

RECORD OF DECISION

HIGHWAY 67 – I-40 WEST ENVIRONMENTAL IMPACT STATEMENT

PULASKI COUNTY, ARKANSAS

Federal Highway Administration-Arkansas Division

FHWA-AR-EIS-91-01-F

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PROJECT OVERVIEW AND HISTORY

The Arkansas State Highway and Transportation Department (AHTD), in cooperation with the Federal Highway Administration (FHWA), is proposing a highway project located in northern Pulaski County, Arkansas. This project, commonly known as the North Belt Freeway, would consist of a four-lane, divided highway constructed to Interstate standards and located between Highway 67 and the Interstate 40/430 Interchange. The completion of the eastern segment of the North Belt Freeway between Highway 67 and the Interstate 40/440 Interchange left this proposed project as the only remaining segment of the urban area's circumferential freeway to be implemented. Although adjacent sections of the circumferential freeway are six-lane, forecast traffic volumes for the proposed project only warrant a four-lane highway. The project is 12.7 miles (20.4 kilometers) in length and would be constructed on new location with an average estimated right of way width of 300 feet (91 meters). Access would be fully controlled with interchanges and grade separations utilized at selected locations.

The proposed North Belt Freeway is included in the Central Arkansas Regional Transportation Study (CARTS) Metro 2030 Metropolitan Transportation Plan and has been part of the transportation planning efforts in northern Pulaski County since 1941. Since 1979, the Pulaski Area Transportation Study, now expanded to the CARTS, has shown the proposed North Belt Freeway essentially in the same general corridor as the Selected Alternative identified in the project's 1994 Final Environmental Impact Statement (FEIS) and Record of Decision (ROD).

In 1997, the local metropolitan planning organization, Metroplan, did not include the North Belt Freeway project in the CARTS Transportation Improvement Program. This decision was made because a portion of the Selected Alternative was not compatible with the City of Sherwood's Master Street Plan. Since the AHTD was unable to proceed with activities on the North Belt Freeway within a 3-year period after the ROD, reassessment of the 1994 Selected Alternative became necessary.

In 2003, a Preliminary Evaluation was conducted by the AHTD in order to resolve issues necessary to proceed with a FEIS reassessment. Public comment from the expanding residential neighborhoods adjacent to the 1994 Selected Alternative and Sherwood's

continuing opposition resulted in the necessity to produce a Supplemental Draft Environmental Impact Statement (SDEIS) as the means of conducting a project reassessment. The SDEIS was completed and approved by FHWA for dissemination on January 31, 2007.

The development of alternatives and detailed environmental study of those alternatives was part of the SDEIS process that resulted in the designation of a Preferred Alternative. An in-depth analysis of the Preferred Alternative was conducted and the results were documented in a new FEIS finalized on June 30, 2008. The Selected Alternative differs from the 1994 Selected Alternative in several areas where substantial land use changes had occurred. These alternatives are shown in Figure 1.

