and Shorter College in North Little Rock and St. John Baptist Church and Ward Chapel AME Church in Little Rock. During the NEPA phase, a second round of open-house meetings were

held in the summer of 2016 at St. John Baptist Church, King Solomon Baptist Church, and Shorter College. During the public hearing comment period in 2018, the project team worked with Senator Linda Chesterfield to present information and answer questions at a community meeting in Little Rock. Throughout the project, minority churches, organizations, and neighborhoods were notified of public meetings through hand-delivered flyers, mailings, public service announcements, newspaper ads, emails, and additional outreach efforts through the woman-owned small business and Minority Business Enterprise J Kelly Referrals in Little Rock. Efforts have also been made to have public meetings hosted by venues in minority areas, including the Horace Mann Arts and Science Magnet Middle School in Little Rock and the Friendly Chapel Church of the Nazarene in North Little Rock.

Quawpaw Quarter Association

7-26-18

The Quapaw Quarter Association (QQA) has reviewed *30 Crossing Environmental Assessment, ARDOT Job NO. CA0602: I-30 (From I-530/I-440 to I-40) and I-40 (From Hwy. 365/MacArthur Dr. to Hwy.67) Pulaski County, Arkansas; May 2018*. We take this opportunity to submit for the record our comments, observations, and recommendations on the 30 Crossing Environmental Assessment (EA). We believe that prior citizen inputs have improved the project and we appreciate ARDOT and FHWA for working with us as we carry out our mission--preserving Greater Little Rock's historic places.

The QQA remains concerned about the final design elements of the project that were not a part of the Draft EA that was provided. The final design details can have a significant impact on the public's acceptance of the project. We also have continuing issues that we do not believe have been acceptably resolved at this point. We are gratified that the majority of traffic exiting from I-30 has been diverted out of th MacArthur Park National Register listed Historic District and away from the National Historic Landmark, U.S. Arsenal, Little Rock. We are also supportive of the decision to retain all on street parking within and adjacent to National Register listed historic districts and individually listed historic properties (Go to: Parking HD). We continue to advocate for measures to maximize connectivity between the areas on the east and west sides of I-30 and to minimize impacts to historic properties within the undertaking's Area of Potential Effect (APE) (see QQA letter to Randal Looney, FHWA, August 21, 2017 Go to: QQA FHWA Letter 2017):

- Limit frontage roads to two lanes
- Install traffic devices allowing pedestrians to cross Capitol, 6th, and 9th Streets easily
- Aggressively slow traffic through enforced speed limits

In addition to the recommendations raised in our comments last year we submit the following suggestions:

- Application of recommendations found in *30 Crossing Content for Quapaw Quarter Association I-30 Group, 5/21/2018*; Patricia M. Blick, Ngozi (Nome) Brown, Brett Budolfson, Ed Sergeant, Tanner A. Weeks. (Go to: QQA Design Team Recommendations)
- Reducing speed limits on I-30 adjacent to historic properties to reduce vehicular noises
- Employ measures to reduce vehicular noise on overpasses

As the primary and longstanding preservation organization focused solely on the greater Little Rock area, the QQA reiterates its request to be a signatory on a Memorandum of

Understanding (MOU) in order to ensure the protection of historic properties within the APE in perpetuity, with other signatories to include the Federal Highway Administration, the Arkansas Department of Transportation and the City of Little Rock.

In the future, if and when changes are contemplated, the MOU can be revisited and amended if warranted.

Comment 1

I-630 Widening

Although not mentioned in the body of the EA as an indirect or cumulative impact, and instead hidden away in Appendix B of Appendix B, the Traffic Analysis Report of the Interchange Justification Report reaches a surprising conclusion:

Action Alternative 2A: 6-Lane with C/D with SPUI Action Alternative serving downtown Little Rock experiences morning congestion between downtown Little Rock and I-630 due to capacity constraints on I-630 in 2021. The speed profile shows that the travel speeds slow to 20-30 mph and the total congestion lasts approximately 1 hour before travel speeds increase back to free-flow conditions. Five years later in 2026, congestion has increased slightly over time, become more severe and lengthened along the corridor.

The same impact is found on I-30 at the South Terminal in the PM peak unless I-30 is widened to eight lanes west to 65th Street immediately and from 65th Street to Benton prior the 2041 study year. Just as I-30 from the South Terminal to 65th Street will have to be widened immediately in order to make the 30 Crossing project function as designed (a fact acknowledged in the EA and integrated into the many different technical reports assessing the benefits of the project), it is reasonable to also conclude that I-630 will need to be widened immediately in the same manner (a fact that appears to be ignored in the EA).

From our standpoint, then, a decision to approve the 6 lane + CD alternative recommended in the Draft EA will be a de facto decision to widen the eastern part of I-630 through Little Rock's most historic neighborhoods. That indirect and cumulative impact has been part of concerns all along about 30 Crossing (see QQA letter to Randal Looney, FHWA, August 21, 2017)—that it might lead to the "inevitable" widening of I-630 through these historic neighborhoods, resulting in adverse effects on historic properties. The commencement of the I-630 widening project west of University Avenue appears to make this widening even more inevitable. ARDOT and others consistently have downplayed the tie between 30 Crossing and widening the eastern part of I-630. But Appendix B of Appendix B suggests otherwise, and should have been included prominently in the EA of the 30 Crossing. It was not.

Response:

See I-12 in Attachment A.

This project addresses the roadway geometric issues that have led to safety and congestion issues within its project limits. The project limits were defined based on documented needs in the I-30 and I-40 corridors, including bridge structural and navigational deficiencies, traffic congestion, safety, roadway geometric deficiencies; as well as points of major traffic generators

- *Congestion on I-30 and I-40 was documented to be most severe on the segment of I-30 from I-440/I-530 to I-40, and on I-40 from I-30 to Hwy. 67.*
- *Safety issues in the project corridor were related to geometric deficiencies: left exits, substandard ramp lengths, substandard curves, substandard shoulders, and closely spaced interchanges, which were found to be most prevalent on I-30 from I-440/I-530 to I-40 and on I-40 from I-30 to Hwy. 67*
- *The southerly project limit is a location where I-30, I-440, and I-530 converge, resulting in a significant change in traffic volumes*
- *The northerly project limit is a location where I-40 and Hwy. 67 converge, another location where traffic volumes change significantly*

There are existing congestion issues on the adjacent segment of I-630. Congestion in the westbound direction is caused by lack of existing capacity between I-30 and Cumberland Street and poor geometry on the I-30 to I-630 ramp. Congestion in the eastbound direction is caused by the eastbound I-630 ramps to northbound and southbound I-30. Each of these ramps has a lane reduction from two lanes to one lane and poor geometry where it merges onto I-30. As shown in Chapter 2.3 of the EA, congestion is projected to become much worse in the future with the No-Action Alternative. Based on the 2010/2040 CARTS Travel Demand Model information provided by Metroplan during the NEPA process, the Future No-Action daily traffic volume on I-630 between Cumberland Street and I-30 is expected to increase approximately 8% from 2010 to 2040. During peak hours, travelers currently avoid the eastbound I-630 congestion by exiting at East 15th Street, and using College Street through Hangar Hill to either reach downtown destinations or access I-30 at East 6th Street. These travel patterns were brought to the attention of the study team during the PEL public outreach activities, and guided the development of alternatives to address these issues.

Under the Preferred Alternative, I-630 westbound congestion on the segment of I-630 from I-30 to Cumberland Street will be improved by the addition of a lane from I-630 to Cumberland Street and improvement of the ramp geometry. I-630 eastbound congestion will be relieved by

correcting the lane reduction from two lanes to one lane on the I-630 to I-30 southbound and northbound ramps and improving the merge geometry onto I-30.

Based on the 2010/2040 CARTS Travel Demand Model information provided by Metroplan during the NEPA process, under the Preferred Alternative, the future daily traffic volume on I-630 between Cumberland Street and I-30 is expected to increase 20% from 2010 to 2040, which is 12% higher than the increase noted above under the Future No-Action Alternative. It is important to realize that this increase in traffic results from the removal of the downtown bottleneck on I-30 and the removal of the I-630 westbound bottleneck due to the Preferred Alternative improvements. Vehicles current avoid the downtown I-30 bottleneck by using alternate routes through downtown Little Rock, such as the Broadway and Main Street Bridges, and avoid the eastbound I-630 bottleneck by using the bypass routes of East 15th Street and College Street. With the removal of these bottlenecks, the CARTS model shows that 12% of the daily traffic volume will choose to use the I-30/I-630 route rather than the local bypass routes. The CARTS model shows the difference in projected traffic on I-630 between the Future No-Action and Preferred Alternative quickly dissipating from 12% at Cumberland Street to 3% at the Marshall Street/Dr. Martin Luther King Driver interchange, as vehicles avoiding the congested sections in the Future No-Action condition re-enter I-630.

The results from the traffic simulations performed for this project show that, compared to existing and Future No-Action Alternative conditions, the Preferred Alternative improves morning and evening traffic congestion in the eastbound direction on the adjacent segment of I-630. Under existing and Future No-Action conditions in the morning, the downtown bottleneck on I-30 is so severe, that traffic avoids it by using alternative routes, reducing the traffic reaching eastbound I-630.

ARDOT does not currently have plans to improve I-630 from I-30 to the west. Due to current and anticipated mobility concerns on the corridor, the Highway Commission has provided approval for a future study of this portion of I-630; however, a date has not yet been set for this study to commence. If, at some future date, ARDOT conducts a study of this section of I-630, that study would be conducted in the context of previously identified commitments and constraints. Any recommendations resulting from such a study would also have to be evaluated through the environmental process to determine the possible environmental impacts. The improvements to I-30 and I-40 being proposed under the Preferred Alternative will not make a study of I-630 improvements any more or less likely.

ARDOT is currently studying the need for and feasibility of improvements to I-30 from Benton to the I-530/I-440 interchange. The limits of the study for this corridor were selected based on the

general commuting patterns and freight movement in the region and beyond. The major issues include traffic demand currently exceeding capacity at various points along this 23-mile corridor, such as the area between 65th Street and the I-530/I-440 interchange. The I-530/I-440 interchange is where I-30 serving downtown Little Rock and North Little Rock, I-440 connecting to I-40 east, and I-530 connecting to Pine Bluff, converge. Between 65th Street and the I-530/I-440 interchange, the mixture of commuter and freight traffic has limited opportunity to cross Fourche Creek. Farther to the west, I-30 is a critical interstate link serving the southwest central Arkansas region as well as connecting central Arkansas to northern Texas. Thousands of intercity motorists and freight providers rely on I-30 to travel between eastern and southwestern Arkansas and beyond. Although I-30 west of the I-530/I-440 interchange will continue to be congested, the Preferred Alternative is expected to improve the current traffic flow condition on the adjacent section of I-30, particularly during the morning peak, by relieving the bottleneck occurring due to weaving just north of the I-440/I-530 interchange.

Comment 2

With the inclusion of impacts to I-630 as part of the evaluation of this current undertaking, we seek clarification on whether the stipulations of the Memorandum of Agreement (MOA), Interstate Highway 630, executed in June 1978 between the Advisory Council on Historic Preservation, the Federal Highway Administration, the Arkansas State Historic Preservation Officer, and the Arkansas Highway and Transportation Department were carried out (Go to: MOA 1978 I-630).

Note, in particular Section O. Monitoring for Future Effects, which is included below for reference.

Memorandum of Agreement

Interstate Highway 630, Federal Highway Administration

O. Monitoring for Future Effects

It has been pointed out that the Scott-Cumberland area is rich in historic resources. After the freeway is opened to traffic, the AHTD will monitor these areas to determine increases in possible freeway related noise and air pollution. If levels exceed Federal standards, mitigation will be provided, such as double glazing, storm windows, extra landscaping, etc. If particulates above acceptable levels are produced by freeway or freeway-related traffic, electro static filters will be provided. The FHWA will review this monitoring.

It should be pointed out that air pollution has been calculated using the worst hypothetical conditions possible, such as maximum traffic, extremely poor weather conditions, and peal

inversion times. Even under these conditions, the calculations indicate that pollution produced will be substantially below maximum acceptable levels.

In other words, there should be no unacceptable air pollution.

Monitoring will also take place at the other properties identified in the first paragraph of this Agreement [MacArthur Park Historic District, Mt. Holly Cemetery, Reichart House, Governor's Mansion Historic District, a structure east of I-30 at 1500 College Street, a structure east of I-30 at 1501 Welsh Street, First Methodist Church at 8th and Center, a structure at 1221 Louisiana, a structure at 1305 Louisiana Street, Conrad House] as well as any other historic places which might be identified by SHPO's survey. If freeway-related impacts are produced on these structures, mitigation such as described above will be provided.

We are aware of studies that purport a link between proximity to freeways with significant negative health impacts, particularly for children. See the Nelson/Nygaard 30 Crossing Strategies Report of June 2016, Health and Freeway Proximity, pp 4/9-10. Frankly, to our knowledge, we are not aware of monitoring contemplated in the 1978 MOA being done at any time, and it certainly was not done as part of the 30 Crossing EA. This was a concern during construction of I-630 and remains a concern 40 years later, today as additional expansion is anticipated.

Consequently, the QQA believes that to not include the widening required on I-630 as the result of constructing 30 Crossing in the EA recommendation is an improper segmentation of the project's environmental analysis and, therefore, the EA as published for comment is incomplete. Further, we call upon ARDOT and FHWA to immediately honor the monitoring requirements of the referenced MOA as the 30 Crossing project independently, or including the referenced I-630 widening, effects the enumerated historic properties mentioned in the MOA as well as additional historic properties identified since 1978.?

Response: *The only improvements along I-630 as part of the 30 Crossing project would be the addition of a southbound I-30 to westbound I-630 lane that will drop at the Cumberland Street exit. These improvements along I-630 only have the potential for noise impacts to the McArthur Park Historic District area. The area in the District along I-30 and I-630 was studied for noise impacts. Predicted noise levels did not meet impact level criteria for any residences in the District and no noise abatement was found to be reasonable and feasible for that area.*

Metroplan

7-26-18

Comment 1

Document improvements assumed in the VISSIM model beyond those shown in the project schematic, specifically the widening of ramps inside the South Interchange and improvements between Roosevelt and the South Terminal to accommodate these improvements.

Response: *The VISSIM model is slightly different than the project schematic presented at the EA public hearing. The differences are:*

- *In southbound direction, the schematic shows Roosevelt southbound on-ramp as a merge; in the VISSIM model the Roosevelt southbound on-ramp is an add lane that is dropped at I-30 and 65th Street.*
- *In the northbound direction, the VISSIM model shows the 65th Street on-ramp as an add lane that continues north through the I-30/I-530/I-440 interchange and drops at the Roosevelt northbound off-ramp; the schematic does not have this extra lane and the Roosevelt northbound off-ramp is a diverge exit.*

ARDOT is currently finalizing a study of I-30 from the I-30/I-530/I-440 interchange to Benton.

Comment 2

Provide an account for the elimination of the outside improvements to I-630 in the EA.

The IJR identified primary changes made since the PEL as design modifications, updated traffic volumes, and an extended traffic analysis period. The elimination of the assumed widening of 1-630 should be added to this list. **The impact of not widening I-630 is well documented in the Preferred Alternative traffic results, showing traffic congestion starting at 1-630 backing onto I- 30 in the opening year and onto I-40 and Hwy 67 in the design year.**

Metroplan staff remains concerned about how *30 Crossing* will affect I-630 and the feasibility and timing of any proposed projects for that corridor. We do acknowledge that *30 Crossing* is not solely responsible for the congestion on I-630 and that regardless of the selected option for *30 Crossing* some modifications to I-630 between I-30 and University are likely warranted. Widening of /-630 from University to /-30 is not part of the vision or financially constrained LRMTP.

Response: *The 30 Crossing project will not impact the entire I-630 corridor. Based on the travel demand model runs provided by Metroplan, the highest increase in volume on I-630 for the Preferred Alternative (2B: 6-lane with C/D SDI) compared to the No-Action Alternative is between Cumberland Street and the I-30 ramps. For the remainder of the I-630 corridor from Cumberland Street to Marshall Street, there is a gradual decrease in the change in volume when comparing the two alternatives. Near the Marshall Street ramps, the difference between the two alternatives is expected to dissipate based on the models, and the volume change is negligible.*

To accommodate the increase in volume between Cumberland Street and I-30, the 30 Crossing project does include some capacity improvements. Currently, the eastbound I-630 to eastbound I-30 traffic concentrates in the middle lane of I-630, leaving the inside lane underutilized because of the two-lane to one-lane reduction on the ramp. With the 30 Crossing improvements, the ramp will be two lanes all the way to I-30. Thus, the inside lane of eastbound I-630 will be better utilized, which will allow eastbound I-630 to accommodate more traffic volume. In the westbound direction, the 30 Crossing project does include an additional lane between I-30 and Cumberland Street.

Comment 3

Recognize the impact of *30 Crossing* on regional land use and the distribution of population and employment. Metroplan staff is available to assist the study team with this discussion.

Response: *The 30 Crossing project will have an impact on regional land use and the distribution of population and employment. The following response was developed by Metroplan.*

“The link between transportation and land use is strong and well-studied, but the direct land use impacts from a specific transportation project can be difficult to quantify. This response begins with broad and relatively well-grounded statements about impacts of the 30 Crossing project. It then moves toward more specific and localized concerns, which are more speculative in nature.

Broadly speaking, 30 Crossing will accentuate the region's tendency to continue developing at low density, with the bulk of residential housing growth in peripheral locations (already growing at a comparatively fast pace) from which resident’s commute to jobs in the central area. The project's greatest impact is expected to be along the region's northeastern vector, the US 67-167 corridor including Sherwood, Jacksonville, Cabot, Austin and Ward. This is because the project (and ongoing widening of Hwy 67 /167) will reduce commuting times to major job concentrations in downtown and midtown Little Rock, south of the Arkansas River, yielding an

acceleration of growth within the corridor over the short term. There could also be a secondary impact on the I-40 corridor toward Maumelle, which has few locally-based jobs but many resident commuters. Additional growth may also happen in the East End area of Pulaski County and Southwest Little Rock where there is ample developable land. Multi-family housing growth may be boosted toward the immediate ends of the 30 Crossing project, in North Little Rock and Sherwood on the northeast as well as the southwest Little Rock/Otter Creek areas to the southwest. In the past, major freeway widenings have yielded substantial commercial/retail land use upgrades, but a major transition is underway in retailing due to e-commerce growth, which dampens growth prospects.

The trend of slow but steady multi-family housing growth seen in recent years in downtown portions of Little Rock and North Little Rock is expected to continue. Traffic flow alterations in specific downtown locations may have localized impacts that are hard to foresee - positive and negative - though generally lesser in scale. The addition of the collector/distributor lanes will increase direct accessibility between the two cities, which could have a positive impact on housing and commercial prospects in both downtowns. The highest uncertainty involves the portion of North Little Rock directly east of I-30. This area, which includes some of the lowest incomes and highest poverty levels in the region, may have been impacted by the division/isolation effect of the original I-30 construction in circa 1950. The area appears ripe for redevelopment owing to its proximity to resurgent urban districts nearby; 30 Crossing may improve accessibility enough to induce renewed private investment. Alternatively, the widening could increase this district's perceptual isolation from the west side of the freeway, with continuation of poor economic prospects, especially toward the northern end. Job growth impacts of 30 Crossing are also difficult to determine. Improved accessibility might, on balance, encourage some job growth in areas with dense job concentrations, including hospitals stretching westward along I-630. Total jobs have declined modestly in downtown Little Rock over the past ten to fifteen years (despite net housing growth); it is difficult to know if the job decline will continue.

Notes and Sources

1. *Metroplan's ICA 2040 Plan, which has informed much of the analysis for 30 Crossing, was developed in the aftermath of the 2000-2010 decade - a period of fast regional growth. Traffic projections for 30 Crossing were developed with the available information at the time of their development, during the spring and summer of 2014. The Imagine Central Arkansas Plan was adopted in December 2014, with these assumptions for population growth.*
2. *Transportation facilities are only one of many factors impacting development trends. Other factors include the availability of city utility services, surrounding land use,*

developable lands, schools, access to quality of life enhancements (parks, entertainment), and the existing distribution of people and jobs. Metroplan considers each of these when developing future year socioeconomic projections for the regional travel demand model, but it is impossible to account for all factors or the inherent randomness of human behavior.

3. This analysis includes the widening of the 67-167 (future 1-57) corridor from Jacksonville to Cabot (currently underway), since this amounts to a northeastern extension of the same corridor.

4. There was a surge in multi-family housing growth in western Little Rock within a 2-mile radius of the Big Rock Interchange project in the years following this project's completion. Some of this development can be attributed to a general shift toward greater multi-family housing that followed the Great Recession, but the location correlation with the 1-630/1-430 interchange improvement is more than coincidental. It is nonetheless likely that the region's multi-family housing will see a down-shift in the immediate future, owing to rising costs in materials, construction labor shortage and rising land costs.

5. The possibility of housing growth in Maumelle may be further boosted near the new Maumelle interchange that will be constructed on 1-40, which is being funded due to a city tax increase approved by city voters during 2018.

6. The accelerated growth of Saline County, which the widening of 1-30 is thought have boosted, is documented in MetroTrends articles: (1) Economic Review and Outlook 2004, outlook section (p. 12); (2) Demographic Review and Outlook 2005, housing trends section (p. 4); (3) Demographic Review and Outlook 2005, from the population estimate section (p. 1); (4) Economic Review and Outlook 2005, from outlook section (p. 12); (5) Economic Review and Outlook 2007, from the outlook section (p. 12); and (6) Demographic Review and Outlook 2014, outlook section (p. 14).

7. This write-up reflects the experience of Metroplan staff, based on many years of experience with land use and traffic projections.

8. The TELUM land use model could be consulted for further land use insights resulting from 30 Crossing. The model demands relatively intensive inputs. Any attempt to use TELUM for 30 Crossing would require something like three months of staff work to conduct.

”

Barry Haas

7-26-18

Comment 1

The lack of an Environmental Impact Statement (EIS)

First, I was one of the plaintiffs in the 1991 lawsuit **Audubon Society of Central Arkansas v. Dailey** No. LRC-91-30 (761 F. Supp. 640) (E.D. Ark. April 1, 1991). We sued the City of Little Rock and the U.S. Army Corps of Engineers for failure to perform an Environmental Impact Statement (EIS) regarding the proposed extension of Rebsamen Park Road west along the Arkansas River in Little Rock. Federal Judge George Howard ruled in our favor in regards to the requirement an EIS be performed, and upon appeal to the 8th Circuit in St. Louis Judge Howard's ruling was upheld.

The proposed Rebsamen Park Road project was on a much smaller scale than the proposed 30 Crossing project. Given the legal precedent in **Audubon Society of Central Arkansas v. Dailey** No. LR-C-91-30 (761 F. Supp. 640) (E.D. Ark. April 1, 1991) and the multitude of human environmental issues needing to be addressed in great detail an EIS is clearly mandated for the proposed 30 Crossing project.

Ben Browning of the Arkansas Department of Transportation (ArDOT) has said in public multiple times that you were doing an "Environmental Assessment on steroids". As I'm sure you know, there is no EA on steroids in the National Environmental Policy Act (NEPA). Why would you intentionally mislead the public by saying such a thing?

Response:

There was no intent on the part of ARDOT to mislead the public. To the contrary, ARDOT has been transparent about the degree of effort involved in the PEL and NEPA phases of this project, and that, due to the complexity of this project, the level of detail in the analyses performed for this EA is well beyond what is typically done for an EA.

FHWA has not decided yet whether and EIS or FONSI is the appropriate document for this project. If it is determined that the project involves a significant impact to the environment, an EIS will be prepared.

See K-12 of Appendix A.

Comment 2

Overwhelming public opposition to the proposed I-30 project as clearly expressed during numerous public comment periods.

When the public has been given an opportunity to comment on the proposed 30 Crossing project these past few years, they have overwhelmingly opposed the project in its present form at every opportunity. Metroplan had four public comment periods regarding 30 Crossing- for example, as Metroplan's Long Range Metropolitan Transportation Plan (LRMTP, or Imagine Central Arkansas) needed to be amended to allow the project planning to continue, or as Metroplan's maximum six-through-lane interstate policy needed to be waived to accommodate the additional lanes and much wider footprint of the proposed 30 Crossing project.

Below is a summary of the overwhelming public opposition with 60% of commenters opposed to amending the LRMTP during the first comment period, 65% opposed to a waiver of the six-through-lane policy during the second comment period, an astounding 94% opposed to another amendment to the LRMTP to grant a waiver to the six-through-lane policy during the third comment period and finally 76% opposed to adding the phrase "Capacity improvements" to Metroplan's Transportation Improvement Program (TIP). (**Footnote 1-** details the four Metroplan public comment periods, number of comments submitted and results both in favor and opposed to the widening of I-30 through downtown Little Rock.)

A preponderance of comments submitted to Metroplan during those four public comment periods in support of the 30 crossing project were made by people identifiable as contractors, bankers, developers and others who may have a financial interest in the project going forward. Most of the comments in support were for the most part "cookie cutter" comments with nothing but a simple sentence like this: "I support the 30 Crossing project". As a long-time poll worker here in Little Rock, I know stacked votes when I see them.

On the other hand comments to Metroplan by opponents of the project were individual and expressed a wide variety of concerns including:

1) the project is a waste of limited highway dollars that could be spent more wisely maintaining the roads we already have

2) the damage to Little Rock's tax base that an interstate widening through the heart of an urban center would cause

3) alternatives ArDOT refused to seriously consider like a new bridge at Chester Street to offer commuters an additional crossing point over the Arkansas River and take pressure off the I-30 bridge

4) more polluted air impacting nearby school children and downtown workers adjacent to I-30 whose health would be damaged by the further degraded air quality

5) increased noise issues in an already very noisy area due to increased traffic

6) ArDOT's refusal to seriously consider the role technology is almost certain to have in the very near future regarding traffic modeling, things like ride-sharing and self-driving vehicles, that may significantly increase the number of vehicles that can safely occupy each lane mile of interstate

In response to ArDOT's Public Meeting #6 on April 26, 2016 there were 1,406 comments submitted per your accounting. Here is your summary of those comments taken from page 10 of the Public Meeting #6 Summary: "**Table 5** Tallies how many times each alternative was selected from the collection of comment forms. Over 500 comment forms selected a preference for the 6-Lane with Collector/Distributor Lanes and 29 for the 8-Lane General Purpose Lanes alternatives.

The No Build alternative was selected 464 times, although a portion of those comment forms also included a specified preference to evaluate turning I-30 into an at-grade boulevard-type facility or suggested that other alternatives be developed and evaluated. Considering the No Build alternative for AHTD projects involves no new construction, these preferences were considered as a preference for "Other." As such, 229 selections of "Other Alternative" were recorded. Those who provided additional comment primarily suggested the boulevard concept, bridge repair or replacement only, and the StudioMAIN-presented concept that includes deck parks as part of the 30 Crossing design."

That comes to just under 38% of commenters who expressed a preference for either of the two "build options" you offered. The remaining 62% did not support either of your "build options".

Re ArDOT's characterization that "Considering the No Build alternative for AHTD projects involves no new construction, **these preferences were considered as a preference for "Other"** [emphasis added]". I offer a different characterization. It is that the public rejected ArDOT's refusal to offer a realistic option between "No Build" using your definition meaning "no new construction", and 14 or 15 lanes cutting through the heart of downtown Little Rock. The fact that ArDOT doesn't seem to comprehend that reality is more than a bit troubling. Is ArDOT a public agency using taxpayer dollars in a fashion the public supports? Or is ArDOT an agency that ignores the public, and does what highway contractors want? Which is it?

Response: *Comments, especially those that are in opposition to a project are not ignored; rather, they have helped to shape and revise the project to reach the point of a proposed Preferred Alternative. The project team also recognizes that when it comes to projects, in general, members of the public who take the time to provide comments are those who voice*

concerns. Comments provided by the public are a factor in the project-development process and not the sole determining factor. For the 30 Crossing project, the project has received support from a wide range of voices, including Little Rock and North Little Rock residents, commuters, central Arkansas officials, technical agencies, and businesses located in the cities.

Regarding comments provided to Metroplan during its various comment periods, ARDOT is not responsible for addressing comments submitted to agencies outside of the Department.

Regarding your statement that most comments provided to Metroplan in support offered simple sentences, were "cookie cutter", and were "stacked votes", please note the following: A majority of the comments ARDOT received during Public Meeting #6, whether in opposition or support, provided simple statements of 0, 1, or 2 sentences. Comments are not discounted due to size, simplicity, or if they've been written by someone else. Many members of the public have encouraged others to submit comments, as you have yourself. One comment submitted during the public hearing comment period included a copy of sentences you provided, including the statement, "Weigh in before 4:30 p.m. tomorrow with your comments on any of the above issues or others I've not mentioned that concern you. Your comments will be most impactful if they are in your own words, not cut and pasted word-for-word from what I've shared with you here."

Regarding comments submitted during Public Meeting #6. Two alternatives listed on the comment form were labeled "No Build (No improvements are implemented)" and "Other." If ARDOT counted the "No Build" preferences without acknowledging the follow-up comments provided, the tally would not have accurately represented the statements made by the public. The indication would be that all of the commenters who selected No Build did not want to see any improvements implemented on the corridor, which was not accurate.

Your statement is inaccurate that just under 38 percent of commenters expressed a preference for either of the two build options and 62 percent did not support. With 1,406 comments submitted, 693 identified No Build (464) or Other (229), which equates to 49.3 percent. The other 713 either selected a build alternative option, did not indicate a preference, or was a duplicate submittal, which equates to 50.7 percent. It would have simplified the counting process if all commenters had selected one of the six alternatives identified on the comment form, but some of the comments did not select a specific alternative but only a portion of one, (e.g., support for the Split Diamond without indicating a preference for the 6 with C/D or 8 GP). Thus, the build alternative preferences were tallied individually as 6 with C/D, 8 GP, Split Diamond, and SPUI. You reached 38 percent by adding 500 preferences for the 6 with C/D and 29 preferences for the 8 GP and dividing by 1,406 comments, without taking into account all of the comments also submitted in support of the Split Diamond or SPUI interchange. The public

comment analysis method for Public Meeting #6 was documented as Attachment G in the public meeting synopsis included in the Environmental Assessment and also posted on the 30 Crossing website.

One example of the responsiveness that ARDOT has displayed is the decision to modify the design of the Preferred Alternative (2B: 6-lane with C/D Split Diamond) as a result of public input. Concern over effects to the MacArthur Park Historic District resulted in a design refinement to prevent the need for any improvements within the District, and no increase in traffic on any streets within the District.

Comment 3

Damage to property values and development potential as a result of interstates through urban areas

Third, in August 2017 Metroplan brought in guest speaker Joe Minicozzi of Urban3 who is a planning professional. Minicozzi presented a public program twice that was titled "Understanding the Market Forces of Regional Development" that documented how damaging interstates like I-30 are that cut through downtown urban areas. I-630 is a real-life example here in Little Rock of the damage interstates in the wrong places can inflict on a community. Little Rock to this day has not recovered from the damage caused by I-630's construction. Urban interstates severely damage the tax base and development potential, reduce property values plus reduce the livability and viability. Originally conceived in the 1950s to move military assets around the country if needed, interstates were designed to avoid major urban areas, not go through them. **See Footnote 2 for a link to Minicozzi's PowerPoint plus a YouTube video of his presentation. I'm submitting and wholly incorporating Minicozzi's presentation as evidence of the fiscal damage to the tax base and potential growth expansion of I-30 would inflict on the downtown Little Rock area.** I don't see any consideration given to this issue in the I-30 EA.

Response: *The economic effects of the project are discussed in Section 3.1 of the EA, as well as in Appendix A: Indirect Effects Technical Report and Appendix F: Community Impacts Technical Report. The point of the Minicozzi presentation is that thriving downtown business districts can generate much greater tax revenue per unit of area than large suburban malls. This project benefits the businesses in the downtown area of Little Rock and North Little Rock by increasing accessibility and is consequently supported by the Chamber of Commerce. The Minicozzi presentation specifically encourages governments to encourage growth in the urban core rather than providing expensive infrastructure to support growth outside the city.*

See K-7 of Appendix A.

Comment 4

Fiscal irresponsibility in heavily funding this 7.3-mile project to the detriment of the Arkansas Department of Transportation's (ArDOT) responsibility to adequately maintain the existing approximately 16,000 miles of state roadways.

Fourth, ArDOT has no business committing roughly $400 million in Connecting Arkansas Program (CAP) funds on this single 7.3 mile project. It's the height of fiscal irresponsibility. An estimated $1.8 billion in CAP funds is expected to be collected statewide during the 10-year period the 1/2% sales tax is being collected. Four hundred million dollars represents almost one-fourth of the entire 10-year estimated income being collected from taxpayers all across Arkansas. Those funds should be spent more broadly, and more wisely, all across the state given that is where the funds originate. In addition it is widely acknowledged the I-30 widening will not eliminate traffic congestion, but simply move congestion and "choke points" just beyond the termini of this proposed project, accomplishing nothing. All the models agree on that point. Attached is a "Review of 30 Crossing Environmental Assessment" by Norman Marshall of Smart Mobility. Marshall is a nationally recognized expert and consultant on traffic modeling. By its submission, I am incorporating this Review in support of my comments. **Footnote 3 is Smart Mobility's "Review of 30 crossing Environmental Assessment", and is wholly incorporated as part of my comments.**

Looking at statewide highway funding ArDOT acknowledges need and additional $140 million a year to maintain the existing estimated 16,000 miles of state roads and widen roads in some areas. Given that unfunded maintenance deficit, how is spending a total of $632 million on such a limited area as the 30 Crossing project responsible stewardship? The clear answer- it's not. The proposed I-30 widening would add even more pavement that would need to be maintained in the future, thus increasing ArDOT's unfunded maintenance costs.

ArDOT has cobbled together an estimated $632 million to start the 30 Crossing project knowing that amount of funding is insufficient for the project to be completed as currently designed. The project as designed cannot be completed for that amount of money. Question- when the $632 million in available funding proves insufficient to complete the project as currently designed, what specific parts of the overall design will be delayed until additional funding is made available or eliminated entirely?

Response: *See L and P of Appendix A.*

Comment 5

Near roadway air pollution health hazards

Fifth, there is an issue of near roadway air pollution health hazards. The snip below is from the Environmental Protection Agency's website section on Air Research (see https://www.epa.gov/air-research/research-nearroadway- and-other-near-source-air-pollution under the heading "Roadways"):

"With more than 45 million people in the U.S. living within 300 feet of a major transportation facility or infrastructure, notably busy roads, there is concern about the potential health impacts from air pollutants emitted from cars, trucks and other vehicles. Research has demonstrated that exposure to pollutants emitted from moto vehicles can cause lung and heart problems and premature death.

To reduce the impact of living near busy roads, researchers are evaluating how roadway design, including noise barriers and roadside vegetation, can help to reduce exposure to air pollutants.

Researchers continue to study the health effects of single and multiple pollutants and are examining specific components of emissions that are associated with the effects. In addition, EPA supports the Health Effects Institute, an independent nonprofit organization that provides science on the health effects of pollutants from motor vehicles and other sources. Supported jointly with industry, HEI has produced important research findings on the health effects of air pollutants related to motor vehicle emissions."

Given the nearby schools and office buildings immediately adjacent to I-30 in downtown Little Rock, it is incumbent on ArDOT to show that air quality will not suffer as a result of your projected large increase in daily vehicle counts, and that children and adults so situated will not suffer short- or long-term adverse health effects as a result of the proposed widening of I-30 through this heavily urban area.

Response: *See K-8 of Appendix A.*

Comment 6

Segmentation of interstate widenings

Sixth, it's clear to those of us who have been following this proposed project for years that widening of central Arkansas interstates is being done on a segmented basis. It's my understanding segmentation violates federal law. A project to widen 2.6 miles of I-630 from the Baptist Hospital interchange to University Avenue just started at a cost of $87.3 million. If the I-30 widening is allowed to proceed, that will leave the stretch of I- 630 from University Avenue to

I-30 as then needing to be widened. Otherwise that segment of I-630 from University Avenue to I-30 will become a newly created source of congestion on both its east and west termini where more lanes from both I-630 to the west and I-30 to the east feed into fewer lanes along that segment of I- 630 connecting the two.

The 30 Crossing project as described on page 201 of Metroplan's Imagine Central Arkansas includes the following "illustrative" language: "Illustrative Projects Linked with 30 Crossing (CA0602)

Three freeway segments have noticeable impacts on or will be impacted by the proposed 30 Crossing improvements. Improvements to these corridors would be necessary (given the modeling assumptions) to avoid forming bottlenecks, which will impact traffic operations and safety within the 30 Crossing corridor. These projects are listed as illustrative as there has been no financial commitment to their construction by the Arkansas Department of Transportation. Improvement projects would be subject to individual corridor and environmental studies.

Capacity Improvements

1. Interstate 30 - I-530/I-440 (South Terminal) to 65th Street

Interstate 30 - 65th to I-430

After widening to 65th

Interstate 630 - I-30 to University

• Congestion impacts on I-630 are greater with 6+C/D Lane Alternatives

FHWA Definition of Illustrative Project

Illustrative project means an additional transportation project that may be included in a financial plan for a metropolitan transportation plan, TIP, or STIP if reasonable additional resources were to become available"

This is well beyond "illustrative". It's a blueprint or road map of what ArDOT is planning for our future- more lane additions on additional interstate segments, segment by segment, until all the interstates have been widened. Incredibly, a planned result of the I-30 widening is "Congestion impacts on I-630 are greater with 6+C/D Lane Alternatives", your Preferred Alternative. Spending hundreds of millions of limited roadway dollars with an acknowledged result of making congestion worse is a failure, plain and simple.

Given the Unfunded Projects (page 181 of Imagine Central Arkansas) staggering deficit of $13.1 billion just within Metroplan's central Arkansas jurisdiction, continued construction of new lanes is clearly unsustainable. In fact just maintaining the existing ArDOT roadways may be unsustainable given current fiscal restraints. And with income sources for such work shrinking-

e.g., the CAP expires in 2023, federal funds are drying up, more fuel efficient vehicles produce fewer gasoline tax dollars- a wise expenditure of every roadway dollar is more critical now than ever. There is little or no evidence ARDOT is up to the task.

Response: *See I-12 of Appendix A.*

Beverly Jackson

7-26-18

Comment 1

I own the property at 2812 Commerce and 423 East 28th. The property has been in my family since before the freeway was built. Before there was no flooding. After the freeway was built and open our house constant flooded. The street was built about my yard and caused my yard to be a sub drain off. He had to move out often because of flooding and it still floods my yard. It is my wish that the project buy out my property as I know the flooding will only be worst. I'm renting the house now but will not be able to continue if the flooding gets worst. Please buy my property. I am a willing seller. Please my family has suffered enough. Home purchased in 1939.

Response: *The house located at 423 East 28th Street is outside of the proposed right of way limits for the project, so it is not currently shown being acquired. A portion of the property at 2812 Commerce Street is being acquired. During design of the proposed improvements along the southbound frontage road, all drainage issues will be closely investigated to make sure water from the proposed improvements is properly conveyed away from private residences.*

John Barron

7-19-18

Comment 1

July 19, 2018

Mr. Ben Browning

Arkansas Department of Transportation

P.O. Box 2261

Little Rock, AR 72203

RE: Highway 30 Crossing Project, downtown
Little Rock Dear Mr. Browning:

As a resident of 300 E. 3rd Street in downtown Little Rock I wish to express my concerns with respect to

certain changes that have been proposed described as the 30 Crossing Project. I understand that you are in charge of the project and hope that you can help me.

It is my understanding the proposal includes changes to the two blocks along 3rd Street between Cumberland and River Market: (1) removal of on-street parking to expand the two lanes to four lanes; and {2} to replace the two existing stop signs with traffic lights.

In my opinion, this would have a significant detrimental effect upon the local residents and tourists who stay in the hotels and upon the shops and restaurants. If the parking is eliminated; the street would become a four lane road which would have a significant negative effect on the quality of the neighborhood along with safety concerns for local pedestrians who live in the immediate vicinity and those who visit the local retail establishments and restaurants.

The area immediately adjacent to this two block section of 3rd Street is one of the most densely populated residential and hotel areas in downtown Little Rock. We have four hotels in this immediate area, two high rise residential towers and two other large multi-family residences immediately abutting these two blocks between Cumberland and River

Market. As a result, foot traffic along 3rd Street is very heavy with many tourists as well as the local residents. People run, walk dogs, frequent the local shops and restaurants, and in many cases, especially for our downtown tourists, the pace is slow which is important for safety reasons.

It is also my understanding that the proposal Includes the replacement of the two existing stop signs at the intersections of 3rd Street, Rock Street, and River Market with stop lights. This coupled with the expansion to four lanes will cause a significant Increase in the volume and speed of traffic along this two block section with significant safety issues. As things presently stand, this section is relatively quiet and the traffic is moderate. With the changes, I understand the traffic volume will grow by 75% and the speed will be increased.

Even though the proposed new traffic lights might be timed in an attempt to keep the speed at a moderate level, we all know that many drivers will speed up to catch lights, essentially, running the lights. When pedestrians get a walk signal they naturally begin walking across the street and with a speeding driver trying to catch the light the probability of a serious injury is increased significantly. I experience this myself when I cross Cumberland and have drivers coming from the west speed up to catch the light to turn left on Cumberland. It's a very dangerous situation. Why create the same thing on a pedestrian two block section?

As you know, the section of 3rd Street going west from Cumberland has traffic lights and no on-street parking as is being proposed for the two block section between Cumberland and River Market. The difference is that 3rd Street going west from Cumberland is not residential, does not have hotels, and does not does have a concentrated section of retail shops and restaurants and heavy pedestrian traffic.

In my opinion, the proposal will have a significant negative economic impact as well. The retail and restaurant business will suffer, vacancies will increase, and property values will decline. It will no longer be a relatively peaceful, casual walking, shopping, and dining area; it will become a busy and noisy with safety issues for pedestrians. The city of Little Rock has made a great effort to make the River Market area a desirable place to live and visit in hopes expanding and improving on what we have and these proposals runs contrary to that goal. I believe it will destroy what we have.

I would greatly appreciate it if you can tell me the status of the project, whether the impact is still under consideration, and who I should express my concerns to in addition to

yourself. Also, do you know if any public forums are planned to discuss this proposal. I appreciate your help.

