

Public Comment Summary
***Imagine Central Arkansas* Proposed Amendment**
April 30 to May 30, 2017

Metroplan has gone to the public three times for comment on proposed amendments to the regional Long-Range Metropolitan Transportation Plan (LRMTP) and the Central Arkansas Regional Transportation Study Transportation Improvement Program (TIP) for *30 Crossing*. The first was in May 2016, to amend the financial plan and project description linked with adoption of the 2016-2020 TIP. The second was in August 2016, to consider an exception to the region's policy regarding the construction of freeways beyond six through lanes. In May of 2017, the public has been asked again to comment on a proposed amendment to *Imagine Central Arkansas* to add descriptive language to the *30 Crossing* project at the request of the Arkansas State Highway & Transportation Department (AHTD).

General Observations

Metroplan received a total of 118 comments during the period extending from April 30 through May 30. They came steadily via email, printed forms, and recorded remarks at a public hearing held on May 17th. Roughly 1/4 of the responders appear to be first-time commenter's on *30 Crossing* to Metroplan.

While most comments were well-articulated and informed, many people addressed the overall *30 Crossing* project and their opinion on alternatives under consideration as part of NEPA instead of the narrow issue of the plan amendment. This is understandable when one considers that the federal and state regulations guiding Metroplan processes are segmented into several distinct pieces. Those distinctions, and responsible agents, are not understood by much of the public at large.

Metroplan responsibilities include:

1. financial constraint considerations,
2. the impact of the project on the remaining transportation system,
3. and consistency with LRMTP.

Issues related to the environmental phase, including the decision of an environmental assessment vs. environmental impact statement, alternatives consideration and evaluation, and community impacts are the responsibility of AHTD with approval required by the Federal Highway Administration.

Comments were overwhelmingly opposed to the plan amendment, regardless of venue. Following is a breakdown of comment by venue.

Public Hearing

Because of the complexity and controversial nature of the project, the Metroplan Board elected to conduct a public hearing, as part of the 30-day comment period. The hearing was held on Wednesday, May 17th, at Pulaski Technical College. Approximately 65 people attended. The event was video-recorded.

Twenty-four individuals spoke at the hearing. Of those, four spoke in favor of the amendment, arguing that an expanded *30 Crossing* facility would:

- provide better regional connectivity

- allow commuters to continue to fill jobs in downtown (concerned about potential loss of workers)
- increase safety for drivers and pedestrians
- offer opportunity for recreational and other development in downtown Little Rock
- encourage development along the corridor
- bring more visitors to the downtown area; and
- improve mobility through and within the downtown areas.

All four speakers indicated their endorsement of the project as proposed, with added lanes. Two made the point that interstates, as a general rule, are good for regions.

Twenty people spoke in opposition to the amendment and the project as proposed. Their arguments were varied and many took a nuanced view toward 30 Crossing. For example, slightly more than half agreed that improvements are needed on the corridor, including replacing the bridge and deteriorated pavement, and improving key interchanges; however, they uniformly opposed the AHTD's proposed designs for adding lanes.

Arguments opposing the amendment, and project in general, include concerns that the project would:

- impose a financial burden on this and future generations
- perpetuate sprawl
- encourage induced traffic, creating more congestion
- limit transportation choice
- increase environmental degradation
- lower property values and harm neighborhoods
- place an unfair burden on minority neighborhoods; and
- preclude innovative options that could more directly contribute to a thriving downtown and region.

Printed forms

Comment forms were provided at the public hearing for people who chose not to speak, but who wanted to express their opinions. The forms asked: **Are you in favor of the proposed amendment to the regional plan?** and included boxes to check **YES**, **NO**, or **WITH CONDITIONS**. Space was provided for additional comments.

Out of the 11 printed forms that were submitted, ten were opposed to the amendment; the single individual who checked the box favoring the amendment wrote no other comment. Of the ten who indicated they were opposed to the amendment, six included comments, expressing concerns that a greatly expanded interstate would:

- negatively impact public health, especially in regard to air quality
- threaten existing downtown infrastructure
- be a huge expenditure on an outmoded system
- ignore demographic and technological trends
- preclude consideration of multi-modal options and other, more innovative approaches to the transportation network

Email

The bulk of comments were received via email. Out of the 83 sent to comments@metroplan.org, only two favored the amendment. One person stated that he supports Option B because it favors development. Another person wrote in part, "Yes, it may hurt a few businesses but it should not stop progress."