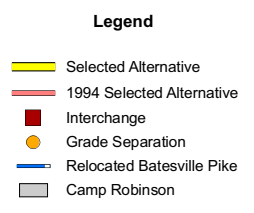
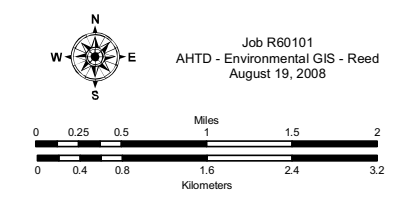
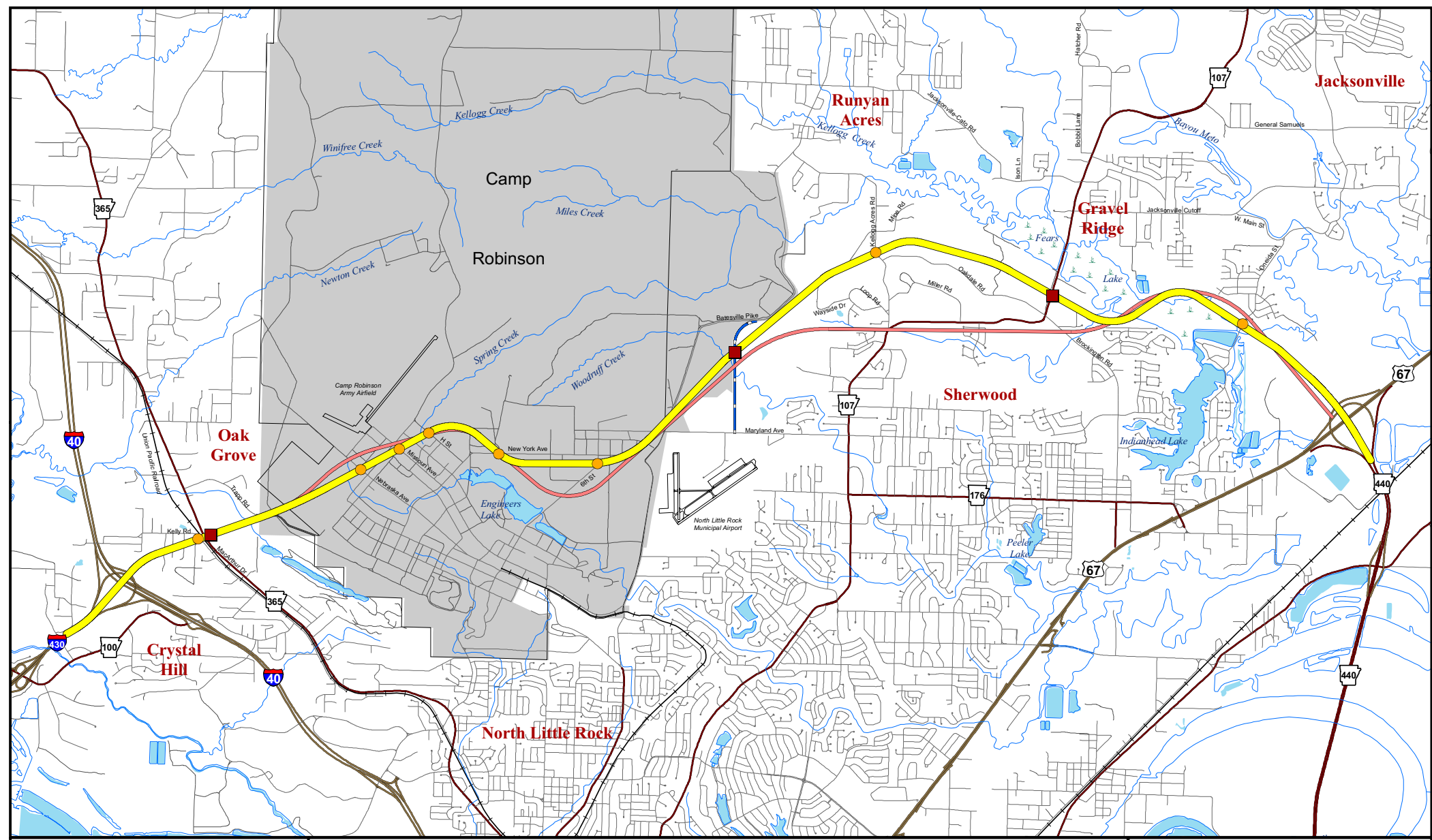


Figure 1
Selected Alternative
North Belt Freeway

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PURPOSE AND NEED

The following project needs were identified in the project's 1994 FEIS:

- 1) Provide a direct east/west facility connecting the developing northeast and northwest parts of Pulaski County;
- 2) Increase safety and decrease congestion on existing streets and highways, especially on Highway 67 and Highway 107;
- 3) Provide traffic service for local traffic demands; and
- 4) Provide a highway facility consistent with the Pulaski Area Transportation Study and related Land Use Plans by providing a facility which:
 - a) Serves as a bypass for east-west through traffic in northern Pulaski County;
 - b) Provides improved access for the traffic generated by the population growth in northern Pulaski County; and
 - c) Completes the northern link in the Little Rock/North Little Rock metro area's circumferential freeway by providing a more direct connection from Highway 67 to the interchange of Interstate 40 with Interstate 430.