I can be reached at 917-991-4940 and johnedbarron@gmail.com or 300 E. 3 rd Street, #909, Little Rock, AR 72201. Please feel free to forward this communication as you see fit.

Response:

Mr. Barron,

I did not receive a response from my previous offer to discuss your letter in person, so I will respond to it by e-mail. I have also forwarded your letter to our team so it can be included in the official documentation for the Environmental Assessment. I am going to paraphrase your questions below and then respond to them. If I have misrepresented any of your questions or missed any of them in this reply, please let me know.

1. *Will 3rd Street be widened from 2 to 4 lanes and on-street parking removed?*

    a. *There are no proposed changes to 3rd Street. 3rd Street will remain a two-lane road with parking on either side in the same locations that there is parking today.*

2. *Will Traffic Signals be added to 3rd and River Market and 3rd and Rock and the speed limit increased?*

    a. *The traffic in this area is expected to double from what is experienced today by the year 2041.*

    b. *A signal is proposed at 3rd and River Market primarily to allow pedestrians to have a protected crossing and to assist the Trolley with its turning movement.*

    c. *A signal is proposed at 3rd and Rock primarily to allow pedestrians to have a protected crossing.*

    d. *The speed limit will not change from what it is today.*

3. *What is the status of the project and will there be public forums to discuss the proposal?*

a. The meeting on July 12th was the public hearing for the project. The most effective method for making your voice heard is by submitting a comment in response to this meeting. As mentioned above, I have submitted your comment as an official comment on the project. The Department will review all comments received and develop responses to them and submit to the Federal Highway Administration for review. Upon approval by the Federal Highway Administration, all comments and responses will be posted to the project website at www.30Crossing.com.

I hope these responses have alleviated some of your concerns now that you can see many of them are not correct. If you would like to discuss further, please feel free to send me an e-mail or give me a call.

Comment 2

7-27-18

Mr. Browning

I didn't see your earlier email until just now but you have addressed most of my concerns. I'm relieved to know that 3rd street between Cumberland and River Market will remain two lane with on-street parking. I understand the safety issue with the lights but am concerned with cars timing the lights and the effect that will have on speed of the cars and trucks.

I do have only two other questions:

1. What is proposed with respect to the on and off ramps that presently connect I-30 to 2nd street and which run directly behind our building at 300 E. 3rd Street? Someone told me they were being removed entirely and replaced with public space.

2. If the existing ramps are removed where will the new ramps will be located and specifically how they will impact 3rd Street.

Thanks so much for being so responsive.

John Barron

Response:

Mr. Barron,

Please see my responses below. If you have any other questions please don't hesitate to contact me.

What you heard is correct. All of the existing infrastructure for the Highway 10/2nd Street interchange will be removed and graded flat.

New ramps will be constructed that terminate at 4th Street. There will also be a dedicated u-turn that will allow access to 3rd Street when traveling in the south bound direction on I30. If you would like, I can put together a graphic that would show all access to 3rd Street.

Comment 3

7-27-18

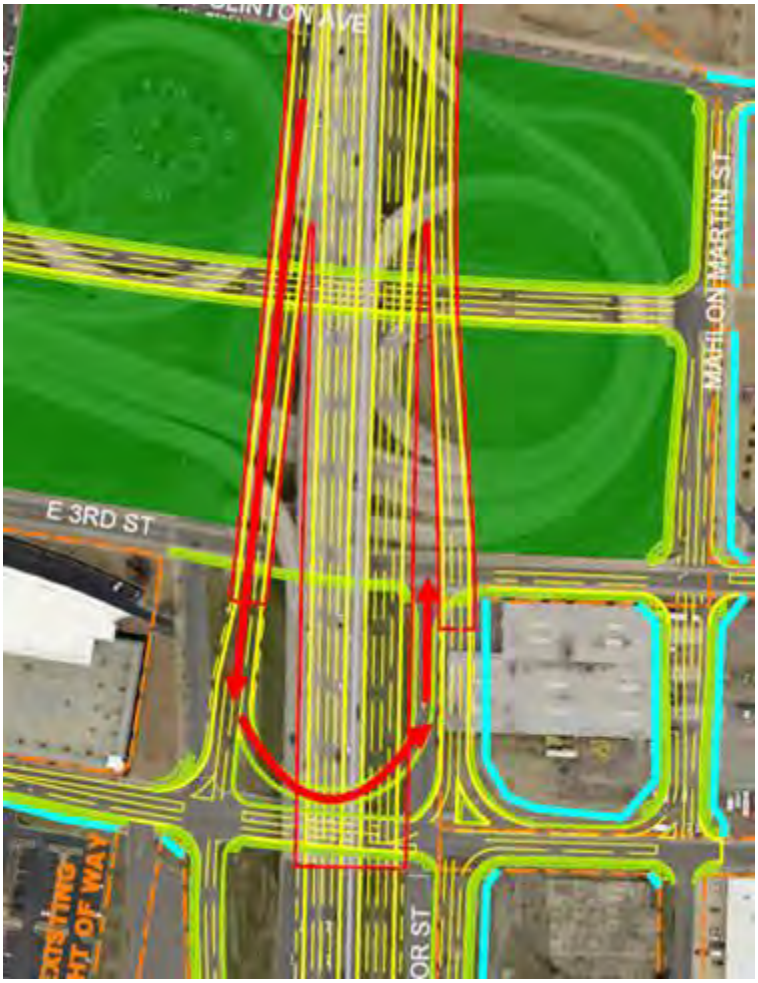
That would be terrific. Thank you

Response:

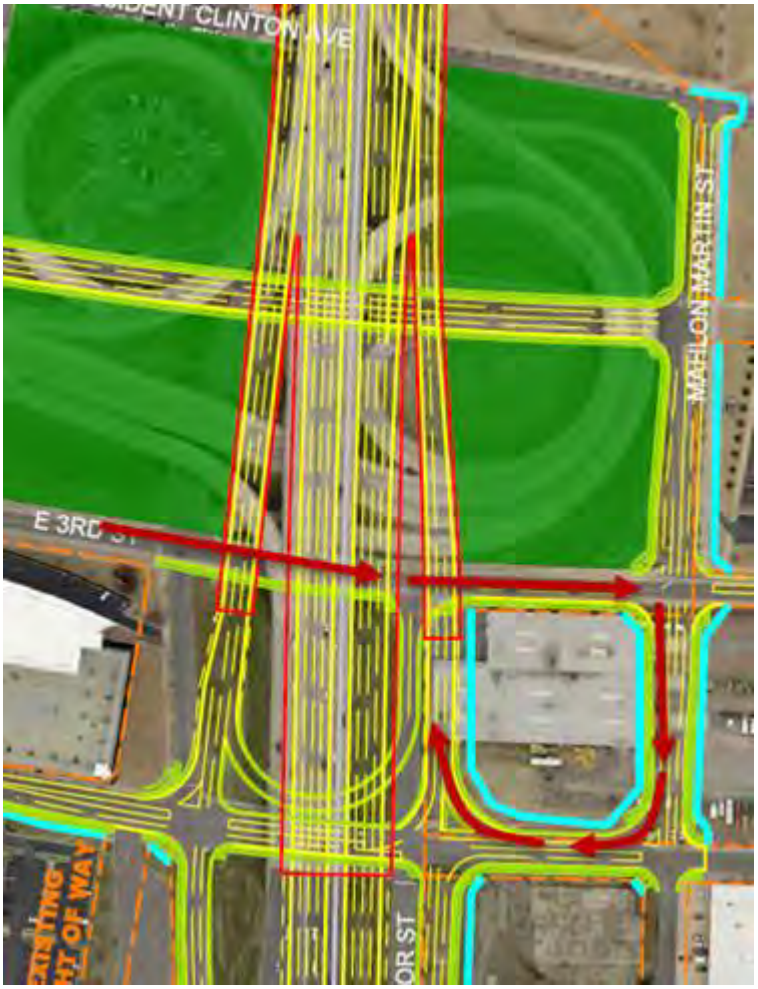
Mr. Barron,

Please see the graphics below that walk through each movement between 3rd Street and I-30. If you have any questions please do not hesitate to respond to this e-mail. Thanks!

I-30 Southbound to 3rd Street – A dedicated u-turn off of the 4th Street ramp will provide access to 3rd Street (you could also turn right on 4th Street and then right on River Market Ave.)



3rd Street to I-30 Northbound *– Turn south on new connector between Mahlon Martin and Collins and use dedicated lane to access the I-30 northbound on-ramp (you could also go south on River Market Ave. and then turn left onto 4th Street to get to the 4th Street on-ramp)*



3rd Street to I-30 Southbound *- Use the new connector between 3rd and 4th streets on the East side of I-30 to access the southbound frontage road)you can also use River Market Avenue to get to 4th street and then turn right on the southbound frontage road. Access to I-630 and I-30 is just 9th street.*

I-30 northbound to 3rd street *– Exit I-30 at 9th street and travel the frontage road to 4th street. Turn right on 4th street and use the new connected between 3rd and 4th streets on the East side of I-30.*


E 3RD ST
RECTOR ST

Matthew Pekar

7-27-18

Comment 1

I am deeply disappointed at the short shrift _all_ of the non-lane expansion alternatives have been given in the PEL, the environmental assessment (EA), and at public meetings. While a multitude of extremely similar lane expansion solutions received funds for fuller development, ARDOT is ignoring the comments of area residents and selectively including/excluding parameters to model non-expansion alternatives in the worst light possible, thus filtering them out at Level 1.

Every metro area I've been to that has gone the route of interstate expansion has an absolutely hellish environment for travel. Congestion, wrecks, constant construction, high-stress driving, pollution, and noise-- interstate expansion makes all our lives worse. One of the main reasons I moved to Little Rock was because I could _walk_ to so many of the local businesses. Note that I didn't say bike, or ride a bus, or take a taxi--I said W-A-L-K. Little Rock is becoming a place where people can actually get where they need to be and get some exercise at the same time. ARDOT's I30 plan feels like a part of a decades long mission to push back environmental and social progress and force residents into their cars, into traffic, and out of the city.

Sadly, I was even more disturbed after reading the "I-30 Alternatives Analysis", a document prepared by Norman Marshall with funding from the Arkansas Public Policy Panel. My reading of this document indicates that ARDOT has:

1) Failed to fully account for drivers re-routing during times of peak congestion. (i.e. assuming I30 is the only route popping up on maps for people.)

2) Through the use of outdated Static Traffic Assignment (STA) processes, failed to constrain forecasts so that roadway capacity is not exceeded. (i.e. they are modeling situations that are not physically possible)

3) Fed CARTS models with flaws 1) and 2) into VISSIM models that in turn calculate extreme delays that, again, are not possible in reality.

4) Failed to model additional routes specified by alternative plans, thus failing to accurately accrue benefits to alternative plans that provide drivers with multiple routes.

5) Acknowledged that widening will induce I30 travel, but fail to model for traffic bottlenecks on the edges of the study area. Again, ARDOT cherry picks their costs and benefits. They know

modeling edge bottlenecks makes the case for widening worse, so they just skip it unless someone in public comments makes a stink about it.

Response:

See I-12 in Appendix A

For a complete description of the traffic modeling efforts on this project, see EA Appendix B: IJR Traffic Results and Safety Analysis, Appendix B – Traffic Results Addendum. The following are specific responses to your comments on the traffic modeling:

1) *The traffic volumes within the studied roadway network were determined by the CARTS model. CARTS is a travel demand model that does take into account driver avoidance of congested roadways. The CARTS regional model uses an iterative process to re-route traffic to account for congested routes. The regional model does include alternative routes such as Broadway, Main, I-430 and I-440 that traffic can be assigned to. The study team then used the CARTS model to inform the development of the appropriate forecast for I-30 along with other information such as historical growth and other studies. VISSIM was then used to model the forecasted traffic demand in the corridor.*
2) *CARTS is a travel demand model, not a static model. The CARTS model is similar to the majority of other travel demand models across the country. The use of a regional travel demand model using a static traffic assignment (STA) and a VISSIM microsimulation model is used by the majority of corridor studies like I-30 around the country and constitutes meeting the standard of practice. Roadway capacities in the travel demand model are based on the LOS and volume to capacity standard for the roadway: for the case of I-30, LOS D/E. As the forecasted traffic approaches the roadways capacity, LOS E or F (V/C = 1.0) results and travel speeds are reduced, triggering a diversion of traffic to alternative routes. Forecast traffic volumes are allowed to exceed the capacity of the roadway only when no other routes providing similar travel times are available. The CARTS Model also utilizes a feedback loop, by which congested travel times are feedback into the trip distribution model step, accounting for the impact of congestion on travel patterns. This is also standard practice for advanced travel models.*
3) *In order to better simulate actual traffic operational conditions within the project area, the volumes predicted by CARTS were used to inform the forecasted traffic for I-30 and I-40 were fed into a microsimulation model (VISSIM). VISSIM represents state-of-the-art in traffic operations modeling. This technique allowed for the most accurate prediction of operating conditions that drivers actually face (queues, delays, etc.) that is currently possible. It is recognized that VISSIM does not predict individual driver behavior. For*

instance, when faced with long delays, drivers on I-30 and I-40 may elect to use local roadways to circumvent bottlenecks. It is important to recognize that the bottleneck predicted by VISSIM will still occur, but may dissipate more quickly due to some vehicles using longer more circuitous routes.

4) *Alternative routes suggested by the public during the PEL and NEPA phases were evaluated. This evaluation is summarized in Section 2.2 of the EA and is detailed in EA Appendix C: Alternatives Analysis Technical Report. The CARTS model was run to look at alternative routes including the proposed Chester Bridge Alternative. Improvements to alternative routes may benefit local traffic circulation, but do not address the roadway geometric issues on I-30 and I-40 that cause safety and congestion issues and are the primary component of the purpose and need for the project.*
5) *The traffic analysis does include bottlenecks on the edges of the study area. Bottlenecks exist on the south side of the model near 65th and I-30 and the north side of the model at Highway 167 and McCain Boulevard, for example. These locations were included in both the regional CARTS model and the project microsimulation models.*

Chapter 3.0 Traffic Volumes, describes how the traffic volumes were developed. Traffic forecasts were developed based on ARDOT's Arkansas State Highway and Transportation Department, Traffic Handbook, 2013. The handbook documents traffic forecasting data collection, and procedures as

required in 23 CFR 500 Subpart B. The Traffic Handbook uses these references:

- *A Policy on Geometric Design of Highways and Streets, American Association of State Highway and Transportation Officials (AASHTO), 2011*
- *Highway Capacity Manual, (HCM 2010), Transportation Research Board*
- *Traffic Monitoring Guide, Federal Highway Administration, 2001*
- *AASHTO Guidelines for Traffic Data Programs, AASHTO 2009*
- *AHTD Technical Services Field Manual, AHTD, Planning and Research Division, Technical Services (Renamed as Traffic Information System Section in 2013), 1988*
- *Highway Performance Monitoring System Field Manual, Federal Highway Administration, Office of Highway Policy Information, 2013*
- *NCHRP Report 365 – Travel Estimation Techniques for Urban Planning, 1998*
- *NCHRP 01-37A: Development of the Guide for the Design of New and Rehabilitated Pavement Structures, 2002*

In summary, the methodology for projecting traffic with and without the improvements was reviewed by FHWA, Metroplan, and ARDOT. The latest available Metroplan travel demand model was used to inform the development of traffic for all future alternatives. The alternatives with more capacity do induce traffic in the corridor. These changes are represented in the text. The traffic volumes were developed using the Metroplan regional travel demand model thus incorporated regional traffic modeling.

The Metroplan travel demand model is a traffic assignment model and was used to inform the development of traffic forecasts for the 30 Crossing Corridor. The Metroplan model does take into account driver avoidance of congested routes by selection of alternative routes. The micro-simulation model, VISSIM, is a static model, and was used to simulate traffic conditions for vehicles entering the corridor. Fifteen assignments were run for each alternative to develop randomness in travel behavior.

The team used FHWA's Traffic Analysis Toolbox Volume III: Guidelines for Applying Traffic Microsimulation Modeling Software, 2004. This is the national standard of how microsimulation models like VISSIM are to be used in projects like 30 Crossing. Once the VISSIM model was completed in was verified by the study team comprised of nationally-recognized experts, including Professional Transportation Operations Engineers, with decades of experience modeling complex interstate projects. The models were also verified by Metroplan, ARDOT, and FHWA.

The team collected travel time runs in the field to aid in the calibration of the VISSIM models. Also, ARDOT cameras were used to observe traffic. Team personnel drove the corridor during peak travel times to understand congestion points and verify vehicle queues. National Performance Management Research Data Set data (formerly called HERE data) were also used to verify travel speeds in the corridor.

Models were then reviewed and verified by ARDOT, Metroplan, and FHWA staff. Traffic model results were then presented to the 30 Crossing Technical Working Group with no recorded comments on the traffic volumes in the existing VISSIM models. Traffic model results were then presented to the public with no recorded comments on the traffic volumes in the existing VISSIM models.

Comment 2

Regarding the Pike Avenue extension alternative, page 707 the EA mentions that development of this alternative was ceased due to the possible impact on "a highly contaminated hazardous waste site just south of the Pike Avenue roundabout". How was the cost of constructing around this waste site estimated and what was the estimated cost?" Page 707 also mentions that this

alternative was discarded due to it not being "an efficient connection to I630". The specific efficiency of connecting to I630 is not a relevant reason to discard the alternative as the stated goal of this project, on page 35, is: "...to provide for increased travel speed and reduced travel time to downtown North Little Rock and Little Rock as traffic demand increases in the future. " The Pike Avenue extension alternative cannot be discarded unless it models worse in pursuit of this goal.

Response: *The Pike Avenue extension does not meet the purpose and need for this project. The goal of reducing travel time to downtown Little Rock and North Little Rock cannot be met by a route that does not efficiently connect to the system of roadways bringing travelers to the downtown area. I-630 is a primary route used by those travelers.*

See H-3 of Appendix A.

Comment 3

Regarding the Chester Street extension, which was discarded by ARDOT at level 1, on page 707 of the EA it states that ARDOT modeled this route as being capable of "only 3.5% removal of the traffic from I30". However, ARDOT's PEL and EA modeling is invalid because it does not:

1) account for shifts among the bridges

2) does not consider the impacts of induced travel outside of the study area

3) does not consider traffic impacts in downtown Little Rock outside of the study area

Analysis done by Smart Mobility--with these necessary adjustments included--indicate that the Chester St. Bridge in conjunction with a form of the Boulevard alternative meets the requirements to move to level 2 and be considered for refinement along with all of the current alternatives that involve widening.

Because ARDOT has failed to bring forth a single alternative that does not involve widening of I30, it is _especially_ critical that this alternative be properly and honestly developed by ARDOT.

Response:

1. The Metroplan CARTS travel demand model was used to develop traffic forecasts for the 30 Crossing project. The model is a traditional four-step daily travel demand model and is the official traffic forecast model for central Arkansas. The model produces a 24-hour traffic forecast along with system performance measures throughout the CARTS area including Faulkner, Pulaski, Saline, and northwestern Lonoke counties. The CARTS model does take into account driver avoidance of congested crossings by selection of alternative

routes and thus does account for destination shifts. The model includes a feedback loop and redistribution of trips to arrive at the shortest travel routes available based on the available network capacity. The model uses capacity constraint assignment and includes multimodal (personal vehicle, transit, walk to transit), multiclass (single occupant vehicle, high occupancy vehicle, and truck) and user equilibrium.

2. Metroplan's CARTS travel model does consider the impacts of induced travel outside of the 30 Crossing study area. Induced traffic volumes outside of the study area are accounted for the same way they are accounted for inside the study area. Induced travel by the Metroplan CARTS model is discussed in Section 3.16 of the EA. The methodology for generation of induced traffic volumes is discussed in EA Appendix B: IJR Traffic Results and Safety Appendix B: Traffic Results.

3. Traffic impacts in downtown Little Rock in the study area are discussed in EA Sections 2.3 and 3.2, as well as EA Appendix F: Community Impacts Technical Report. See K-15 of Appendix A. Outside of the downtown study area, minimal or no traffic impacts are expected in the 2040 design year.

The evaluation of the Chester Street Bridge and Boulevard Alternative is summarized in Section 2.2 of the EA and detailed in EA Appendix C: Alternatives Analysis Technical Report. Constructing a bypass route at Chester Street along with the Boulevard Alternative does not meet the purpose and need for this project. It fails to address the I-30 and I-40 roadway geometric deficiencies.

The Chester St. Bridge concept was analyzed during the PEL and was eliminated because it did not meet the I-30 Purpose and Need to address congestion and safety in the corridor. The Boulevard concept was analyzed during the NEPA phase and was eliminated because it did not meet the I-30 Purpose and Need. (See EA Appendix C for further detail). The Chester St. Bridge introduces new traffic to the Pike Avenue corridor that is not there today. Also, today Pike Avenue corridor serves a high volume of traffic. Today, Pike Avenue has a high number of pedestrians that would be impacted by increased traffic. (See Standard Response H-3 for additional discussion on Chester St. Bridge).

There were complimentary alternatives that were advanced to the EA NEPA phase that do not involve widening. Non-widening improvements listed in the PEL Recommendation include:

- Interchange improvements
- Intersection improvements
- Bottleneck removal
- Auxiliary lanes
- Roadway shoulder improvements
- Frontage road improvements
- Main Lane pavement rehabilitation
- Horizontal and vertical curve improvements
- Ramp Metering
- Transportation System Management (TSM)
- Wayfinding / Signage
- Bus on Shoulder
- Bicycle / Pedestrian

For a full discussion of the non-widening alternatives see the Standard Comment Response I-6 Congestion Management.

John Hedrick

7-27-18

Comment 1

The EA defines Mobility (page 16):

"What is mobility? Mobility is the movement of people and goods. Improvements in mobility make it faster, easier and safer for people to use the roadway."

Mobility is defined as the movement of people and goods, but then transportation equity is removed by tying the definition to the roadway. Future uses of “mobility” in the EA refer to the movement of vehicles, not just people and goods—other modes are excluded. From the very beginning of the PEL process for 30 Crossing, AHTD defined mobility as the movement of vehicles.

Overspending on 30 Crossing's Preferred Alternative assures that all future spending goes to highways as bottlenecks in the 30 Crossing limits will be moved to I-30 to the south (shown in modeling results) and I-630. Studies show that up to $4 billion will be needed to resolve the new bottlenecks. I-30 will need to be widened to 65th Street and I-630 will need to be widened to University. Since mobility is equated with moving vehicles, there is no transportation equity. Although the Connecting Arkansas Program sales tax expires in 2023, continuing widenings apply pressure to extend the sales tax making it more difficult to obtain sales tax funding for transit or other modes to provide equity. Meanwhile, as pointed out by Highway Commissioner Alec Farmer (Talk Business & Politics a news website that covers business, politics and culture in Arkansas, “Managing the highway system decline Opinion by **Alec Farmer** (alecfarmer@suddenlink.net) July 4, 2018”), ArDOT does not have funding to maintain existing roads, yet it continues to add lanes which add to its maintenance needs.

See “Review of 30 Crossing Environmental Assessment” prepared by Norman Marshall, President Smart Mobility, Inc., and submitted with comments by others. Also, comments from Metroplan, Dale Pekar, and others in the EA point out the fallacy of limiting the study to this narrow corridor and show establishing LOS D as unsustainable

Response: *See I-9 and L of Appendix A.*

Comment 2

The well vetted regional long range transportation plan, Imagine Central Arkansas, presented a balanced approach to transportation investment to provide transportation choices; and, therefore, transportation equity for all citizens. Even though AHTD became ArDOT during this process, the Imagine Central Arkansas long range plan (limiting the regional freeway system to six lanes and investing in robust regional arterial and transit systems as well as spending more on system preservation in order to achieve a balanced transportation system by 2040) was never considered in the Department's plans for 30 Crossing. Records and correspondence going back to 2013 show the ten lane plan was pushed at the expense of any other alternative. “An Interstate Runs Through It: The Construction of Little Rock's Interstate 630 and the Fight to Stop It” a 2013 thesis by Darcy Phumphrey at Utah State University (http://works.bepress.com/darcypumphrey/1/) stated on page 45: “. . . the AHD's EIS simply justified the I-630 project and failed to impartially consider environmental and societal implications of the interstate on the surrounding areas.” A successful lawsuit led to a second EIS and ultimately to mitigation measures to lessen the road's impact.

Response: *A summary of the alternatives analysis is presented in EA Appendix C: Alternatives Analysis Technical Report. The Alternatives Analysis Technical Report summarizes the extensive evaluation of alternatives that began during the PEL study with the evaluation of the universe of alternatives (see PEL Appendix D: Alternatives Development and Evaluation: reference website 30 Crossing.com) and continued into the NEPA phase. These alternatives were developed by the project team with input from the public during the public outreach which was a part of the PEL and NEPA processes (refer to EA Appendix D and E). All alternatives suggested by the public were evaluated, including alternative routes and alternatives to widening I-30. Alternatives that were determined not to meet the purpose and need for the project were not discussed in detail in the EA, but are discussed in Appendix C.*

During the PEL, four basic scenarios were evaluated in Level 2B: 6-lane (no main lane widening), 8-lane (addition of one main lane or C/D lane in each direction), 10-lane (addition of two main lanes or two C/D lanes in each direction), and 12-lane (addition of three main lanes in each direction). As part of each of these basic scenarios, complementary alternatives that had passed the Level 2A screening were included. Many of these are what would be considered “operational improvements”: ramp consolidation/elimination, intersection improvements, bottleneck removal, auxiliary lanes, roadway shoulder improvements, frontage road improvements, main lane pavement rehabilitation, and horizontal/vertical curve improvements. Consequently, the No-Action (6-lane) along with these operational improvements

(complementary alternatives), was indeed compared with three other basic scenarios in the PEL. This alternative scored very poorly with respect to mobility and safety, compared with the 8-lane C/D and 10-lane basic scenarios, and failed the Level 2B screening.

The methodology for projecting traffic with and without the improvements was reviewed by FHWA, Metroplan and ARDOT. The latest available Metroplan travel demand model was used to develop traffic for all future alternatives. The alternatives with more capacity do induce traffic in the corridor. These changes are represented in the text. The traffic volumes were developed using the Metroplan regional travel demand model thus incorporated regional traffic modeling. In Metroplan's comments on the draft EA dated July 26, 2018, they state "The traffic and operational analysis provides an admirable analysis and summary of traffic impacts of the various 30 Crossing alternatives under consideration. Furthermore, staff believes that the traffic projections are reasonable and fall within an acceptable range given engineering practice."

An evaluation of the arterial network was performed as well, and is summarized in EA Appendix B: IJR Traffic Results and Safety Analysis. Metroplan's policy is to perform an assessment of the regional arterial network (RAN) to identify improvements to arterials prior to highway widening. A RAN analysis was presented in the EA, Appendix B IJR Traffic Results and Safety Analysis, Appendix B Traffic Results, Section 4.5. This section analyzed the RAN from a planning and engineering point of view. The conclusions of the analysis were that although there are a few arterial improvements identified that could improve operations within the 30 Crossing project limits, all come at a high cost regarding right of way, structural impacts, and/or railroad impacts. The urban environment and location of the Arkansas River render few opportunities to increase the roadway capacity of the regional arterial network to improve operations on I-30.

Comment 3

Although 30 Crossing is the largest project ever undertaken by now ArDOT and the I-630 project mentioned above proved the importance of thorough environmental analysis, ArDOT chose to complete an EA rather than an EIS even though they frequently state they are effectively doing an EIS. There is perhaps a fatal flaw in this thinking. According to AASHTO's "Handbook Defining the Purpose and Need and the Range of Alternatives for Transportation Projects," the CEQ regulations require an EIS to rigorously explore and objectively evaluate all reasonable alternatives. "An alternative may be reasonable even if it is not desired by the project sponsor."

“An alternative may be reasonable even if it requires legislative change.” However, an EA only requires a brief discussion of alternatives. The PEL and EA only looked at alternatives in isolation and never considered what combination of improvements would return the most benefit and, therefore, value for $630 million.

Response:

Although this project is the largest in terms of funding commitment, it is not the largest in terms of the scope of work being accomplished by the project. The high cost of the project is due to the complexity of the project, including modifications to four system-to-system interchanges and the replacement of the Arkansas River Bridge.

The decision to perform an EA was made in order to gather enough information to determine whether the project involves any significant environmental impacts, in which case an EIS would then be performed, or whether a Finding of No Significant Impact (FONSI) is appropriate. The decision of whether to produce an EIS or FONSI has not yet been made by FHWA.

The EA summarizes the evaluation of project alternatives in Section 2.2. The complete analysis of the alternatives that were evaluated is in EA Appendix C: Alternatives Analysis Technical Report. Alternatives were evaluated in terms of their ability to meet the purpose and need for the project, and the degree to which they avoided or minimized environmental impacts.

See N-1 and K-12 of Appendix A.

Comment 4

Correspondence from Metroplan to Garver Engineers and FHWA, with dates from June 5, 2014 to July 31, 2015, raises concerns about the PEL process. Metroplan raised many of the concerns in the PEL process that Dale Pekar points out in his comments on the EA. June 17, 2016, Scott Bennett, P.E., Director of Highways and Transportation, sent a letter to Gary Fletcher, President of the Metroplan Board of Directors, requesting an amendment to Imagine Central Arkansas to “ . . . repeal the freeway widening restriction . . ..” He further requested “. . . that the Board a abolish the six-lane freeway restriction referenced in Imagine Central Arkansas at the June Board meeting.” The June Board meeting was scheduled for June 29, 2016, a mere eight days from the date of his letter for a major change in the adopted long range plan. Bennett's letter concluded that “if the no-build alternative is selected at the conclusion of the NEPA process . . . the available funding would be dedicated elsewhere . . ..” The request was discussed and subsequently changed to a request for a waiver from the Imagine Central

Arkansas six-lane restriction. The waiver request came before Metroplan's Regional Planning Advisory Council on August 24, 2016. After much discussion, the RPAC voted to recommend that the Board deny the waiver. The following is excerpted from the minutes of that meeting giving the feelings of the majority of the group. Of particularly note are the comments from Rock Region Metro's representative:

Excerpts from August 24, 2016 Minutes of Metroplan's Regional Planning Advisory Council re AHTD Request for Waiver from 6 Lane Policy

"Dr. Hampton: How did we get here? I've given this much thought. Many of us are strongly opposed to granting the waiver, and I would like to speak to that. Metroplan has developed an incredible process in response to the federal desire to have a more inclusive process in making decisions of this magnitude. I recognize that there was an opportunity in the time that we've been meeting for us to have some sense that this kind of request would be coming, and what it would mean. That opportunity was not taken. The feeling that I've had about this is all along is that I am insulted when people don't have a process that allows me to have voice (even when I cannot have vote). For future reference, I want the Department [AHTD] to really understand that people are not unreasonable; it was the lack of process, in creating a sense of urgency and the message that if we didn't act as the Highway Department wanted in spending federal dollars, we would be penalizing our communities. We don't like to make decisions with the "Sword of Damocles" over our heads. I think that for me, I will be able to make a good decision today, and a fair decision, because it is clear to me that my concern is that the process was violated. All that Metroplan has done to create something where so many people in the community have been brought in and engaged, has been ignored. My desire is that after we take this vote, the Department will seriously come to terms with its lack of inclusive planning and resolve to do something about that.

MOTION by Mr. Roda, second by Ms. Fraisier

"To recommend that the Metroplan Board of Directors deny the AHTD's request for waiver for the I-30 Crossing project."

Mr. Roda: This Motion is being put forth in order to clarify the first and indicate that the RPAC is opposed to the waiver.

Ms. Green [Rock Region METRO representative] asked that the following statement be entered into the record: Anyone representing public transit cannot vote in support of an exemption to or repeal of the Metroplan policy on freeways and expressways, for several reasons:

Such a change creates even more disparity among transportation choices in the future than we currently have, tipping our region to invest even more heavily in cars and highways rather than

in alternative modes of transportation, including transit. The 30 Crossing project would use a huge amount of limited resources, which means that if it moves forward as proposed, our region would miss out on other opportunities, like the investments outlined in the Imagine Central Arkansas plan, which has extensive public support. Maintaining a balanced approach to transportation investment - investing in multiple modes of transportation to create and maintain choices - is a fundamental aspect of Metroplan's federally mandated responsibilities. Mr. Bennett's letter to Mayor Fletcher states that AHTD prefers that Metroplan repeal the entire freeway and expressway policy, paving the way not only for this one project but any and all freeway widening projects. This action will dictate how our cities develop for decades to come. The letter alludes to Metroplan's long-term plan investment strategy goals of equality of access and transportation choice being contrary to the policy of limiting freeway and expressways to six lane widths, but these goals (equality of access and transportation choice) are consistent with the current policy. Limited freeway expansion should provide more resources for alternate modes of transportation, which are used to ensure that the young, the old, the poor and people with disabilities can have equality of access to transportation and that our citizens have true transportation choices.

Mr. Bennett's letter asserts that public transit and the factors that influence it, factors such as land use and development plans that would be heavily influenced by the 30 Crossing project, are of local concern only and not state concern. AHTD strategic plan objectives include "supporting and promoting intermodal transportation activities," and so we disagree that factors that influence the quality of public transit are not a state concern.

The AHTD letter also alludes to the lack of support for public transit investment from the voting public. I don't think coming up a little short during the first ballot initiative to fund public transit in 12 years means there is no support in our community for public transit investment. We are carrying almost 3 million rides per year – rides that are taking people to their jobs, education, health care appointments and daily activities. We enjoyed a tremendous amount of support for our public transit funding ballot initiative from several groups, including this committee, the Metroplan board of directors, area chambers of commerce and various associations – these groups and others understand the value of public transit to our local economy and understand the increasing value it has as the Boomer generation seeks communities where they can age in place and as younger generations seek communities with robust investment in alternate modes of transportation.

We need AHTD to join this group of transit champions and actively support more investment in our system. You can't sell tomorrow's dreams on today's limitations; you have to have vision. You can't presume cars will be the preferred choice of transportation 20 years from now, you

can't presume no one wants to invest in public transit just because we central Arkansans are essentially forced to drive cars today in our unbalanced car culture infrastructure, and you can't presume Rock Region METRO won't be successful in gaining more funding, and therefore, greatly increase its appeal through the improvements in service that more investment brings. With the proper investment in public transit, we'll garner even more support for our plans to improve transit service. And, here's something we can predict: We know we will get more support, because we hear from riders, from school administrators, from elected officials, from major employers and from nonprofits every day regarding the need for more investment in our public transit system.

Finally, I would like to like to remind everyone that our community has a regional transportation vision, as set forth in the *Imagine Central Arkansas* plan, which was put together by and for our community and backed by this committee. An exemption to or repeal of Metroplan's policies on freeways and expressways does not support the Imagine Central Arkansas plan. I appreciate AHTD has completed a tremendous amount of work to vet their vision for 30 Crossing, and at the same time, it's clear a significant portion of the public has legitimate concerns with the existing 30 Crossing proposals. I'm confident we can work together to reach a solution that works best for all concerned.

MOTION PASSED with 20 votes in favor, three votes opposed and one abstention"

The Metroplan Board subsequently voted to grant the waiver with only Rock Region METRO voting against the waiver. Along with comments submitted by many others, the above comments illustrate bias in the environmental process and the need for an EIS.

Response: *See N-3 and H-6 of Appendix A.*

Comment 5

From Transportation Research Board Record 2320:

Fundamental Principles of Environmental Justice (EJ) in Transportation

Specifically, FHWA and FTA define EJ as having three Fundamental principles related to burdens, process, and benefits:

1. To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations (burdens):

2. To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process (process):

3. To prevent the denial of, reduction in, or significant delay of the benefits by minority and low-income populations (benefits).

The EA says adverse impacts effect EJ and non-EJ populations equally, but the EA did not perform an in depth EJ analysis. The Preferred Alternative creates a great divide between the downtown core to the west and neighborhoods and businesses to the east. According to the Quapaw Quarter Association's I-30 Report, 25% of the households in the area impacted by 30 Crossing do not own cars.

From Quapaw Quarter Association's I-30 Report:

"Poverty and Transportation Equity Immediately south of the Rivermarket District is an extremely poor area of Little Rock (Fig. 5). Poverty in this neighborhood creates challenges for resiliency to the changes resulting from the I-30 expansion. Notably, over 25% of these households do not own cars (Fig. 6). All of this area is considered transit-accessible if allowing a ¾ mile buffer from all transit routes (Fig. 2 and Imagine Central Arkansas Fig. 4-20). Of course that ¾ mile between a bus route and a home is traveled on foot or by bike.

Safety impacts caused by I-30 expansion induced increases in traffic volumes must be mitigated by increased investment in bicycle and pedestrian infrastructure. Anything less will result in the I-30 expansion project decreasing transportation equity in Little Rock. Figure 5. The majority of the I-30 corridor between the Arkansas River and I-630 (yellow highlight) is extremely poor. Imagine Central Arkansas Figure 4-15. Figure 6. Over 25% of the households in the majority of the I-30 corridor between the Arkansas River and I-630 (yellow highlight) have no vehicles. Imagine Central Arkansas Figure 4-21."

There are job and educational opportunities to the east and educational and job opportunities to west just as there are EJ populations on the east and the west needing access to those opportunities. The bare-bones hardscape overpasses planned present a hostile environment for pedestrians and bicycle users effectively forcing one to use a vehicle to feel safe crossing the great divide to reach job and educational opportunities, retail, medical, and other daily service needs. Without a vehicle, one must cross the great divide on a narrow sidewalk, one side looking down on expanded lanes of speeding traffic with its accompanying noise and fumes, while traffic passes by on the overpass next to the sidewalk. Envision the frightening experience for a disabled person on an overpass without a vehicle! I would not feel comfortable walking across the Sixth or Ninth Street overpasses, but I can take my car, pickup, or one of my motorcycles to feel much more comfortable than I would walking. EJ populations without a vehicle do not have that choice; and, therefore, there is a disparate adverse impact on EJ

populations caused by 30 Crossing as planned. EJ populations' mobility and access is disparately limited.

Sixty-four percent of the funding for 30 Crossing comes from the CAP sales tax, not user fees such as fuels tax or tolls. Sales tax is a regressive tax that places its burden disproportionately on EJ populations. The very populations disproportionately adversely impacted must pay a disproportionate share of the cost of 30 Crossing that ultimately subsidizes sprawl and single occupancy vehicle travel from which EJ populations receive no benefit.

While there is transit service, transit service is very limited. Weekday bus routes operate roughly 5:30 am to 8:30 pm, weekend hours are more limited and some routes do not operate on Sundays. The lack of bus service severely limits job opportunities for EJ populations. With highways now taking general revenue funds and with no political will to raise user fees to fund highways, it is likely that the CAP sales tax expiring in 2023 will need to be extended. Overbuilding 30 Crossing to eliminate congestion will only move the choke points to other locations forcing continued freeway widenings that will require ever increasing funding.

Response: *See K-16 of Appendix A.*

Comment 6

At the very least, ArDOT should provide overpasses with not only bike lanes and sidewalks for pedestrians, but also additional width with green space and plantings accommodating the pedestrian and bicycle paths to make the overpasses inviting so that pedestrians and bicyclists will feel comfortable using them. As Nelson\Nygaard pointed out in its “30 Crossing Strategies” white paper to the City of Little Rock, “. . . cost of widened bridges should be borne by AHTD as a mitigation obligation to secure a FONSI.” The enhanced bridges with bike lanes, pedestrian walks, and green space have the additional benefit of visually uniting the east and west sides of 30 Crossing and can undo some of the damage done by the interstate's dividing our city. Overpasses with green space will visually unite neighborhoods to the east and to the west as well as provide an inviting and comfortable route for pedestrians, bicyclists, and even motor vehicles. This point was made in the “Team Report Summaries” of the PEL process (epage 1025/3992):

"I-30 disrupted communities. Need to recognize communities that have been neglected, weave back east to west. Knit back community."

The Department acknowledged that enhanced overpasses could be provided but they would need to be funded with funds from other sources. An in depth Environmental Justice analysis

would show that enhanced overpasses should be included in the project as a mitigation obligation.

With numerous schools in the study corridor including schools with EJ populations adjacent to the right-of-way, more detailed air quality analysis should be performed.

Response:

See J-2 and K-16 of Appendix A.

Section 176 of the Clean Air Act as amended (42 USC Sections 7401-7671q) regulates air quality from transportation sources. Conformity with the Clean Air Act must be demonstrated if the project is within an area designated non-attainment/maintenance for all of the National Ambient Air Quality Standards (NAAQS).

A geographic area with air quality that is cleaner than the primary standard is called an "attainment area". Likewise, areas that do not meet the primary standards are called "non-attainment" areas. The 30 Crossing project is located in an area that has been in attainment of the six criteria pollutants (particulate pollution (PM2.5 and PM10), ground-level ozone, nitrogen oxides, lead, carbon monoxide, and sulfur dioxide) in the NAAQS for the past 25 years. Therefore, the conformity requirements of the Clean Air Act do not apply to this project. Impacts of the six criteria pollutants in the geographic area of the project are expected to be minimal and an analysis is not necessary or required.

A Mobile Source Air Toxic (MSAT) quantitative analysis was prepared for the Preferred Alternative (2B: 6-lane with C/D SDI) and No-Action Alternatives for the existing year (2014), opening year (2021), and design year (2041). The geographic scope of the analysis extended well beyond the project limits on Hwy. 67 and I-630. MSATs are nine compounds with significant contributions from mobile sources that are considered to be non-cancer hazards and cancer risk contributors: acetaldehyde, acrolein, benzene, 1,3-butadiene, diesel particulate matter (diesel PM), ethylbenzene, formaldehyde, naphthalene, and polycyclic organic matter. The amount of MSATs emitted in the region are proportional to Vehicle Miles Traveled (VMT); however, because of improvements in emissions technologies, total MSAT emissions will decline over time, even while VMT increases. Under both the Preferred Alternative and No-Action Alternative, total MSAT emissions would be lower than present levels in the design year by 88% with the Preferred Alternative being 0.3% to 0.9% less than the No-Action. The MSAT analysis is presented in the MSAT Technical Report (EA Appendix Q).

Preserve Arkansas/Rachel Patton/ Arkansas Archaeological Survey

7-27-18

Comment 1

The 30 Crossing project—if constructed as planned—will eventually require the continued widening of I-630 from University Avenue to I-30, impacting a much larger area. Historic neighborhoods and resources in close proximity to the I-30/I-630 interchange, such as Mount Holly Cemetery, the South Main Historic District (SoMa), and the Governor's Mansion Historic District, as well as additional resources along the I-630 corridor like Philander Smith College, the Central High School Neighborhood Historic District, and the Capitol View/Stifft Station Neighborhood, should be evaluated as part of an EIS.