Arguments opposing the amendment and the project were substantially the same as those heard in the public hearing. Predominant among the emails were concerns that the expansion would prove:

- detrimental to downtowns, established neighborhoods and community cohesiveness
- financially wasteful and place a burden on future generations (when including projected additional interstate projects)
- ineffective, ultimately leading to more congestion
- harmful to public health due to air, water and noise pollution
- unsupportive of new technology and a multi-modal network

More than half of those opposing the amendment clarified that some improvements to the corridor were needed, and asked for "reasonable alternatives." Many suggested alternatives. Eighteen people stated their support for *Imagine Central Arkansas* and urged Metroplan to stand by its goals. "To allow such an amendment is to throw away years of planning and input from thousands of central Arkansans who helped shape this plan." Thirteen comments questioned the process itself, the reasoning behind the size of the project, and requested a full Environmental Impact Statement to study the alternatives. Many more people urged the Board to "slow down" the process to consider other options. Four people cautioned against "repeating errors of the past," referring to the original routing of I-30 through downtown Little Rock and North Little Rock.

Commonalities

Common themes emerged across venues.

All seven individuals who supported the amendment advocated additional lanes. Four expressed confidence in the AHTD's process and designs. They agreed with the idea that interstates are good for regional growth and were optimistic about continued downtown revitalization.

The dominant theme among the people who opposed the amendment was fear of a degraded quality of life. This fear was expressed in varying terms in nearly all of the written comments. Concerns about community cohesiveness, urban lifestyle, public health and environmental impacts were woven into many of the comments. The majority of people who opposed the amendment argued that the AHTD's proposal for interstate expansion is out of step with 21st century technology and Millennials' aspirations for urban living.

People opposing the amendment were almost uniformly skeptical of the need for the "massive" scope of the proposed *30 Crossing*. Clarifying that some improvements were needed to the corridor, many offered a combination of alternative solutions, ranging from signage and rerouting, constructing a Chester Street bridge, strengthening the arterial network, and supporting a robust public transit system, to more audacious concepts, such as park decking. Many were interested in exploring the boulevard idea.

Related to the skepticism about process and need was concern regarding financial implications of the undertaking. Commenters pointed not just to the initial estimated investment, but to potential future costs as bottlenecks occur throughout the interstate system. Several questioned whether the money could be better used, either within the region or in other parts of the state. Many comments expressed worry about lowering property values and economic decline within the urban core.

Comparison to Previous Public Comment

Metroplan has held two previous public comment periods for which a majority of comments received pertained to *30 Crossing*. Issues raised throughout all of the public comment periods have been similar, with those supporting *30 Crossing* asserting that the project is important for downtown businesses and commuting workers, and that it will improve safety and will enhance (not harm) downtown. The supporters say we should consider all of the region and not just the urban core needs, and they believe that the NEPA process and ongoing community dialogue will result in the best project for the region. Those opposing the project argue that additional alternatives should be considered, the project will harm quality of life and economic development (of downtowns), that it should be consistent with alternatives within the LRMTTP strategies for regional transportation, and that it is based upon outdated technology and assumptions.

Previous comment periods have garnered 196 and 260 comments, both were represented by roughly 40% favoring the amendment (i.e. supportive of *30 Crossing*) and 60% against the amendment (against *30 Crossing*).

Conclusion and Process

There is no clear consensus among the community regarding *30 Crossing*, its design, or its potential impacts. The community at large supports reconstruction of the corridor and safety improvements, and it is appropriate to consider to what extent added capacity - consistent with the LRMTTP goals of improving interchanges and arterial (collector-distributor and frontage roads) - should be included. This is especially true regarding existing capacity issues and those within the corridor resulting from the widening of the areawide freeway system to six through lanes. Many questions, however, remain.

Title VI, federal transportation legislation, and Metroplan's own public participation process require consideration of all perspectives. The people who commented on the proposed amendment to *Imagine Central Arkansas* have legitimate concerns - as well as hopes - about how *30 Crossing* will impact their lives. These comments, as well as previous comments, have been sent to the project team to be addressed as part of the final environmental documentation. Issues of alternative consideration, community and historic property impacts, and the decision if the project is raised to a full Environmental Impact Statement will be fully documented as part of the Environmental Assessment. The public desire for this information, as well as the selected alternative, will not be available until the draft environmental assessment is released.

The project to rebuild the I-30 corridor was in the 2014 long-range plan. As the process for defining how *30 Crossing* continues, the responsibility for balancing safety and mobility needs with the valid and competing concerns of residents rests with the Metroplan Board of Directors.