Review of land development and traffic growth in the region since the completion of the 1994 FEIS does not indicate a change in the purpose or need for the proposed North Belt Freeway. Some specific findings include:

- 1) Population growth has continued and even accelerated throughout the project area. Locations at both ends of the project area that provide destinations for the facility's motorists have also continued to grow.
- 2) Traffic growth has continued to reflect the development trends in the region.
- 3) The existing and planned roadway network is not sufficient to provide the desired quality of traffic operations within the Little Rock/North Little Rock urban area.
- 4) The specific proposed project alignment alternatives are being threatened by development.

- 5) Camp Robinson, an Arkansas National Guard training center, continues to create a 10-mile (16-kilometer) long barrier to civilian travel that would continue to focus east-west travel in northern Pulaski County onto Interstate 40 if an alternate route is not developed.

ALTERNATIVES

Development of alternatives for the SDEIS was conducted in a manner that considered the history of the project while also taking into account the amount of time that has passed since the original ROD in 1994. Input from Agency Scoping, Public Officials meetings, and Public Involvement meetings also played a role in the development of the alternatives that were evaluated in the SDEIS.

The previous DEIS and FEIS analyzed and eventually discarded several alternatives for the North Belt Freeway project, including: Transportation System Management, Mass Transit, and Road Reconstruction. From these studies, it was determined that a new location alignment alternative was the only viable alternative to meet the purpose and need of the project. Current land use development within and adjacent to the study area has not altered this determination.

The Notice of Intent for preparation of the SDEIS, published in April 2004, stated that the entire length of the project would be reassessed due to the amount of time that had passed since the ROD. The reassessment of the project area began with a meeting with Army National Guard officials in March 2004 where they proposed a new alignment through Camp Robinson for the AHTD's evaluation. The proposed alignment crossed Camp Robinson north of the cantonment and continued down the west border of the Camp. A preliminary evaluation of the new alignment was conducted, and it was found to be more costly than the existing alignment and would attract less traffic. For these and other reasons, this new alignment alternative was not found to meet the purpose and need for the proposed project. Army National Guard officials were informed of the AHTD's intentions to drop the new alignment from consideration at a meeting in February 2005. At that time, they reaffirmed their commitment to allow the AHTD to utilize the original alignment with slight modifications. These modifications were incorporated into the proposed alignment through the Camp.

Alignment alternatives were developed in the project area based upon alignments from previous environmental documents, existing highways, facilities, landforms, and other known constraints. The option for construction of either a grade separation or an interchange was included for the alignment alternatives that crossed Oneida Street in response to public

and community comments. The alignment alternatives were presented for public comment in November 2005. Revisions to the alignment alternatives presented at the public involvement meetings were made after analyses of public comments and preliminary constraints. A public officials meeting was held in January 2006 to discuss the revised alignment alternatives.

The No-Action Alternative was retained throughout the study as a basis for comparing the relative benefits and impacts of the alignment alternatives. The No-Action Alternative consists of no improvements to the present system and no expenditures other than regular maintenance of the existing route.

The comments received from the SDEIS Location Public Hearings and the information in the SDEIS were used to choose an alignment alternative to be carried forward into the FEIS. The Interdisciplinary Staff, composed of representatives from various disciplines of AHTD and FHWA, met and considered the potential impacts, advantages, and disadvantages of the various alignment alternatives before the identification of a Preferred Alternative. The various alignment alternatives were compared and Alignment Alternative Bab was recommended for combination with the Common Alignment and designation as the Preferred Alternative.