Response: *See I-12 and K-12 of Appendix A.*

Comment 2

According to the Environmental Assessment (EA), the goal/purpose of the 30 Crossing project is "to provide for increased travel speed and reduced travel time to downtown North Little Rock and Little Rock" (pg. 22), presumably for the residents of other central Arkansas cities who commute to Little Rock/North Little Rock for work as well as "through traffic." This goal does not consider current scholarship on the worldwide trend toward urbanization or Census data showing population growth in Arkansas's urban areas, as the state's rural communities shrink.

City planners and historic preservationists recognize that downtown freeways ruin the development potential of central city neighborhoods and create "dead zones" that divide downtown areas. Cities like Philadelphia and Dallas recognize that the expressway building boom of the 1960s and '70s sliced urban neighborhoods apart, and they have sought alternative ways to reunite and boost their downtowns and to improve downtrodden neighborhoods, like "highway cap parks." In her Master's Thesis, "An Interstate Runs Through It: The Construction of Little Rock's Interstate 630 and the Fight to Stop It," Darcy Baskin Pumphrey illustrates how the construction of I-630 divided Little Rock neighborhoods along racial and socioeconomic lines. The indirect impacts of interstate construction are still felt today in communities south of I-630 and east of I-30 on both sides of the Arkansas River.

In Appendix R: Cumulative Effects Technical Report, pg. 8, lines 4-6, ArDOT argues that the trend of people moving to nearby towns like Maumelle, Sherwood, and Jacksonville and

commuting to jobs in the city center will continue, thus increasing traffic congestion, but millennials are choosing to live in urban areas close to their place of employment. And our modes of travel will most certainly change by 2041, the design year for the project. ArDOT is missing an opportunity to find a creative solution to alleviate congestion while benefiting residents and businesses in the city center.

Response: *See I-13 and K-5 of Appendix A.*

Comment 3

The EA does not adequately consider the impact of increased traffic volume on east-west city streets throughout the project area. According to EA, pg. 43, lines 1-5 and Appendix F: Table 2, the preferred Split Diamond Interchange (SDI) alternative will significantly increase traffic on 2nd, 3rd, 4th, Cumberland, and Mahlon Martin streets. An in-depth analysis of the impacts to properties along these streets is warranted; especially considering that northbound traffic on I-30 will exit on 9th or 6th Street to avoid bottlenecks farther north, therefore increasing traffic through the heart of the MacArthur Park Historic District and directly in front of the Arsenal Building, a National Historic Landmark. An increase in traffic volume on these city streets will negatively impact the quiet, primarily residential setting and feeling of Little Rock's oldest neighborhood. It could also lead to increased commercialization and a decrease in property values. And although the EA quickly dismisses any negative impacts to Historic Arkansas Museum as a result of increased traffic on 2nd and 3rd streets, routing more traffic past some of Little Rock's earliest standing structures could adversely affect their historic integrity and hinder access to the museum.

Response: *See I-5, K-3, and K-15 of Appendix A.*

Comment 4

Furthermore, the EA does not address the impact of the 30 Crossing project on the Metro Streetcar system, which runs along 2nd and 3rd streets in the project area, and will have to be relocated to accommodate an increase in traffic volume. And increased traffic on 4th Street could cause exit and entry problems at the River City Travel Center and U.S. Post Office, endangering motorists and pedestrians.

Response:

Relocation of the entire streetcar system along East 2nd and 3rd Streets is not required due to an increase in traffic volume. The issue is that catenary poles for the streetcar are located in Highway Commission right of way, and those poles may have to be moved in order to construct the improvements associated with the Preferred Alternative.

More than a dozen catenary poles for the Rock Region Metro (RRM) Streetcar are located within Highway Commission right of way along East 2nd Street and East 3rd Street in Little Rock. Many of these poles could be in conflict with the construction of the Preferred Alternative which involves the removal of the existing elevated Hwy. 10 ramps and widening of East 2nd Street. The Department, under the authority of the Highway Commission, and RRM entered into agreements in 2002 and 2004 to allow Streetcar infrastructure to be installed within Highway Commission right of way. As with all right of way usage agreements that the Department enters into, the agreements related to the Streetcar make RRM the responsible party for the relocation of any RRM infrastructure that comes into conflict with the use of Highway Commission right of way for highway purposes. As the project continues to develop, the Department will work with RRM, the Design-Builder, and other project partners to minimize impacts to the Streetcar as much as possible.

Impacts to the River City Travel Center and Post Office are summarized in Section 3.2 of the EA and are detailed in EA Appendix F: Community Impacts Technical Report. The project is expected to enhance access to these public facilities.

Impacts to pedestrians due to increased traffic on some city streets will be mitigated by the installation of signalized crossings. Signalized crossings have been shown to be safer for pedestrians than unsignalized crossings.

See K-13 of Appendix A.

Comment 5

The SDI alternative at the Highway 10/Cantrell Road interchange will result in the loss of three surface parking lots and 47 on-street parking spaces along E. 2nd, Ferry, and E. 4th streets. There is already a perceived lack of parking in downtown Little Rock, and the elimination of these parking spaces will negatively impact businesses. According to Appendix A, pg. 6, lines 32-33, “business owners would need to consider the parking options for their customers and employees.” The indirect effects of the reduction in parking are not adequately addressed, as no alternate solutions are offered in the report. Another concern for preservationists is the potential for demolition of historic structures to create additional surface parking lots.

Response: *See K-7 of Appendix A.*

Comment 6

The EA fails to consider impacts to the Argenta Historic District in North Little Rock, which is near the Area of Potential Effect (APE) and is mentioned as an area of development/redevelopment in Appendix A: Indirect Effects Technical Report. Especially during

the construction phase of the 30 Crossing project and replacement of the Arkansas River Bridge, southbound traffic on I-30 will likely come through the Argenta Historic District along Main, Maple, and 7th/Bishop Lindsey/Broadway to avoid delays, thereby increasing traffic volume and noise in the historic district, which is half commercial and half residential. Danger to pedestrians could also occur as a result of the increased traffic volume in this highly walkable neighborhood.

Response: *See M of Appendix A.*

Comment 7

The EA repeatedly asserts that the 30 Crossing project will have no significant impact on historic properties now or in the foreseeable future because of existing protections provided by local ordinance districts in Little Rock and North Little Rock. The Little Rock Historic District Commission only has purview over the MacArthur Park Historic District. No local ordinance protections exist for Hanger Hill, Marshall Square, Tuf Nut, or any individually listed properties within the current APE that are located outside of the MacArthur Park Historic District boundary. And the North Little Rock Historic District Commission only has purview over the Argenta Historic District, which is not even included in the current APE. Outside of the local ordinance district boundary, there are no protections that would prevent the demolition of existing historic fabric in any of the aforementioned neighborhoods. Furthermore, citywide historic preservation plans and design overlay districts are important but do not have “teeth” like a local ordinance district, meaning they offer recommendations and guidelines but do not prevent demolition or the alteration of character-defining features on historic buildings.

Response: *Due to the traffic modeling predictions, MacArthur Park Historic District (HD) and Tuf Nut HD will be the only two historic districts affected by traffic. Increased traffic may cause indirect effects as described under NEPA guidelines. With the alternatives, only one street within MacArthur Park HD, Capitol Avenue, is predicted to experience additional traffic. The vehicles using 6th and 9th Streets will likely continue to use these streets in the same manner with or without completion of this project. The discussion of the Little Rock Historic District Commission (HDC) included the concern regarding whether the increased traffic would cause induced growth or change the future infill, which are under the purview of and protected by the HDC. Additional protections from a Certified Local Government (CLG), such as a the HDC are not necessary to protect the Tuf Nut HD from these indirect effects, since the buildings are significant as examples of early twentieth century industrial structures. Increased traffic, commercial growth, or population density in the area would not harm the integrity of the Tuf Nut HD.*

The other historic districts mentioned in the EA are not expected to experience increased traffic from this project; therefore, this project should not cause the same indirect effects of induced growth, changes in pattern of land use, population density, or increased growth rate to Hanger Hill, Marshall Square, the Van Frank Cottages, and Park Hill historic districts any more than have historically occurred in those areas. The oversight or lack thereof from an historic district commission does not apply to the possible effects to these districts, which included noise and visual aspects that have been addressed within the document (Appendix G). This project and its possible impacts are not expected to cause abandonment or increased commercialization in these areas requiring additional oversight.

Comment 8

Throughout the EA and appendices, ArDOT cites the potential for "increased east-west connectivity," including the creation of green/park space under the Highway 10/Cantrell Road interchange and bicycle and pedestrian improvements as the "positive" to outweigh any negative impacts on adjacent neighborhoods, but these improvements are not part of the project budget. Improvements to city streets and green spaces/parks will be funded by the cities of Little Rock and North Little Rock, respectively, and may take years to complete. In other words, ArDOT cannot take credit for "new connectivity" because it is not part of the proposed project and should not be used as a way to placate residents.

Response: *See K-11 of Appendix A.*

Comment 9

The majority of residences along the 30 Crossing project right-of-way are in low-income and greater than 50% minority census tracts. These populations are already disproportionately impacted by interstate noise, loss of aesthetic value, and separation from the broader community. The environmental justice aspect of this project should be investigated further and addressed in the Cumulative Effects Technical Report and ultimately, in an EIS.

Response: *The green/park space is not part of the proposed project; however, the area is accommodated by the proposed project. In addition, ARDOT has been in coordination with the City of Little Rock with the intention by the City to construct and designate these areas for green space. Bicycle and pedestrian accommodations are included in the proposed project which would also provide increased connectivity and provide alternative modes of transportation.*

The community resources were assessed and included in the cumulative impacts analysis. We understand that minority and low-income populations have been historically treated unfairly during the development of highway projects. In order to prevent such practices, NEPA studies

must follow Executive Order 12898, which requires federal agencies to address disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations, to the greatest extent practical and permitted by law. The 30 Crossing project did conduct an analysis of potential impacts on these populations as directed by Executive Order 12898 and determined that this project did not disproportionately impact any minority or low-income population. Furthermore, in order to promote nondiscrimination, minority and low-income communities were offered additional opportunities to participate in project related meetings and voice their opinions on the proposed actions.

Comment 10

Little Rock has a rich buried past as evidenced by urban archeology done on the grounds of Historic Arkansas Museum and the fact that the construction of downtown parking lots and basements have uncovered important information about the city's early history. There is ample evidence showing that the existence of concrete does not mean there are not archeological sites buried beneath it. Since historic artifacts are often similar to modern ones, urban archeology requires a careful analysis of historic documents and maps along with archeological field methods. In Appendix G: A Phase I Cultural Resources Survey for AHTD Job Number CA0602, the archeological survey revisited one site, 3PU415, and identified six new ones, 3PU969, 3PU970, 3PU971, 3PU972, 3PU974, and 3PU975. None of the sites were recommended eligible for the National Register of Historic Places (NRHP). This raises a number of concerns about research methods and documentation of historic properties. It is questionable that archeologists could dig 5,004 shovel tests and 80 auger tests along the interstate and have so many negative shovel tests, as anyone who digs near a road or house knows it is impossible not to uncover glass, nails, or other cultural deposits. In addition, in Segment 2, Area A, near Second Street, it is unclear where Transect B was excavated since it is marked in green like the Area of Potential Effect boundary. This is important, as this location with its proximity to the Arkansas River could contain archeological evidence associated with the Indian Removals of the 1830s, Little Rock's historic ferry, foundries, and other historic sites.

Because early settlement was concentrated near the Arkansas River, the areas around the Arkansas River Bridge should be more carefully investigated. Bridge demolition and construction, as well as the use of heavy equipment in nearby construction staging areas, could damage or destroy archeological sites associated with the Trail of Tears, early 19th century ferry sites, and Little Rock's early industrial development. I-30 was built over an area that was home to cotton mills, stave and cooperage companies, planing mills, and other industries in the late 19th and early 20th centuries. The interstate also covered city streets that likely had brick

pavers and street railways preserved under concrete. Impacts to these historic archeological sites should be more carefully considered.

The Cultural Resources Report does not mention the potential to unearth archeological evidence from St. Johns College, which was located east of Mac Arthur Park in the current path of I-30 at about 10th Street. St. Johns College was the first institution of higher learning chartered in Arkansas (1850) and served as a hospital during the Civil War. Although the main building burned in 1890, the former college grounds could contain significant archeological resources.

The addendum to Appendix G discusses the Odd Fellows Cemetery at the foot of Park Hill in North Little Rock but fails to mention the African American Military Heights neighborhood that once occupied that site. Although burials from the Odd Fellows Cemetery were relocated in preparation for the construction of I-40, the potential to discover unmarked graves from the cemetery still exists and should be noted.

All of the archeological sites documented in the Cultural Resources Appendix “lack historic context,” making them ineligible for the NRHP. Preserve Arkansas contends that more research should be done to place these sites in context. Preserve Arkansas is also not aware of a Sanborn Fire Insurance Map from 1921, which is cited throughout the report, and recommends that the following maps, as well as historical property records, be consulted:

1864, “Little Rock and Vicinity,” submitted by Brigadier General Quincy A. Gillmore,

Division of Western Mississippi

1886 Sanborn Fire Insurance Map

1887 *Perspective map of the city of Little Rock, Ark., State capital of Arkansas, county seat of Pulaski County.*

1889 Sanborn Fire Insurance Map

1892 Sanborn Fire Insurance Map

1897 Sanborn Fire Insurance Map

1913 Sanborn Fire Insurance Map

1939 Sanborn Fire Insurance Map

1950 Sanborn Fire Insurance Map

Specific examples from the survey where more research is clearly warranted are below:

In Segment 1, Area G, the archeologists identified two brick and mortar wells (3PU969 and 3PU970). They cite examination of the 1921 and 1939 Sanborn Fire Insurance Maps for Little

Rock, Beauman's 1906 Atlas of Pulaski County, and the 1910 Blaisdell's Map of Little Rock. Earlier Sanborn Fire Insurance maps should be consulted prior to making decisions on the sites' eligibility for the National Register of Historic Places.

In Segment 2, Area I, two sites were identified (3PU973 and 3PU974). At 3PU973, a ceramic sherd possibly identified as Blue Transfer Print was recovered (Table 4). There were no photos or discussion in the report, but Blue Transfer Print was produced from 1828 to the present. These dishes could have been handed down over generations, but the site could also date to an earlier time period. The report cites only the 1921 and 1939 Sanborn Fire Insurance Maps for Little Rock, Beauman's 1906 Atlas of Pulaski County, and the 1910 Blaisdell's Map of Little Rock.

In Segment 3, Area B, site 3PU971 was identified with nine positive shovel tests. The report indicates that archeologists recovered "bricks and brick fragments, decorated and undecorated whiteware, stoneware, container glass, window glass, wire nails, and fragments of mortar." The report discusses the bricks and the stoneware, but omits the Blue Transfer Print or hand-painted ceramics and the amethyst, or solarized, glass (Table 2). Blue Transfer Print whiteware ceramics were produced from 1828 to the present, and amethyst glass dates between 1870 and 1920. The site could, therefore, date to an earlier time period, but again, the archeologists only cite the 1921 and 1939 Sanborn Fire Insurance Maps for Little Rock, Beauman's 1906 Atlas of Pulaski County, and the 1910 Blaisdell's Map of Little Rock.

Site 3PU909, Civil War barracks, is located east of the current I-30 interchange between Second and Markham streets. This site, which was identified on the 1864 map, "Little Rock and Vicinity," submitted by Brigadier General Quincy A. Gillmore, Division of Western Mississippi, was not discussed in the report, despite its proximity to the Area of Potential Effect.

The Cultural Resources Report does not identify staging areas for the widening construction. Staging areas should be identified to ensure that historic properties are not adversely affected by the construction. In the survey report, the archeologists recommend monitoring during construction for the area near 3PU762, the 3rd Street and 12 Sherman Street 1906 Railroad Feature, and 3PU707, the brick pavement. Preserve Arkansas recommends additional historical research for the sites identified in the survey, additional archeological research in staging areas, and that an archeological monitor be present for all ground disturbances during construction.

Response: *The archeological fieldwork and report are in compliance with Section 106 of the National Historic Preservation Act and its implementing regulations, "Protection of Historic Properties" (36 CFR Part 800). One of the reasons the implementing regulations contain a post-review discovery provision is that the level of effort is reasonable and in good faith, not*

100 percent or exhaustive. Post-review discoveries (aka buried resources), as well as offsite locations (staging areas), restraining conditions, and archeological monitoring, are addressed in the Programmatic Agreement in consultation with the State Historic Preservation Officer for the current project.

William McFadden

7-27-18

Comment 1

One downgrade of service I see in this design is 13th Street east of I-30 no longer has convenient access to I-40 west or 107 North. In fact, there is no access to I-40 west or 107 North anywhere north of Broadway Street. It seems another flyover ramp from Locust Street north of 19th street to the I-40 west/107 north ramps would solve that problem for northbound. This might also help with traffic leaving Verizon events. Instead of that traffic having to come all the way back down to Broadway, they could use Bishop Lindsey to go north on Locust.

Response: *A flyover ramp was initially investigated to provide access to I-40 West at the Curtis Sykes interchange. However, there are several constraints that make providing access very challenging and costly. Based on the volume of traffic that utilizes the ramp, the other four access points available were determined to be sufficient to provide similar access to I-40 West. Those four routes include: utilizing the northbound frontage road to the North Hills Boulevard interchange, utilizing 13th Street to the North Hills Boulevard interchange, utilizing Main Street to the JFK interchange, and utilizing the southbound frontage road to the dedicated U-turn at Broadway Street.*

Paul Dodds

7-27-18

Comment 1

I am the sole owner of Urban Frontier LLC. I currently have 22 houses and 9 vacant lots in a concentrated area in the Little Rock Central High School National Historic District north of Wright Avenue, with some outliers on 10th St. Over the past 14 years, I have renovated 14 houses and invested over $2,000,000 here. I am submitting these comments from the point of view of a worried homeowner and investor with a large stake in this historic district.

I know best the area bounded by I-630 on the north, Roosevelt on the south, MLK on the east and the railroad tracks on the west. Other than two homes, there has been NO construction of non-subsidized housing in this area for at least 50 years since I-630 was built, while scores of historic properties have been demolished and many more are at risk. Several years ago, Preserve Arkansas put the entire historic district on its annual “most endangered” list. This reality and its highway-driven causes cannot be ignored.

I thus urge the Highway Department to conduct an honest and full Environmental Impact Statement that adequately reflects the cumulative, direct and indirect impacts on the inner city south of I-630 and east of I-30 of the interrelated projects of the I-30 Crossing expansion, the I-630 expansion and the expansion of the Cantrell/430 interchange. An EA on one part of the Department’s plans is not enough. The EIS must be grounded in the historical role of current Government owned and operated interstates in fostering disinvestment, value loss, loss of local tax revenue and residential segregation on the “wrong” side of these self-created class and ethnic dividing lines. The interstates have clearly robbed the vibrancy of downtown to enable suburban and exurban expansion. If more highways are “needed” to continue this wasteful trend, they should be funded with peak period user fees, not by using State power to force their burden on those left behind with regressive sales taxes.

Many houses that I own were unsafe and vacant when I bought them, a few still are; 10 were crack houses; most are contributing structures to the historic district and were redone using Federal and State tax credits. They had been thrown away as the metro region grew into an amorphous blob, around the donut hole of our still depopulated, divided and undervalued inner city. Tax credits are essential to my business, and the historic district could lose its status if many more contributing structures are lost. This remains a fragile area. Interstates almost killed the neighborhood. Their expansion puts the revival at risk.

There are now over 40 people living well in my once dying historic homes. My tenants have to be tolerant of vacant properties all around, tolerant of the occasional panhandler and understanding that poorer people can be excellent neighbors. The intolerant quickly self select out. I receive countless calls from prospective tenants who hang up when they realize my homes are all south of I-630. For far too many frightened white people in Little Rock, this area remains a no-go zone. I moved here in 2003 from afar, to my own surprise and continued delight in this community. I did not know to fear moving south of I-630, and remain unafraid of it. My real fear is what ineffective City government, weak regional planning and an overly effective Highway Department will do to further undermine the inner city.

I do not share the intense desire of so many Arkansans to segregate into sanitized enclaves of racial and class homogeneity. I do not understand what lures people to drive too far, to consume too much house, to live in contrived places where neighbors never walk and rarely talk with each other. I understand even less why I should subsidize these expensive, environmentally and socially dubious lifestyle choices with my taxes, or put my property values at risk, yet again, to make it cheaper for others to leave the city faster.

I do not want to have my private property values taken and the viability of my local government undermined, yet again, by highway expansion plans that will gut my older neighborhood, to benefit new development. If others so urgently want to live far from the city, let them pay for their own roads with user fees. Please do not add to my injury by making me pay – and do not pretend that the past highway-caused injuries do not exist, and the risk of new injuries are not real, by simply refusing to consider them in a serious EIS.

Response: *See K-12 and I-10 of Appendix A.*

We understand that historically minority and low income populations have sometimes been unfairly treated during the development of highway projects. In order to prevent such practices, NEPA studies must follow Executive Order 12898, which requires federal agencies to address disproportionately high and adverse human health or environmental effects of their action on minority and low-income populations, to the greatest extent practical and permitted by law. The 30 Crossing project did conduct an analysis of potential impacts on these populations as directed by Executive Order 12898 and determined that this project did not disproportionately impact any minority or low income population. Furthermore, in order to promote nondiscrimination, minority and low income communities were offered additional opportunities to participate in project related meetings and voice their opinions on the proposed actions.

Comment 2

I remain stunned at our local elite's endless desire to push the infrastructure of segregation onto the backs of long-suffering African Americans. Despite some progress since 1957, the forces driving us apart remain too much in charge. Our business class seems firmly hooked on profiting from taxpayer funding of expanded white flight. Too many of our City Directors and urban institutions have myopically caved, refusing to defend downtown from being squashed, again, by highway boondoggles designed to continue to destroy Little Rock's tax base to benefit the exurbs. The Chamber of Commerce's heavy pressure to get and spend this money, however unwisely, seems all but impossible to resist. I find it indefensible, especially given the history – largely ignored in the EA and planning, as if there were none.

I may be the biggest investor around here, but my slow and hopeful cottage industry can seem pitifully naïve, facing the well-funded Goliath of sprawl. I wish there were more fools like me, and constantly try to recruit others. It is a hard sell. These highway expansions will make it no easier. The small amounts spent to bring us together in a vibrant, mixed urban core are dwarfed by these grotesque highway plans, designed and needed only to spread us farther apart.

I own two houses outside the historic district, which will be directly affected by the expanded I-630. These are on 10th St, close enough to the viaduct to hear its noises and catch its fumes. This once urban, potentially remarkable area near the Capitol now has so many vacant lots that it feels like country - or would except for the long tolerated open air drug market around the corner. I have renovated a tiny house, which rents well, but hold onto a once grand, large yellow brick house, beautifully built in 1905. I keep it empty, patched and well boarded. This old gem is clearly visible when heading east on the I-630 viaduct just to the west of Children's Hospital. With the highway expansion, the continued crime and loss of houses around, the complete lack of historic protections and the low neighborhood values, I cannot figure a way to make the needed renovation work.

Widening I-630 will destabilize this very weak edge of the neighborhood even further. While the plans to widen I-630 were not included in the EA, they should have been as they are inextricably related to the I-30 Crossing expansion. If the Crossing goes through, the pressure to expand I-630 will be impossible to withstand.

I receive kudos and support for my work. As my persistence and that of my neighbors gradually pays, young people move in and continuing decline no longer seems inevitable, at least in a few blocks anchored around the High School and in some of the grander blocks south of Wright Avenue. I have almost no vacancies in market rate houses, and am able to rent sustainably for strong returns. Local banks have been very supportive, and approve of my cautious, solid

model. While a few others have successfully renovated and resold historic homes in the area, it is a difficult market to do this. The top prices here are now in the $110 per square foot range. Given the level of reinvestment needed, this valuation barely justifies tax credit projects. It is still not enough to encourage new construction. While I can make good ROI based on realistic ten-year rental projections, the location is not for the casual “flipper”. Anything that risks decreasing market values further, such as more highways, is an existential threat to my business.

Response: *We understand that minority and low-income populations have been historically treated unfairly during the development of highway projects. In order to prevent such practices, NEPA studies must follow Executive Order 12898, which requires federal agencies to address disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations, to the greatest extent practical and permitted by law. The 30 Crossing project did conduct an analysis of potential impacts on these populations as directed by Executive Order 12898 and determined that this project did not disproportionately impact any minority or low-income population. Furthermore, in order to promote nondiscrimination, minority and low-income communities were offered additional opportunities to participate in project related meetings and voice their opinions on the proposed actions.*

Comment 3

I agree with comments provided by Tom Fennell, Josh Silverstein, Barry Haas and Norman Marshall, and those from various neighborhood associations and preservation groups. There are, no doubt, many other critical and serious comments, begging the Highway Department to reconsider and take more care. Big money loves this project. Most people don’t – as comments show.

I would like to call the Highway Department’s attention to carefully researched articles about how highways damaged Little Rock and other inner cities, and served to solidify and deepen our underlying racial and class divisions. These are cited below. The Department should look seriously at the history and incidence of lost property values and lost tax revenues from its creation of the “wrong” sides of I-30 and I-630. This cannot simply be brushed aside in planning, as it has been in the EA. The cumulative effects are huge, and obvious to all. They need to be considered. The existing damage caused, especially to African American property owners, needs to be weighed and mitigating measures considered as highways are expanded further. This planning cannot take place in a vacuum, with one project divided from another as in the EA, when in reality they are all part of a large, unified plan.

Response: *Cumulative Impacts are evaluated in Appendix R of the EA, the Cumulative Impact Technical Report. The Cumulative Impact Technical Report provides a detailed assessment of*

cumulative impacts within the Resource Study Area using the CEQ procedures for evaluating cumulative effects in NEPA documents, found in the American Association of State Highway and Transportation Officials (AASHTO) Practitioner's Handbook, "Assessing Indirect Effects and Cumulative Impacts under NEPA" (August 2016).The present, past, and future projects included in each resource evaluation are clearly listed in Step 3 of each resource evaluation. In Step 4, the overall effects of the project, in combination with these other actions, is determined. In Step 5, mitigation of cumulative effects is considered.

Comment 4

Serious consideration should be given to funding these expansions with user fees, especially fees designed to charge commuters for rush hour travel. While it is obvious that the I-30 bridge over the Arkansas River needs replacement, and obvious that the highway system needs improved maintenance, were it not for commuters who have chosen to live far away from the inner city, none of this expansion would be necessary. They should be made to pay for the bigger roads needed to fund their private, personal choices, rather than taking a free ride on everyone else.

These choices take place in a particular political geography that merits discussion. When you look at voting patterns, it is very clear that inner cities in Arkansas are far more Democratic than Republican. Electoral maps show blue dot cities surrounded by red seas of suburbs, exurbs and Arkansas countryside. The red seas are now in ascendance. Republican voters generally strongly support private property rights and low taxes – or at least claim to. Republican infrastructure road policies, insofar as they exist, often favor toll roads over public ones, as in the Cato Institute opinion piece, cited below. That same logic should argue for at least giving serious consideration to ways to fund these absurdly expensive expansions through user fees, rather than taxes.

Oddly, or perhaps not, given that these expansions will likely overwhelmingly benefit Republican commuters to the burden of Democratic city dwellers, no serious consideration has been given in planning to make commuters pay for their own roads. Why not? Republican State, plans pushed by Republican Chamber of Commerce, to benefit Republican voters, perhaps? It is clear where the benefits of these expansions will flow. Without real study, their true costs remain hidden. While the Highway Department may wish just to stay to simple engineering, the political convenience of this planning oversight speaks volumes. The EIS should seriously and honestly consider options for paying for expansions with user fees.

Response: *See L of Appendix A.*

Comment 5

Finally, I am disturbed by the Highway Department's rigid and misleading sales job. From faulty traffic projections, to disingenuous refusal to consider alternatives, to presenting pictures in public hearings of pretty parks that will never be, to giving the public three days notice to object to the 630 expansion from University to Baptist, to minimizing real impacts, to ignoring the need for public transportation or the possibilities of non-car transport, to refusing to consider the true scope of areas to be affected, to providing understated cost estimates, to refusing to consider possible impacts of foreseeable technological changes, etc. the Department has, I believe, often acted in bad faith to sell this project – and I only know a tiny part of the scheme. The public is still not buying it, but that does not seem to matter here, when the powerful want it badly enough.

Response: *See N-2 of Appendix A.*

Comment 6

As a taxpayer I am offended at the millions spent justifying these awful plans. I am offended that "categorical exclusions" can be used to push through projects piecemeal that merit close study in context. As a citizen of what purports to be a democracy committed to higher values, I am disappointed. We deserve better from our bureaucracies, and certainly better from our elected officials. It is not surprising that this set of costly, dangerous and outmoded projects would be underwritten with such analytic shabbiness, but it is still unacceptable. We must do better. The divide and conquer strategy of separating the I-30 Crossing plans from what is being done to I-630 and the Cantrell interchange should not be permitted. A full Environmental Impact Statement comprehensively covering the three main planned highway expansions in the metro region, sincerely prepared, would be a good beginning. A partial and deceptively prepared EA is not.

Response: *See I-12 of Appendix A.*

Wright Avenue Neighborhood Association

7-27-18

Comment 1

The residents of the Wright Avenue Neighborhood Association, Inc. (WANA) are rather apprehensive about the Arkansas Department of Transportation (ARDOT) I-30 expansion (and I-630) and requests a full Environmental Impact Statement offering a clear explanation on how all this interstate-building will impact our historic neighborhoods.

Located in heart of Little Rock Arkansas, the Historic Wright Avenue Neighborhood boasts of being home to the largest collection of historic homes within the City of Little Rock. The neighborhood is bounded south side of 17th Street on the north, Roosevelt Road on the south, Dr Martin Luther King Jr on the east, and Thayer Street on the west. Although the neighborhood is diverse, it is predominantly African American and spans age, gender, and varying income brackets. Our neighborhood earned national recognition and was awarded Neighborhood of the Year Award (2nd place) in the Social Revitalization category for our Annual Movies on the Boulevard event—a free community outdoor movie with free concession.

Traditionally highways divide cities and destroy neighborhoods--particularly predominantly African American neighborhoods. Ninth Street was a thriving successful African American business and entertainment district in Little Rock from the 19th century through the early 20th century. This closeknit self-sufficient African American community had all the services needed in the once booming Ninth Street business corridor. By 1959, the thriving business district reached over 100 businesses including doctors, dentists, drug stores, hospital, grocery stores, jewelers, hotels, taxis, theaters barbers, beauty shops, service stations, tailors, restaurants, colleges, churches, and more. Despite segregation, the Ninth Street business community provided jobs and created a high level of self reliance. Neighborhoods face ongoing neglect and stillborn investment.

Building Interstate 630 contributed to the decline of the thriving Ninth Street business district; it plowed through the middle of the vibrant close-knit self-sufficient African American community—dividing and destroying the neighborhood. There is aftermath from this type of devastation.

Across the country, cities have embraced the funds, mostly funded by Federal Highway Act, to build roads that disproportionately displace and destroy the once vibrant successful African American communities. In addition to the destruction of Little Rock’s Ninth Street and

neighborhoods south of I- 630, highways have destroyed inner cities such as Birmingham Alabama, Charlotte (Brooklyn) North Carolina, Dallas(Oak Cliff) Texas, Jacksonville Florida, Baltimore Maryland, Detroit Michigan, Richmond Virginia, Syracuse New York, etc. The list goes on and on. Example after example the story is the same. The inner city becomes underserved while the federally funded highways are built to accommodate people who leave the heart of the city driving home to the suburbs.

Response: *Cumulative Impacts are evaluated in Appendix R of the EA, the Cumulative Impact Technical Report. The Cumulative Impact Technical Report provides a detailed assessment of cumulative impacts within the Resource Study Area using the CEQ procedures for evaluating cumulative effects in NEPA documents, found in the American Association of State Highway and Transportation Officials (AASHTO) Practitioner's Handbook, "Assessing Indirect Effects and Cumulative Impacts under NEPA" (August 2016).The present, past, and future projects included in each resource evaluation are clearly listed in Step 3 of each resource evaluation. In Step 4, the overall effects of the project, in combination with these other actions, is determined. In Step 5, mitigation of cumulative effects is considered.*

We understand that minority and low-income populations have been historically treated unfairly during the development of highway projects. The initial construction of I-30 made a profound effect on the community; however, since that time, several regulations and NEPA have been adopted in order to prevent repetition of such actions. NEPA studies must follow Executive Order 12898, which requires federal agencies to address disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations, to the greatest extent practical and permitted by law. The 30 Crossing project did conduct an analysis of potential impacts on these populations as directed by Executive Order 12898 and determined that this project did not disproportionately impact any minority or low-income population.

Comment 2

I have read your Environment Assessment including the Community Impact Technical Report and appendices. More detail is necessary. For example, specifically what are you saying in this excerpt from your report. The direct displacement and relocation or alteration of homes, businesses or public facilities may lead to indirect effects such as changes to neighborhood cohesion, neighborhood stability, the local economy, access to specific services or products, recreation patterns at public facilities and cultural values. As previously described, the majority of the proposed improvements will take place within existing ROW. The proposed project would potentially result in six residential displacements for all Action Alternatives."

Your Environment Assessment inadequately explains the impact of your proposed changes to the neighborhood. I saw the addresses of the displaced commercial businesses. What are the addresses of the proposed residential property owners being displaced? Which properties will require alterations and what type of alterations? What are the displaced residents' racial, gender, and age makeup?

Which proposed displaced properties are African American property owners? How many renters? Do you classify landlord properties as businesses? Your plan indicates you have relocation assistance for businesses. With what percentage of the relocation cost will you assist? Your assessment estimates 75 jobs will be displaced. Do you pay the businesses' employees during the transition time? What is your plan to help sustain displaced businesses? What is your plan to assist these individuals find employment if jobs are lost? You reached out to the city to get their opinion about the proposed changes. What are the opinions of each of the proposed displaced property owners and business owners? Bike lanes and parks are insignificant when the basic needs are of residents are stripped away.

In your report, you stated ARDOT will assist displaced residents under the Uniform Act. Your research estimates the residential appraised values range from $29,200 to $53,500; however the sales histories range from $47,000 to $147,000. This doesn't add up. Your appraised values are approximately 40% - 60% less than market value. What appraiser did you use? If a house cost $47,000 and you propose to pay your appraised value of $29,200, the basic needs of the resident are not being met. Are you going to pay dislocated residents based on your extremely low appraised values or the sales/market values?

A family member recently experienced the impact of an ARDOT highway expansion, and it was not a pleasant one. The property owners directly affected were mostly low-income senior citizens with no mortgage and fixed incomes. The ARDOT staff bullied and intimidated these elderly owners who would not agree to low-ball offers. Staff was disrespectful and would use the verbiage 'you people' when the owners refused to comply. I observed an ARDOT staff member yell at a senior citizen who asked a question. This was a classic example of "don't question me, just follow along and comply".

The WANA board and membership voted to submit public comments.

All five residential displacements are rental properties owned by one owner. Values included in the tech report were gathered from the Pulaski county appraisal district latest property tax information. The report also stated sale history to show the difference of tax value versus recent sale market values.

Response: *ARDOT complies with the Uniform Act. In accordance with the Uniform Act, comparable replacement dwellings would be identified for all displaced residential property owners. In accordance with the Uniform Act, **t**he term "comparable replacement dwelling" means any dwelling that is (A) decent, safe, and sanitary; (B) adequate in size to accommodate the occupants; (C) within the financial means of the displaced person; (D) functionally equivalent; (E) in an area not subject to unreasonable adverse environmental conditions; and (F) in a location generally not less desirable than the location of the displaced person's dwelling with respect to public utilities, facilities, services, and the displaced person's place of employment.*

Furthermore, relocation assistance is available to all individuals, families, businesses, farmers, and non-profit organizations displaced as a result of a highway project or other transportation project. This assistance applies to tenants as well as owners occupying the real property needed for the project. As stated previously, assistance would be provided should the local existing housing market be insufficient for relocation. ARDOT would complete a survey of the housing market and provide housing supplements to displaced residents, if necessary. Additionally, ARDOT would relocate businesses and assist displaced businesses and non-profit organizations to aid in their satisfactory relocation with a minimum delay of and loss in earnings. The proposed project would proceed to construction only when all displaced residents have been provided the opportunity to be relocated to adequate replacement sites.

Comment 3

We are requesting a full Environmental Impact Statement offering a clear explanation on how all this interstate-building will impact our neighborhoods.

Response: *See K-12 of Appendix A.*

Richelle Britain

7-27-18

Comment 1

Since I had to wait till the very end of the comment period to submit this, I'll have to be much shorter than I wanted to be. I moved from midtown Little Rock to Jacksonville two years ago; my prior comments are still in the public record, and I stand behind the parts that haven't been discarded already, including my proposal that the 30 Crossing bridge be named for Maya Angelou. Indeed, the park space created next to the CALS Main Library, whose prototype carried her name even though it was rejected as she was then still living, makes it even more appropriate that the bridge and/or park be named for Ms. Angelou, since the Southwest Trail crossing in this area was the inspiration for her poem "On the Pulse of Morning" at President Clinton's first inauguration. (That should be confirmable by Dr. Patricia W. McGraw, a retired UCA and former UALR professor and a member of the Arkansas Black Hall of Fame, who told me 25 years ago that Ms. Angelou told her that at the inauguration.)

I fully support the Preferred Alternative and urge you NOT to give in to the "boulevard nuts" and their stupid "induced demand" (or as I call it, "Field of Dreams") traffic theories, recycled from the fight against widening I-30 to Benton many years ago. Though sometimes traffic does increase beyond projections after a freeway expansion, IMO that is better described as "repressed demand" due to the poor freeway. The "boulevard nuts" have tried other stuff in the past, including calling it a "tunnel to Cabot" (disproved by a spot in the Preferred Alternative that actually gives I-30 *fewer* thru lanes than present, not to mention actual traffic flow) and even stealing my own comments in the Democrat- Gazette about Pine Bluff's Martha Mitchell "Expressway" (they ignore why I put "Expressway" in quotes -- it's mostly an example of building a boulevard where a freeway was needed, NOT a freeway destroying a neighborhood since it's not really a freeway).

Their REAL purpose is to stop ALL freeway construction in Little Rock in a futile attempt to stop suburban flight, as the recent I-630 lawsuit proves. Don't give in!

One last thing: Please review AGAIN the "dip" in North Hills just off the south end of its I-40 interchange, which floods every time Dark Hollow floods. The best, and possibly ONLY, way to eliminate it is to extend the southern end of 30 Crossing's interchange reconstruction right up to the NLR-built drainage ditch bridge. If that requires cooperation with NLR, so be it; you built parts of Big Rock in LR city right-of-way (i.e., the Financial Centre Parkway end of the Shackleford overpass).

Response: *Regarding flooding concerns, flooding on North Hills to the south of the interchange is outside of the project limits; however, drainage within the project limits, including the frontage roads, will be designed to handle the design storm event and will provide an alternative route around the flooded area.*

U.S. Army Corps of Engineers

7-27-18

Comment 1

For the Arkansas River Bridge, the bottom elevation of the web wall set at elevation 233.0 feet mean sea level (msl) presents a possible safety hazard to recreational vessels with a 2-foot opening from the bottom of the wall to normal pool elevation (231.0 feet msl) and could allow part of their vessel to proceed underneath the wall when navigating close to the pier. We recommend lowering the bottom of the web wall to elevation 231.0 feet msl or lower to remove the possible hazard. We request that you provide additional details/plans/drawings for the web wall design so that we can review before the bridge design is final.

Response: *This is not an EA comment; however, the contract will include provisions to design the web wall to remove this potential hazard.*

Comment 2

In the Cumulative Impacts Section, a discussion should be included regarding the new development that is currently under construction located north of Dark Hollow and is known as The Pointe at North Hills Apartments. We have development information associated with the Dark Hollow area that can be provided.

Response: *Present and future actions identified through comments and information recently received have been included into the analysis. These future actions include new developments (the Pointe at North Hills apartment and the Amazon distribution center development projects in North Little Rock). These areas encompass approximately 67 acres of land to be developed and approximately 3 acres to be redeveloped.*

Comment 3

In the Cumulative Impacts Section, you should verify that the statement, "Therefore, the historic decline in water resources is not likely to continue and is not a concern due to the large amount of wetlands and floodplains present in the project watershed", is accurate since many publications state that there is actually a slow and steady decline of water resources due to development.

Response: *The sentence will be deleted. The change will be reflected in an addendum that catalogues changes to the DEA made in response to public comments.*

Comment 4

A detailed explanation should be provided in the EA as to how Level of Service (LOS) and peak traffic are related since they are considered in the alternatives analysis and are used to develop the purpose and need.

Response: *Level of Service (LOS) is only mentioned once in the EA document on page 27, line 15, in reference to the screening process that was used to evaluate a range of alternatives for the Cantrell Interchange. It defines Level of Service as a measure of traffic operational effectiveness. It is not used otherwise to describe traffic conditions in the EA.*

During the Planning and Environmental Linkages (PEL) study, Metroplan requested that LOS be used on a limited basis. A number of other mobility performance measures were used in addition to LOS at their request. The Interstate Justification Report (IJR) does reference Arterial Level of Service. Arterial intersection LOS was evaluated for each alternative.

Comment 5

We recommend additional language or re-wording the Environmental Justice Section to clearly state that all of the alternatives would have approximately the same impacts on minority populations. Also, we recommend adding some historical discussion regarding the disproportionate impacts of transportation projects on minority populations either in the main document or in the Community Impacts Technical Report.

Response:

The impacts of the project on Environmental Justice and LEP Populations is discussed in the EA in Section 3.2. Impacts due to noise, access, aesthetics, and displacements are discussed and determined to be minimal with all Action Alternatives. A more detailed discussion can be found in EA Appendix F: Community Impacts Technical Report.

We understand that historically minority and low income populations have sometimes been unfairly treated during the development of highway projects. In order to prevent such practices, NEPA studies must follow Executive Order 12898, which requires federal agencies to address disproportionately high and adverse human health or environmental effects of their action on minority and low-income populations, to the greatest extent practical and permitted by law. The 30 Crossing project did conduct an analysis of potential impacts on these populations as directed by Executive Order 12898 and determined that this project did not disproportionately impact any minority or low income population. Furthermore, in order to promote nondiscrimination, minority and low income communities were offered additional opportunities to participate in project related meetings and voice their opinions on the proposed actions.

Comment 6

Under Section 14 of the Rivers and Harbors Act of 1899 and codified in 33 U.S.C. 408 (commonly referred to as "Section 408"), the Corps must review any proposals by private, public, tribal, or other federal entities, to make alterations to, or temporarily or permanently occupy or use, any U.S. Army Corps of Engineers federally authorized Civil Works project. For legal sufficiency and so that we can make an accurate determination, please include a discussion of the Section 408 issues.

Response: *Under Section 14 of the Rivers and Harbors Act of 1899 and codified in 33 U.S.C. 408 (commonly referred to as "Section 408"), USACE must review any proposals by private, public, tribal, or other federal entities, to make alterations to, or temporarily or permanently occupy or use, any USACE federally authorized Civil Works project.*

The 30 Crossing project was reviewed for potential impacts to the following USACE Civil Works projects: The North Little Rock levee and floodwall; the Little Rock/Pulaski County Drainage District Number 2, the Arkansas River at River Front Park Section 14, the Arkansas River Navigation System (MARKANS), and the Fourche Bayou floodplain basin project. Through early and regular coordination with the Little Rock District USACE, it was determined that there was potential impact to the North Little Rock levee and floodwall, the MARKANS, and the Fourche Bayou floodplain basin project.

The 30 Crossing project proposes to remove and replace the existing Arkansas River bridge. Relative to the North Little Rock levee wall and the MARKANS, the new bridge will exceed the required spans both vertically and horizontally; therefore, navigation will potentially improve due to the pier configuration and increased clearances. Temporary fill during demolition of the existing bridge will be removed promptly so that navigation is not impacted for more than 24 hours at a time. Operation and maintenance of the MARKANS will not be impacted. The new bridge structure on the North Little Rock side will not be located within 15 feet of either side of the North Little Rock levee wall and will not impact the integrity or operation and maintenance of the levee wall system. Relative to the Fourche Bayou Basin project the 30 Crossing project proposes to place both temporary and permanent fill within the floodplain. A volumetric evaluation was completed and borrow areas have been designed that will mitigate for the potential rise due to the proposed fill.

A Section 408 information package including a description of the potential impacts, schematic drawings, technical documents, and proposed mitigation measures, was provided to the Little Rock District USACE in May of 2018 and is currently under review.

Comment 7

In the Wetlands Impacts Section, for the question, "What are jurisdictional wetlands?", we recommend re-wording to state that jurisdictional wetlands are areas adjacent to rivers or streams that are periodically inundated or saturated with water and are identified by their hydrology indicators, plant communities and soil characteristics.

Response: *Text box will be reworded as suggested. The change will be reflected in an addendum that catalogues changes to the DEA made in response to public comments.*

Comment 8

We also recommend adding another informational blue box in the Wetlands Impacts Section that reads, Why are wetlands important? They provide important functions and services for the public such as storing flood waters, filtering pollutants and providing valuable habitat for many species of fish and wildlife.

Response: *Requested text box will be added. The change will be reflected in an addendum that catalogues changes to the DEA made in response to public comments.*

Comment 9

For impacts to waters of the U.S., we recommend adding language describing avoidance and minimization measures. For example, at the Interstate 40/U.S. Highway 67 Interchange where wetland impacts are the greatest, please describe any alignments, design configurations, construction methods, etc., that were considered and the reason(s) they were or were not carried forward as part of the proposed project.

Response: *Various options were evaluated for the I-40/Hwy. 67 interchange. Two examples are described below:*

An alternative was evaluated in which the flyover ramp from eastbound I-40 to Hwy. 67 NB would be relocated west of the preferred configuration. This alternative performed similarly operationally, but involved more impacts to Wetland 4 than the Preferred Alternative, and additionally involved a conflict with an overhead power line.

Another alternative evaluated involved relocating I-40 eastbound to the north, closer to I-40 eastbound, in the vicinity of the Hwy. 67 interchange. This would allow the existing left exit onto Hwy. 67 northbound to remain as a right exit. Although the ramp could remain at its current location, and the impacts to Wetland 4 associated its relocation would be avoided, there would be impacts to Wetland 5 associated with the new alignment of I-40.

Wetland impacts involved in the construction of the proposed ramp will be minimized by adherence to ARDOT Standard Specifications for Highway Construction Section 110, which includes specifications for minimizing the impacts of any required work ramps or haul roads and for erosion and sediment control.

Richard Mays

7-27-18

Comment 1

PURPOSE AND NEED OF THE PROJECT

40 CFR §1502.13, relative to a statement of the purpose and need of the proposed project, states that "The statement shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives, including the proposed action."

Although the "Purpose and Need" section of the DEA covers the first 25 pages in the DEA, it consists largely of background information about the Little Rock-North Little Rock area, and is overly broad, vague and inadequate. It is only at page 22 of the DEA that a concrete discussion of the purposes begins. There, it is stated that the purposes are primarily (i) to improve the condition of I-30 by "modernizing" infrastructure; (ii) improve navigational safety on the Arkansas River, and (iii) increase speeds and reduce traffic congestion to downtown Little Rock-North Little Rock.

The "purposes and needs" of the Project influence the remainder of the scope of the DEA. However, the DEA does not address the issues to which those purposes and needs relate, whether there are alternatives that could meet those purposes and needs in a more efficient and less expensive manner, and the potential impacts of the proposed action on the human environment. In order to determine whether the purposes and needs, and the proposed means to achieve them as appropriate, it is necessary to view the Project in the context of the highway system in the State and particularly in the Pulaski County area.

The Project involves the expansion of approximately seven (7) miles of interstate highway, including three (3) interchanges, that transect Little Rock and North Little Rock, at an expense of approximately $700 million dollars. This is being done contemporaneously with the project to widen I-630 ("the I-630 Project) which is estimated to cost approximately $90 million. Another $90 million is estimated to be expended on the widening and reworking of the intersection of I-430 and Highway 10, and the widening of Highway 10 between Pleasant Ridge Road and Pleasant Valley Drive ("the I-430/Hy. 10 Project"), all in the City of Little Rock, Arkansas. Assuming those cost estimates are relatively accurate, the total cost of these three projects will be in excess of $1 billion.

A substantial portion (but not all) of the money to pay for these highway expansions and modifications is to be derived from a ten-year, one-half cent sales tax approved by the

voters of Arkansas in 2012, estimated to raise approximately $1.8 billion (The Connecting Arkansas Program, or "CAP"). The purpose of the bond issue, according to the ArDOT, was to "improve highway and interstate projects throughout the state." However, it appears that the needs of the Arkansas highway system are not met by spending such a disproportionate amount of the total revenue on the Project.

According to a publication of the ArDOT dated October 8, 2015, entitled "Connecting Arkansas Program," the State of Arkansas contains approximately 16,416 miles of highways, which is higher than Illinois, California, New York and Florida, all of which have significantly higher populations than that of Arkansas. However, the amount of "revenue per mile" *(i.e.,* the amount of revenue allocated for expenditure on construction/maintenance of highways) in Arkansas is only $79,232, as opposed to significantly higher amounts for Illinois ($376,461); New York ($648,927), California ($1,262,809) and Florida ($622,740). This strongly indicates that Arkansas has more highway mileage that it can afford to maintain, and that concentrating a relatively high proportion of the money derived from the Connecting Arkansas program on the Interstate highways in Little Rock may not be the wisest and best use of that money.

This discrepancy between highway mileage and funding for maintenance was pointed out in an opinion published in Arkansas Talk Business and Politics on July 4, 2018, by Mr. Alec Farmer, a member of the Arkansas Highway Commission, in which he described the CAP program and stated:

“When the CAP funding ends the Arkansas Department of Transportation (ARDOT) will be left with only regular annual highway funding, and herein lies the problem for our highway system going forward. Due to several factors, including more fuel- efficient vehicles, no highway user fee increase since 2001, and construction costs growing by more than 150% during the last 20 years, our annual funding now only provides enough revenue to maintain about half (or 8,000 miles) of our entire 16,400-mile state highway system, a system that is the 12th largest in the nation.

ARDOT will again in January request additional funding.... Additional funding needs are now approximately $400 million per year just to maintain the existing system at a minimum level. ...

Under this scenario, with declining revenues and increasing construction costs, decisions will have to be made as to which highways are critical to the system, and therefore, should be adequately maintained and what to do with the highways that ARDOT cannot adequately maintain. Exhibit A’

This opinion from a member of the State Highway Commission points out the need to make informed and judicious decisions on the use of the monies that are to be derived from the Connecting Arkansas tax-supported bond issue. The choices that are reflected by the three construction projects mentioned above do not reflect such decisions. The program that is being proposed is more of a "Connecting Central Arkansas" rather than Connecting All of Arkansas.

In addition, the congestion that is noted in the DEA as one of the "needs" for the Project occurs almost exclusively at peak travel times; *i.e.,* during the hour to hour and one-half in the morning (7:30-9:00 a.m.) and in the afternoon (4:30- 6:00 p.m.). Otherwise, traffic on these interstates flow smoothly in the absence of a major accident. The Project is proposed and designed to meet an hour and one- half maximum capacity projected years into the future, and numerous credible studies show that the proposed remedy for such congestion (expansion of travel lanes) will only be temporary until the expanded roadways are also at capacity. There are other, less-expensive means of dealing with the capacity issue that have not been explored.

Response*: The purpose and need for the project was developed in the Planning and Environmental Linkages (PEL) study utilizing public and stakeholder input (see PEL Appendix A: Purpose and Need) and is summarized in Section 1.4 (page 8) of the Environmental Assessment (EA): "Why Does I-30 Need to Be Improved". Information is presented on roadway geometric deficiencies, safety, traffic congestion, bridge deficiencies, and navigational safety. Traffic congestion exists today and is not based on future traffic projections. It is primarily a result of roadway deficiencies, such as inadequate interchange spacing and left exits.*

The purpose of this project is to increase the safety of vehicular traffic on I-30 and I-40 by correcting geometric deficiencies, improve the condition of the roadway by modernizing infrastructure and maintaining a state of good repair, improve navigational safety on the Arkansas River, correct the I-30 Arkansas River Bridge deficiencies, and reduce traffic congestion by improving mobility on I-30 and I-40. The intent of the project improvements is to provide a reliable transportation corridor between Little Rock and North Little Rock that is structurally sound and improves safety and mobility by improving the operations of the multiple interchanges in the corridor. The I-30 Arkansas River Bridge would be replaced with a new structure, correcting the functional and structural deficiencies and navigation safety issues.

The close proximity of five high volume interchanges (Hwy 67/I-40, I-40/I-30, I-30/Broadway, I-30/Hwy. 10, and I-30/I-630) and a major river crossing in the 30 Crossing corridor introduces a complex interdependence between each of these major transportation components. Due to this

interdependence, improvements to the geometric and structural deficiencies of any one component relates directly to the other components in close proximity to it. Although the Arkansas River Bridge is the most critical component of the 30 Crossing project, corrections to its structural and geometric deficiencies tie directly into the improvements of the components adjacent to it. The major geometric deficiency for all of the interchanges and the River bridge is insufficient space and distance necessary to safely perform the merging and weaving maneuvers that are typical when traveling through and beyond a major interchange. The result of the similar deficiencies and close proximity of each interdependent component is that operational improvements for each component blend into those adjacent to it resulting in an increase of capacity throughout the project.

The alternatives that were evaluated to address these needs are summarized in Section 2 of the EA. A universe of alternatives was initially developed during the PEL (see PEL Appendix C: Alternatives Development and Evaluation: reference website 30 Crossing.com) using input from the public and stakeholders (see EA Appendix D: PEL Public Involvement Summary: reference website 30 Crossing.com). Additional alternatives were developed during the National Environmental Policy Act (NEPA) phase in response to public comments. These alternatives were refined through the PEL and NEPA phases to arrive at the Action Alternatives addressed in the EA. A more detailed description of the alternatives that were evaluated during the PEL and NEPA stages is presented in EA Appendix C: Alternatives Analysis Technical Report.

The impacts of the Action Alternatives that were evaluated during the NEPA phase are summarized in Section 3 of the EA. More detailed information on the impacts is presented in the various appendices attached to the EA.

This project addresses the roadway geometric issues that have led to safety and congestion issues within its project limits. The project limits were defined based on documented needs in the I-30 and I-40 corridors, including bridge structural and navigational deficiencies, traffic congestion, safety, roadway geometric deficiencies; as well as points of major traffic generators.

- *Congestion on I-30 and I-40 was documented to be most severe on the segment of I-30 from I-440/I-530 to I-40, and on I-40 from I-30 to Hwy. 67.*
- *Safety issues in the project corridor were related to geometric deficiencies: left exits, substandard ramp lengths, substandard curves, substandard shoulders, and closely spaced interchanges, which were found to be most prevalent on I-30 from I-440/I-530 to I-40 and on I-40 from I-30 to Hwy. 67*

- *The southerly project limit is a location where I-30, I-440, and I-530 converge, resulting in a significant change in traffic volumes*
- *The northerly project limit is a location where I-40 and Hwy. 67 converge, another location where traffic volumes change significantly*

There are existing issues on adjacent roadways, including but not limited to traffic congestion on I-630 and I-30, as detailed in EA Appendix B: IJR Traffic Results and Safety Analysis. The Preferred Alternative improvements are not the cause of these issues and do improve adjacent segments of I-630 and I-30 compared to the No-Action Alternative (see Standard Response I-12). Therefore, the project improvements do not make improvements to adjacent segments of I-30 or I-630 any more needed than they currently are. In fact, the Preferred Alternative improvements will improve traffic congestion on adjacent segments of I-630 and I-30. I-630 eastbound congestion in the morning and afternoon peak hours will be relieved by the Preferred Alternative, as the capacity of the I-630 eastbound to I-30 northbound ramp will be improved. I-30 northbound congestion in the morning and afternoon peak hours will be relieved by the Preferred Alternative, which relieves the bottleneck occurring due to weaving just north of the I-440/I-530 interchange.

Cumulative Impacts are evaluated in the Cumulative Impact Technical Report, Appendix R of the EA. Reasonably foreseeable transportation actions that were included in the cumulative impact analysis included the widening of Hwy. 67 north of the Hwy. 67/I-440 interchange; the widening of I-630 from Baptist Hospital to University Avenue; the I-40/ Hwy. 391 interchange improvements; the reconstruction of I-30 at 65th Street, and I-440 from the Arkansas River Bridge to I-40. These were the only transportation projects on the 2016-2020 Transportation Improvement Plan within the Resource Study Areas at the time the analysis was performed. The direct, indirect, and cumulative impacts of those projects on community, water, and historic resources were analyzed using the AASHTO procedures for evaluating cumulative effects in NEPA documents. The analysis followed the AASHTO procedures and considered the impacts of these aforementioned projects in the cumulative analysis.

Since the time the analysis was performed, other considerations have been included in the cumulative impacts analysis and reflected in the final technical report in response to public comments. This includes the proposed developments for Amazon and the Pointe at North Hills apartments as well as planned transportation projects. The table below lists the planned transportation projects within the Resource Study Areas. Projects along I-40 and I-30 are being studied; however, scope and plans for these projects have not yet been determined at this time. Impacts that could be estimated and anticipated to be likely were considered for the cumulative

impacts analyses for the resources analyzed and included in the final technical report. Although the table below lists planned transportation projects, each of these is an independent project not associated with the proposed project. Each of these planned transportation project has their own individual independent utility, independent project purpose, and logical termini.

Location	***Type of Work***
I-40 in Maumelle	*New Interchange*
Hwy. 5/Hwy. 70/University Avenue	*Intersection Improvements*
Hwy. 10 and I-430 from Pleasant Ridge Road to Pleasant Valley Drive	*Major Widening*
Hwy. 176 at Shilcotts Bayou	*Structure and Approaches Improvements*
Hwy. 365 at Palarm Creek	*Structure and Approaches Improvements*
JP Wright Loop Road Rail	*Railroad Grade Separation*
Shackleford Road and Gamble Road (Kanis Road)	*Major Widening*
Hwy. 10 at Gill Street	*Railroad Overpass Structures and Approaches Improvements*
Hwy. 67 from Main Street to Vandenberg Boulevard	*Major Widening*
Hwy. 176 from 47th Street to Remount Road	*Safety Improvements*
Hwy. 10 at Taylor Loop Road to Pleasant Ridge Road	*Major Widening and Operational Improvements*

The proposed project is not associated with the planned transportation projects listed above nor was it influenced by them. The project limits were defined based on documented needs in the I-30 and I-40 corridors, as well as points of major traffic generators. The primary purpose for the 30 Crossing proposed project is infrastructure replacement. The purpose and need of the proposed project is to address the existing condition issues of rebuilding a deteriorating infrastructure and improving the safety conditions such as weaving within the project corridor. Furthermore, Metroplan has recognized this 30 Crossing project as a need and has included this project in their plans since 2003.

With these considerations, the proposed project is not anticipated to contribute to the cumulative effects of the community due to the following:

1) The developments would not result in relocations because they are located on mostly undeveloped property. Two of the planned transportation projects have prepared environmental documents that were reviewed to determine that 32 acres of total proposed ROW is anticipated within areas unlikely to be within Environmental Justice census block group areas. The nine other planned transportation projects are in planning stages and have no information yet to determine potential impacts; however, most of these are unlikely to result in major ROW acquisitions or community impacts because a majority of these projects are overlay and pavement reconstruction projects and bridge replacements.
2) The Preferred Alternative is anticipated to have 11.1 acres of proposed ROW within the 7.3-mile corridor. No displacements or ROW acquisitions are proposed south of I-630.
3) Community cohesion within minority and low-income population areas would not be adversely impacted by the proposed project. The 5 residential displacements are located in predominantly minority census area; however, these displaced rental properties are adjacent to the existing facility and would not result in a further division or separation of a neighborhood. The proposed frontage road would, in fact, improve north and south connectivity along Cypress St. Furthermore, proposed ROW acquisitions would not result in any division or further separation of any existing neighborhoods.
4) Improvements are included in the proposed project to minimize the east and west divisions from the original construction of I-30. Bicycle and pedestrian accommodations and improved overpass and underpass intersections would improve the walkability between the west and east sides of I-30.

With these considerations, the proposed project is not anticipated to contribute to the cumulative effects of water resources due to the following:
1) Approximately 312 acres in the initial evaluation plus an estimated 15 acres of potential stream or wetland impacts from the developments and planned transportation projects would equate to approximately 327 acres which is approximately 8.5 percent of the total water resources within the RSA.
2) Regulatory control strategies and permitting requirements would be required of developments to minimize and mitigate potential floodplain, stream and wetland impacts.

With these considerations, the proposed project is not anticipated to contribute to the cumulative effects of historic resources due to the following:

1) The only historic resource impacted by the proposed project would be the Locust Street bridge which is being mitigated through a programmatic agreement in coordination with the SHPO. The bridge needs to be replaced because it does not meet current structural standards.
2) The additional developments and planned transportation projects are not anticipated to result in historical resource impacts that would contribute to overall cumulative effects.
3) Although other historic resources and districts would not be impacted by the proposed project, it is acknowledged that historic properties are deteriorating with little support and protection. Unfortunately, the cost to preserve and revitalize such properties are scarce. Without intervention by local funding sources or entities, there is a concern for the loss of integrity of historic properties. There are preservation groups and individuals who are able to protect and restore properties with the cities in the APE; however, the extent of such restoration would not encompass all historic properties that need and require preservation due to cost and funding constraints.

Comment 2

Furthermore, the modeling used in the DEA is faulty in numerous respects. First, the PEL modeling used in the DEA overstates levels of existing congestion by artificially increasing the "demand" to account for "oversaturated conditions." The resulting numbers are not an accurate reflection of demand for the highway and could not be present on the existing roadway today because drivers would (and do) find other routes. See Exhibit B, "Review of the Travel Forecasts and Analyses in the I-30 Planning and Linkages Report", Norman L. Marshall, April 2016. Additionally, the improper PEL modeling results in exaggerated delays when those results are inputted into the VISSIM model, rendering that modeling also inaccurate.

Response:

The traffic volumes within the studied roadway network were developed with information from the CARTS model. CARTS is a travel demand model that does take into account driver avoidance of congested roadways. The CARTS regional model uses an iterative process to re-route traffic to account for congested routes. The regional model does include alternative routes such as Broadway, Main, I-430 and I-440 that traffic can be assigned to. The study team then used the CARTS model to inform the development of the appropriate forecast for I-30 along with other information such as historical growth and other studies. VISSIM was then used to model the forecasted traffic demand in the corridor.

CARTS is a travel demand model used to forecast traffic. The CARTS model is similar to the majority of other travel demand models across the country. The use of a regional travel

demand model using Static Traffic Assignment (STA) and a VISSIM microsimulation model is used by the majority of corridor studies like I-30 around the country and constitutes meeting the standard of practice. Roadway capacities are based on the LOS standard for the roadway: for the case of I-30, LOS D/E. As the forecasted traffic approaches the roadway capacity, LOS E or F (V/C = 1.0) results and travel speeds are reduced, triggering a diversion of traffic to alternative routes. Forecast traffic volumes are allowed to exceed the capacity of the roadway only when no other routes providing similar travel times are available. The CARTS Model also utilizes a feedback loop, by which congested travel times are feedback into the trip distribution model step, accounting for the impact of congestion on travel patterns. This is also standard practice for advanced travel models.

In order to better simulate actual traffic operational conditions within the project area, the volumes predicted by CARTS used to inform the forecasted traffic for I-30 and I-40 were fed into a microsimulation model (VISSIM). VISSIM represents state-of-the-art in traffic operations modeling. This technique allowed for the most accurate prediction of operating conditions that drivers actually face (queues, delays, etc.) that is currently possible. It is recognized that VISSIM does not predict individual driver behavior. For instance, when faced with long delays, drivers on I-30 and I-40 may elect to use local roadways to circumvent bottlenecks. It is important to recognize that the bottleneck predicted by VISSIM will still occur, but may dissipate more quickly due to some vehicles using longer more circuitous routes.

For a complete description of the traffic modeling efforts on this project, see EA Appendix B: IJR Traffic Results and Safety Analysis, Appendix B – Traffic Results Addendum.

The evaluation of solutions for the I-30/I-40 corridor included an assessment of regional arterials and highways.

Arterials

Metroplan's policy is to perform an assessment of the regional arterial network (RAN) to identify improvements to arterials prior to highway widening. A RAN analysis was presented in the EA, Appendix B: IJR Traffic Results and Safety Analysis, Appendix B Traffic Results, Section 4.5. This section analyzed the regional arterial network from a planning and engineering point of view.

The arterial analysis indicates that a balanced regional network of arterial improvements and highway improvements will best serve the Little Rock region to plan for the population growth forecasted by Metroplan by 2040. Both a planning and engineering assessment was

performed. In the IJR Traffic Results and Safety Analysis, Appendix B Traffic Results, Section 4.5. Figure 29 shows the regional arterials that are under capacity and nearing or over capacity. The map also includes planned and committed capacity projects from the Central Arkansas Regional Transportation Study (CARTS) Long Range Transportation Plan. As shown in IJR Traffic Results and Safety Analysis, Appendix B Traffic Results, Section 4.5. Figure 29 shows there are four arterial corridors where new capacity is planned in the CARTS Long Range Transportation Plan. These arterials are:

- *State Highway 161 (northeast of the study corridor)*
- *State Highway 365 (McArthur Drive) (northwest of the study corridor)*
- *University Avenue (southwest of the study corridor)*
- *State Highway 5 (southwest of the study corridor)*

If these arterial improvements were made they could provide some benefit to the I-30 and I-40 corridor but the comprehensive benefit is expected to be minimal. Both Highway 10 (Cantrell Road) and Highway 70 approach capacity west of I-30 near downtown. This will impact motorists' decision to use the arterial network to their downtown destinations. Finally, many communities today are not looking for wider arterial with more traffic traveling faster. Local communities are looking for complete streets, a national movement to rebalance the modes of travel on roadways that maneuver through communities, slow traffic down and provide amenities for pedestrians, bicyclists and transit. Promoting active (non-motorized) transportation on arterials is difficult to achieve while also increasing arterial vehicle capacity.

EA Appendix B: IJR Traffic Results and Safety Analysis, Appendix B5 (Arterial Assessment) is an assessment of the surrounding arterial network within the 30 Crossing project limits from an engineering perspective. Each arterial identified in IJR Traffic Results and Safety Analysis, Appendix B Traffic Results, Section 4.5. Figure 29 was broken down into segments according to the existing roadway section or number of lanes. Each segment was assigned a set of arterial improvements for which a high to low benefit to operations to the 30 Crossing project was assigned. Equally important, a high to low level was also assigned to gauge the impacts to right of way, existing structures, and existing railroad infrastructure. An order of magnitude cost was developed utilizing the assumption of five million dollars per mile of roadway widening (excluding potential retaining walls, barriers, and other roadside grading) and preliminary bridge replacement costs. This cost represents construction cost only and does not consider right of way cost, utility impact cost, engineering cost, etc. The cost is in 2017 dollars with an assumed

twenty percent contingency, but without consideration of inflation. The table also contains information of related improvements within Metroplan's Long Range Plan.

A preferred rating combination is a high benefit to project operations and a low level of impact. The lower the impact, the easier to incorporate into the project scope and promote as a solution to improve regional traffic operations, safety and mobility. For example, expanding Highway 161, listed above as being identified in the CARTS model as a Long-Range Plan project, south of Interstate 40 from the existing two-lane roadway section to a four-lane section, is expected to have a relatively low impact to right of way and existing structures but is expected to only minimally improve the operations within the 30 Crossing project limits. This expansion produces an alternate route for the AM traffic to enter downtown from the north, however, still results in traffic utilizing the I-30 Bridge or Broadway Bridge to cross the Arkansas River, furthering congestion issues.

There are four arterial improvements assessed that are expected to improve traffic operations within the I-30 project, as shown in EA Appendix B: IJR Traffic Results and Safety Analysis, Appendix B5 (Arterial Assessment). Each of these improvements is also assigned a significant level of impact. For example, re-aligning southbound Highway 107 at Washington Avenue to parallel northbound would increase operations for traffic entering the downtown area from the north in the AM. Together with an expansion of J.F.K. Boulevard from a four-lane roadway section to a six-lane section, Highway 107 could be a viable alternative route for peak AM traffic. However, both improvements require significant impacts regarding right of way and existing structures.

In addition to improvements along Highway 107, expansion along Broadway Street could potentially have some benefit to I-30 traffic operations. Several routes coalesce at the Broadway Street Bridge and I-30. Expanding the bridge to accommodate six lanes of traffic would be a significant cost but would increase capacity to carry traffic to and from the downtown area. Additionally, expanding Broadway Street (Highway 70) to six lanes between the Broadway Street Bridge and Main Street Bridge, could allow better flow for traffic coming from the north and east to enter downtown Little Rock from North Little Rock. These improvements could offer an alternate route to and from downtown but come at a high cost. Especially with the newly constructed Broadway Bridge that opened in 2018.

Although there are a few arterial improvements identified that could improve operations within the 30 Crossing project limits, all come at a high cost regarding either right of way, structural impacts, environmental impacts, railroad impacts, or a combination. The urban environment and

location of the Arkansas River render few opportunities to increase the roadway capacity of the regional arterial network to improve operations on I-30.

Interstates

The assessment of the I-30/I-40 corridor included understanding travel characteristics. According to Metroplan, I-30 through traffic is estimated to be less than 18% of total I-30 traffic in 2040 (I-30 PEL, Appendix F Section 4.1: reference website 30 Crossing.com). Due to the origin of the trips being taken, not all of this traffic will be willing to reroute to other interstates such as I-440, resulting in far less than 18% of traffic being diverted from I-30. This would leave the majority of the 2041 forecasted traffic still on the I-30 corridor accessing downtown Little Rock or North Little Rock.

Travel patterns on this corridor have been established over time as a result of how Little Rock and North Little Rock have developed. Dramatic changes in these traffic patterns cannot be made without significant impacts on businesses, housing patterns, and the general economic vitality of the region. In addition, significant improvements to other corridors and interchanges that would receive traffic diverted from I-30 would have to be made in conjunction with any downgrade in capacity of the I-30 facility.

Below are some of the regional travel characteristics that led to the conclusion to improve the study corridor.

- *Signage on I-40 westbound directs drivers to take exit 159, interstate I-440, to go to Texarkana. Signage on I-30 eastbound directs drivers to take exit 138A, interstate I-440, to go to Memphis. Google Maps and other mapping software will often recommend that drivers moving through the area take I-440 to I-30 or I-40 because it is the current, shortest travel time.*
- *Based on discussions with community leaders, truck drivers and review of truck data, truck traffic currently uses I-440 over I-30. Truck volumes are lower on I-30 (6% in 2014) than they are on I-440 (32% in 2014). Truck drivers avoid driving during peak congested time periods and congested corridors because time is so valuable to the delivery of goods. As a result, truck drivers try and avoid the I-30 corridor and use alternate routes such as I-430 and I-440 when possible.*
- *Traffic is already being diverted to I-440. There are several ways through traffic is alerted that I-440 is a downtown bypass route.*

EA Appendix B: IJR Traffic Results and Safety Analysis, Appendix B1, Chapter 3.0 Traffic Volumes, describes how the traffic volumes were developed. Traffic forecasts were developed

based on ARDOT's Arkansas State Highway and Transportation Department, Traffic Handbook, 2013. The handbook documents traffic forecasting data collection, and procedures as

required in 23 CFR 500 Subpart B. The Traffic Handbook uses these references:

- *A Policy on Geometric Design of Highways and Streets, American Association of State Highway and Transportation Officials (AASHTO), 2011*
- *Highway Capacity Manual, (HCM 2010), Transportation Research Board*
- *Traffic Monitoring Guide, Federal Highway Administration, 2001*
- *AASHTO Guidelines for Traffic Data Programs, AASHTO 2009*
- *ARDOT Technical Services Field Manual, ARDOT, Planning and Research Division, Technical Services (Renamed as Traffic Information System Section in 2013), 1988*
- *Highway Performance Monitoring System Field Manual, Federal Highway Administration, Office of Highway Policy Information, 2013*
- *NCHRP Report 365 – Travel Estimation Techniques for Urban Planning, 1998*
- *NCHRP 01-37A: Development of the Guide for the Design of New and Rehabilitated Pavement Structures, 2002*

In summary, the methodology for projecting traffic with and without the improvements was reviewed by FHWA, Metroplan and ARDOT. The latest available Metroplan travel demand model was used to develop traffic for all future alternatives. The alternatives with more capacity do induce traffic in the corridor. These changes are represented in the text. The traffic volumes were developed using the Metroplan regional travel demand model thus incorporated regional traffic modeling.

In Metroplan's comments on the draft EA dated July 26, 2018, they state "The traffic and operational analysis provides an admirable analysis and summary of traffic impacts of the various 30 Crossing alternatives under consideration. Furthermore, staff believes that the traffic projections are reasonable and fall within an acceptable range given engineering practice."

The development of the traffic modeling for this project involved a team of nationally-recognized experts, including Professional Transportation Operations Engineers, with decades of experience modeling complex interstate projects.

Comment 3

The models also do not properly account for the effects of induced travel on the expanded highway and do not calculate total Vehicle Miles Traveled (VMT) or Vehicle Hours Traveled (VHT), which presents a more true picture of the effects of an action on existing roadway congestion.

The base 2041 forecast for the study corridor was developed for an 8-lane facility at the beginning of the PEL study. Traffic forecasts were based on the CARTS travel demand model, ARDOT counts, the assumptions outlined in this appendix, and additional assumptions which are outlined in EA Appendix B: IJR Traffic Results and Safety Analysis, Appendix B: Traffic Results. To account for the effects of induced demand, the base 8-lane forecast volumes were adjusted. Interstate induced demand adjustments were derived using the CARTS travel demand model.

Table 2 in EA Appendix B: IJR Traffic Results and Safety Analysis, Appendix B: Traffic Results, shows the induced demand adjustment factors that were used to develop forecasted 2041 traffic during the PEL and during the NEPA phase at each study count location (A1, A2 and A3 as shown Figure 4 in EA Appendix B: IJR Traffic Results and Safety Analysis, Appendix B: Traffic Results).

For example, as shown in Table 4 in EA Appendix B: IJR Traffic Results and Safety Analysis, Appendix B: Traffic Results, at location A1, shown in Figure 4 in EA Appendix B: IJR Traffic Results and Safety Analysis, Appendix B: Traffic Results, a 6-lane facility would have four percent less traffic demand than an 8-lane facility at that location. A 6-lane with C/D lanes would be expected to have two percent more traffic than the 8-lane facility base forecast, according to the Metroplan CARTS regional travel demand model. A1, A2 and A3 locations along the study corridor are shown in Figure 4 in EA Appendix B (IJR Traffic Results and Safety Analysis), Appendix B Traffic Results. Induced demand during the PEL was added as additional through traffic.

Based on more detailed Metroplan modeling in the NEPA phase, additional induced demand was added to I-30 due to traffic being diverted from the Broadway and Main Street river crossings into and out of downtown Little Rock as well as additional traffic drawn to the I-30 corridor from the south.

In addition to the induced demand added to the I-30 corridor and local ramps, in the NEPA phase, downtown streets were analyzed with the induced demand in Little Rock and North Little Rock to better understand the impacts of each of the action alternatives.

The need determination is also faulty because it does not take into consideration emerging trends that will impact highway users and congestion. For example, the DEA does not consider the possibility that people will use alternative forms of transportation to travel to and from destinations or that people are increasingly working closer to where they live, which would cut down on the overall number of commuters.

Additionally, drivers' increasing use of traffic prediction software such as Google Maps means that traffic on the various roadways is not static, with drivers taking the same route every day, but dynamic and shifting with the levels of congestion on the various available routes. As use of these types of software become more common, drivers will automatically reroute themselves to the least crowded route at that time, reducing the overall congestion on I-30 and redistributing it to other roads. The DEA recognizes, but does not account for this equalizing behavior in its predictions of congestion on I-30. Specifically, the DEA states, "The VISSIM microsimulation model used is a static model rather than a dynamic assignment model meaning that the model does not reassign traffic based on congestion. Therefore, it can be assumed that as congestion builds to oversaturated extreme gridlock conditions, motorists will seek alternative routes." EA Appendix B p. ES-4.

***Response**: The Action Alternatives do add capacity to the corridor and do induce traffic. Induced demand due to capacity improvements, and the effect that will have on growth in the study area, is discussed in Section 3.16 of the EA, "Does the Project Have Any Indirect and Cumulative Effects?", and also in Appendix A, the Indirect Effects Technical Report, and Appendix R, the Cumulative Effects Technical Report. Table 9 of the EA shows the increased volumes that are anticipated due to induced demand. The traffic volumes were developed with information from the Metroplan regional travel demand model CARTS and incorporated regional traffic modeling.*

The Metroplan travel demand model is a traffic assignment model used to forecast traffic. The Metroplan model does take into account driver avoidance of congested routes by selection of alternative routes. The micro-simulation model, VISSIM, is a static model, and was used to simulate traffic conditions for vehicles entering the corridor. Fifteen assignments were run for each alternative to develop randomness in travel behavior.

The team used FHWA's Traffic Analysis Toolbox Volume III: Guidelines for Applying Traffic Microsimulation Modeling Software, 2004. This is the national standard of how

microsimulation models like VISSIM are to be used in projects like 30 Crossing. Once the VISSIM model was completed it was verified by the study team comprised of nationally-recognized experts, including Professional Transportation Operations Engineers, with decades of experience modeling complex interstate projects. The models were also verified by Metroplan, ARDOT and FHWA.

The team collected travel time runs in the field to aid in the calibration of the VISSIM models. Also, ARDOT cameras were used to observe traffic. Team personnel drove the corridor during peak travel times to understand congestion points and verify vehicle queues. National Performance Management Research Data Set data (formerly called HERE data) was also used to verify travel speeds in the corridor.

Models were then reviewed and verified by ARDOT, Metroplan and FHWA staff. Traffic model results were then presented to the 30 Crossing Technical Working Group with no recorded comments on the traffic volumes in the existing VISSIM models. Traffic model results were then presented to the public with no recorded comments on the traffic volumes in the existing VISSIM models.

For a complete description of the traffic modeling efforts on this project, see EA Appendix B: IJR Traffic Results and Safety Analysis, Appendix B – Traffic Results Addendum Chapter 3.0 Traffic Volumes, describes how the traffic volumes were developed.

Traffic forecasts were developed based on ARDOT's Arkansas State Highway and Transportation Department, Traffic Handbook, 2013. The handbook documents traffic forecasting data collection, and procedures as required in 23 CFR 500 Subpart B. The Traffic Handbook uses these references:

- *A Policy on Geometric Design of Highways and Streets, American Association of State Highway and Transportation Officials (AASHTO), 2011*
- *Highway Capacity Manual, (HCM 2010), Transportation Research Board*
- *Traffic Monitoring Guide, Federal Highway Administration, 2001*
- *AASHTO Guidelines for Traffic Data Programs, AASHTO 2009*
- *ARDOT Technical Services Field Manual, ARDOT, Planning and Research Division, Technical Services (Renamed as Traffic Information System Section in 2013), 1988*
- *Highway Performance Monitoring System Field Manual, Federal Highway Administration, Office of Highway Policy Information, 2013*

- *NCHRP Report 365 – Travel Estimation Techniques for Urban Planning, 1998*
- *NCHRP 01-37A: Development of the Guide for the Design of New and Rehabilitated Pavement Structures, 2002*

In summary, the methodology for projecting traffic with and without the improvements was reviewed by FHWA, Metroplan and ARDOT. The latest available Metroplan travel demand model was used to develop traffic for all future alternatives. The alternatives with more capacity do induce traffic in the corridor. These changes are represented in the text. The traffic volumes were developed using the Metroplan regional travel demand model thus incorporated regional traffic modeling.

Emerging technologies are addressed in EA Appendix B (IJR Traffic Results and Safety Analysis), Appendix B6, Emerging Technologies. Developing and evolving aspects of transportation technology are being considered in the development of the 30 Crossing project. It is anticipated that these technologies will be a standard part of traveling in the coming decades. Consideration of Intelligent Transportation System (ITS) technologies and congestion management strategies are ongoing. These considerations, will enable ARDOT to respond efficiently in adapting and retooling roadways to accommodate new technologies. An assessment of these technologies is presented in EA Appendix B: IJR Traffic and Safety Analysis, Appendix B6 -Emerging Technologies. The conclusion of the analysis is that any improvement in traffic congestion due to the conversion of a large percentage of the vehicle fleet into connected and autonomous vehicles is probably at least 30 years in the future.

Comment 4

Finally, further study should be done on the DEA's assumption that eliminating congestion will necessarily result in safer roads. In fact, a recent study by the Victoria Transport Policy found exactly the opposite - that "crash rates tend to decline with increase traffic congestion, and congestion reductions that increase traffic speeds tend to increase crash severity and therefore traffic casualties." Exhibit C, "Smart Congestion Relief," Victoria Transport Policy Institute, July 24, 2018, at 18. Additionally, accidents occurring during periods of congestion are generally not as severe as those occurring in free-flowing traffic.

Exhibit D, Maryland State Highway Administration Report, Relationship Between Congestion Levels and Accidents, July, 2003.

This is not to say that maintenance and some improvements on the existing roadbed and a new bridge are not needed on the I-30 corridor, but the capacity problems can be resolved by alternatives that have not been adequately considered in the EA.

***Response**: Congestion is only one factor contributing to safety issues on the I-30 and I-40 corridor. The purpose and need for the project addresses many of the roadway deficiencies that contribute to an unsafe roadway, including ramp lengths that are too short, interchanges that are too close together, curves that are too sharp, left exits, and shoulders that are either missing or deficient. The AASHTO Highway Safety Manual identifies these features as contributing to crashes. A predictive analysis done for the project using the software developed by FHWA, Enhanced Interchange Safety Analysis Tool (ISATe), confirmed that these deficiencies do contribute to the safety issues on the corridor and that the project improvements do reduce the potential for crashes to occur.*

With respect to congestion, KA (fatal and serious injury) crashes on this corridor were compared with other similar facilities (6-lane urban freeways) throughout the state that are not as congested as I-30. The KA rates on these less congested roadways are much lower than on I-30. The ISATe results indicated that the Preferred Alternative would reduce the number of KA crashes.

There are a number of research reports that have evaluated the relationship between safety and congestion. For instance, the Victoria Transport Policy Institute's report Smart Congestion Relief (24 July 2018) states that "crash rates tend to decline with increase traffic congestion". It references two reports to support this statement. However, neither report actually supports this statement. The Handbook of Transportation Engineering, Chapter 12 (Kockelman 2011) states that "crash rates generally appear to rise as congestion sets in" (page 4). The Relationship Between Road Safety and Congestion on Motorways (Marchesini and Weijermars 2010), a literature review of other research, states that there are inconsistencies with the research it reviewed and thus no conclusion can be made on the relationship between crash frequency and congestion levels. The Maryland State Highway Administration Report, Relationship Between Congestion Levels and Accidents, July, 2003 also concludes that crash rates increase with increases in freeway volume.

The same sentence referenced above in the Victoria Transport Policy Institute report also states that "congestion reductions that increase traffic speeds tend to increase crash severity and therefore traffic casualties", again referencing the same two reports. It is widely understood that slower speeds generally result in less severe traffic crashes, governed by the basic principles of the laws of motion. However, what is not mentioned in this report is that it is also widely

understood that there is a relationship between speed differential and crashes (again, governed by the basic principles of the laws of motion), including crash severity. The Marchesini and Weijermars 2010 report makes this hypothesis, but found little literature available on the subject. The Highway Safety Manual, published by the American Association of State Highway and Transportation Officials, also acknowledges this general relationship.

The same Victoria Transport Policy Institute report also compares TomTom Traffic Index 2014 data with average traffic deaths per 100,000 residents (no reference is made as to how this information is obtained). This comparison is made to support its statement that "casualty rates (injuries and deaths) often increase when congestion is eliminated." This comparison says that the five most congested US cities have a fatality rate about half of the ten least congested cities. A comparison of 2016 TomTom Traffic Index data (TomTom does not make available its archived data online) and CDC 2009 fatality data by metro area (the most recent data available in a report online), however, shows the relationship is more complicated. When comparing the top 80 most congested cities in the US (only 80 are given by TomTom), the fatality rate relationship is not linear. There are many less congested cities that have fatality rates comparable to the more congested cities, if not less.

The conclusion to be drawn from these studies is that, while there is a clear linear relationship between congestion and crashes, the relationship between congestion and severe injury crashes is not clear-cut and is probably influenced greatly by site-specific conditions. The geometric deficiencies that are addressed by the Preferred Alternative (ramp lengths that are too short, interchanges that are too close together, curves that are too sharp, left exits, and shoulders that are missing or not wide enough) have, however, been shown to contribute to both crashes and severe injury crashes.

Comment 5

THE ALTERNATIVES ANALYSIS IS INADEQUATE.

40 CFR §1502.14, relative to the assessment of alternatives, is referred to as "the heart" of an EA or EIS. This section should present the environmental impacts of the proposal and the alternatives in comparative form, sharply defining the issues and providing a clear basis for choice among options by the decision maker and the public.

Among other things, the agency is to:

(a) Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated;

(b) Devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits;

(c) Include reasonable alternatives not within the jurisdiction of the lead agency; and

(d) Include the alternative of no action.

The DEA seriously considers essentially only two alternatives, each with two sub-alternatives relative to several interchanges and collection/distribution lanes. The No-Action alternative was not "rigorously explored and objectively evaluated," nor were a number of other reasonable and feasible alternatives that are given only passing reference, if mentioned at all in the DEA. Some of those will be mentioned herein.

Alternative Routes Are Not Considered

The DEA is based upon the premise that the only acceptable route for traffic into and/ or through central Little Rock is upon I-30, a premise that excludes other alternatives for achieving the goals of reducing drive time, increasing safety, etc. Alternatives that would involve the expansion and improvement of existing streets in Little Rock and North Little Rock as major arteries from I-30, I-430 and I-40 into the downtown areas were rejected without serious consideration. See comments of Tom Fennell, for example.

Response*: A summary of the thorough alternatives analysis that was conducted during the PEL and NEPA phases is presented in EA Appendix C: Alternatives Analysis Technical Report. The Alternatives Analysis Technical Report summarizes the extensive evaluation of alternatives that began during the PEL study with the evaluation of the universe of alternatives (see PEL Appendix D: Alternatives Development and Evaluation: reference website 30 Crossing.com) and continued into the NEPA phase. These alternatives were developed by the project team with input from the public during the public outreach which was a part of the PEL and NEPA processes (refer to EA Appendix D and E). All alternatives suggested by the public were evaluated, including alternative routes and alternatives to widening I-30. For example, Appendix C devotes an entire attachment to the evaluation of the Boulevard Alternative suggested by Tom Fennell. Alternatives that were determined not to meet the purpose and need for the project were not discussed in detail in the EA, but are discussed in Appendix C.*

An evaluation of the arterial network was performed as well, and is summarized in EA Appendix B: IJR Traffic Results and Safety Analysis. Metroplan's policy is to perform an assessment of the regional arterial network (RAN) to identify improvements to arterials prior to highway widening. A RAN analysis was presented in the EA, Appendix B: IJR Traffic Results and Safety

Analysis, Appendix B Traffic Results, Section 4.5. This section analyzed the regional arterial network from a planning and engineering point of view. The conclusions of the analysis were that although there are a few arterial improvements identified that could improve operations within the 30 Crossing project limits, all come at a high cost regarding right of way, structural impacts, and/or railroad impacts. The urban environment and location of the Arkansas River render few opportunities to increase the roadway capacity of the regional arterial network to improve operations on I-30.

CEQ guidance (40 CFR Parts 1500-1508) for the recommended length of an EA excluding appendices is 15 pages. This EA is 123 pages without the appendices. Section 2 of the EA (Alternative Development), which is a high-level summary of the exhaustive and thorough alternatives analysis that was performed during the PEL and NEPA phases, is 40 pages alone. Details on the material summarized in the EA are found in the EA appendices.

Comment 6

Use of HOV/Public Transit Lanes Were Not Considered

Alternatives such as the creation and use of high-occupancy lanes or lanes for use of buses and other public transit vehicles during specific times of the day on the existing I-30, I-40, I-630 and other major highways were not given serious consideration. The Project is conceived and designed primarily to accommodate single-passenger vehicles rather than attempting to reduce the number of vehicles by encouraging and accommodating a public transit system that would reduce the number of vehicles on the highways.

The DEA Does Not Consider Congestion Pricing Options

The DEA fails to consider the option of "congestion pricing," which is emerging as a viable and cost-efficient solution to congestion arising during peak travel times. The Federal Highway Administration (FHWA) has defined "Congestion Pricing" as "a way of harnessing the power of the market to reduce the waste associated with traffic congestion." Exhibit E, FHWA Congestion Primer. According to the FHWA, congestion pricing "represents the single most viable and sustainable approach to reducing traffic congestion." Exhibit E, at 4. See also, Exhibit F "The Only Hope for Reducing Traffic," Eric Jaffe, Oct. 19, 2011. Congestion pricing options can include such options as HOT lanes, which allow cars with multiple passengers to utilize the lane without paying a toll, or single passenger cars to pay a toll. Other options include tolls during certain times of day or for certain sections of the road. Congestion pricing also fulfills the joint purposes of reducing congestion on the

highway while also raising money for roadway maintenance. This option is being seriously considered in numerous other metropolitan areas and should be considered as an option for Little Rock.

The DEA Does Not Consider A Reversible Lane Option

Another option being successfully utilized in other metropolitan areas is employing reversible lanes that flow in the direction of the congestion during peak travel times. See Exhibit G, Advantages and Disadvantages of Reversible Managed Lanes Systems, Georgia Department of Transportation, January 2010. Because the traffic during non-peak times is not congested, the proposed expansion will go mostly unutilized. Constructing less extra lanes to be utilized specifically to alleviate construction during peak hours would reduce costs for the project while still achieving the same results. This option has not been examined in the DEA.

***Response**: EA Appendix C: Alternatives Analysis Technical Report summarizes the evaluation of congestion management strategies performed in the PEL. The congestion management strategies evaluated in the PEL study are described in detail inthe PELAppendix D: Alternatives Development and Evaluation, available at https://connectingarkansasprogram.com/interstate-30-pel-report. . These strategies were developed by the project team based on suggestions received from the public during public outreach in the PEL study.*
The following strategies scored relatively low in Level 2A screening in the PEL for the reasons given and not advanced further:

- *Managed lanes are defined as a set of lanes where operational strategies are proactively implemented and managed in response to changing conditions. Managed lanes are segregated, typically by barrier, from general use lanes in order to reduce weaving and increase capacity. Access to the managed lane is restricted to specific locations. Variable tolling can be used to regulate usage of the managed lanes, with higher prices at time of peak demand. High Occupancy Vehicle (HOV) and High Occupancy Toll (HOT) lanes, a type of managed lanes in which high occupancy vehicles are either exclusively allowed or allowed without a toll, were evaluated and were not recommended. It was determined t that the ingress and egress points to the managed lanes system would have to occur in areas where weaving due to traffic entering and leaving the highway would also be occurring, creating new conflict points and potential safety issues. Conflict points are defined as locations on the highway where the path of a vehicle crossing, merging with, or diverging from the roadway*

intersects, or conflicts, with the path of another vehicle performing a similar maneuver. An example of one such location would be the I-630/I-30 interchange.

- *Reversible lanes were also not recommended due to the introduction of new conflict points and possible need to acquire ROW.*
- *Hard shoulder running was not recommended due to the potential for passenger vehicles to conflict with the operation of emergency vehicles.*
- *Land use policy is a long-term strategy that has the potential to reduce peak hour traffic in the future, but is dependent on other agencies operating independently of ARDOT.*

The following passed the Level 2 A screening in the PEL and were advanced due to their effectiveness in improving peak hour mobility:

- *Information systems/advanced traveler information was recommended and is included in the Preferred Alternative.*
- *Ramp metering is an effective congestion management strategy that is not precluded from being implemented in the future.*
- *Wayfinding/signage along the corridor will be improved with the Preferred Alternatives, helping travelers to make decisions.*
- *Transportation system management (TSM) improvements such as variable signal timing that can be adjusted based on traffic conditions is not applicable to freeways, but can be used to control conditions on connecting roadways. Signals installed as part of the Preferred Alternative will be interconnected in order to support this capability.*
- *Travel demand management(TDM) includes alternative work hours, telecommuting and ridesharing. Although these are effective congestion management strategies supported by ARDOT, it is not within the ability of ARDOT to implement these measures.*
- *New and widened shoulders will provide more efficient congestion management with respect to stalled vehicles and incident management*

These congestion management strategies are either included in the Preferred Alternative or are not precluded (ramp metering and TDM).

Strategies such as bus on shoulder, temporary hard shoulder running, and managed lanes could possibly be implemented at a later date if necessary; however, updates to infrastructure, policy and/or law may be necessary prior to implementation of these strategies.

Comment 7

The DEA Completely Ignores Public Transit

The Project does nothing for the considerable number of people in Little Rock and the surrounding area who have no means of dependable and safe privately-owned transportation. According to facts developed by Imagine Central Arkansas, *over 25% of the households who live south of the River Market District in Little Rock, including those south of I-630, do not own automobiles.* (See 30 Crossing Content for Quapaw Quarter Association I-30 Group, p. 3). This is a startling figure. Many of those households contain elderly persons or low-income persons who must depend on public transit for their transportation needs. Persons with those transportation needs are not limited to the geographic area mentioned above, but exist throughout Pulaski County and in surrounding areas.

Yet, the DEA does not discuss in any meaningful way any plan or program for meeting the needs of this considerable portion of the population. There is no discussion of improvements to public transit. Most major cities rely heavily upon clean, safe and efficient public transit to accommodate the transportation needs of all components of the public - not just the elderly and low-income - and at the same time reduce the demands on the capacity of the existing highways. As noted above, the 30 Corridor Project is designed primarily to accommodate the needs of the single-passenger private automobile user.

The DEA also did not consider or discuss the development of a light rail system connecting downtown Little Rock with the major suburban areas, such as Benton, Conway, Cabot and other areas. Other cities have long operated light rail systems as a means of safely and efficiently moving people from suburbs to inner-cities and back. Parking lots located at light rail stations along the routes provide convenience for the commuters, save energy, and remove many vehicles from the highways.

Response*: As discussed in Section 1 of the EA, accommodating existing and future transit and improving opportunities for east-west connectivity, including bicycle and pedestrian connectivity, are among the goals of the project. The area where a large percentage of persons do not own automobiles is served buses operated by Rock Region Metro. The Preferred Alternative would include C/D roads, which would allow the buses to move between Little Rock and North Little Rock more quickly and efficiently. The Preferred Alternative provides sidewalks and signals at intersections, improving the safety of pedestrians, as listed below:*

Sidewalks:

- ***2nd Street*** *- On the south side of 2nd Street, there will be sidewalks with buffers to the street the entire length from Cumberland Street to Mahlon Martin Street. Additionally, wheelchair ramps will be installed at each intersection. On the north side, the existing sidewalk will remain*

as is from Cumberland Street to Sherman Street. New sidewalk with buffer and wheelchair ramps will be installed from Sherman Street to Mahlon Martin Street.

- ***3rd Street** – Existing sidewalk will remain in place for most of the corridor. On the south side from the existing SB frontage road to Mahlon Martin Street, sidewalks with a buffer and wheelchair ramps will be installed.*
- ***4th Street** - Existing sidewalk will remain in place for most of the corridor. On the south side from approximately 250' west of the existing SB frontage road to Mahlon Martin Street, sidewalks with a buffer and wheelchair ramps will be installed.*
- ***Northbound and Southbound Frontage Roads** – In the existing conditions, there are not sidewalks on the frontage roads north of 6th Street. This project will provide sidewalks with buffers and wheelchair ramps on the west side of the SB frontage road and on the east side of the NB frontage road.*

Traffic Signals

In downtown Little Rock, the most significant traffic increases are expected on 2nd Street, 3rd Street and 4th Street. On these corridors, new signals or modified signals are being added for the Preferred Alternative at the following locations:

- *2nd Street at Cumberland Street*
- *2nd Street at River Market Avenue*
- *2nd Street at Sherman Street*
- *2nd Street at Mahlon Martin Street*
- *3rd Street at Rock Street*
- *3rd Street at River Market Avenue*
- *3rd Street at Texas Turnaround*
- *3rd Street at Mahlon Martin Street*
- *4th Street at Rock Street*
- *4th Street at River Market Avenue*
- *4th Street at SB Frontage Road*
- *4th Street at NB Frontage Road*
- *4th Street at Mahlon Martin Street*
- *Capitol Avenue at SB Frontage Road*
- *6th Street at SB Frontage Road*

The evaluation of transit alternatives that occurred during the PEL and NEPA phases is summarized in EA Appendix C: Alternative Analysis Technical Report. Evaluation of transit alternatives began during the PEL (see PEL Appendix D: Alternative Development and Evaluation), available at https://connectingarkansasprogram.com/interstate-30-pel-report.

A transit study conducted during the PEL Study (Attachment B to the Level 2 Screening in PEL Appendix D: Alternative Development and Evaluation) indicated that transit would not divert sufficient trips from auto to transit on I-30 in 2040 to improve driving conditions from LOS F to LOS E. The transit analysis concluded that a minimum of 795 vehicles passing over the I-30 Arkansas River Bridge would need to be diverted from auto to transit in 2040 to improve the LOS from LOS F to LOS E with the existing 6-lane facility. However, the maximum feasible number of vehicles that can be diverted by transit is 650, assuming route headways of 10 minutes. Therefore, even under the best-case scenario, there is a deficit of nearly 150 vehicles during the 2040 No-Action peak hour to achieve LOS E.

In addition, transit alternatives would not address roadway and bridge deficiencies or navigational safety, all of which are components of the project purpose and need. ARDOT agrees that transportation challenges have to be addressed through a multi-faceted approach with solutions spanning across all modes. If regional transit agencies such as Rock Region Metro implement mass transit improvements, it will certainly contribute to improving the overall regional transportation system performance.

During the PEL screening process, transit alternatives were considered as complementary rather than as a solution that could meet the congestion relief component of the project purpose and need on their own. Light rail (Street Car) was specifically evaluated and screened on in Level 2A of the PEL. The Central Arkansas Transit Authority (CATA) Strategic Plan (10-year plan) does not include light rail improvements. Light Rail is part of CATA's long range plan; however, CATA has indicated that they would implement Bus Rapid Transit (BRT) before implementing Light Rail along future Light Rail corridors. This alternative was screened out as a result of CATA not including light rail in their 10-year Strategic Plan and the lack of a dedicated funding source identified in the Metroplan LRMTP. Metroplan modeled Light Rail under the category of Fixed Guideway which included both Light Rail and Commuter Rail and found that together under the most aggressive "Supportive" land use policy, fixed guideway attracts approximately 6,400 person trips.

ARDOT has worked with Rock Region Metro on the 30 Crossing project to identify ways to accommodate transit in the corridor, and Rock Region Metro serves as a member of the 30 Crossing Technical Work Group.

Comment 8

New and Developing Transportation Technology Was Not Considered

It is surprising that, in this age of rapidly developing technology in every area of our lives, including automobile design and operation, and in the design and construction of highways to assist drivers in making intelligent choices, there is no consideration given in the DEA to the incorporation of currently developing technology in the 30 Corridor Project. Such technology is currently being used in other states with more complex traffic problems than those presented by the Project, and in other countries.

In addition, the DEA does not consider and discuss current development of alternative means of transporting people, and the potential effect that those alternative means of transport may have on the highways. The use of "for hire" vehicles, such as Uber, is increasing and has the potential to reduce the number of privately-owned vehicles on the highways.

It is no answer to merely say that technology such as self-driving cars and highway sensors to aid in safe and efficient driving are not yet fully developed. It is only a matter of time before they are, and the 30 Corridor Project would be much more economical and foresighted if the work to be performed were limited to the basic amount required for meeting the average demand, rather than peak demand, and allow for the future opportunity to modify the highway with the technology mentioned above when it is proven and readily available in a few years.

Response*: States and communities are dealing with an unprecedented amount of potential change as they plan for their transportation needs. Within their next planning horizon, States and MPOs need to decide how best to address the increasing deployment of emerging technologies such as automated, connected, electric and shared-use vehicles (ACES) and complementary technologies. As with many technologies in their infancy, there is uncertainty about likely outcomes and how to plan for them. Appendix B6 to EA Appendix B (IJR Traffic Results and Safety Analysis), titled Planning for Emerging Technologies, addresses some of these questions. The report looks at the following questions:*

- *What are the transformative emerging technologies?*
- *What factors could delay or accelerate the impact of these technologies?*
- *How can we best manage competing demand and interest of numerous and varied stakeholders?*
- *What does a smart city look like?*

The report concludes that planning for the future should include the installation of a communications backbone. The deployment of traffic surveillance and monitoring intelligent transportation system (ITS) infrastructure will allow the operational efficiency of the improved roadway corridors to maximize the return on investment for the planned improvements. The traditional ITS deployment of traffic surveillance cameras, vehicle flow monitors and dynamic message signs will allow for traffic incidents to addressed in a more efficient manner.

Alternative means of travel using "for hire" vehicles are referred to as transportation network companies (TNCs). TNCs are changing the way people get around but they come with both pros and cons. TNCs provide more options for people which is a good thing but their use may increase vehicle miles traveled as TNC drivers circulate around looking for customers. The New York Times recently published an article titled Uber Hit With Cap as New Your City Takes Lead in Crackdown, (August 8, 2018). New York became the first major American city on Wednesday to halt new vehicle licenses for ride-hail services, dealing a significant setback to Uber in its largest market in the United States. "this action will stop the influx of (Uber) cars contributing to the congestion grinding our streets to a halt." There is still much to learn from TNC and their impact on the transportation system.

Developing and evolving aspects of transportation technology are being considered in the development of the 30 Crossing project. It is anticipated that these technologies will be a standard part of traveling in the coming decades. Consideration of Intelligent Transportation System (ITS) technologies and congestion management strategies are ongoing. These considerations, will enable ARDOT to respond efficiently in adapting and retooling roadways to accommodate new technologies. An assessment of these technologies is presented in EA Appendix B: IJR Traffic and Safety Analysis, Appendix B-6 – Emerging Technologies. The conclusion of the analysis is that any improvement in traffic congestion due to the conversion of a large percentage of the vehicle fleet into connected and autonomous vehicles is probably at least 30 years in the future.

Comment 9

The "No Action" Alternative and Variations Thereon Were Not Adequately Considered

The DEA treats the No-Action Alternative in a summary fashion. No one seriously contends that the I-30 bridge over the Arkansas River does not require replacement in the near future. However, other improvements to the roadbed of 1-30 could be made to improve

traffic flow and make driving on the roadbed more safe, but do not require the major rebuilding that the 30 Crossing Project calls for. Those improvements could be done at far less expense than the major overhaul of the I-30 corridor, leaving funds available to expend on other projects that are also needed, but for which funding would not otherwise be available. No such "hybrid" action alternative was considered.

Additionally, the Federal Highway Administration has recognized that many congestion problems can be alleviated or minimized by utilizing "operational solutions" rather than expansion. See Exhibit H, "Operational Solutions to Traffic Congestion," FHWA, December 2004. These management techniques should be examined in conjunction with the No-Action Alternative to determine if sufficient improvement in congestion can be gained from them without the suggested expansion.

***Response**: NEPA requires that a true No-Action Alternative, one that involves no improvements, be evaluated along with Action Alternatives to provide a baseline condition for measurement of the performance of the Action Alternatives.*

However, operational solutions were evaluated. A summary of the alternatives analysis is presented in EA Appendix C: Alternatives Analysis Technical Report. The Alternatives Analysis Technical Report summarizes the extensive evaluation of alternatives that began during the PEL study with the evaluation of the universe of alternatives (see PEL Appendix D: Alternatives Development and Evaluation: available at https://connectingarkansasprogram.com/interstate-30-pel-report) and continued into the NEPA phase.

During the PEL, there were four basic scenarios evaluated in Level 2B: 6-lane (no main lane widening), 8-lane (addition of one main lane or C/D lane in each direction), 10-lane (addition of two main lanes or two C/D lanes in each direction), and 12-lane (addition of three main lanes in each direction). As part of each of these basic scenarios, complementary alternatives that had passed the Level 2A screening were included. Many of these are what would be considered "operational improvements": ramp consolidation/elimination, intersection improvements, bottleneck removal, auxiliary lanes, roadway shoulder improvements, frontage road improvements, main lane pavement rehabilitation, and horizontal/vertical curve improvements. Consequently, the No-Action (6-lane) along with these operational improvements (complementary alternatives), was indeed compared with three other basic scenarios in the PEL. The 6-lane alternative (no main lane widening, with operational improvements and replacement of the Arkansas River Bridge) scored very poorly with respect to mobility and safety, compared with the 8-lane C/D and 10-lane basic scenarios, and failed the Level 2B screening.

The purpose of this project is to increase the safety of vehicular traffic on I-30 and I-40 by correcting geometric deficiencies, improve the condition of the roadway by modernizing infrastructure and maintaining a state of good repair, improve navigational safety on the Arkansas River, correct the I-30 Arkansas River Bridge deficiencies, and reduce existing and future traffic congestion by improving mobility on I-30 and I-40. The intent of the project improvements is to provide a reliable transportation corridor between Little Rock and North Little Rock that is structurally sound and improves safety and mobility by improving the operations of the multiple interchanges in the corridor. The I-30 Arkansas River Bridge would be replaced with a new structure, correcting the functional and structural deficiencies and navigation safety issues.

The close proximity of five high volume interchanges (Hwy 67/I-40, I-40/I-30, I-30/Broadway, I-30/Hwy. 10, and I-30/I-630) and a major river crossing in the 30 Crossing corridor introduces a complex interdependence between each of these major transportation components. Due to this interdependence, improvements to the geometric and structural deficiencies of any one component relates directly to the other components in close proximity to it. Although the Arkansas River Bridge is the most critical component of the 30 Crossing project, corrections to its structural and geometric deficiencies tie directly into the improvements of the components adjacent to it. The major geometric deficiency for all of the interchanges and the River bridge is insufficient space and distance necessary to safely perform the merging and weaving maneuvers that are typical when traveling through and beyond a major interchange. The result of the similar deficiencies and close proximity of each interdependent component is that operational improvements for each component blend into those adjacent to it resulting in an increase of capacity throughout the project.

Congestion management strategies alone will not solve the congestion problems anticipated for I-30 and I-40. Various congestion management strategies were evaluated in the PEL study, and summarized in Appendix B of the EA. These strategies were developed by the project team based on suggestions received from the public during public outreach in the PEL study.

- *Information systems/advanced traveler information was recommended and is included in the Preferred Alternative.*
- *Managed lanes are defined as a set of lanes where operational strategies are proactively implemented and managed in response to changing conditions. HOV lanes, a type of managed lanes, were evaluated and were not recommended due to the fact that the ingress and egress points to the managed lanes system would have to occur in areas where weaving due to traffic entering and leaving the highway would also be occurring, creating new conflict points and potential safety issues. The EA does state*

however that bus on shoulder, also a type of managed lane, is not being precluded and could be implemented in the future if Rock Region would be interested.

- *Reversible lanes were also not recommended due to the introduction of new conflict points and possible need to acquire ROW.*
- *Ramp metering is an effective congestion management strategy that is not precluded from being implemented in the future.*
- *Hard shoulder running was not recommended due to the potential for passenger vehicles to conflict with the operation of emergency vehicles.*
- *Travel demand management includes alternative work hours, telecommuting and ridesharing. Although these are effective congestion management strategies supported by ARDOT, it is not within the ability of ARDOT to implement these measures.*
- *Transportation system management (TSM) improvements such as variable signal timing that can be adjusted based on traffic conditions is not applicable to freeways, but can be used to control conditions on connecting roadways. Signals installed as part of the Preferred Alternative will be interconnected in order to support this capability.*
- *Wayfinding/signage along the corridor will be improved with the Preferred Alternatives, helping travelers to make decisions.*
- *Land use policy is a long-term strategy that has the potential to reduce peak hour traffic in the future, but is dependent on other agencies operating independently of ARDOT*
- *New and widened shoulders will provide more efficient congestion management with respect to stalled vehicles and incident management*

Strategies such as bus on shoulder, temporary hard shoulder running, and managed lanes could possibly be implemented at a later date if necessary; however, updates to infrastructure, policy and/or law may be necessary prior to implementation of these strategies.

*Developing and evolving aspects of transportation technology are being considered in the development of the 30 Crossing project. It is anticipated that these technologies will be a standard part of traveling in the coming decades. Consideration of Intelligent Transportation System (ITS) technologies and congestion management strategies are ongoing. These considerations, will enable A**R**DOT to respond efficiently in adapting and retooling roadways to accommodate new technologies. An assessment of these technologies is presented in EA Appendix B: IJR Traffic and Safety Analysis, Traffic Results Addendum.*

Comment 10

Direct Impacts

"Direct impacts" are those that are caused by the action and occur at the same time and place. Among those could be the effects of the project on noise, air toxics, dust, nighttime lighting and other effects on people and things in the immediate area of the project.

There are many people, particularly minorities and low-income persons, who live in the immediate vicinity of the 30 Corridor Project, and who will be directly and continuously affected by some of the noise, air and light emissions from the Project. The DEA failed to adequately assess the impacts of those emissions on the human receptors who live within reasonable proximity to the I- 30 corridor - particularly the areas of intersection with other highways.

Response*: The EA includes detailed evaluations of the noise, air, and visual impacts of the project in Appendix I: Traffic Noise Technical Report, Appendix K: Visual Impacts Technical Report, and Appendix Q: MSAT Technical Report*

The noise study involved modeling of future noise levels under the No-Action and Action Alternatives at 1022 receivers, representing 1612 receptors, within the project limits along I-30 and I-40. No substantial increases in noise levels were found to result from any of the Action Alternatives at any locations; however, noise levels for the Preferred Alternative were found to exceed the Noise Abatement Criterion at 224 receptors. Fifteen noise barriers were evaluated to mitigate noise effects, and three barriers were found to be reasonable and feasible. These three barriers would mitigate noise effects at 253 residences.

Visioning workshops were held throughout the project to get stakeholder and public input on how to best blend in the project improvements with the existing visual environment. This input shaped the alternative development process. The visual impact evaluation determined that the scale, massing and construction materials of the Preferred Alternative would be similar to the existing facility and that there would be minimal visual changes. The changes at the Hwy. 10 interchange were determined to be beneficial, due to the enhanced views and expanded green space that the removal of the existing ramps allows. By Arkansas' Shielded Outdoor Lighting Act, outdoor lighting installed using public funds must be shielded and must not emit any light higher than 90 degrees above the downward axis of the light pole. The Design-Builder will check for spill over lighting outside the ROW and provide appropriate directional assemblies or shielding to reduce impacts. The design will minimize any spillover lighting onto surrounding residential areas.

The 30 Crossing project is located in an area that has been in attainment of the 6 criteria pollutants in the National Ambient Air Quality Standards (NAAQS) for the past 25 years. A

Mobile Source Air Toxic (MSAT) quantitative analysis was prepared for the Preferred Alternative and No-Action Alternative for the existing year (2014), opening year (2021), and design year (2041). The geographic scope of the analysis extended well beyond the project limits on Hwy. 67 and I-630. Because of improvements in emissions technologies, total MSAT emissions will decline over time, even while vehicle miles traveled (VMT) increases. Under both the Preferred Alternative and No-Action Alternatives, total MSAT emissions would be lower than present levels in the design year by 88% with the Preferred Alternative being 0.3% to 0.9% less than the No-Action.

No significant noise, air, or visual impacts will occur as a result of the Preferred Alternative.

Comment 11

-- The DEA also fails to consider the potential archeological significance of the area. Although the existing highway may reduce the likelihood of any archeologically significant areas, the project area is part of the original Little Rock development and has not, to date, been the subject of a comprehensive archeological survey. Such a study should be done on any potential construction sites to ensure that any remaining artifacts can be recovered and preserved.

***Response**: A comprehensive archaeological study done for this project is included in Appendix G of the EA. The Area of Potential Effect (APE) was established in coordination with SHPO. The fieldwork and reports were conducted in accordance with the Advisory Council on Historic Preservation's "Protection of Historic Properties" (36 CFR Part 800), the Secretary of the Interior's "Standards and Guidelines for Archaeology and Historic Preservation" (Federal Register 48:44716–44742), and Appendix B of the Arkansas State Plan: Guidelines for Archeological Fieldwork and Report Writing in Arkansas Guidelines (Early et al. 2010). The Principal Investigator for the project met the Secretary of the Interior's "Professional Qualification Standards" (36 CFR Part 61). Fieldwork was conducted over the course of six weeks in July and August of 2015 and one day in June 2016, excavating shovel tests at 20 meter intervals for a total of 5,065 screened shovel tests with an additional 80 auger tests conducted at the Arkansas River. Seven new sites were recorded and one previously recorded site was revisited. No further work was recommended for the eight sites. The reports were reviewed and approved by SHPO in accordance with the Section 106 of the National Historic Preservation Act.*
Coordination with the Osage Nation, United Keetoowah Band of Cherokee Indians, Quapaw Tribe of Oklahoma, Tunica-Biloxi Tribe of Louisiana, Choctaw Nation of Oklahoma, and the

Caddo Nation occurred during the PEL phase and continued into the NEPA phase. The Osage Nation participating in the development of the Programmatic Agreement (PA).

One of the reasons the implementing regulations of Section 106 contain a post-review discovery provision is due to limitations on projects that may restrict subsurface investigations, such as a built-up urban environment. Post-review discoveries (aka buried resources), as well as off-site locations (staging areas), restraining conditions, and archeological monitoring, are addressed in the PA in consultation with SHPO, FHWA, and the Advisory Council on Historic Preservation for the current project. If archeological sites are discovered during construction, the sites and associated artifacts will be documented and curated following all applicable laws and according to the procedures laid out in the PA. The PA allows the Design-Build team flexibility in design, and in construction details such as the location of staging areas.

Comment 12

Indirect Impacts

One of the stated purposes and needs of the Project is to reduce traffic congestion and improve speeds of driving into and through Little Rock-North Little Rock. Notwithstanding this, the two alternatives proposed by ArDOT and FHWA simply shifts the congestion and traffic impediments to other portions of the interstate system in the Pulaski County area. This is actually acknowledged by ArDOT and FHWA, although it is difficult to find that acknowledgment in the DEA. This is because ArDOT and FHWA are attempting to "segment" the interstate system in Pulaski County to avoid addressing all of the congestion issues comprehensive!y.

The DEA "Segments" The Highway System To Avoid An Analysis of All Affected Areas.

The defining limits of the 30 Crossing Project are contained in the DEA. Generally, they are where I-30 intersects on the south with I-530 and I-440; on the northwest end at I-40 and State Highway 365 (MacArthur Drive); and at the intersection of 1-40 and Highway 67-167 on the northeast end. In addition, I-630 intersects with 1-630.

A considerable amount of traffic enters the 30 Corridor area from each of the terminus points mentioned above. Studies and computer modeling conducted by ArDOT and others have clearly shown that, if the 30 Crossing Project is constructed, it will simply shift congestion to other areas of I-30 between the south terminus of the Project, 65th Street, University Street and I-30, and I-430. For example, the VISSIM model clearly indicates a

reduction in travel speeds on I-30 outside the project area from 55 mph to 35 mph, indicating that the proposed project would not alleviate congestion but would simply move it further down the highway. See DEA, Appendix 1 Table 6. The modeling also showed that it would shift congestion onto I-630, causing slowing and backup.

This means that in order to achieve removal of congestion of I-30 between Little Rock and Benton, for example, it will be necessary to widen I-30 along the entire Little Rock-Benton corridor, and along the entire length of I-630. ArDOT and FHWA have attempted to isolate the 30 Corridor Project into a separate segment in an attempt to avoid determining the environmental impacts of resolving the traffic problems that will continue to exist in other segments.

A segmentation of a project is improper when the segmented project has no independent justification, no life of its own, or is simply illogical when viewed in isolation. *One Thousand Friends of Iowa v. Mineta,* 364 F.3d 890 (8th Cir., 2004); *Save Barton Creek Ass'n v. Fed. Highway Admin.,* 950 F.2d 1129, 1139 (5th Cir.1992); *Sierra Club v. Clinton,* 689 F.Supp.2d 1123 (D. Minn. 2010)

The 30 Corridor Project sector of I-30 has no logical terminus at any of the points used in the DEA. They are simply arbitrary points selected by the sponsors to avoid assessing the environmental consequences of the Project on other areas of I-30, I-630, I-40 and Highway 67/167. Consequently, the failure to evaluate the impacts of the 30 Crossing Project on the other segments of I-30 and on I-630 violates NEPA.

As a "miscellaneous" comment, we would observe that certain assumptions were made in the DEA to arrive at the conclusions supporting the Project. However, those same assumptions were not carried over into the appendices and applied to the other segments discussed above with regard to traffic volumes and congestion. The same assumptions should apply to any modeling or assessments of traffic volumes and congestion on any of the adjoining segments of I-30, I-40, I-630 and Highway 67/167.

***Response**: Although improved mobility is an important part of the project's Purpose and Need statement, complete elimination of congestion in an urban corridor as complex as this is often not feasible and is not a goal of this project. Rather, the project seeks to mitigate the congestion in the corridor in the most effective way possible within the limitations that exist for the project. Although traffic modeling does show congestion returning to the corridor by the design year of 2041, the improvements proposed in the 30 Crossing project will provide a significant improvement over the congestion that would occur if no improvements are made. In addition, the proposed improvements would ensure that this critical portion of*

the Central Arkansas Freeway System is built in such a way to be able to maximize the benefits of any future improvements made to adjacent portions of the system. This project is effective in reducing congestion within the project limits and has both logical termini and independent utility.

The project limits were defined based on documented needs in the I-30 and I-40 corridors, including bridge structural and navigational deficiencies, traffic congestion, safety, roadway geometric deficiencies; as well as points of major traffic generators

- *Congestion on I-30 and I-40 was documented to be most severe on the segment of I-30 from I-440/I-530 to I-40, and on I-40 from I-30 to Hwy. 67.*
- *Safety issues in the project corridor were related to geometric deficiencies: left exits, substandard ramp lengths, substandard curves, substandard shoulders, and closely spaced interchanges, which were found to be most prevalent on I-30 from I-440/I-530 to I-40 and on I-40 from I-30 to Hwy. 67*
- *The southerly project limit is a location where I-30, I-440, and I-530 converge, resulting in a significant change in traffic volumes*
- *The northerly project limit is a location where I-40 and Hwy. 67 converge, another location where traffic volumes change significantly*

The Preferred Alternative improvements do not make congestion on adjacent segments of I-630 and I-30 any worse than they currently are, or are predicted to be in the future under the No-Action Alternative. I-630 eastbound congestion in the morning and afternoon peak hours will be relieved by the Preferred Alternative, as the capacity of the I-630 eastbound to I-30 northbound ramp will be improved. I-30 northbound congestion in the morning and afternoon peak hours will be relieved by the Preferred Alternative, which relieves the bottleneck occurring due to weaving just north of the I-440/I-530 interchange.

The need for improvements to adjacent roadway segments is not a result of this project; it is an existing need that will continue to exist with the No-Action Alternative. The region is growing, which places demand on transportation facilities throughout the greater Little Rock area. Regional growth trends are described in the assessment from Metroplan below:

“Broadly speaking, 30 Crossing will accentuate the region's tendency to continue developing at low density, with the bulk of residential housing growth in peripheral locations (already growing at a comparatively fast pace) from which residents commute to jobs in the central area. The project's greatest impact is expected to be along the region's northeastern vector, the US 67-167 corridor including Sherwood, Jacksonville, Cabot, Austin and Ward. This is because the project (and ongoing widening of Hwy 67/167) will reduce commuting times to major job

concentrations in downtown and midtown Little Rock, south of the Arkansas River, yielding an acceleration of growth within the corridor over the short term. There could also be a secondary impact on the 1-40 corridor toward Maumelle, which has few locally-based jobs but many resident commuters. Additional growth may also happen in the East End area of Pulaski County and Southwest Little Rock where there is ample developable land. Multi-family housing growth may be boosted toward the immediate ends of the 30 Crossing project, in North Little Rock and Sherwood on the northeast as well as the southwest Little Rock/Otter Creek areas to the southwest. In the past, major freeway widenings have yielded substantial commercial/retail land use upgrades, but a major transition is underway in retailing due to e-commerce growth, which dampens growth prospects."

Comment 13

The DEA Does Not Address the Indirect Impact on Downtown Little Rock Traffic

In addition to creating congestion in other parts of existing highways, the proposed project will significantly increase traffic on certain streets in downtown Little Rock, such as 3rd Street, 4th Street, or 9th Street. No consideration is given in the DEA to the likely need for widening of streets to account for the increased traffic or any plans to accommodate such a need.

Response*: Traffic volumes in the downtown Little Rock area are discussed in the EA in Chapter 2: Alternative Development. Table 1 presents existing, Future No-Action, and Action Alternative project traffic volumes on downtown Little Rock streets. Each Action Alternative described in Chapter 2 is designed to account for the anticipated traffic volumes.*

Traffic volumes in the downtown Little Rock area were projected for the design year of 2041 by means of traffic modeling software. The methodology is described in EA Appendix G-3 (Appendix B: the 30 Crossing Volume Development Methodology). The traffic modeling was approved by ARDOT, FHWA, and Metroplan. The results of the modeling are in EA Appendix B: IJR Traffic and Safety Results. These volumes were then tested using Synchro/SimTraffic software. Based on review of the SimTraffic simulations, lane configurations for the Preferred Alternative (2B: 6-lane with C/D SDI) were modified on East 2nd Street, East 4th Street and Mahlon Martin Street. With these modifications, the streets in the downtown Little Rock can adequately convey the increase in traffic.

East 6th Street and East 9th Street will not see an increase in average daily traffic (ADT) over the Future No-Action Alternative as a result of the Preferred Alternative, and no improvements are proposed for those streets.

All improvements described above will be within existing ROW. The removal of the existing Hwy. 10 ramp and distribution of its traffic onto the streets above is preferred by the City of Little Rock and the Little Rock Chamber of Commerce.

The indirect effects of the increase in traffic on certain streets in downtown Little Rock is evaluated in EA Appendix A: Indirect Effects Technical Report. The streets experiencing a traffic increase are predominantly commercial areas. The Preferred Alternative would improve accessibility in comparison to the No-Action Alternative, and improves access to local businesses which could result in economic benefits attributed to shorter travel times, easier access, and reduction of costs driving to/from commercial and retail destinations.

According to local planners, the Preferred Alternative is not likely to induce growth in downtown Little Rock, as it is already highly developed. The noise analysis done for historic properties on East 3rd Street, East 6th Street and East 9th Street demonstrated no impacts due to noise. Increase in noise levels predicted within this area are less than 5 dBA, which is barely detectable by the human ear.
Indirect Impacts are evaluated in the Indirect Effects Technical Report, Appendix A of the EA. The indirect effects technical report looks at projects within the Area of influence (study area) that would be influenced or induced by the proposed project. The analysis determined that induced growth effects would include increasing the rate of development for 5 planned development areas. It was also determined that these planned developments would occur regardless of the proposed project. This was determined from the following information:

- *Feedback from local planners showed that in their professional opinion that these developments would be independent of the proposed project and market forces would influence these developments to a greater extent.*
- *Induced growth was not identified or anticipated for other areas in the AOI because most of the AOI is fully developed and highly urbanized and developed with some intermittent pockets of undeveloped areas. Undeveloped areas represent approximately 21 percent of the entire AOI. Approximately 12 percent of this area is unlikely to be developed due to natural features such as floodplains that would make it unsuitable for development, leaving only 9 percent of the entire AOI that have the potential for development.*

- *Furthermore, these areas are undeveloped primarily due to natural features such as parks, streams, wetlands, and floodplains. These areas are not likely to be developed due to these regulated features.*
- *Local growth trends also evaluated show a minor amount of growth. Both Little Rock and North Little Rock are experiencing a minor growth trend. According to U.S. Census Bureau population data, both cities' population numbers from 2010 to 2014 increased, from 193,524 to 197,706 for Little Rock and 62,304 to 66,810 for North Little Rock. This is approximately a 2 percent and 7 percent change for Little Rock and North Little Rock respectively.*

Comment 14

The DEA Does Not Address the Indirect Impact Of Induced Development Resulting From This and Other Projects

The creation or expansion of highways frequently drives the development of new housing areas and new commercial centers. Most major cities, such as Dallas and Houston, demonstrate this principal, and is also demonstrated by the development of the Bentonville - Fayetteville Arkansas area. Such development then changes the driving patterns of persons who may have formerly used such highways onto new roads.

The CEQ Regulations specifically recognize induced growth as an Indirect Effect that must be analyzed. 42 CFR §1058.8 specifically states that ""Indirect effects" may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems."

A conclusory statement that growth will increase with or without the project, or that development is inevitable, is insufficient; the agency must provide an adequate discussion of growth-inducing impacts. *Laguna Greenbelt, Inc. v. United States Dep't of Transp.,* 42 F.3d 517,526 (9th Cir.1994)

Yet, the DEA fails to adequately consider and analyze the indirect impact of the 30 Corridor Project on induced growth and development in the Central Arkansas area.

Response*: The comment refers to 42 CFR which is regarding Public Health and does not define indirect effects. Indirect effects are defined under CEQ regulations under 40 CFR 1508.8 which is referenced and included in Section 2.0 of the Indirect Effects Technical Report, Appendix A of the EA.*

Indirect Effects were analyzed using the procedures in AASHTO Practitioner's Handbook: Assessing Indirect Effects and Cumulative Impacts under NEPA (August 2016), in accordance with CEQ Regulations in 40 CFR 1508.8. The Indirect Effects of the project were evaluated and included an analysis of induced growth effects for the proposed project included coordination with local planners. The discussion of the induced growth effects is included in Section 4.0 of the Indirect Effects Technical Report.

Local planners were interviewed and coordinated to determine development of green spaces and identify other development areas. These areas were discussed in the indirect and cumulative impact technical reports. From the feedback received during this coordination, the rate of development of these areas could be increased as a result of the proposed project; however, these developments are likely to occur regardless of the proposed project; therefore, the effects are not a direct result of the proposed project. As stated in page 21 of the Indirect Impacts Technical Report, local planners also stated that market forces and cooperation with future land use regulations are more likely to influence growth, not the proposed project.

Metroplan has provided the information below on the potential of the project to induce growth:

"Broadly speaking, 30 Crossing will accentuate the region's tendency to continue developing at low density, with the bulk of residential housing growth in peripheral locations (already growing at a comparatively fast pace) from which residents commute to jobs in the central area. The project's greatest impact is expected to be along the region's northeastern vector, the US 67-167 corridor including Sherwood, Jacksonville, Cabot, Austin and Ward. This is because the project (and ongoing widening of Hwy 67/167) will reduce commuting times to major job concentrations in downtown and midtown Little Rock, south of the Arkansas River, yielding an acceleration of growth within the corridor over the short term. There could also be a secondary impact on the 1-40 corridor toward Maumelle, which has few locally-based jobs but many resident commuters. Additional growth may also happen in the East End area of Pulaski County and Southwest Little Rock where there is ample developable land. Multi-family housing growth may be boosted toward the immediate ends of the 30 Crossing project, in North Little Rock and Sherwood on the northeast as well as the southwest Little Rock/Otter Creek areas to the southwest. In the past, major freeway widenings have yielded substantial commercial/retail land use upgrades, but a major transition is underway in retailing due to e-commerce growth, which dampens growth prospects.

The trend of slow but steady multi-family housing growth seen in recent years in downtown portions of Little Rock and North Little Rock is expected to continue. Traffic flow alterations in specific downtown locations may have localized impacts that are hard to foresee - positive and

negative - though generally lesser in scale. The addition of the collector/distributor lanes will increase direct accessibility between the two cities, which could have a positive impact on housing and commercial prospects in both downtowns. The highest uncertainty involves the portion of North Little Rock directly east of 1-30. This area, which includes some of the lowest incomes and highest poverty levels in the region, may have been impacted by the division/isolation effect of the original 1-30 construction in circa 1960. The area appears ripe for redevelopment owing to its proximity to resurgent urban districts nearby; 30 Crossing may improve accessibility enough to induce renewed private investment. Alternatively, the widening could increase this district's perceptual isolation from the west side of the freeway, with continuation of poor economic prospects, especially toward the northern end. Job growth impacts of 30 Crossing are also difficult to determine. Improved accessibility might, on balance, encourage some job growth in areas with dense job concentrations, including hospitals stretching westward along 1-630. Total jobs have declined modestly in downtown Little Rock over the past ten to fifteen years (despite net housing growth); it is difficult to know if the job decline will continue.

Notes and Sources

1. *Metroplan's ICA 2040 Plan, which has informed much of the analysis for 30 Crossing, was developed in the aftermath of the 2000-2010 decade - a period of fast regional growth. Traffic projections for 30 Crossing were developed with the available information at the time of their development, during the spring and summer of 2014. The Imagine Central Arkansas Plan was adopted in December 2014, with these assumptions for population growth.*

2. *Transportation facilities are only one of many factors impacting development trends. Other factors include the availability of city utility services, surrounding land use, developable lands, schools, access to quality of life enhancements (parks, entertainment), and the existing distribution of people and jobs. Metroplan considers each of these when developing future year socioeconomic projections for the regional travel demand model, but it is impossible to account for all factors or the inherent randomness of human behavior.*

3. *This analysis includes the widening of the 67-167 (future 1-57) corridor from Jacksonville to Cabot (currently underway), since this amounts to a northeastern extension of the same corridor.*

4. There was a surge in multi-family housing growth in western Little Rock within a 2-mile radius of the Big Rock Interchange project in the years following this project's completion. Some of this development can be attributed to a general shift toward greater multi-family housing that followed the Great Recession, but the location correlation with the 1-630/1-430 interchange improvement is more than coincidental. It is nonetheless likely that the region's multi-family housing will see a down-shift in the immediate future, owing to rising costs in materials, construction labor shortage and rising land costs.

5. The possibility of housing growth in Maumelle may be further boosted near the new Maumelle interchange that will be constructed on 1-40, which is being funded due to a city tax increase approved by city voters during 2018.

6. The accelerated growth of Saline County, which the widening of 1-30 is thought have boosted, is documented in MetroTrends articles: (1) Economic Review and Outlook 2004, outlook section (p. 12); (2) Demographic Review and Outlook 2005, housing trends section (p. 4); (3) Demographic Review and Outlook 2005, from the population estimate section (p. 1); (4) Economic Review and Outlook 2005, from outlook section (p. 12); (5) Economic Review and Outlook 2007, from the outlook section (p. 12); and (6) Demographic Review and Outlook 2014, outlook section (p. 14).

7. This write-up reflects the experience of Metroplan staff, based on many years of experience with land use and traffic projections.

8. The TELUM land use model could be consulted for further land use insights resulting from 30 Crossing. The model demands relatively intensive inputs. Any attempt to use TELUM for 30 Crossing would require something like three months of staff work to conduct."

Comment 15

The DEA Fails to Sufficiently Identify and Analyze the Health Effects of Mobile Source Air Toxics That Would Be Produced by This and Other Projects

The DEA does not fully address the potential indirect and cumulative impacts of the 30 Crossing Project on persons who reside in the vicinity. It is widely accepted and recognized through medical and scientific studies that vehicular traffic on interstates and other high-traffic roads emit a number of mobile source air toxic compounds (MSATs) that are harmful to human health, particularly the elderly and children. See the attached articles entitled "Associations Between Residential Proximity to Traffic and Vascular Disease in a Cardiac Catherization Cohort," and a publication of the U.S. Centers for Disease Control entitled

"Residential Proximity to Major Highways - United States 2010". The U.S. Environmental Protection Agency and even FHWA recognize the risk of MSATs in their official publications.

The DEA states that one of the needs and purposes of the proposed Project is to accommodate an even greater volume of traffic on the I-30 Corridor, and at higher speeds. Although FHWA maintains that the volume of MSATs that will be emitted will be lower because of regulations requiring more efficient automobile engines, that is speculation in the current regulatory environment, and in any event the volume of MSATs emitted by current and near-future vehicles is such that a detailed analysis is required.

This is even more pressing because of the cumulative impact on air emissions that the proposed widening of the easternmost portions of I-630 will have, in conjunction with those issued from the I-30 Corridor.

***Response**: MSAT's are evaluated in Appendix Q of the EA (MSAT Technical Report).*

The project met the FHWA criteria for a Category 3 quantitative MSAT analysis due to the increase in capacity to an interstate highway where traffic volumes are projected to be greater than 140,000 by the design year, and the location of the project in proximity to a populated area. The FHWA Office of Natural Environment and the Office of Project Development and Environmental Review in FHWA Headquarters assisted in developing a methodology for assessing the impacts of the project. The methodology is consistent with FHWA interim guidance.

An MSAT analysis was conducted for the nine compounds with significant contributions from mobile sources that are among the national and regional-scale cancer risk drivers or contributors and non-cancer hazard contributors from the 2011 National Air Toxics Assessment. Motor vehicle emissions of these nine compounds were simulated using the latest EPA program, MOVES2014a.

The analysis was performed on an Affected Transportation Network that was established through consultation with representatives of the Arkansas Department of Environmental Quality, Metroplan, ARDOT, and FHWA. The FHWA Frequently Asked Questions on conducting quantitative MSAT emissions analysis were considered in crafting the study area used in the analysis. The network is shown on Figure 3 of the MSAT Technical Report. The network extends well outside the project limits.

Annual total MSAT emissions in the Affected Transportation Network would drop dramatically from 2014 to 2021 and would continue to decline into the 2041 design year for all alternatives.

The data indicates that the analyses predict a decrease of 88 percent from 2014 to 2041 despite a 19 to 20 percent increase in VMT. It was found that MSAT emissions in 2041 are expected to be relatively similar under the Action Alternatives relative to the No-Action Alternative. All the Action Alternatives had lower MSAT emissions in 2041 than the No-Action Alternative by -0.3% to -0.9%. There is no indication in the analysis that the proposed project is significant in terms of estimated MSAT emissions.

Comment 16

Throughout the DEA, it observes that the Project "may have" or "could have' certain effects, but then avoids further analysis through the excuse that the specific impacts of these changes cannot be quantified.

CEQ's *Forty Questions* specifically addresses this issue in its answer to Question No. 19 as follows:

18. Uncertainties About Indirect Effects of A Proposal. How should uncertainties about indirect effects of a proposal be addressed, for example, in cases of disposal of federal lands, when the identity or plans of future landowners is unknown?

> A. The EIS must identify all the indirect effects that are known, and make a good faith effort to explain the effects that are not known but are "reasonably foreseeable." Section 1508.8(b). In the example, if there is total uncertainty about the identity of future land owners or the nature of future land uses, then of course, the agency is not required to engage in speculation or contemplation about their future plans. But, in the ordinary course of business, people do makejudgments based upon reasonably foreseeable occurrences. It will often be possible to consider the likely purchasers and the development trends in that area or similar areas in recent years; or the likelihood that the land will be used for an energy project, shopping center, subdivision, farm or factory. The agency has the responsibility to make an informed judgment, and to estimate future impacts on that basis, especially if trends are ascertainable or potential purchasers have made themselves known. The agency cannot ignore these uncertain, but probable, effects of its decisions.

Response*: Indirect Effects are evaluated in Appendix A of the EA, the Indirect Effects Technical Report. Indirect Effects were analyzed using the procedures in AASHTO Practitioner's Handbook: Assessing Indirect Effects and Cumulative Impacts under NEPA (April 2016), in*

accordance with CEQ Regulations in 40 CFR 1508.8. The analysis relied on input from local planning authorities to make an informed decision on what indirect effects were probable.

Local planners were interviewed and coordinated to determine development of green spaces and identify other development areas. These areas were discussed in the Indirect Effects Technical Report. From the feedback received during this coordination, the rate of development of these areas could be increased as a result of the proposed project; however, these developments are likely to occur regardless of the proposed project; therefore, the effects are not a direct result of the proposed project. As stated in page 21 of the Indirect Impacts Technical Report, local planners also stated that market forces and cooperation with future land use regulations are more likely to influence growth, not the proposed project.

Metroplan offered their opinion on the likelihood of development in the region. In the following passage, provided by Metroplan. significant uncertainty in forecasting growth trends is cited:

"Broadly speaking, 30 Crossing will accentuate the region's tendency to continue developing at low density, with the bulk of residential housing growth in peripheral locations (already growing at a comparatively fast pace) from which residents commute to jobs in the central area. The project's greatest impact is expected to be along the region's northeastern vector, the US 67-167 corridor including Sherwood, Jacksonville, Cabot, Austin and Ward. This is because the project (and ongoing widening of Hwy 67/167) will reduce commuting times to major job concentrations in downtown and midtown Little Rock, south of the Arkansas River, yielding an acceleration of growth within the corridor over the short term. There could also be a secondary impact on the 1-40 corridor toward Maumelle, which has few locally-based jobs but many resident commuters. Additional growth may also happen in the East End area of Pulaski County and Southwest Little Rock where there is ample developable land. Multi-family housing growth may be boosted toward the immediate ends of the 30 Crossing project, in North Little Rock and Sherwood on the northeast as well as the southwest Little Rock/Otter Creek areas to the southwest. In the past, major freeway widenings have yielded substantial commercial/retail land use upgrades, but a major transition is underway in retailing due to e-commerce growth, which dampens growth prospects.

The trend of slow but steady multi-family housing growth seen in recent years in downtown portions of Little Rock and North Little Rock is expected to continue. Traffic flow alterations in specific downtown locations may have localized impacts that are hard to foresee - positive and negative - though generally lesser in scale. The addition of the collector/distributor lanes will increase direct accessibility between the two cities, which could have a positive impact on housing and commercial prospects in both downtowns. The highest uncertainty involves the portion of North Little Rock directly east of 1-30. This area, which includes some of the lowest

incomes and highest poverty levels in the region, may have been impacted by the division/isolation effect of the original 1-30 construction in circa 1960. The area appears ripe for redevelopment owing to its proximity to resurgent urban districts nearby; 30 Crossing may improve accessibility enough to induce renewed private investment. Alternatively, the widening could increase this district's perceptual isolation from the west side of the freeway, with continuation of poor economic prospects, especially toward the northern end. Job growth impacts of 30 Crossing are also difficult to determine. Improved accessibility might, on balance, encourage some job growth in areas with dense job concentrations, including hospitals stretching westward along 1-630. Total jobs have declined modestly in downtown Little Rock over the past ten to fifteen years (despite net housing growth); it is difficult to know if the job decline will continue.

Notes and Sources

1. *Metroplan's ICA 2040 Plan, which has informed much of the analysis for 30 Crossing, was developed in the aftermath of the 2000-2010 decade - a period of fast regional growth. Traffic projections for 30 Crossing were developed with the available information at the time of their development, during the spring and summer of 2014. The Imagine Central Arkansas Plan was adopted in December 2014, with these assumptions for population growth.*

2. *Transportation facilities are only one of many factors impacting development trends. Other factors include the availability of city utility services, surrounding land use, developable lands, schools, access to quality of life enhancements (parks, entertainment), and the existing distribution of people and jobs. Metroplan considers each of these when developing future year socioeconomic projections for the regional travel demand model, but it is impossible to account for all factors or the inherent randomness of human behavior.*

3. *This analysis includes the widening of the 67-167 (future 1-57) corridor from Jacksonville to Cabot (currently underway), since this amounts to a northeastern extension of the same corridor.*

4. *There was a surge in multi-family housing growth in western Little Rock within a 2-mile radius of the Big Rock Interchange project in the years following this project's completion. Some of this development can be attributed to a general shift toward greater multi-family housing that followed the Great Recession, but the location correlation with the 1-630/1-430 interchange improvement is more than coincidental. It is nonetheless likely that the region's multi-family housing will see a down-shift in the immediate future, owing to rising costs in materials, construction labor shortage and rising land costs.*

5. The possibility of housing growth in Maumelle may be further boosted near the new Maumelle interchange that will be constructed on 1-40, which is being funded due to a city tax increase approved by city voters during 2018.

6. The accelerated growth of Saline County, which the widening of 1-30 is thought have boosted, is documented in MetroTrends articles: (1) Economic Review and Outlook 2004, outlook section (p. 12); (2) Demographic Review and Outlook 2005, housing trends section (p. 4); (3) Demographic Review and Outlook 2005, from the population estimate section (p. 1); (4) Economic Review and Outlook 2005, from outlook section (p. 12); (5) Economic Review and Outlook 2007, from the outlook section (p. 12); and (6) Demographic Review and Outlook 2014, outlook section (p. 14).

7. This write-up reflects the experience of Metroplan staff, based on many years of experience with land use and traffic projections.

8. The TELUM land use model could be consulted for further land use insights resulting from 30 Crossing. The model demands relatively intensive inputs. Any attempt to use TELUM for 30 Crossing would require something like three months of staff work to conduct."

Comment 17

40 CFR §1508.12 defines "cumulative impacts" as "the impact on the environment which results from the incremental impact of the action when added to other past, present and reasonably foreseeable actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time."

Courts have particularly emphasized the importance of discussing cumulative impacts in environmental impact statements. *Kern v. United States,* 284 F.3d 1062 (9th Cir., 2002) An EA fails to satisfy the requirements of NEPA if it does not contain an adequate evaluation of the cumulative impacts of a project. *See Natural Resources Defense Council, Inc. v. United States Army Corps of Engineers,* 457 F.Supp.2d 198, 230-31 (S.D.N.Y.2006); *Sierra Club v. Bosworth,* 352 F.Supp.2d at 925-27; and *Wyoming Outdoor Council Powder River Basin Resources Council v. United States,* 351 F.Supp.2d 1232, 1243 (D.Wyo.2005). "Evidence is increasing that the most devastating environmental effects may result not from the direct effects of a particular action, but from the combination of individually minor effects of multiple actions over time. CEQ, "Considering Cumulative Effects Under the National Environmental Policy Act", p. 1 (herein "Considering Cumulative Effects").

The DEIS' Assessment of Cumulative Impacts is Too Restrictive

In analyzing cumulative impacts, it is first necessary for an agency to identify the geographic area within which a project's cumulative impact on environmental resources may occur. The choice of an analysis scale must represent a reasonable decision and cannot be arbitrary. An agency must provide support for its choice of analysis area and must show that it considered the relevant factors. The geographical scope is not necessarily limited to the project's geographical boundaries.

Nor is it limited to other administrative or political boundaries. Instead, demarcation of the boundaries requires a complicated analysis of several factors, such as the scope of the project considered, the features of the land, and the types of species in the area.

The DEA in this case did not make clear the geographic area within which it chose to conduct the cumulative impacts analysis.

Response*: The document under review is not a DEIS.*

The Cumulative Impact Technical Report provides a detailed assessment of cumulative impacts within the Resource Study Area (RSA) using the Council on Environmental Quality (CEQ) procedures for evaluating cumulative effects for NEPA. The analysis was performed in accordance with the American Association of State Highway and Transportation Officials (AASHTO) Practitioner's Handbook, "Assessing Indirect Effects and Cumulative Impacts under NEPA" (August 2016).

Cumulative Impacts are evaluated in the Cumulative Impact Technical Report, Appendix R of the EA. Reasonably foreseeable transportation actions that were included in the cumulative impact analysis included the widening of Hwy. 67 north of the Hwy. 67/I-440 interchange; the widening of I-630 from Baptist Hospital to University Avenue; the I-40/ Hwy. 391 interchange improvements; the reconstruction of I-30 at 65th Street, and I-440 from the Arkansas River Bridge to I-40. These were the only transportation projects on the 2016-2020 Transportation Improvement Plan within the Resource Study Areas at the time the analysis was performed. The direct, indirect, and cumulative impacts of those projects on community, water, and historic resources were analyzed using the AASHTO procedures for evaluating cumulative effects in

NEPA documents. The analysis followed the AASHTO procedures and considered the impacts of these aforementioned projects in the cumulative analysis.

Since the time the analysis was performed, other considerations have been included in the cumulative impacts analysis and reflected in the final technical report in response to public comments. This includes the proposed developments for Amazon and the Pointe at North Hills apartments as well as planned transportation projects. The table below lists the planned transportation projects within the Resource Study Areas. Projects along I-40 and I-30 are being studied; however, scope and plans for these projects have not yet been determined at this time. Impacts that could be estimated and anticipated to be likely were considered for the cumulative impacts analyses for the resources analyzed and included in the final technical report. Although the table below lists planned transportation projects, each of these is an independent project not associated with the proposed project. Each of these planned transportation project has their own individual independent utility, independent project purpose, and logical termini.

Location	***Type of Work***
I-40 in Maumelle	*New Interchange*
Hwy. 5/Hwy. 70/University Avenue	*Intersection Improvements*
Hwy. 10 and I-430 from Pleasant Ridge Road to Pleasant Valley Drive	*Major Widening*
Hwy. 176 at Shilcotts Bayou	*Structure and Approaches Improvements*
Hwy. 365 at Palarm Creek	*Structure and Approaches Improvements*
JP Wright Loop Road Rail	*Railroad Grade Separation*
Shackleford Road and Gamble Road (Kanis Road)	*Major Widening*
Hwy. 10 at Gill Street	*Railroad Overpass Structures and Approaches Improvements*
Hwy. 67 from Main Street to Vandenberg Boulevard	*Major Widening*
Hwy. 176 from 47th Street to Remount Road	*Safety Improvements*

Hwy. 10 at Taylor Loop Road to Pleasant Ridge Road	*Major Widening and Operational Improvements*

The proposed project is not associated with the planned transportation projects listed above nor was it influenced by them. The project limits were defined based on documented needs in the I-30 and I-40 corridors, as well as points of major traffic generators. The primary purpose for the 30 Crossing proposed project is infrastructure replacement. The purpose and need of the proposed project is to address the existing condition issues of rebuilding a deteriorating infrastructure and improving the safety conditions such as weaving within the project corridor. Furthermore, Metroplan has recognized this 30 Crossing project as a need and has included this project in their plans since 2003.

With these considerations, the proposed project is not anticipated to contribute to the cumulative effects of the community due to the following:

1) The developments would not result in relocations because they are located on mostly undeveloped property. Two of the planned transportation projects have prepared environmental documents that were reviewed to determine that 32 acres of total proposed ROW is anticipated within areas unlikely to be within Environmental Justice census block group areas. The nine other planned transportation projects are in planning stages and have no information yet to determine potential impacts; however, most of these are unlikely to result in major ROW acquisitions or community impacts because a majority of these projects are overlay and pavement reconstruction projects and bridge replacements.

2) The Preferred Alternative is anticipated to have 11.1 acres of proposed ROW within the 7.3-mile corridor. No displacements or ROW acquisitions are proposed south of I-630.

3) Community cohesion within minority and low-income population areas would not be adversely impacted by the proposed project. The 5 residential displacements are located in predominantly minority census area; however, these displaced rental properties are adjacent to the existing facility and would not result in a further division or separation of a neighborhood. The proposed frontage road would, in fact, improve north and south connectivity along Cypress St. Furthermore, proposed ROW acquisitions would not result in any division or further separation of any existing neighborhoods.

4) Improvements are included in the proposed project to minimize the east and west divisions from the original construction of I-30. Bicycle and pedestrian accommodations and improved

overpass and underpass intersections would improve the walkability between the west and east sides of I-30.

With these considerations, the proposed project is not anticipated to contribute to the cumulative effects of water resources due to the following:

1) Approximately 312 acres in the initial evaluation plus an estimated 15 acres of potential stream or wetland impacts from the developments and planned transportation projects would equate to approximately 327 acres which is approximately 8.5 percent of the total water resources within the RSA.

2) Regulatory control strategies and permitting requirements would be required of developments to minimize and mitigate potential floodplain, stream and wetland impacts.

With these considerations, the proposed project is not anticipated to contribute to the cumulative effects of historic resources due to the following:

1) The only historic resource impacted by the proposed project would be the Locust Street bridge which is being mitigated through a programmatic agreement in coordination with the SHPO. The bridge needs to be replaced because it does not meet current structural standards.

2) The additional developments and planned transportation projects are not anticipated to result in historical resource impacts that would contribute to overall cumulative effects.

3) Although other historic resources and districts would not be impacted by the proposed project, it is acknowledged that historic properties are deteriorating with little support and protection. Unfortunately, the cost to preserve and revitalize such properties are scarce. Without intervention by local funding sources or entities, there is a concern for the loss of integrity of historic properties. There are preservation groups and individuals who are able to protect and restore properties with the cities in the APE; however, the extent of such restoration would not encompass all historic properties that need and require preservation due to cost and funding constraints.

The Resource Study Area (RSA) was established in accordance with CEQ guidance and was tailored to the type of resource being evaluated. The RSA for the community, water, and historic resources are shown on Figures 2, 3, and 5 of the Cumulative Impact Technical Report. The RSA's were determined by the potential areas of impact that would be influenced by the proposed project. For community resources, the city limits of Little Rock, North Little Rock,

Maumelle, Sherwood and Jacksonville were used and included in the RSA because these areas included the project corridor and its communities and facilities would have the most potential impact by the proposed project. For water resources, the watershed in which the project corridor is located was chosen for the RSA boundary because of the water features related to the proposed project would be influenced and impacted within this watershed. For historic resources, the RSA was based on the historic districts and the APE used for the Section 106 process that has been approved by the SHPO.

Comment 18

DEA Failed To Provide A Detailed Catalogue of Past, Current and Future Projects That Have Or Could Combine With The Intermodal Project To Cause Cumulative Impacts

A starting point for assessment of cumulative impacts in an EIS is for the preparer to prepare a catalogue of past, current and future projects (sources) reasonably certain to occur as a source of information regarding the environmental impacts from those sources that currently exist, under development, or that may be developed.

An EA's analysis of cumulative impacts must give a sufficiently detailed catalogue of past, present, and future projects, and provide adequate analysis about how these projects, and differences between the projects, are thought to have impacted the environment. General statements about "possible effects" and "some risk" do not constitute a "hard look" absent a justification regarding why more definitive information could not be provided. Some quantified or detailed information is required.

The DEA provides no catalogue of past, current and future projects (sources) reasonably certain to occur as a source of information regarding the environmental impacts, and is deficient.

***Response**: It appears that the commenter is referring to another project as there is no intermodal component to this project.*

Cumulative Impacts are evaluated in Appendix R of the EA, the Cumulative Impact Technical Report. The Cumulative Impact Technical Report provides a detailed assessment of cumulative impacts within the Resource Study Area using the CEQ procedures for evaluating cumulative effects in NEPA documents, found in the American Association of State Highway and Transportation Officials (AASHTO) Practitioner's Handbook, "Assessing Indirect Effects and Cumulative Impacts under NEPA" (August 2016).The present, past, and future projects included in each resource evaluation are clearly listed in Step 3 of each resource evaluation. In Step 4,

the overall effects of the project, in combination with these other actions, is determined. In Step 5, mitigation of cumulative effects is considered.

Comment 19

The DEA Fails To Address Cumulative Impacts Of Simultaneous Projects on Three Interrelated Interstates

As noted above, at least three (3) major projects involving the interstate highway system in Little Rock-North Little Rock are planned and in the development stage, and if they all are implemented, their construction will overlap. Those areas are the 30 Corridor Project, the widening of 1-630 between University Avenue and Baptist Medical Center, and the widening of Highway 10 between Pleasant Valley Drive and Pleasant Ridge Road, with modifications to the 1-430 Interchange with Highway 10.

All of these Interstates and State Highway 10 are major traffic arteries, carrying hundreds of thousands of vehicles per day in and through Little Rock and North Little Rock. There is no question that they are present or reasonably foreseeable actions, one of which is already under construction, and clearly fall within the definition of "cumulative impacts" set forth above.

The cumulative impacts of conducting all three of those major projects with substantial overlap of construction was not mentioned in the DEA. In addition, the cumulative impacts of all three projects (assuming they are completed) in the future was not discussed and analyzed.

***Response**: Cumulative Impacts are evaluated in the Cumulative Impact Technical Report, Appendix R of the EA. Reasonably foreseeable transportation actions that were included in the cumulative impact analysis included the widening of Hwy. 67 north of the Hwy. 67/I-440 interchange; the widening of I-630 from Baptist Hospital to University Avenue; the I-40/ Hwy. 391 interchange improvements; the reconstruction of I-30 at 65th Street, and I-440 from the Arkansas River Bridge to I-40. These were the only transportation projects on the 2016-2020 Transportation Improvement Plan within the Resource Study Areas at the time the analysis was performed. The direct, indirect, and cumulative impacts of those projects on community, water, and historic resources were analyzed using the AASHTO procedures for evaluating cumulative effects in NEPA documents. The analysis followed the AASHTO procedures and considered the impacts of these aforementioned projects in the cumulative analysis.*

Since the time the analysis was performed, other considerations have been included in the cumulative impacts analysis and reflected in the addendum to the EA in response to public

comments. This includes the proposed developments for Amazon and the Pointe at North Hills apartments as well as planned transportation projects. The table below lists the planned transportation projects within the Resource Study Areas. Projects along I-40 and I-30 are being studied; however, scope and plans for these projects have not yet been determined at this time. Impacts that could be estimated and anticipated to be likely were considered for the cumulative impacts analyses for the resources analyzed.

Location	Type of Work
I-40 in Maumelle	New Interchange
Hwy. 5/Hwy. 70/University Avenue	Intersection Improvements
Hwy. 10 and I-430 from Pleasant Ridge Road to Pleasant Valley Drive	Major Widening
Hwy. 176 at Shilcotts Bayou	Structure and Approaches Improvements
Hwy. 365 at Palarm Creek	Structure and Approaches Improvements
JP Wright Loop Road Rail	Railroad Grade Separation
Shackleford Road and Gamble Road (Kanis Road)	Major Widening
Hwy. 10 at Gill Street	Railroad Overpass Structures and Approaches Improvements
Hwy. 67 from Main Street to Vandenberg Boulevard	Major Widening
Hwy. 176 from 47th Street to Remount Road	Safety Improvements
Hwy. 10 at Taylor Loop Road to Pleasant Ridge Road	Major Widening and Operational Improvements

With these considerations, the proposed project is not anticipated to contribute to the cumulative effects of the community due to the following:

1) The developments would not result in relocations because they are located on mostly undeveloped property. Two of the planned transportation projects have prepared environmental documents that were reviewed to determine that 32 acres of total proposed ROW is anticipated within areas unlikely to be within Environmental Justice census block group areas. The nine other planned transportation projects are in planning stages and have no information yet to determine potential impacts; however, most of these are unlikely to result in major ROW acquisitions or community impacts because a majority of these projects are overlay and pavement reconstruction projects and bridge replacements.

2) The Preferred Alternative is anticipated to have 11.1 acres of proposed ROW within the 7.3-mile corridor. No displacements or ROW acquisitions are proposed south of I-630. The bulk of the proposed ROW is located in North Little Rock along the south side of I-40 where no development currently exists.

3) Community cohesion within minority and low-income population areas would not be adversely impacted by the proposed project. The 5 residential displacements are located in predominantly minority census area; however, these displaced rental properties are adjacent to the existing facility and would not result in a further division or separation of a neighborhood. Furthermore, proposed ROW acquisitions would not result in any division or further separation of any existing neighborhoods.

4) Improvements are included in the proposed project to minimize the east and west divisions from the original construction of I-30. Bicycle and pedestrian accommodations and improved overpass and underpass intersections would improve the walkability between the west and east sides of I-30.

With these considerations, the proposed project is not anticipated to contribute to the cumulative effects of water resources due to the following:

1) Approximately 312 acres in the initial evaluation plus an estimated 15 acres of potential stream or wetland impacts from the developments and planned transportation projects would equate to approximately 327 acres which is approximately 8.5 percent of the total water resources within the RSA.

2) Regulatory control strategies and permitting requirements would be required of developments to minimize and mitigate potential floodplain, stream and wetland impacts.

With these considerations, the proposed project is not anticipated to contribute to the cumulative effects of historic resources due to the following:

1) The only historic resource impacted by the proposed project would be the Locust Street bridge which is being mitigated through a programmatic agreement in coordination with the SHPO. This impact is needed to address the bridge not meeting current structural standards.

2) The additional developments and planned transportation projects are not anticipated to result in historical resource impacts that would contribute to overall cumulative effects.

3) Although other historic resources and districts would not be impacted by the proposed project, it is acknowledged that historic properties are deteriorating with little support and protection. Unfortunately, the cost to preserve and revitalize such properties are scarce. Without intervention by local funding sources or entities, there is a concern for the loss of integrity of historic properties. There are preservation groups and individuals who are able to protect and restore properties with the cities in the APE; however, the extent of such restoration would not be complete to encompass all historic properties that need and require preservation due to cost and funding constraints.

Response Code	General Topic Addressed	Response
C	Description of the Split Diamond Interchange	The Preferred Alternative (2B: 6-lanes with C/D-SDI Action Alternative) eliminates the existing partial cloverleaf interchange at Hwy. 10 and the elevated Hwy. 10 “spur” connecting I-30 and Cumberland Street. With these alternatives, the only southbound I-30 off-ramp between I-630 and the Arkansas River would be at 4th Street and the only northbound I-30 off-ramp in the same area would be at 9th Street. Frontage roads would be used to distribute traffic onto the downtown road network. This alternative would provide direct access to I-630 westbound from the southbound frontage road and direct access to the northbound frontage road from I-630 eastbound. Modifications to the existing traffic patterns in downtown Little Rock would be required: • East 4th Street between Cumberland Street and the southbound frontage road would be two lanes eastbound and one lane westbound, requiring the removal of 29 on-street parking spaces to accommodate three lanes of traffic. • A Texas U-turn would be added to allow traffic on the southbound I-30 off-ramp to exit onto 3rd Street. • Mahlon Martin Street would be widened and converted from a one-way roadway to a two-way roadway. • East 2nd Street would be widened and improved between Cumberland Street and Mahlon Martin Street to provide two lanes eastbound and two lanes westbound. Six on-street parking spaces along East 2nd Street and twelve along Ferry Street would be removed. • A new road would be constructed between East 3rd and East 4th Streets east of I-30. • Cumberland Street between East 2nd Street and East 3rd Street would be slightly widened to provide two lanes in both the northbound and southbound directions. • Traffic signals may be required at the intersections of East 2nd Street with River Market Avenue, Sherman Street, and Mahlon Martin Street; East 3rd Street with River Market Avenue, the Texas U-turn and Mahlon Martin Street; East 4th Street with River Market Avenue and Rock Street; and Capitol Avenue and the southbound frontage road. The Preferred Alternative removes the existing exit ramp that provides direct access to the complex intersection of Hwy. 10, 2nd Street and Cumberland Street, which provides opportunity for a decrease in traffic at this intersection. The traffic currently using the existing Hwy. 10 interchange would shift primarily to East 2nd Street, East 3rd Street, and East 4th Street, resulting in an increase in the traffic volumes on these city streets. The removal of the existing interchange would open up the space currently occupied by the interchange providing opportunity for improved multi-modal east-west movement under I-30 at this location.
D	Description of the Single Point Urban Interchange (SPUI)	The SPUI Action Alternatives are a refinement of the initial Single Point Urban Interchange concept that was developed in order to avoid impacts to the portion of the River Rail Street Car on East 3rd Street and loss of vehicular access to East 4th Street. With the SPUI Action Alternatives (1A ad 2A), I-30 would continue to be elevated over East 2nd Street, while all entrance and exit ramps would intersect at a central signalized location under the I-30 Arkansas River Bridge. This signalized location would be modestly elevated on embankment in order to provide clearance over East 3rd and East 4th Streets for entrance and exit ramps. Traffic would access the SPUI from Little Rock by a six-lane elevated roadway beginning at-grade at the Cumberland/LaHarpe/East 2nd Street intersection on the west side and at Mahlon Martin Street on the east side. In addition, traffic would be able to enter I-30 northbound from East 6th Street by using a ramp that would bridge over East 4th, East 3rd, and East 2nd Streets, and exit I-30 southbound by an additional ramp that would intersect with Capitol Avenue. An additional traffic signal would be needed at the intersection of East 3rd Street and Mahlon Martin Street. In this interchange option, traffic would continue to enter and exit downtown Little Rock in a similar manner as the existing interchange. The only change to the local street systems would be that Cumberland Street between East 2nd Street and East 3rd Street would be closed to traffic. The Hwy. 10 interchange would also continue to utilize the right of way (ROW) of the current interchange for transportation purposes, although there would be an increase in open space as a result of removal of the circular ramps.
E	Description of the No Action Alternative	The No-Action Alternative represents the case in which the proposed project is not constructed, but could include future projects identified through the long-range planning process for maintaining a state of good repair as funding becomes available. The No-Action Alternative would not make any immediate improvements to the existing roadway or any bridges throughout the corridor, including the I-30 Arkansas River Bridge. With increasing population and traffic demand and no improvements to the project area, congestion will increase and ultimately decrease safety and mobility. This alternative would not improve the existing geometric deficiencies, traffic capacity limitations, safety insufficiencies, or deteriorating roadway and bridges. The No-Action Alternative does not meet the purpose and need outlined for the project.

Response Code	General Topic Addressed	Response
		• Mobility on I-30 and I-40 would become increasingly worse, decreasing travel speed and time. Congestion on I-30 would make the downtown areas of Little Rock and North Little Rock less attractive to visitors, causing impacts to downtown businesses. Connectivity between Little Rock and North Little Rock would suffer as I-30 congestion worsens. • An increase in crashes would be expected with increasing congestion, making the downtown destinations less attractive. • Structural and functional roadway deficiencies would not be addressed. • Navigational safety would not be addressed. • The structurally deficient and functionally deficient bridges within the corridor would not be addressed. • East-west connectivity, including bicycle and pedestrian connectivity, would not be improved. • Future transit opportunities would not be accommodated. • The No Action Alternative is not consistent with area wide transportation plans. • The No Action Alternative is not consistent with the CAP (the CAP included a commitment to voters to improve I-30). • Maintenance and improvement costs required to maintain the corridor in a state of good repair would be deferred to multiple other projects, resulting in increased cost and lengthy construction time. By the design year 2041, traffic volumes over the I-30 Arkansas River Bridge are expected to increase by approximately 24%, from 123,000 to 153,000 vehicles per day. Under the No-Action Alternative, in the morning peak, weaving issues over the I-30 Arkansas River Bridge and capacity issues at the I-30/I-40 interchange would lead to congested conditions, low speeds and long travel times on Highway 67, I-40 both east and west of I-30, and on I-30 from I-40 to downtown Little Rock The congestion would begin around 6:30 AM and would extend through the morning. I-630 eastbound from Cumberland Street to the merge with I-30 northbound would be congested through the morning peak. There would also be a segment of I-30 northbound that extends from outside the south project limit on I-30 to Roosevelt Road that would experience congestion, low speeds and delays from 6:45 AM to 9:30 AM. During the afternoon peak, weaving issues over the I-30 Arkansas River Bridge and capacity limitations would lead to congestion that would spread through the entire project limits in the southbound direction, as well as from I-630 to Hwy. 67 interchange in the northbound direction, which would continue until well after the end of the afternoon peak. This congestion would spread throughout arterial roadways connecting to I-30, especially in the downtown Little Rock area, leading to long delays at intersections. The No-Action Alternative does not relieve congestion or improve mobility.
F	Elimination of the NEPA 8-Lane Alternatives	The 8-Lane General Purpose Action Alternatives (1A and 1B) would fail to remove a major bottleneck within the project limits, specifically on I-40 between I-30 and Hwy. 67. This congestion would extend outside the project limits on I-40 and Hwy. 67. Queues resulting from this bottleneck would extend outside the project limits on I-40 and Hwy. 67, restrict the through traffic movement on I-40, and leave traffic in the corridor with few options to bypass the congestion in order to reach downtown North Little Rock and Little Rock. Furthermore, the 8-Lane General Purpose with SDI Action Alternative (1B) would introduce additional congestion on I-30 between the Arkansas River and I-40 due to the reduction in access points into the downtown area of Little Rock, particularly during the morning peak period. The improvements required in order to remove the bottleneck would result in a final project configuration very similar to that of the 6-Lane with C/D Action Alternatives (2A and 2B). However, if these improvements were deferred to a later date, the construction cost would increase and the traveling public would continue to experience traffic delays and safety issues. Conversely, the 6-Lane with C/D Action Alternatives (2A and 2B) would eliminate the major bottleneck within the project limits on I-40 between I-30 and Hwy. 67. By eliminating the major bottleneck on I-40, traffic is able to reach the grid system in downtown North Little Rock, where various travel options and destinations exist, including additional river crossings into Little Rock. In addition, the C/D lanes provided with these alternatives would result in improved local access across the Arkansas River by connecting the frontage roads on both sides of the river.
G	Preferred Alternative	The 6-Lane with C/D with SDI Action Alternative (Alternative 2B) has been identified as the Preferred Alternative due to the following reasons related to the project goals: • Improves local vehicle access to and from downtown Little Rock/North Little Rock by more directly connecting the frontage road system to the C/D lanes crossing the Arkansas River;

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		• Optimizes opportunities for economic development by providing a continuous frontage road system between I-630 and East 4th Street and connection to the River Market and Clinton Center areas via President Clinton Avenue, 2nd Street and 3rd Street and allowing additional green space for public use in downtown Little Rock; • Enhances east-west connectivity, including bicycle and pedestrian connectivity, by removing the elevated ramps between President Clinton Avenue and 3rd Street and by replacing the elevated Hwy. 10 Spur with an improved at-grade 2nd Street; and • Identified by the local MPO as the locally Preferred Alternative and has received the most public and business support.
H – Other Alternatives		
H-1	At-Grade Boulevard	The Boulevard Alternative was evaluated in response to public comment following Public Meeting 5, held on October 22, 2015. Because this alternative had not been through the PEL Study screening process, it was decided to evaluate it using the same process as the other Action Alternatives, using the Level 1 PEL Study screening. The Boulevard Alternative would convert I-30 from I-630 to 13th Street in North Little Rock to an at-grade roadway with three through lanes in each direction. In addition, there would be a fourth lane to the outside that would be used as a through lane during peak periods, and used for on-street parking the remainder of the day. The I-30/I-630 interchange would be reconstructed as a roundabout. The Boulevard Alternative was screened out in Level 1 as it does not address the purpose and need for the project. CARTS travel demand model runs conducted by Metroplan reflect significant changes in travel patterns that make the boulevard alternative less palatable, including increased travel on local arterials streets and the I-440 and I-430 bridges over the Arkansas River. The alternative would result in an increase in vehicular collisions due to the increase in conflict points and signalized intersections and an increase in bicycle and pedestrian crashes. Finally, the alternative is not practicable as it would result in the removal of the interstate designation from I-30, triggering the need for additional studies to evaluate the impacts of the removal of the roadway from the interstate system.
H-2	Repairing or Rehabilitating I-30 Bridge	Bridges are considered structurally deficient if significant load carrying elements are found to be in poor condition due to deterioration. Of the forty-seven bridges in the project limits, five bridges, including the I-30 Arkansas River Bridge, which was constructed in 1958, were found to be structurally deficient based on information provided by ARDOT in September 2017. In addition, fourteen bridges were found to be functionally obsolete, meaning that lane widths, shoulder widths, or other features are not sufficient for the traffic the bridge is currently carrying. The I-30 Arkansas River Bridge has been determined to have portions that are designated fracture critical. Most modern bridges are designed so that the fracture of a steel member would not result in collapse of the entire bridge. This is accomplished through design and selection of materials. The I-30 Arkansas River Bridge was not designed this way. In addition to structural deficiencies of the I-30 Arkansas River Bridge, the width of the existing bridge is less than desirable. Although the bridge meets the minimum width requirements, the shoulders on the bridge are below current standards for new construction. The reduction in the shoulder width can lead to driver discomfort, resulting in decreased speed and increased congestion. A reduced bridge width can also lead to an increase in emergency response time and traffic accidents because there is not enough shoulder width for storage of disabled vehicles, maneuvering around an obstacle in the roadway, or passage of emergency response vehicles.

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H-3	Additional River Crossing/ Bypass Routes	Bypass routes were evaluated during the PEL Study but were also screened out. In general, bypass routes do not meet the purpose and need of the project because they do not address operational and safety issues along I-30 and I-40, structural and functional roadway issues along I-30 and I-40, and structural and navigational issues with the I-30 Arkansas River Bridge. Construction of a bypass route would divert funds away from improvements to I-30, which would prevent the roadway safety issues, roadway and bridge structural and functional deficiencies, and bridge navigational issues, from being addressed by the project. Bypass routes were evaluated to see if they could provide traffic congestion relief to the I-30 corridor. A new parallel route to I-30, the **Pike Avenue extension**, was included in the Central Arkansas Regional Transportation Study (CARTS) Areawide Freeway Study, Phase 1, Arkansas River Crossing Study, in 2003. The Pike Avenue extension was conceived as originating at either I-630 or 7th Street, and terminating at the Pike Avenue roundabout in North Little Rock. The existing Pike Avenue would then provide a connection to I-40. The intent of the Pike Avenue extension was primarily to connect the Capitol area of Little Rock directly to Pike Avenue in North Little Rock. The connection to I-630 would create operational issues, as it is located within 1000 feet of the existing Woodrow Street interchange. Terminating the bypass at 7th Street would solve that problem, but this would not be an efficient connection to I-630. In addition, there is a highly contaminated hazardous waste site just south of the Pike Avenue roundabout that would be impacted. Because of the costs and environmental impacts of this potential bypass route, and the fact that it would not provide an efficient connection between I-630 and I-40, it was not considered to be a reasonable alternative to improving I-30. The **Chester Street extension** was suggested by the public during the PEL Study as a possible alternative to the Pike Avenue extension. The intent would be to widen and improve South Chester Street along its current alignment from its interchange with I-630 to LaHarpe Boulevard, then extend North Chester Street across the Arkansas River and tie into Riverfront Drive just east of the UPRR overpass in North Little Rock. Its primary benefit would be in providing an additional connection between Little Rock and North Little Rock; it would not provide an efficient connection between I-630 and I-40. This project would require the acquisition of land from approximately nine businesses in Little Rock and would divide the downtown Little Rock commercial district between West 8th Street and West Markham Street. An analysis of the Chester Street bypass route was done during the PEL Study (PEL Study Report Attachment F, Traffic and Safety), using Metroplan's Travel Demand model. The analysis showed that the bypass route would only remove 3.5% of the traffic from I-30. Therefore, the Chester Street bypass route would not meet the traffic congestion component of the project purpose and need. The **East Bypass** was suggested by the public during the NEPA study as a possible bypass route for I-30. The intent would be to construct a new roadway between the I-30/I-630 interchange, and the I-40/Hwy 67 interchange. While no traffic analysis has been done on this route, it does have the potential to provide an efficient connection between the two interchanges. Bypasses were evaluated during the PEL study and screened out, because they do not address the purpose and need for the project: operational and safety issues along I-30 and I-40, structural and functional roadway issues along I-30 and I-40, and structural and navigational issues with the I-30 Arkansas River Bridge. Bypasses were evaluated as possible ways to relieve traffic congestion on the I-30 corridor. The primary engineering issue with this concept is the high cost of constructing a new roadway along the new alignment. This alternative would also involve a new bridge at a new location over the Arkansas River, which would present navigational concerns that would have to be addressed in order to obtain USCG approval. Finally, the corridor crosses the UPRR at a new location, which would require an easement from UPRR and be very expensive. The primary environmental impacts from this alternative would be the impacts to environmentally sensitive areas. It would require the acquisition of businesses along 15th Street and divide two residential neighborhoods, one lying west of the Airport between East 8th and East 12th Streets, and along South Buckeye Street between East Lincoln Avenue and East Broadway Street. The communities that are impacted in Little Rock have a high minority population, while the impacted communities in North Little Rock have both large minority and low income populations. Finally, the roadway would also have significant wetland and floodplain impacts in Dark Hollow. Because of the environmental issues with this alternative, and the fact that it would not meet the project purpose and need, it was not evaluated further.

H-4	Evaluation of Alternative Routes	The evaluation of solutions for the I-30/I-40 corridor included an assessment of regional arterials and highways. **Arterials** Metroplan's policy is to perform an assessment of the regional arterial network (RAN) to identify improvements to arterials prior to highway widening. A RAN analysis was presented in the EA Appendix B: IJR Traffic Results and Safety Analysis, Appendix B Traffic Results, Section 4.5. This section analyzed the regional arterial network from a planning and engineering point of view. The arterial analysis indicates that a balanced regional network of arterial improvements and highway improvements will best serve the Little Rock region to plan for the population growth forecasted by Metroplan by 2040. Both a planning and engineering assessment was performed. In the planning assessment, Figure 29 shows the regional arterials that are under capacity and nearing or over capacity. The map also includes planned and committed capacity projects from the CARTS Long Range Transportation Plan. As shown in Figure 29, there are four arterial corridors where new capacity is planned in the CARTS Long Range Transportation Plan. These arterials are: • State Highway 161 (northeast of the study corridor) • State Highway 365 (McArthur Drive) (northwest of the study corridor) • University Avenue (southwest of the study corridor) • State Highway 5 (southwest of the study corridor) If these arterial improvements were made they could provide some benefit to the I-30 and I-40 corridor but the comprehensive benefit is expected to be minimal. Both Highway 10 (Cantrell Road) and Highway 70 approach capacity west of I-30 near downtown. This will impact motorists' decision to use the arterial network to their downtown destinations. Finally, many communities today are not looking for wider arterial with more traffic traveling faster. Local communities are looking for complete streets, a national movement to rebalance the modes of travel on roadways that maneuver through communities, slow traffic down and provide amenities for pedestrians, bicyclists and transit. Promoting active (non-motorized) transportation on arterials is difficult to achieve while also increasing arterial vehicle capacity. EA Appendix B: IJR Traffic Results and Safety Analysis, Appendix B5 (Arterial Assessment) is an assessment of the surrounding arterial network within the 30 Crossing project limits from an engineering perspective. Each arterial identified in Figure 29 was broken down into segments according to the existing roadway section or number of lanes. Each segment was assigned a set of arterial improvements for which a high to low benefit to operations to the 30 Crossing project was assigned. Equally important, a high to low level was also assigned to gauge the impacts to right of way, existing structures, and existing railroad infrastructure. An order of magnitude cost was developed utilizing the assumption of five million dollars per mile of roadway widening (excluding potential retaining walls, barriers, and other roadside grading) and preliminary bridge replacement costs. This cost represents construction cost only and does not consider right of way cost, utility impact cost, engineering cost, etc. The cost is in 2017 dollars with an assumed twenty percent contingency, but without consideration of inflation. The table also contains information of related improvements within Metroplan's Long Range Plan. A preferred rating combination is a high benefit to project operations and a low level of impact. The lower the impact, the easier to incorporate into the project scope and promote as a solution to improve regional traffic operations, safety and mobility. For example, expanding Highway 161, listed above as being identified in the CARTS model as a Long-Range Plan project, south of Interstate 40 from the existing two-lane roadway section to a four-lane section, is expected to have a relatively low impact to right of way and existing structures but is expected to only minimally improve the operations within the 30 Crossing project limits. This expansion produces an alternate route for the AM traffic to enter downtown from the north, however, still results in traffic utilizing the I-30 Bridge or Broadway Bridge to cross the Arkansas River, furthering congestion issues. Four arterial improvements assessed are expected to improve traffic operations within the I-30 project, as shown in EA Appendix B: IJR Traffic Results and Safety Analysis, Appendix B5 (Arterial Assessment). Each of these improvements is also assigned a significant level of impact. For example, re-aligning southbound Highway 107 at Washington Avenue to parallel northbound would increase operations for traffic entering the downtown area from the north in the AM. Together with an expansion of J.F.K. Boulevard from a four-lane roadway section to a six-lane section, Highway 107 could be a viable alternative route for peak AM traffic. However, both improvements require significant impacts regarding right of way and existing structures. In addition to improvements along Highway 107, expansion along Broadway Street could potentially have some benefit to I-30 traffic operations. Several routes coalesce at the Broadway Street Bridge and I-30. Expanding the bridge to accommodate six lanes of traffic would be a significant cost but would increase capacity to carry traffic to and from the downtown area. Additionally, expanding Broadway Street (Highway 70) to six lanes between the Broadway Street Bridge and Main Street Bridge, could allow better flow for traffic coming from the north and east to enter downtown Little Rock from North Little Rock. These improvements could offer an alternate route to and from downtown but come at a high cost. Especially with the newly constructed Broadway Bridge that opened in 2018. Although a few arterial improvements were identified that could improve operations within the 30 Crossing project limits, all come at a high cost regarding either right of way, structural impacts, railroad impacts, environmental impacts, or a combination, and would result in only minor operational improvements to I-30. The

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		urban environment and location of the Arkansas River render few opportunities to increase the roadway capacity of the regional arterial network to improve operations on I-30. **Interstates** The assessment of the I-30/I-40 corridor included understanding travel characteristics. According to Metroplan, I-30 through traffic is estimated to be less than 18% of total I-30 traffic in 2040 (I-30 PEL, Appendix F Section 4.1: reference website 30 Crossing.com). Due to the origin of the trips being taken, not all of this traffic will be willing to reroute to other interstates such as I-440, resulting in far less than 18% of traffic being diverted from I-30. This would leave the majority of the 2041 forecasted traffic still on the I-30 corridor accessing downtown Little Rock or North Little Rock. Travel patterns on this corridor have been established over time as a result of how Little Rock and North Little Rock have developed. Dramatic changes in these traffic patterns cannot be made without significant impacts on businesses, housing patterns, and the general economic vitality of the region. In addition, significant improvements to other corridors and interchanges that would receive traffic diverted from I-30 would have to be made in conjunction with any downgrade in capacity of the I-30 facility. Below are some of the regional travel characteristics that led to the conclusion to improve the study corridor. • Signage on I-40 westbound directs drivers to take exit 159, interstate I-440, to go to Texarkana. Signage on I-30 eastbound directs drivers to take exit 138A, interstate I-440, to go to Memphis. Google Maps and other mapping software will often recommend that drivers moving through the area take I-440 to I-30 or I-40 because it is the current, shortest travel time. • Based on discussions with community leaders, truck drivers and review of truck data, truck traffic currently uses I-440 over I-30. Truck volumes are lower on I-30 (6% in 2014) than they are on I-440 (32% in 2014). Truck drivers avoid driving during peak congested time periods and congested corridors because time is so valuable to the delivery of goods. As a result, truck drivers try and avoid the I-30 corridor and use alternate routes such as I-430 and I-440 when possible. • Traffic is already being diverted to I-440. There are several ways through traffic is alerted that I-440 is a downtown bypass route.
H-5	Questions/ Concerns regarding I-630	The Preferred Alternative includes improvements to I-30 and I-40; it does not include major improvements to I-630. Traffic modeling determined that additional capacity improvements on I-630 from Louisiana Street west beyond the PEL study limits (“outside area”) are needed in the future year (2041) to avoid backups from congestion outside the study limits impacting traffic and safety inside the study limits on I-30. ARDOT has acknowledged this outside area warrants additional study and will evaluate and potentially improve, as determined necessary.
H-6	Transit as an Alternative	During the PEL screening process, transit alternatives were considered as complementary rather than as a solution that could meet the congestion relief component of the project purpose and need on their own. A transit study conducted during the PEL study indicated that transit would not divert sufficient trips from auto to transit on I-30 in 2040 to improve driving conditions. In addition, transit alternatives would not address roadway and bridge deficiencies or navigational safety, all of which are components of the project purpose and need. ARDOT agrees that transportation challenges have to be addressed through a multi-faceted approach with solutions spanning across all modes. If regional transit agencies such as Rock Region Metro implement mass transit improvements, it will certainly contribute to improving the overall regional transportation system performance. ARDOT has worked with Rock Region Metro on the 30 Crossing project to identify ways to accommodate transit in the corridor, and Rock Region Metro serves as a member of the 30 Crossing Technical Work Group.
H-7	More Options for Evaluation	The PEL study involved the evaluation of a broad range of 43 potential strategies, including other modes of transportation, as well as the No Action Alternative. These alternatives were developed by the study team, drawing upon previous planning efforts, with help from the Technical Working Group (TWG), stakeholders and the public. The TWG is composed of representatives of 37 agencies with an interest in the project. The Universe of Alternatives included Highway Build Alternatives, Arkansas River Bridge Alternatives, Other Mode Alternatives, Congestion Management Alternatives, and Non-Recurring Congestion Management Alternatives. Alternatives that were deemed to either not meet the purpose and need of the project, or to be impractical, based on either environmental impacts or costs that are so high as to make the alternative infeasible, were considered to have a “fatal flaw” and were screened out. Action Alternatives that were considered to have the potential to have a positive impact on the facility were carried into NEPA as Primary Alternatives. Action Alternatives that could enhance the effectiveness of the primary alternatives were carried into NEPA as Complementary Alternatives.

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H-8	Freeway Removal	See Fact 1.4 under Know the Facts: I-30 web page for the report titled Freeway Decommissioning, February 2018. The report reviews highway decommissioning projects in other cities and compares them to the 30 Crossing project in Little Rock, AR. When evaluating national examples, there were common characteristics which appear to be essential for the decommissioned highway plan to be successful. Decommissioned highways can be an effective way to improve local access and mobility within a downtown city, add green space to a city, and ultimately rejuvenate a downtown setting. Decommissioned highways are effective and successful in certain circumstances, including low volumes, low through vehicles, lack of need for the route, other high-speed routes are available, and/or have taken place of the route, and/or the facility is a short-distance route (approximately 1 mile). Most of the decommissioning examples fundamentally differ from the 30 Crossing project. A majority of the national examples where highway decommissioning is being considered and/or has been successful are situations where the freeway being removed and repurposed meets the characteristics of success noted above, and when the route is intended to serve vehicles remaining within the city network, as opposed to vehicles traveling through the downtown area. Finally, in addition to the research of national highway decommissioning projects, The Center for New Urbanism (CNU) CNU has published five reports titled "Freeways Without Futures". *Freeways Without Futures* 2017 edition brings together research into a comprehensive look at the current state of urban highway removal. In CNU's 2017 report, CNU identified 10 highways for possible conversion from freeway to boulevard. The projects identified in the CNU *Freeways Without Futures* report were found to exemplify the same characteristics as the projects identified in the Arkansas Times and the Arkansas Democrat-Gazette including: • Low volumes along the route • Alternative high-speed routes are available • Short distance route (approximately 1-mile) In summary, the 30 Crossing project is vastly different than the decommissioned highway projects identified by either local newspaper articles or in the *Freeways Without Futures* report. The 30 Crossing project does not represent a viable candidate project to removing the freeway and rebuilding a boulevard.
I – Purpose and Need for the Project		
I-1	Safety Issues and Changes	I-30 and I-40 within the project corridor have some of the highest densities of crashes in central Arkansas on its interstates and freeways. Roadway characteristics that do not meet the minimum standard that is necessary for safe travel are known as geometric deficiencies. Among the roadway geometric deficiencies that have been identified as contributing to an unsafe roadway corridor are: • Ramp lengths that are too short • Interchanges that are too close together • Curves that are too sharp • Left exits • Shoulders that are missing or not wide enough With the combination of roadway geometric deficiencies and increased congestion through the project area, the No-Action Alternative would result in a corridor that would be increasingly difficult to travel safely. Using the methods in the Highway Safety Manual, the IJR Safety Analysis (Appendix B) documented the results of a predictive safety analysis which estimated potential crash reductions for the No-Action and Preferred Alternative. Under the No-Action Alternative, the section of I-30 from I-630 to I-40 is expected to have the highest number of crashes in 2041 (444), with a crash rate of 2.89 crashes per million vehicle miles. For the entire project, the number of crashes is expected to rise from 616 in 2014 to 792 in 2041. In addition, the navigational safety issues would not be addressed under the No-Action Alternative, and the I-30 Arkansas River Bridge would be expected to continue to experience barge strikes due to the substandard horizontal clearance. The Preferred Alternative (2B: 6-lane with C/D SDI) would address the roadway geometric deficiencies that contribute to the high amount of crashes, and, according to the predictive safety analysis, result in a reduction in crashes compared to the No-Action Alternative. Looking at all segments of the project combined, the Preferred Alternative would be effective in reducing the crash rate, from 1.95 crashes per million vehicle miles under the No-Action Alternative to 1.01 crashes per million vehicle miles. In terms of crashes, this would be a reduction of approximately 336 crashes per year. The number of crashes would be

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		expected to drop by approximately half on the high crash rate segment of I-30 from I-630 to I-40, as well as on the important freight corridor of I-40 from I-30 to Hwy. 67. The C/D lanes included under the Preferred Alternative separate traffic entering and exiting the freeway from the through traffic, and reduce weaving, which is a major source of vehicle conflicts and crashes. This improvement is reflected in the lower fatal and serious injury (KA) crash rates with this alternative. Because of the predicted reduction in crashes with the Preferred Alternative, as well as the improvement in incident clearance time due to reduced congestion, the Preferred Alternative would improve reliability. The Preferred Alternative would also address the navigational safety issues on the Arkansas River.
I-2	Existing Access Issues	Left exits are not expected by drivers and occur from lanes that typically have higher speeds. Drivers may change lanes rapidly when they realize that the exit is not in the expected location (right side), and may exit onto the ramp at a speed which is higher than the ramp is designed for. There are two left exits within the project limits; on I-40 westbound at I-30 and at I-40 eastbound at Hwy. 67. In the morning and afternoon, traffic to and from Hwy. 67 and downtown Little Rock must weave across eastbound and westbound traffic on I-40, causing congestion and safety issues.
I-3	Existing Ramp Issues	Requirements for interstate ramp acceleration/deceleration lengths are based on the difference between the freeway speed and ramp speed. The design speed for I-30 is 60 miles per hour, while ramp speeds vary between a low of 25 miles per hour at the Hwy. 10 (Cantrell Road) interchange, to 50 miles per hour on the I-30 to I-40 ramps. Ramp lengths were measured and evaluated against recommended standards found in A Policy on Geometric Design of Highways and Streets, 2011 (Green Book), as well as ARDOT standards. Fifteen locations were identified in the IJR Safety Analysis (Appendix B) where substandard acceleration/deceleration lengths exist, including eight locations where no deceleration lanes exist at all. Closely spaced interchanges result in exit and entrance ramps that are very close together. Vehicles entering and leaving the freeway do not have sufficient distance to smoothly enter or leave the traffic stream (weaving). Recommended weaving lengths are given in the Green Book as 2000 feet. Eleven locations were identified in the IJR Safety Analysis (Appendix B) where substandard weaving lengths exist, with five of these locations between I-630 and the Arkansas River. When weaving lengths are too short and traffic volumes are high, it can become difficult for vehicles to enter a freeway at the same time vehicles are attempting to leave the freeway.
I-4	Existing Shoulder Issues	Nine locations have inadequate shoulder widths, including two locations where the curb and gutter is immediately adjacent to the travel lanes. Disabled vehicles can obstruct the travel lanes if shoulders are not wide enough, leading to further accidents and congestion. Emergency vehicles responding to an accident may be unable to use the inadequate shoulder to reach the accident, leading to increased response time.
I-5	Traffic Conditions in Downtown Little Rock	Both the Future No-Action and the Preferred Alternative (Action Alternative 2B: 6-lane with C/D with Split Diamond) use the same socio-economic data set from the Metroplan CARTS travel model. Therefore, there are the same number of vehicle trips generated with all future alternatives (Action and No-Action) to and from downtown Little Rock. On a daily basis, the difference between the No-Action and Preferred Alternative is that the preferred alternative redistributes the traffic to and from the greater downtown area as a result of the modified I-30 access, with more traffic accessing downtown Little Rock via I-30. The increase in traffic to and from downtown via I-30 results in a reduction in traffic to and from downtown via the Main Street and Broadway bridges. During the peak period, the Preferred Alternative would introduce slightly more traffic into the downtown area of Little Rock compared to the Future No-Action alternative as the Preferred Alternative eliminates the bottleneck on I-40 that currently exists, which allows traffic to be able to reach downtown more efficiently. Metroplan indicates that there is expected to be an increase in population of 271,764 between 2010 and 2040 in the Little Rock region growing the region to almost one million residents by 2040.The majority of this growth is expected to be outside Pulaski County in other parts of the metropolitan region. (Imagine Central Arkansas Long Range Transportation Plan, State of the Region: Demographic Trends Working Paper #2, Table 2. Traffic modeling for the Future No-Action condition shows that congestion will continue to get more severe if no improvements are made. This is evidenced by the length of the congestion in the peak periods in the morning and afternoon (EA Appendix B IJR Traffic Results and Safety Analysis, Appendix B3 Speed Profiles, Attachment 2, Exhibits 1A through 1D). This has a direct impact on traffic to and from downtown Little Rock. Speed profiles show that the Future No-Action congested peak period is much longer than the length of the existing peak period. The preferred alternative reduces the length of the congested peak period to close to existing conditions. Future No-Action congestion is not expected to be as bad as shown on some of the speed profiles due to limitations in the VISSIM software, because, as congestion increases over time to extreme conditions, some motorists will reroute to other corridors and growth may shift to other areas.

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		The No-Action Alternative would not provide any improvements in access to public facilities and would result in decreased access into downtown as congestion increases. In addition, emergency response times would not be improved and may worsen over time as a result of increasing congestion within the corridor. (Appendix A Indirect Effects Technical Report Attachment B, Appendix F Community Impacts, Tables 1 and 2, and Appendix B Traffic Results and Safety Analysis, Interchange Justification Report Addendum, Table 5, pdf p. 219). The Preferred Alternative eliminates the Hwy. 10 ramp from I-30 to Cumberland Street. Traffic using that ramp under the existing and No Action Alternatives would be redistributed onto local roadways. Traffic volumes on East 6th and East 9th Street will be the same under the preferred alternative and Future No Action Alternative. The preferred alternative results in higher daily traffic volumes on East 2nd Street, East 3rd Street, East 4th Street, Capitol Avenue, and on Cumberland Street between East 2nd Street and Capitol Avenue, than the Future No-Action Alternative. Traffic volumes on Cumberland Street between President Clinton Avenue and East 2nd Street are lower with the preferred alternative than with the Future No-Action Alternative. The Preferred Alternative includes restriping, signage, and signal improvements to downtown streets to address this change in travel patterns (EA Table 1, pdf p. 75). The Preferred Alternative includes improvements to interchange ramps, frontage roads, and cross streets, including bicycle and pedestrian accommodations that would improve access to public facilities and improve emergency services response time in downtown Little Rock (EA Appendix B Traffic Results and Safety Analysis, Appendix B Traffic Results, Table 7, pdf p. 325). Although there would be temporary disruptions to access of public facilities during construction, the Preferred Alternative improvements would enhance access to public facilities throughout Little Rock and North Little Rock up to the 2041 design year and beyond.
I-6	Congestion Management	Congestion management strategies alone will not solve the congestion problems anticipated for I-30 and I-40. Various congestion management strategies were first evaluated in the PEL study (I-30 PEL, Sections 11.0 through 16.0, and summarized in EA Appendix C Alternatives Analysis Technical Report, Section 3.0. These strategies were developed by the project team based on suggestions received from the public during public outreach in the PEL study. (See also Standard Comment Responses H-6, H-7 and N-1. • Information systems/advanced traveler information was recommended and is included in the Preferred Alternative. • Managed lanes are defined as a set of lanes where operational strategies are proactively implemented and managed in response to changing conditions. HOV lanes, a type of managed lanes, were evaluated and were not recommended due to the fact that the ingress and egress points to the managed lanes system would have to occur in areas where weaving due to traffic entering and leaving the highway would also be occurring, creating new conflict points and potential safety issues. • Reversible lanes were also not recommended due to the introduction of new conflict points and possible need to acquire ROW. • Ramp metering is an effective congestion management strategy that is not precluded from being implemented in the future. • Hard shoulder running was not recommended due to the potential for passenger vehicles to conflict with the operation of emergency vehicles. • Travel demand management includes alternative work hours, telecommuting and ridesharing. Although these are effective congestion management strategies supported by ARDOT, it is not within the ability of ARDOT to implement these measures. • Transportation system management (TSM) improvements such as variable signal timing that can be adjusted based on traffic conditions is not applicable to freeways, but can be used to control conditions on connecting roadways. Signals installed as part of the Preferred Alternative will be interconnected in order to support this capability. • Wayfinding/signage along the corridor will be improved with the Preferred Alternatives, helping travelers to make decisions. • Land use policy is a long-term strategy that has the potential to reduce peak hour traffic in the future, but is dependent on other agencies operating independently of ARDOT. • New and widened shoulders will provide more efficient congestion management with respect to stalled vehicles and incident management Strategies such as bus on shoulder, temporary hard shoulder running, and managed lanes could possibly be implemented at a later date if necessary; however, updates to infrastructure, policy and/or law may be necessary prior to implementation of these strategies.
I-7	Truck Traffic	The project is not anticipated to direct trucks into downtown. Trucks making local deliveries will continue to be present in the downtown area. However, trucks without local destinations are directed via signage to continue using I-440 as a route to the east of downtown or I-430 as a route to the west of downtown, and

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		I-40 serving as a route to the north. These routes serve as a beltway around Little Rock and North Little Rock, to which I-30 and I-630 serve as radial connections for trucks needing to make local, downtown deliveries. (I-30 PEL Traffic and Safety Report, section 3.2.1)
I-8	Existing Safety Evaluation	The safety analysis of the existing condition, shown in Appendix B of the EA, revealed that congestion and high number of access points along the route has contributed to high crash rates when compared to similar interstate facilities in Arkansas. Currently, the project area has the highest concentration of crashes in the region. The relative safety performance is generally determined by comparing the crash rate on the facility to the statewide average crash rate for similar facilities. ARDOT calculates statewide average crash rates for different facilities annually. For this section of I-30, the similar facilities were classified as Six-Lane or More Divided Highways, Full-Control of Access (Freeways) - Urban. This does not include the ramps or frontage roads, it only includes the main lanes. The average crash rate for Six-Lane or More Divided, Full-Control of Access (Freeways) - Urban was 1.02 in 2014, 0.99 in 2013, and 0.95 in 2012. For the segment of I-30 from I-630 to I-40, the calculated crash rate was 2.92 in 2014, 3.02 in 2013, and 3.52 in 2012.
I-9	Purpose and Need	The purpose of this project is to increase the safety of vehicular traffic on I-30 and I-40 by correcting geometric deficiencies, improve the condition of the roadway by modernizing infrastructure and maintaining a state of good repair, improve navigational safety on the Arkansas River, correct the I-30 Arkansas River Bridge deficiencies, and reduce traffic congestion by improving mobility on I-30 and I-40. The intent of the project improvements is to provide a reliable transportation corridor between Little Rock and North Little Rock that is structurally sound and improves safety and mobility by improving the operations of the multiple interchanges in the corridor. The I-30 Arkansas River Bridge would be replaced with a new structure, correcting the functional and structural deficiencies and navigation safety issues. The close proximity of five high volume interchanges (Hwy 67/I-40, I-40/I-30, I-30/Broadway, I-30/Hwy. 10, and I-30/I-630) and a major river crossing in the 30 Crossing corridor introduces a complex interdependence between each of these major transportation components. Due to this interdependence, improvements to the geometric and structural deficiencies of any one component relates directly to the other components in close proximity to it. Although the Arkansas River Bridge is the most critical component of the 30 Crossing project, corrections to its structural and geometric deficiencies tie directly into the improvements of the components adjacent to it. The major geometric deficiency for all of the interchanges and the River bridge is insufficient space and distance necessary to safely perform the merging and weaving maneuvers that are typical when traveling through and beyond a major interchange. The result of the similar deficiencies and close proximity of each interdependent component is that operational improvements for each component blend into those adjacent to it resulting in an increase of capacity throughout the project.
I-10	Induced Travel and Induced Demand	Induced travel describes the impact on choices that travelers or shippers make in response to improvements in travel time or cost to use a relevant facility or service. 1) Some travelers may be able to plan less buffer time in their schedule and leave later than usual. 2) Travelers on other routes may decide to change their route and use the new service or facility to gain a time or cost benefit. 3) Resource and schedules permitting, some travelers may decide to change destinations and/or modes. 4) Some households and businesses may decide to locate to existing development to gain a purchase or rent advantage. 5) Land developers may change their buildout schedules or plan new developments to take advantage of the influence of improved accessibility on real estate markets. It is important to note that these choices are considered across different time horizons. Finally, induced travel is related to induced growth where changes in the type, quantity, and rate of land development subsequently affect travel demand. The EA considered induced travel effects of route and destination changes attributable to relevant alternatives. The procedure as discussed in EA Appendix B Traffic Results and Safety Analysis used the Metroplan CARTS travel model to evaluate changes in volumes on key segments for each alternative. These changes informed the development of scenario-specific forecast adjustment factors (EA Appendix B Traffic Results and Safety Analysis, Appendix B Traffic Results, Table 2: 2041 Induced Demand Adjustment Factors pdf p. 299). Travel demand within the AM and PM peak periods was estimated using standard ARDOT project forecasting methods with best available information including: observed travel patterns; the scenario-specific adjustment factors; and subsequently further informed by the results of the VISSIM model. The EA considered induced growth effects (factors 4 & 5) of improved accessibility in Appendix A, Section 4.0 Induced Growth Effects. See Appendix B: IJR Traffic Results and Safety Analysis, June 2018, Interchange Justification Report, Appendix B – Traffic Results Addendum, January 2018. Chapter 3.0 Traffic Volumes, describes how the traffic volumes were developed. Traffic forecasts were developed based on ARDOT's *Arkansas State Highway and Transportation Department, Traffic Handbook*, 2013. The handbook documents traffic forecasting data collection, and procedures as required in 23 CFR 500 Subpart B. The Traffic Handbook uses these references: • A Policy on Geometric Design of Highways and Streets, American Association of State Highway and Transportation Officials (AASHTO), 2011

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Highway Capacity Manual, (HCM 2010), Transportation Research Board
Traffic Monitoring Guide, Federal Highway Administration, 2001
AASHTO Guidelines for Traffic Data Programs, AASHTO 2009
ARDOT Technical Services Field Manual, ARDOT, Planning and Research Division, Technical Services (Renamed as Traffic Information System Section in 2013), 1988
Highway Performance Monitoring System Field Manual, Federal Highway Administration, Office of Highway Policy Information, 2013
NCHRP Report 365 – Travel Estimation Techniques for Urban Planning, 1998
NCHRP 01-37A: Development of the Guide for the Design of New and Rehabilitated Pavement Structures, 2002

In summary, the methodology for projecting traffic with and without the improvements was reviewed by FHWA, Metroplan and ARDOT. The latest available Metroplan travel demand model was used to develop traffic for all future alternatives. The alternatives with more capacity do induce traffic in the corridor. These changes are represented in the text. The traffic volumes were developed using the Metroplan regional travel demand model thus incorporated regional traffic modeling.
</td></tr>
<tr><td>I-11</td><td>Verification of Traffic Congestion</td><td>
The team collected travel time runs in the field to aid in the calibration of the VISSIM models. Also, ARDOT cameras were used to observe traffic. Team personnel drove the corridor during peak travel times to understand congestion points and verify vehicle queues. National Performance Management Research Data Set data was also used to verify travel speeds in the corridor (I-30 PEL Appendix F, Traffic and Safety Report, Appendices 2 Traffic Technical Report and 3 VISSIM Model Methodology Report).
Models were then reviewed and verified by ARDOT, Metroplan and FHWA staff. Traffic model results were then presented to the 30 Crossing Technical Working Group with no recorded comments on the traffic volumes in the existing VISSIM models. Traffic model results were then presented to the public with no recorded comments on the traffic volumes in the existing VISSIM models.
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<tr><td>I-12</td><td>Logical Termini /Segmentation/ Independent Utility
Cumulative Impact APE</td><td>
The project limits were defined based on documented needs in the I-30 and I-40 corridors, including bridge structural and navigational deficiencies, traffic congestion, safety, roadway geometric deficiencies; as well as points of major traffic generators

Congestion on I-30 and I-40 was documented to be most severe on the segment of I-30 from I-440/I-530 to I-40, and on I-40 from I-30 to Hwy. 67.
Safety issues in the project corridor were related to geometric deficiencies: left exits, substandard ramp lengths, substandard curves, substandard shoulders, and closely spaced interchanges, which were found to be most prevalent on I-30 from I-440/I-530 to I-40 and on I-40 from I-30 to Hwy. 67
The southerly project limit is a location where I-30, I-440, and I-530 converge, resulting in a significant change in traffic volumes
The northerly project limit is a location where I-40 and Hwy. 67 converge, another location where traffic volumes change significantly

The Preferred Alternative provides some benefits to the adjacent segments of I-630 and I-30 compared to Future No-Action as shown in the table below.
2041 Peak Traffic
6-Lane with CD - Split Diamond Interchange
I-630 and I-30 outside of the Study Area
Comparison to Future No-Action
<table>
<tr><td>2041</td><td>AM</td><td>PM</td></tr>
<tr><td colspan="3">I-630</td></tr>
<tr><td>WB</td><td>Worse</td><td>Same</td></tr>
<tr><td>EB</td><td>Better</td><td>Better</td></tr>
<tr><td colspan="3">I-30</td></tr>
<tr><td>WB</td><td>Same</td><td>Worse</td></tr>
<tr><td>EB</td><td>Better</td><td>Better</td></tr>
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		In summary, I-630 eastbound congestion in the morning and afternoon peak hours will be relieved by the Preferred Alternative because the capacity of the I-630 eastbound to I-30 northbound ramp will be improved. I-30 eastbound congestion in the morning and afternoon peak hours will be relieved by the Preferred Alternative, which relieves the bottleneck occurring due to weaving just north of the I-30/I-440/I-530 interchange. The directions that performed worse are a result of improving an upstream bottleneck on I-30 and thus releasing more traffic to I-630 and I-30. In total, there were four segments that performed better and two segments that performed worse as summarized in the table. (30 Crossing Interchange Justification Report, Appendix B, Appendix B3 – speed Summary, Attachment 3, Exhibits 2 and 4).
I-13	Regional Population Growth Trends	Originally formed as the Metropolitan Area Planning Commission of Pulaski County in 1955, Metroplan has served as the area's federally-designated Metropolitan Planning Organization (MPO) since 1972. Its function as an MPO is to work with local governments, ARDOT, and local transit providers to determine transportation needs and funding priorities for federal transportation investments. The creation and implementation of the area's long-range transportation plan is a principal function of Metroplan as the region's designated Metropolitan Planning Organization. The current long-range transportation plan, *Imagine Central Arkansas*, was adopted by the Metroplan Board of Directors in December of 2014. The long-range plan is updated every five years and has a planning horizon of twenty to twenty‑five years in the future. The long-range plan provides a vision for how to invest in and improve the regional transportation infrastructure of Central Arkansas. Regional planning through the long-range transportation planning process includes community input. Metroplan's LRTP *Imagine Central Arkansas* developed a population and employment forecast for the entire region and distributed the population growth and employment throughout the region for the planning horizon year of 2040. Metroplan has stated that they expected a 268,000 increase in population between 2010 and 2040 with 73.5% of the growth occurring outside of Pulaski County. The Preferred Alternative addresses the regional and study area needs that are identified in Metroplan's regional travel demand model. As demonstrated in Section 1 of the EA, the need for this project already exists based on existing measured travel demand, and is not solely based on projected future traffic volumes (*Imagine Central Arkansas*). According to Metroplan's land use analysis: "Broadly speaking, the Preferred Alternative will accentuate the region's tendency to continue developing at low density, with the bulk of residential housing growth in peripheral locations (already growing at a comparatively fast pace) from which residents commute to jobs in the central area. The project's greatest impact is expected to be along the region's northeastern vector, the US 67-167 corridor including Sherwood, Jacksonville, Cabot, Austin and Ward. This is because the project (and ongoing widening of Hwy 67/167) will reduce commuting times to major job concentrations in downtown and midtown Little Rock, south of the Arkansas River, yielding an acceleration of growth within the corridor over the short term. There could also be a secondary impact on the 1-40 corridor toward Maumelle, which has few locally-based jobs but many resident commuters. Additional growth may also happen in the East End area of Pulaski County and Southwest Little Rock where there is ample developable land. Multi-family housing growth may be boosted toward the immediate ends of the Preferred Alternative, in North Little Rock and Sherwood on the northeast as well as the southwest Little Rock/Otter Creek areas to the southwest. In the past, major freeway widenings have yielded substantial commercial/retail land use upgrades, but a major transition is underway in retailing due to e-commerce growth, which dampens growth prospects. The trend of slow but steady multi-family housing growth seen in recent years in downtown portions of Little Rock and North Little Rock is expected to continue. Traffic flow alterations in specific downtown locations may have localized impacts that are hard to foresee - positive and negative - though generally lesser in scale. The addition of the collector/distributor lanes will increase direct accessibility between the two cities, which could have a positive impact on housing and commercial prospects in both downtowns. The highest uncertainty involves the portion of North Little Rock directly east of 1-30. This area, which includes some of the lowest incomes and highest poverty levels in the region, may have been impacted by the division/isolation effect of the original 1-30 construction in circa 1960. The area appears ripe for redevelopment owing to its proximity to resurgent urban districts nearby; the Preferred Alternative may improve accessibility enough to induce renewed private investment. Alternatively, the widening could increase this district's perceptual isolation from the west side of the freeway, with continuation of poor economic prospects, especially toward the northern end. Job growth impacts of the Preferred Alternative are also difficult to determine. Improved accessibility might, on balance, encourage some job growth in areas with dense job concentrations, including hospitals stretching westward along 1-630. Total jobs have declined modestly in downtown Little Rock over the past ten to fifteen years (despite net housing growth); it is difficult to know if the job decline will continue."

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		Notes and Sources 1. Metroplan's ICA 2040 Plan, which has informed much of the analysis for 30 Crossing, was developed in the aftermath of the 2000-2010 decade - a period of fast regional growth. Traffic projections for 30 Crossing were developed with the available information at the time of their development, during the spring and summer of 2014. The Imagine Central Arkansas Plan was adopted in December 2014, with these assumptions for population growth. 2. Transportation facilities are only one of many factors impacting development trends. Other factors include the availability of city utility services, surrounding land use, developable lands, schools, access to quality of life enhancements (parks, entertainment), and the existing distribution of people and jobs. Metroplan considers each of these when developing future year socioeconomic projections for the regional travel demand model, but it is impossible to account for all factors or the inherent randomness of human behavior. 3. This analysis includes the widening of the 67-167 (future 1-57) corridor from Jacksonville to Cabot (currently underway), since this amounts to a northeastern extension of the same corridor. 4. There was a surge in multi-family housing growth in western Little Rock within a 2-mile radius of the Big Rock Interchange project in the years following this project's completion. Some of this development can be attributed to a general shift toward greater multi-family housing that followed the Great Recession, but the location correlation with the 1-630/1-430 interchange improvement is more than coincidental. It is nonetheless likely that the region's multi-family housing will see a down-shift in the immediate future, owing to rising costs in materials, construction labor shortage and rising land costs. 5. The possibility of housing growth in Maumelle may be further boosted near the new Maumelle interchange that will be constructed on 1-40, which is being funded due to a city tax increase approved by city voters during 2018. 6. The accelerated growth of Saline County, which the widening of 1-30 is thought have boosted, is documented in MetroTrends articles: (1) Economic Review and Outlook 2004, outlook section (p. 12); (2) Demographic Review and Outlook 2005, housing trends section (p. 4); (3) Demographic Review and Outlook 2005, from the population estimate section (p. 1); (4) Economic Review and Outlook 2005, from outlook section (p. 12); (5) Economic Review and Outlook 2007, from the outlook section (p. 12); and (6) Demographic Review and Outlook 2014, outlook section (p. 14). 7. This write-up reflects the experience of Metroplan staff, based on many years of experience with land use and traffic projections. 8. The TELUM land use model could be consulted for further land use insights resulting from 30 Crossing. The model demands relatively intensive inputs. Any attempt to use TELUM for 30 Crossing would require something like three months of staff work to conduct." (Metroplan's Public Hearing Comments).
J – Alternative Transportation Considerations		
J-1	Transit as Part of Project	Two of the goals established for the 30 Crossing project included connecting bicycle/pedestrian friendly facilities across I-30/I-40 and accommodating existing transit and future transit. Pedestrian facilities are well developed in the project area, with the two closest bridges to Arkansas River Bridge being pedestrian-only bridges. There is also a network of bicycle facilities, including the Arkansas River Trail, which crosses the corridor along both sides of the Arkansas River. There is one bus route run by a public transit system (Rock Region Metro, formerly Central Arkansas Transit Authority, or CATA) that uses the corridor, with five trips per day. Additionally, the River Rail Street Car runs throughout the downtown areas of Little Rock and North Little Rock, including under the existing I-30 bridge over 3rd Street. The proposed Action Alternatives were developed to avoid impacts to the portion of the River Rail Street Car on 3rd Street.
J-2	Bicycle / Pedestrian	Proposed bicycle and pedestrian facilities would be included in the proposed project for all Action Alternatives. These accommodations would include wider sidewalks for pedestrians and wider lanes to accommodate a four-foot wide bike lane in each direction for cyclists at the 6th St. and 9th St. bridges over I-30. In addition, underpass bridge improvements could include sidewalk improvements and lighting for travelers at most of the cross streets which have bridge openings that meet or exceed the master street plan width. The striping for a designated bike lane would be determined by the cities; however, the proposed project would provide the lane widths to accommodate a four-foot wide bike lane in each direction. These cross-street improvements are a result of community input and provided in an effort to improve east to west connectivity for neighborhoods adjacent to the proposed project limits. Additional sidewalks would also be included for the reconstruction of 2nd Street under the SDI Action Alternatives. Unlike the SPUI Alternatives, the SDI Action Alternatives would include the reconstruction of 2nd Street to include sidewalks along both sides of 2nd Street, two westbound lanes, and two eastbound lanes from Cumberland St. to Mahlon Martin Street. The sidewalks would provide additional east to west connectivity.

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K – Concerns about potential social, economic or environmental impacts and/or request for protection of environmental resources in the study area		
K-1	Regional and Community Growth	The No-Action Alternative would not address the existing safety and traffic congestion issues on the I-40 and I-30 corridors. Traffic congestion is one of the factors used to evaluate quality of living for cities. The Preferred Alternative would provide better relief than the No-Action Alternative from the congestion expected as a result of projected population growth. The Preferred Alternative would improve travel conditions, enhancing safety and mobility. This transportation project alone would not cause a substantial impact to the population growth of the study area. Although population growth can directly impact the cities and communities within the project corridor, population growth would occur in the future and is not a direct effect of the proposed project. Any effect resulting from the proposed project that occurs later in time and distance from the proposed project footprint would be considered an indirect effect. Indirect effects are detailed in the Indirect Impacts Technical Report (Appendix A).
K-2	Noise Impacts and Mitigation	Impacts from traffic noise are discussed in detail in the Traffic Noise Study Report (Appendix I). Long term noise measurements were taken at three locations during a 48-hour period within the project area to determine the time of day when traffic noise levels were the highest. Simultaneously, short-term noise measurements were taken at 15 other locations throughout the project area. Traffic was counted at the same time as these short-term noise measurements, for the purpose of verifying that the noise levels produced by the computer program, FHWA's Traffic Noise Model (TNM) 2.5, were reasonable compared to the short-term measurements. It was found that the computer program would model noise levels that compared reasonably well with the short-term noise measurements. The model was then used to predict existing and future (2041) traffic noise levels for the No- Action and the Preferred Alternative. Traffic noise levels are measured and modeled in a unit of noise intensity called as Leq, A-weighted decibels (dB(A)). Whether or not traffic noise from a highway project would result in environmental impacts depends on the land use of the site (receptor) that is receiving the noise and the noise level. For residences and parks, a noise level of 66 dB(A) is considered a noise impact, while 71 dB(A) is considered an impact for businesses. An increase in noise levels of 10 dB(A) from the existing condition to the future condition is considered a significant increase and is also considered to be a noise impact. No increases of 10 dB(A) were predicted by the noise model as a result of the No-Action and the Preferred Alternative. Results of the analysis conclude that the Preferred Alternative would result in traffic noise impacts. Noise abatement measures were evaluated for all areas with noise impacts. Noise barriers must be both feasible and reasonable in order to be proposed for construction. "Feasible" means that the barrier provides a substantial (5 dB(A) or greater) noise reduction for at least one impacted site and that there are no engineering or economic obstacles to its construction. "Reasonable" means that the barrier is cost effective in that it can be built at an average of $36,000 or less for each site that is benefited by the barrier; that for at least one site that is benefited, an 8 dB(A) reduction is obtained. For the Preferred Alternative, three barriers were found to be both feasible and reasonable: • West of I-30 from 21st St. to UPRR in Little Rock, benefiting 84-86 residences • West of I-30 between 17th St. and 21st St. in Little Rock, benefiting 30-33 residences • East of I-30 between 13th St. and 19th St. in North Little Rock, benefiting 87-139 residences Based on the traffic noise study report, ARDOT is likely to incorporate the feasible and reasonable noise barriers identified above into the project. During the design phase of the project, the location of feasible and reasonable noise mitigation will be reassessed. If final design results in substantial changes in roadway design from the conditions modeled for the EA, noise abatement measures will be reviewed. A final decision on the installation of abatement measures will be made upon completion of the public involvement process, which will solicit the viewpoints of residents and property owners benefited by the construction of the feasible and reasonable noise barriers and in accordance with 23 CFR 772.13(i). For design-build projects, the traffic noise study report shall document all considered and proposed noise abatement measures for inclusion in the NEPA document. Final design of design-build noise abatement measures shall be based on the preliminary noise abatement design developed in the traffic noise study report. Noise abatement measures shall be considered, developed, and constructed in accordance with this standard (23 CFR 772) and in conformance with the provisions of 40 CFR 1506.5(c) and 23 CFR 636.109. Construction activities such as demolition, hauling, grading, paving and bridge construction would result in temporary increases in noise along the project. Local noise ordinances may place restrictions on the contractor, including limiting certain activities to specified hours, in order to reduce construction noise impacts. In addition, techniques such as temporary noise barriers are available that would further reduce temporary noise impacts.

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K-3	Historic Districts	Section 106 of the National Historic Preservation Act requires agencies to consider the effects of federal actions to historic properties. ARDOT cultural resources specialists consulted with the staff of the Arkansas Historic Preservation Program (AHPP) and State Historic Preservation Officer (SHPO) to determine that seven historic districts that are listed in the National Register of Historic Places (NRHP) are located within, or partially within, the APE. In addition to the seven historic districts, 136 NRHP-listed or NRHP-eligible properties are within the APE, including the Locust Street Overpass. Potential effects of the Preferred Alternative and No-Action Alternatives on these resources were evaluated in the Built Environment Resources Effects Analysis Technical Report (Appendix G). The No Action Alternative would have no impact on these resources. Construction, demolition, noise, traffic, and visual impacts of the Preferred Alternative were evaluated. Noise impacts on historic properties would be mitigated. It was determined that the permanent traffic and visual impacts, and temporary construction impacts, of the Preferred Alternative would not reduce the integrity of any historic properties, with the exception of the Locust Street Overpass, which would be demolished. The removal of the Locust Street Overpass would be an adverse effect. The Preferred Alternative would have no adverse effect on the remainder of the historic properties within the APE. The FHWA and the Advisory Council on Historic Preservation are developing a Section 106 Programmatic Agreement (PA) to address any adverse effects on historic properties within the APE. The PA will stipulate measures to avoid, minimize or mitigate any adverse effects to historic properties that are currently identified or that become apparent in a later phase of the project. The PA will allow the Design/Build contractor greater flexibility in design and in construction details such as the location of staging areas. With regards to the Locust Street Overpass, the PA will include appropriate measures to minimize harm as required by the Programmatic Section 4(f) Evaluation and Approval for FHWA Projects that Necessitate the Use of Historic Bridges. This Programmatic 4(f) document can be found in Appendix H.
K-4	Parks	There are three parks along the Arkansas River that would be affected by the construction of the I-30 Arkansas River Bridge. None of these parks used funds from the Land and Water Conservation Act Funds; therefore, there is no Section 6(f) involvement. On the south bank of the River, the William J. Clinton Presidential Center and Park (Clinton Center) lies to the east of I-30 and Julius Breckling Riverfront Park (Riverfront Park) lies to the west of I-30. Both parks are administered by the City of Little Rock. North Shore Riverwalk (Riverwalk Park) lies on the north side of the River on both sides of I-30. Riverwalk Park is administered by the City of North Little Rock. The North Little Rock Downtown Riverside Recreational Vehicle Park (RV Park), which is separately administered by the City of North Little Rock, lies within its boundaries. During construction, there would be temporary impacts to the Clinton Center and Riverfront Park under the Preferred Alternative due to construction of the I-30 Arkansas River Bridge. The following resources within the Clinton Center would have to be temporarily relocated by the City of Little Rock or closed under all project alternatives: the Promenade, an access roadway located just to the east of and under I-30; a stairway from Clinton Drive to the Arkansas River Trail; statues along the Promenade; and the Arkansas River Trail. ARDOT would work with the Clinton Center and the City of Little Rock to minimize disruption due to construction activities. Also during construction, there would be temporary impacts to the following resources within the Riverfront Park: the Promenade, an access roadway located under I-30 and extending into the Park, and the Arkansas River Trail. ARDOT would work with Riverfront Park and the City of Little Rock to minimize temporary disruption to these resources due to construction activities. During construction, there would be temporary impacts under the Preferred Alternative to the pavilion, parking, the Arkansas River Trail, and the Locust Street boat ramp within Riverwalk Park. These amenities would be within the footprint of the construction activities and would have to be temporarily relocated out of the construction area by the City of North Little Rock. Following construction, the City could request relocation of the pavilion and parking back within ARDOT ROW by means of an air space agreement. The Arkansas River Trail would have to be temporarily detoured around the construction zone. ARDOT would work with the City of North Little Rock to minimize disruption to the Arkansas River Trail. The Locust Street boat ramp would be temporarily closed for the duration of construction activities. There will be no permanent noise impacts to the parks as a result of the project. During construction, there will be temporary impacts due to construction noise. The proposed I-30 Arkansas River Bridge would be wider than the existing bridge and would require ARDOT to expand the air space agreement over the Parks. In addition, temporary construction easements would be required. Under the Preferred Alternative, it would also be necessary to acquire a 7-10-foot strip of ROW along the west side of Mahlon Martin, part of the Clinton Center, to allow for widening of the roadway. Travel times to and from the Clinton Center under the Preferred Alternative and No-Action Alternatives were evaluated in the Indirect Effects Technical Report (Appendix A). The analysis showed that the Preferred Alternative would provide better access to and from the Clinton Center than the No-Action Alternative. The No-Action alternative would have no effect on the Parks; however, access to the Parks would be affected by increasing traffic congestion.

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		FHWA has determined that the project will not harm the protected features, assets, or activities that make the Parks important for recreation under Section 4(f), thus qualifying for a de minimis finding. The Cities of Little Rock and North Little Rock have agreed that the project will not have a harmful effect on the Parks. Documentation is provided in Appendix H.
K-5	Social / Community Impacts	The No-Action Alternative would not involve any temporary disruption during construction, but would not provide any connectivity enhancements. Additionally, as congestion worsens and conditions on I-30 deteriorate, communities would be impacted by travelers seeking alternate routes. The Preferred Alternative (2B: 6-lane with C/D SDI) includes improvements to frontage roads and cross streets, including bicycle and pedestrian accommodations that would enhance east-west connectivity across I-30 and promote community cohesion. The Preferred Alternative (2A: 6-lane with C/D Split Diamond Interchange)) would additionally improve connectivity across the Arkansas River between North Little Rock and Little Rock. During construction, there would be temporary disruptions. The effects of the Action Alternatives are similar throughout the project area, except in the downtown Little Rock area. The Preferred Alternative would be a visual enhancement. The existing Hwy. 10 ramps and the existing elevated spur of Hwy. 10 from I-30 to Cumberland Street would be removed altogether, increasing connectivity along Rock Street and making the area around the Historic Arkansas Museum safer and more pedestrian and bicycle-friendly. The removal of the ramps would have a beneficial effect on community cohesion by increasing vehicular, pedestrian and bicycle connectivity across the I-30 corridor and improving the area aesthetically by creating approximately 15.7 acres of green space along both I-30 and East 2nd Street. Views along President Clinton Avenue would not be obstructed and pedestrian movements would not be inhibited along East 2nd Street. The development of the potential green space would be determined by the City of Little Rock. Traffic volumes along East 2nd, 3rd, and 4th Streets would increase; however, because this area is highly developed, the change would not affect the character of the area.
K-6	Aesthetic Impacts	The viewshed from the 30 Crossing project area is described in the Visual Impact Assessment Technical Report (Appendix K). From south to north, the Area of Visual Effect (AVE) was broken down into the Landscape Units of North Little Rock, I-30 Arkansas River Bridge, and Little Rock. The North Little Rock Landscape Unit consists of the wetland area of Dark Hollow Basin, Northern Residential area, and Southern Light Industrial area. The I-30 Bridge (Arkansas River) Landscape Unit consists of the North Bank, Arkansas River, Clinton Presidential Center and Park, and downtown Little Rock. The Little Rock Landscape Unit consists of the predominantly residential area of South Little Rock, the light industrial/commercial area of East Little Rock, MacArthur Park, and the natural area of Fourche Creek. The No-Action Alternative would have no impact on the viewshed. The Preferred Alternative (2B: 6-lane with C/D SDI) would have temporary impacts on the viewshed during construction. Once construction has been completed, the Preferred Alternative would provide an area of revitalized green space in downtown Little Rock. The Preferred Alternative would remove the existing Hwy. 10 Interchange and elevated spur from I-30 to Cumberland Street, enhancing the viewshed in downtown Little Rock and providing 15.7 acres of green space. The Preferred Alternative would involve improvements within the ROW, with very little alteration in the height of the roadway and bridges above the surrounding land. Consequently, changes in the appearance of the corridor, as well as the views experienced by road users, would be minor. The Cities of Little Rock and North Little Rock will provide guidance on the aesthetics for their respective portions of the project in an Agreement of Understanding with ARDOT. Aesthetic components that are not addressed in these Agreements will be implemented in accordance with the Project Aesthetics Guidelines which were developed with input from a visioning committee of citizens from Little Rock, North Little Rock, and Pulaski County.
K-7	Impacts to Parking	Under the Preferred Alternative (2B: 6-lane with C/D SDI), the existing public parking lots within ARDOT ROW would be removed 1) under the I-30 facility south of President Clinton Ave. 2) within the circular ramp to 2nd St./Ferry Street. and 3) under the Markham St./Hwy. 10 (Cantrell Rd.) ramp to Cumberland Avenue. Removal of these parking lots are not required for the proposed improvements; however, the City of Little Rock has not requested to renew the air space agreement with ARDOT to retain these parking facilities. These areas could potentially be replaced by the proposed roadway improvements or additional green space to be determined at a later date as a separate project by the City of Little Rock. On-street parking options are available and business owners would need to consider the parking options for their customers and employees. The green space could also include bike and pedestrian walkways to provide additional east-west connectivity. The green space is further discussed in the EA Appendix F: Community Impacts Technical Report. For the Preferred Alternative, modifications to 2nd Street and 4th Street would result in additional parking removals. On-street parking removals are anticipated along 2nd Street, 4th Street, and Ferry Street. On-street parking removal would be required along these streets to accommodate additional lanes for 2nd Street and 4th Street. Removal of these parking options could influence future development along these streets and require future consideration of parking options for future developments.

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K-8	Air pollution and emissions	Since the Clean Air Act of 1970, EPA has been responsible for a variety of efforts to reduce air pollution nationwide. EPA develops standards for the following human health based criteria air pollutants: particulate pollution (PM2.5 and PM10), ground-level ozone, nitrogen oxides, lead, carbon monoxide, and sulfur dioxide. The limits based on human health are called primary standards. Of the six criteria pollutants, particulate pollution (PM2.5 and PM10) along with ozone are the most widespread health threats. A geographic area with air quality that is cleaner than the primary standard is called an "attainment area". Likewise, areas that do not meet the primary standards are called "non-attainment" areas. The 30 Crossing project is located in an area that has been in attainment of the 6 criteria pollutants in the National Ambient Air Quality Standards (NAAQS) for the past 25 years. A Mobile Source Air Toxic (MSAT) quantitative analysis was prepared for the Preferred Alternative (2B: 6-lane with C/D SDI) and No-Action Alternatives for the existing year (2014), opening year (2021), and design year (2041). The geographic scope of the analysis extended well beyond the project limits on Hwy. 67 and I-630. MSATs are nine compounds with significant contributions from mobile sources that are considered to be non-cancer hazards and cancer risk contributors: acetaldehyde, acrolein, benzene, 1,3-butadiene, diesel particulate matter (diesel PM), ethylbenzene, formaldehyde, naphthalene, and polycyclic organic matter. The amount of MSATs emitted in the region are proportional to Vehicle Miles Traveled (VMT); however, because of improvements in emissions technologies, total MSAT emissions will decline over time, even while VMT increases. Under both the Preferred Alternative and No-Action Alternative, total MSAT emissions would be lower than present levels in the design year by 88% with the Preferred Alternative being 0.3% to 0.9% less than the No-Action. The MSAT analysis is presented in the MSAT Technical Report (EA Appendix Q).
K-9	ROW Acquisition and Displacements / Relocations	The No-Action Alternative would not require any ROW acquisition or displacements. The Preferred Alternative (2B: 6-lane with C/D SDI) ROW acquisition begins with an easement over the UPRR near the southern end of the project and ends with ROW for a ramp at the I-40/Hwy. 67 interchange near the eastern project limit. The Preferred Alternative would result in five commercial and six residential displacements. All six residential displacements are located along Cypress Street in North Little Rock. Under the Preferred Alternative, the existing southbound frontage road (Cypress Street) would be extended over the UPRR between 9th and 13th Streets, in order to improve connectivity and access to businesses and residences in this neighborhood. In the downtown Little Rock area, the Preferred Alternative would require additional ROW to be acquired along the northbound exit ramp between East 3rd and East 6th Streets, requiring the acquisition of the EZGO Golf Cart Headquarters and westernmost building of the Arkansas Gazette. The taking from the Arkansas Gazette would also involve a connection between 3rd and 4th Streets on the east side of I-30. The Preferred Alternative would require a taking from the Clinton Presidential Center and Park along Mahlon Martin Street and the northbound entrance ramp. The Preferred Alternative would require a taking along the southbound exit ramp to Hwy. 10, involving the Julius Breckling Riverfront Park and one commercial displacement (C3).
K-10	Evolving Technology	Developing and evolving aspects of transportation technology are being considered in the development of the 30 Crossing project. It is anticipated that these technologies will be a standard part of traveling in the coming decades. Consideration of Intelligent Transportation System (ITS) technologies and congestion management strategies are ongoing. These considerations, will enable ARDOT to respond efficiently in adapting and retooling roadways to accommodate new technologies. An assessment of these technologies is presented in EA Appendix B: IJR Traffic and Safety Analysis, Appendix B6 -Emerging Technologies. The conclusion of the analysis is that any improvement in traffic congestion due to the conversion of a large percentage of the vehicle fleet into connected and autonomous vehicles is probably at least 30 years in the future.
K-11	Additional Greenspace	The Preferred Alternative (2B: 6-lane with C/D SDI) would transform the River Market central business district by changing travel patterns, eliminating some on-street parking, and increasing connectivity in downtown Little Rock. The Preferred Alternative would increase green space in downtown Little Rock, which has the potential to increase the recreation opportunities and economic vitality of the area, particularly the developing area east of I-30. The Preferred Alternative would result in an increase of 15.7 acres of green space and provide an unobstructed open area under I-30 from the Arkansas River to 3rd Street.
K-12	Environmental Documentation	Per Federal Highway Administration (FHWA) NEPA Documentation standards, an Environmental Assessment (EA) is being prepared to assist in determining the significance of environmental impacts. Following the completion of the PEL study, FHWA determined that the appropriate Class of Action is an Environmental Assessment on August 19, 2015. The EA is being prepared to: • Evaluate the environmental effects of improving I-30 and I-40. • Inform and receive feedback from the public and decision makers about the purpose and need for the project, the alternatives that are being considered, and the anticipated environmental effects of the improvements.

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		• Determine whether effects are significant and require an Environmental Impact Statement or if the project effects can be sufficiently documented through an EA and Finding of No Significant Impacts (FONSI). The determination of class of action is at the sole discretion of the FHWA. Based on the information contained in this EA, and after a review of comments received from citizens, public officials, and public agencies FHWA will make a decision regarding whether the project is likely to have a significant impact on the environment. If FHWA determines that a significant impact is likely, an Environmental Impact Statement (EIS) will be prepared by ARDOT and submitted to FHWA. If FHWA determines a significant impact is not likely, a Finding of No Significant Impact (FONSI) document will be prepared by ARDOT and submitted to the FHWA. Although the format and documentation required for the EIS is different from the EA, because of the complexity of this project, a much more thorough evaluation of environmental impacts was done than is normally done for an EA. In fact, all of the analyses required for an EIS have been performed and are summarized in the EA. The EA includes 18 appendices providing detailed analysis of every issue that was raised by the public or agencies involved in the process from the PEL through NEPA phases. The total size of the EA with appendices is 3992 pages. FHWA guidance is that the body of an EA should be less than 15 pages and an EIS less than 150 pages. The body of this EA is 123 pages. As cooperating agencies, it is anticipated that both the United States Army Corps of Engineers (USACE) and United States Coast Guard (USCG) would adopt the FHWA/ ARDOT NEPA document as their environmental document, issuing a joint NEPA determination. All coordination, environmental documentation, review and decision making with the USCG would occur in accordance with the Memorandum of Agreement (MOA) and Memorandum of Understanding (MOU) between the USCG and FHWA and the Application for Coast Guard Bridge Permits guidance. Additionally, the FHWA/ ARDOT NEPA document must comply with the USCG environmental document checklist before issuance of a joint NEPA decision.
K-13	Traffic Signals/ Pedestrian Safety in Downtown Little Rock	**Sidewalks:** • **2nd Street** - On the south side of 2nd Street, there will be sidewalks with buffers to the street the entire length from Cumberland Street to Mahlon Martin Street. Additionally, wheelchair ramps will be installed at each intersection. On the north side, the existing sidewalk will remain as is from Cumberland Street to Sherman Street. New sidewalk with buffer and wheelchair ramps will be installed from Sherman Street to Mahlon Martin Street. • **3rd Street** – Existing sidewalk will remain in place for most of the corridor. On the south side from the existing SB frontage road to Mahlon Martin Street, sidewalks with a buffer and wheelchair ramps will be installed. • **4th Street** - Existing sidewalk will remain in place for most of the corridor. On the south side from approximately 250' west of the existing SB frontage road to Mahlon Martin Street, sidewalks with a buffer and wheelchair ramps will be installed. • **Northbound and Southbound Frontage Roads** – In the existing conditions, there are not sidewalks on the frontage roads north of 6th Street. This project will provide sidewalks with buffers and wheelchair ramps on the west side of the SB frontage road and on the east side of the NB frontage road. **Traffic Signals** In downtown Little Rock, the most significant traffic increases are expected on 2nd Street, 3rd Street and 4th Street. On these corridors, new signals or modified signals are being added for the Preferred Alternative at the following locations: • 2nd Street at Cumberland Street • 2nd Street at River Market Avenue • 2nd Street at Sherman Street • 2nd Street at Mahlon Martin Street • 3rd Street at Rock Street • 3rd Street at River Market Avenue • 3rd Street at Texas Turnaround • 3rd Street at Mahlon Martin Street • 4th Street at Rock Street • 4th Street at River Market Avenue • 4th Street at SB Frontage Road • 4th Street at NB Frontage Road • 4th Street at Mahlon Martin Street • Capitol Avenue at SB Frontage Road

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		• 6th Street at SB Frontage Road • 6th Street at NB Frontage Road • 9th Street at SB Frontage Road • 9th Street at NB Frontage Road At each of these intersections there will be pedestrian push buttons and countdown pedestrian signals, stop lines on all approaches, crosswalks and wheelchair ramp modifications to comply with ADA standards, and luminaires on luminaire arms where overhead power lines or trolley wiring is not in conflict. **Safety:** According to FHWA's *Signalized Intersections: Informational Guide*, pedestrian signals reduce pedestrian collisions 15-17%. Additionally, this document notes that the countdown feature of these pedestrian signals could reduce vehicle-pedestrian crashes caused by pedestrians trying to cross when the pedestrian walk time is near the end of its phase. FHWA's *Crash Modification Factors* (CMF) *Clearinghouse*, a searchable online database, provides CMF data which indicate the proportion of expected number of crashes after implementing a countermeasure such as pedestrian signals. This information also shows a reduction in vehicle/pedestrian crashes when signals are installed. For example, CMF ID 2673 shows a 24% reduction in expected crashes when an intersection is changed from yield-controlled to signalized.
K-14	Streetcar Impacts	More than a dozen catenary poles for the Rock Region Metro (RRM) Streetcar are located within Highway Commission right of way along East 2nd Street and East 3rd Street in Little Rock. Many of these poles could be in conflict with the construction of the Preferred Alternative which involves the removal of the existing elevated Hwy. 10 ramps and widening of East 2nd Street. The Department, under the authority of the Highway Commission, and RRM entered into agreements in 2002 and 2004 to allow Streetcar infrastructure to be installed within Highway Commission right of way. As with all right of way usage agreements that the Department enters into, the agreements related to the Streetcar make RRM the responsible party for the relocation of any RRM infrastructure that comes into conflict with the use of Highway Commission right of way for highway purposes. As the project continues to develop, the Department will work with RRM, the Design-Builder, and other project partners to minimize impacts to the Streetcar as much as possible.
K-15	Quality of Life in Downtown Little Rock	A more detailed discussion on the effects of the project on the regional and local economy can be found in the Indirect Effects Technical Report (EA Appendix A) and in the Community Impacts Technical Report (EA Appendix F). All Action Alternatives would provide additional lanes, bicycle and pedestrian accommodations, and ramp improvements. Discontinuous frontage roads on both west and east sides of I-30 would be converted to one-way, continuous frontage roads. These features would improve access and safety and decrease congestion, which would have a beneficial effect on local transit, emergency, and other services. Decreasing congestion and shorter travel times would also reduce operating costs for commercial road users and reduce time spent by commuters in traffic congestion in the project area, both of which would have an overall positive effect on the regional economy. Improved travel times and reliability would make downtown destinations more attractive to businesses, visitors and tourists, which would provide a boost to the local economy. The Little Rock Chamber of Commerce supports the project due to the increase in accessibility to downtown businesses. All Action Alternatives would correct the I-30 Arkansas River Bridge navigational safety issues. This would provide an economic benefit to barge traffic on the Arkansas River. The No-Action Alternative would result in increasing congestion and crash potential, which would have a direct adverse effect on businesses, commuters, and tourists using the corridor, negatively impacting the regional economy. Travel times from area destinations such as the River Market and Clinton Center to outside the project during the afternoon peak would be several times greater than travelers currently experience. Emergency response times would increase, and no bicycle and pedestrian improvements would be provided. Barge traffic would continue to be impacted by the navigational restrictions at the Arkansas River Bridge. The Preferred Alternative, (2B: the 6-lane with C/D SDI) would transform the River Market central business district by changing travel patterns, eliminating some on-street parking, and increasing connectivity in downtown Little Rock. The Preferred Alternative would increase green space in downtown Little Rock, which has the potential to increase the recreation opportunities and economic vitality of the area, particularly the developing area east of I-30. The Preferred Alternative would result in an increase of 15.7 acres of green space and provide an unobstructed open area under I-30 from the Arkansas River to 3rd Street, which would benefit east-west connectivity, including bicycle and pedestrian connectivity. The Preferred Alternative would improve local vehicle access to and from Little Rock and North Little Rock by connecting the frontage road system to the C/D lanes crossing the Arkansas River. The Preferred Alternative would optimize opportunities for economic development by providing a continuous frontage road system between I-630 and East 4th Street and connection to the River Market and Clinton Center areas via President Clinton Avenue, 2nd Street and 3rd Street.

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<tr><th>Response Code</th><th>General Topic Addressed</th><th>Response</th></tr>
<tr><td>K-16</td><td>Environmental Justice</td><td>The Preferred Alternative is anticipated to provide benefits to EJ populations through improved north-south and east-west connectivity from additional bicycle and pedestrian accommodations along 2nd Street. Adverse impacts to EJ populations resulting from all the Preferred Alternative includes increased noise at certain locations, changes in access, and displacements; however, these impacts would also affect non-EJ populations. Relocation assistance, noise abatement measures, and added benefits from bicycle and pedestrian accommodations would mitigate and minimize the adverse impacts resulting from the alternative. Therefore, the Preferred Alternative would not cause disproportionately high and adverse impacts on minority or low-income populations in accordance with the provisions of EO 12898 and FHWA Order 6640.23.</td></tr>
<tr><td>K-17</td><td>Indirect Effects</td><td>Indirect Impacts are evaluated in the Indirect Effects Technical Report, Appendix A of the EA. The indirect effects technical report looks at projects within the Area of influence (study area) that would be influenced or induced by the proposed project. The analysis determined that induced growth effects would include increasing the rate of development for 5 planned development areas. It was also determined that these planned developments would occur regardless of the proposed project. This was determined from the following information:
Feedback from local planners showed that in their professional opinion that these developments would be independent of the proposed project and market forces would influence these developments to a greater extent.
Induced growth was not identified or anticipated for other areas in the AOI because most of the AOI is fully developed and highly urbanized and developed with some intermittent pockets of undeveloped areas. Undeveloped areas represent approximately 21 percent of the entire AOI. Approximately 12 percent of this area is unlikely to be developed due to natural features such as floodplains that would make it unsuitable for development, leaving only 9 percent of the entire AOI that have the potential for development.
Local growth trends also evaluated show a minor amount of growth. Both Little Rock and North Little Rock are experiencing a minor growth trend. According to U.S. Census Bureau population data, both cities' population numbers from 2010 to 2014 increased, from 193,524 to 197,706 for Little Rock and 62,304 to 66,810 for North Little Rock. This is approximately a 2 percent and 7 percent change for Little Rock and North Little Rock respectively.</td></tr>
<tr><td>K-18</td><td>Cumulative Impacts</td><td>Cumulative Impacts are evaluated in the Cumulative Impact Technical Report, Appendix R of the EA. Reasonably foreseeable transportation actions that were included in the cumulative impact analysis included the widening of Hwy. 67 north of the Hwy. 67/I-440 interchange; the widening of I-630 from Baptist Hospital to University Avenue; the I-40/ Hwy. 391 interchange improvements; the reconstruction of I-30 at 65th Street, and I-440 from the Arkansas River Bridge to I-40. These were the only transportation projects on the 2016-2020 Transportation Improvement Plan (TIP) within the Resource Study Areas at the time the analysis was performed. The direct, indirect, and cumulative impacts of those projects on community, water, and historic resources were analyzed using the AASHTO procedures for evaluating cumulative effects in NEPA documents. The analysis followed the AASHTO procedures and considered the impacts of these aforementioned projects in the cumulative analysis.

Since the time the analysis was performed, other considerations have been included in the cumulative impacts analysis and reflected in the final technical report in response to public comments. This includes the proposed developments for Amazon and the Pointe at North Hills apartments as well as planned transportation projects included in the recently approved 2019-2022 TIP (Sept. 2018). The table below lists the planned transportation projects within the Resource Study Areas. Projects along I-40 and I-30 are being studied; however, scope and plans for these projects have not yet been determined at this time. Impacts that could be estimated and anticipated to be likely were considered for the cumulative impacts analyses for the resources analyzed and included in the final technical report. Although the table below lists planned transportation projects, each of these is an independent project not associated with the proposed project. Each of these planned transportation projects have their own individual independent utility, independent project purpose, and logical termini.

<table>
<tr><th>Location</th><th>Type of Work</th></tr>
<tr><td>I-40 in Maumelle</td><td>New Interchange</td></tr>
<tr><td>Hwy. 5/Hwy. 70/University Avenue</td><td>Intersection Improvements</td></tr>
<tr><td>Hwy. 10 and I-430 from Pleasant Ridge Road to Pleasant Valley Drive</td><td>Major Widening</td></tr>
<tr><td>Hwy. 176 at Shilcotts Bayou</td><td>Structure and Approaches Improvements</td></tr>
<tr><td>Hwy. 365 at Palarm Creek</td><td>Structure and Approaches Improvements</td></tr>
<tr><td>JP Wright Loop Road Rail</td><td>Railroad Grade Separation</td></tr>
<tr><td>Shackleford Road and Gamble Road (Kanis Road)</td><td>Major Widening</td></tr>
<tr><td>Hwy. 10 at Gill Street</td><td>Railroad Overpass Structures and Approaches Improvements</td></tr>
<tr><td>Hwy. 67 from Main Street to Vandenberg Boulevard</td><td>Major Widening</td></tr>
<tr><td>Hwy. 176 from 47th Street to Remount Road</td><td>Safety Improvements</td></tr>
<tr><td>Hwy. 10 at Taylor Loop Road to Pleasant Ridge Road</td><td>Major Widening and Operational Improvements</td></tr>
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Response Code	General Topic Addressed	Response
		The proposed project is not associated with the planned transportation projects listed above nor was it influenced by them. The project limits were defined based on documented needs in the I-30 and I-40 corridors, as well as points of major traffic generators. The primary purpose for the 30 Crossing proposed project is infrastructure replacement. The purpose and need of the proposed project is to address the existing condition issues of rebuilding a deteriorating infrastructure and improving the safety conditions such as weaving within the project corridor. Furthermore, Metroplan has recognized this 30 Crossing project as a need and has included this project in their plans since 2003. With these considerations, the proposed project is not anticipated to contribute to the cumulative effects of the community due to the following: 1) The developments would not result in relocations because they are located on mostly undeveloped property. Two of the planned transportation projects have prepared environmental documents that were reviewed to determine that 32 acres of total proposed ROW is anticipated within areas unlikely to be within Environmental Justice census block group areas. The nine other planned transportation projects are in planning stages and have no information yet to determine potential impacts; however, most of these are unlikely to result in major ROW acquisitions or community impacts because a majority of these projects are overlay and pavement reconstruction projects and bridge replacements. 2) The Preferred Alternative is anticipated to have 11.1 acres of proposed ROW within the 7.3-mile corridor. No displacements or ROW acquisitions are proposed south of I-630. 3) Community cohesion within minority and low-income population areas would not be adversely impacted by the proposed project. The 5 residential displacements are located in predominantly minority census area; however, these displaced rental properties are adjacent to the existing facility and would not result in a further division or separation of a neighborhood. The proposed frontage road would, in fact, improve north and south connectivity along Cypress St. Furthermore, proposed ROW acquisitions would not result in any division or further separation of any existing neighborhoods.
L	Questions / Concerns Regarding Project Cost / Funding	The 30 Crossing project is part of the Connecting Arkansas Program (CAP) and is funded with both federal and state funds based upon a $631.7 million-dollar budget. The federal funds are National Highway Performance Program (NHPP) funds making up approximately 29% of the budget. The state funds consist of match funds for federal funding (approximately 7% of the budget) and CAP funds (approximately 64% of the budget). The 30 Crossing corridor consists of infrastructure that is over 50 years old and at the end of its useful life, including the Arkansas River Bridge which has been classified as functionally obsolete, structurally deficient, and fracture critical in its design. In addition to these infrastructure deficiencies, congestion and mobility concerns on this corridor have been reported by Metroplan since as early as 2002. The 2003 Central Arkansas Regional Transportation Study – Areawide Freeway Study and the 2012 Congestion Management Process Report also both included recommendations for capacity improvements within this corridor. Although this corridor has been a high priority for improvement for over a decade, an adequate funding package for this improvement could not be established under the Department's standard federal-aid funding constraints. The CAP program has provided additional state funds that can be combined with federal-aid funding in order to create a unique funding scenario to address the pressing needs to maintain and improve this important part of the state's transportation system. Due to the reality of limited highway funding, the Highway Commission has chosen to focus the majority of its federal aid program on system preservation projects which seek to improve the condition and operation of existing highways – especially those that carry a high percentage of the State's traffic. By focusing these funds on system preservation, the Department will be able to reduce the funds needed to continue to maintain deteriorating highways and the higher cost of replacing failed highways and bridges. Although the primary purpose of the CAP program is not system preservation, the 30 Crossing project is an example of utilizing a combination of CAP and federal aid funds to complete a very critical system preservation project that improves one of the most important highway and bridge corridors in the state. By preserving this top priority corridor today, the Department will be able to focus future system preservation and maintenance funds on other high priority corridors. A review of the ARDOT estimate was performed using identified project risks and their probabilities as inputs to a risk-based cost-estimating simulation which provided a probabilistic range of estimated project costs. The estimate is being shown as a range which is typical for a complex major project at this stage of development. The review indicated a range of $615 million to $700 million. This project will initially be delivered using a fixed budget/variable scope design-build delivery contract. Design-Builders will compete to provide the most project scope for the fixed budget. In the event that none of the Design-Build firms are able to provide the full project scope, additional projects will be programmed to complete the project scope at a future date. Any work postponed to a future date will include additional costs for inflation.
M	Construction Impacts	Construction is expected to begin in 2019 and anticipated to take 4 years. During reconstruction of the bridge and interchanges and the roadway, the design-builder will be incentivized to develop a maintenance of traffic plan that will provide for six lanes of traffic (three in each direction) during peak travel times throughout the construction phase. Given the magnitude of the project there will be disruptions during construction that will be temporary in nature and minimized to the extent possible.

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N – Questions about the Project Process and Public Involvement		
N-1	Screening Process	The production of the PEL Study involved a thorough, three-level screening process. The Alternative Screening Methodology, reviewed by the Project Partners, Technical Advisory Group, stakeholders and the public, reviewed alternatives derived from multiple sources, including the 2003 Central Arkansas Regional Transportation Study (CARTS) Areawide Freeway Study, Phase 1 Arkansas River Crossing Study, the Long Range Metropolitan Transportation Plan for the CARTS area, and the I-30 PEL Purpose and Need Report, along with input from the Technical Work Group, public, and other stakeholders. Alternatives were evaluated against the study goals and study area needs. The first level reviewed the "Universe" of alternatives against fatal flaws. The second level of preliminary alternatives refined the alternatives. The third level performed a detailed evaluation of the reasonable alternatives. Throughout the entire screening process, stakeholder and public input was solicited and evaluated as part of the methodology. Examples of alternatives eliminated by the screening process include dedicated truck lanes, elevated highway lanes, and heavy rail. In the NEPA phase, additional alternatives including a bypass to the East, the Boulevard Alternative, and a 4-lane with C/D Alternative were evaluated. Multiple alternatives for the Hwy. 10 interchange were also evaluated, including a diverging diamond, standard diamond, roundabout, one-way pair, and tunnel. The result of the NEPA evaluation was that two corridor Action Alternatives, the 6-lane with C/D and 8-lane General Purpose, and two Hwy. 10 Action Alternatives, the single point urban interchange (SPUI) and split diamond interchange (SDI) were carried forward for thorough evaluation. The entire screening process through the PEL and NEPA phases is described in the Alternatives Analysis Technical Report, Appendix C of the Environmental Assessment.
N-2	Public Involvement	There was an extensive public outreach effort during the PEL study that continued into the NEPA phase. Among the strategies was the creation of a Technical Working Group (TWG) consisting of local, state, and federal staff, as well as representatives from local businesses, environmental advocacy groups and major regional institutions. TWG meetings were held prior to all Public Meetings, allowing the Study Team to meet with subject matter experts and incorporate their feedback prior to presenting concepts to the public. There have been a total of four public meetings in the PEL study and two in the NEPA phase. Public Meetings 1 through 4 allowed for the PEL Study team and the public to work together to choose the alternatives that would be carried through to the NEPA phase. During the NEPA phase, the project team has continued to organize and participate in extensive informational and advisory meetings with local officials and organizations. Monthly meetings have been held with the Project Partners group, which includes the cities of Little Rock and North Little Rock, Pulaski County, Metroplan, and the FHWA. Unique presentations have been given to residents and stakeholder groups, both to inform and allow the public to ask questions and provide comments. These have included a Town Hall meeting at the Clinton Library, community meetings at churches within minority communities, one-one-one discussions with state legislators and local government officials, and various presentations to local cities, associations and boards. In 2016, more than a dozen "pop-up" stations were held in large businesses in Little Rock and North Little Rock. Staff members answered questions from the public and showed materials provided at Public Meeting 6, including the 3D video renderings. Details on the NEPA public involvement efforts can be found in EA Appendix E. Comments received from the public at and in response to these public meetings are not ignored; rather, they have helped to shape and revise the project to reach the point of a proposed Preferred Alternative. From the very beginning, the project team has engaged with and responded to residents, stakeholders, agencies, and elected officials to keep the various entities informed and involved.
N-3	Metroplan Policy Waiver	In the Spring of 2014, the Department began a Planning and Environmental Linkages study for the 30 Crossing corridor. This study utilized a collaborative effort between local agencies, project partners, transportation professionals, and the public to identify the problems on the 30 Crossing corridor and develop a universe of possible solutions to these problems. A qualitative and quantitative screening process was then applied to this universe of possible solutions in order to identify the solutions that would best fit the context of the corridor and address the problems that had been identified. The universe of possible solutions were developed against the backdrop of over a decade of reports by local agencies that identified this corridor as highly congested and in need of capacity improvements. Metroplan's Congestion Management System Reports from 2004 to 2011 identified this corridor as highly congested, listing widening as a possible congestion reduction measure recommended from the Areawide Freeway study, while noting it would require a change in Metroplan's current policy. On June 17, 2016, after studying the 30 Crossing corridor for over two years, the Department formally requested an exception to Imagine Central Arkansas' policy strategy that seeks to restrict freeways in the CARTS area to six "general purpose" lanes. In this request, the Department made the case that a strict application of the strategy across all freeways in the CARTS area was not appropriate and an exception should be given for the 30 Crossing project due to the following:

Response Code	General Topic Addressed	Response
		• The variability of traffic volumes and mobility across the various freeways in the CARTS area is not conducive to a system-wide cap on lanes. The traffic volumes in the 30 Crossing corridor are much higher than many of the other sections of the Central Arkansas Freeway System and it contains numerous closely spaced, high volume interchanges. • The applicability of Improvements to the Regional Arterial Network (RAN) and transit systems as congestion mitigation strategies (as required by the policy strategy) varies widely across the various freeways in the CARTS area. The Department performed an analysis of the RAN as well as possible transit improvements to determine their applicability as effective congestion mitigation strategies for the 30 Crossing project. These analyses did not show opportunity for a sufficient reduction in traffic volume in the 30 Crossing corridor nor did they provide any solutions for the structural and functional deficiencies of the corridor. This issue is complicated by the fact that the policy strategy lacks clear guidance in how to sufficiently demonstrate whether or not RAN and transit mitigation investments would provide sufficient solutions for freeway congestion. • The policy strategy acknowledges a need to correct choke points at interchanges which will often result in the addition of lanes, especially in a corridor like 30 Crossing which is essentially a string of closely spaced and complex interchanges. It was for these reasons that the Department asked the Metroplan Board of Directors to consider the 30 Crossing corridor as a unique corridor and grant an exception to the policy strategy so that all reasonable alternatives to address the deficiencies of the corridor could be considered.
O	NEPA Next Steps	Based on the information contained in this EA, and after a review of comments received from citizens, public officials, and public agencies a decision will be made regarding whether the project is likely to have a significant impact on the environment. If FHWA determines that a significant impact is likely, an Environmental Impact Statement (EIS) will be prepared by ARDOT and submitted to FHWA. If FHWA determines a significant impact is not likely, a Finding Of No Significant Impact (FONSI) document will be prepared by ARDOT and submitted to the FHWA. The Final Request for Proposals for Design-Build procurement will be issued following the approval of the final environmental decision document. If the selected Design-Build team elects to make any modifications to the design which change the environmental impacts, commitments or mitigation measures identified in the NEPA document, FHWA will make the determination if a re-evaluation of the NEPA document is needed. The Design-Build team will be responsible for securing all regulatory approvals prior to implementing the change.
P	Design Build	The identified method of delivery of the project is Design-Build. Design-Build is delivery system used for transportation projects. The design and construction services are contracted with a single entity, called the design-builder. In Design-Build, the design-builder is permitted to incorporate innovation into final design, as long as the project purpose and need, environmental commitments and contractual obligations are met. This allows for innovation and cost efficiency. This project will initially be delivered using a fixed budget/variable scope design-build delivery contract. Design-Builders will compete to provide the most project scope for the fixed budget. In the event that none of the Design-Build firms are able to provide the full project scope, additional projects will be programmed and contracts will be let at a future date to complete the project scope. Any work postponed to a future date will include additional costs for inflation.
Q	General Comment	Thank you for your comment, it has been documented. The input gathered at the Public Hearing will be used to move forward with the NEPA process.
R	Individual Response	