This alternative:

- 1) Meets the project purpose and need;
- 2) Minimizes overall impacts;
- 3) Best balances the benefits expected from the project with the overall impacts; and
- 4) Provides good access to communities and other regional highway facilities.

The Preferred Alternative is 12.7 miles (20.4 km) in length, with five interchanges and eight grade separations proposed. An interchange is not proposed at Oneida Street in order to minimize residential relocations, wetland impacts, and impacts to the surrounding subdivisions. Additionally, interchange constructability issues exist due to the proximity of Kellogg Creek and Fears Lake, and spacing with the Highway 67 Interchange would not be

optimal for traffic operations. The Preferred Alternative avoids recreation areas and the Kellogg Mine area, while minimizing relocations, wetland, and noise impacts to the maximum extent possible.

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DECISION

Based on environmental studies, agency coordination, the public input process, and in accordance with the National Environmental Policy Act, the FEIS Preferred Alternative was identified as the Selected Alternative (Figure 1).

As summarized in the preceding sections and in greater detail in the FEIS, the Selected Alternative is the environmentally preferred alternative that will sufficiently address the Purpose and Need for action while balancing important environmental, community, and economic values. This alignment provides the best transportation solution that also minimizes harm to the environment to the extent practicable. While some of the other alternatives, such as transportation system management and transit alternatives, may have lesser impacts on certain environmental resources, those alternatives do not provide a sufficient solution to the region's long-term transportation needs and their selection would not be reasonable or prudent. The Selected Alternative also incorporates extensive measures to avoid, minimize, and mitigate potential harm to the region's natural and human environment. The United States Environmental Protection Agency (USEPA) has given a Lack of Objection rating to the proposed project as described in the SDEIS. The USEPA letter, dated April 12, 2007, can be found in the FEIS Section 5.6.1.

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SUMMARY OF FUTURE ACTIONS

As a result of the environmental evaluation of the Preferred Alternative, a number of identified future actions are necessary in conjunction with the design development and construction phases of the project. The following is a list of these actions:

- Mitigation Plan Coordination – AHTD will coordinate the development of a stream mitigation plan with the U.S. Army Corps of Engineers, if required, during the Section 404 permitting process.
- US Fish and Wildlife Service Coordination (USFWS) – AHTD will informally coordinate design and construction activities with the USFWS.
- Cultural Resources Investigation – AHTD will fulfill the cultural resources commitments in conjunction with the design and construction phases as described in Section 4.11 of the FEIS and in the Programmatic Agreement (Appendix M of the FEIS). Consultation between FHWA and the appropriate Native American Tribe(s) will be maintained in accordance with 36 CFR Part 800.4(a) of the National Historic Preservation Act.
- Water Pollution Control – AHTD will coordinate the development and implementation of water pollution control measures as a part of the design development and construction process.
- Design Evaluation Commitments – A number of commitments were made in Section 4 of the FEIS concerning issues that would be evaluated during the design phase. These design commitments are detailed in Section 6 of this Record of Decision.
- Contract Special Provisions – Included in the project contract will be a number of project specific Special Provisions. These will include Section 404 Permit Requirements, a Storm Water Pollution Prevention Plan, and Migratory Bird Protection.
- Context Sensitive Solutions – Considerations to be included as a part of a context sensitive solution evaluation during the design phase will include aesthetics, security

issues, median barrier protection, potential wildlife mortality and construction cost/time savings. Coordination with local municipalities, the metropolitan planning organization, and Camp Robinson will be conducted as part of the evaluation process for the project's design phase. Focus groups are one evaluation tool that may be used during this process.

MEASURES TO MINIMIZE HARM

Throughout the project development process, alternatives were developed and will be designed to avoid and minimize, to the extent practicable, impacts to environmental resources. Mitigation commitments for unavoidable impacts were established in Section 4 of the FEIS, including conceptual measures that will be further developed during the design and/or construction phases.

MITIGATION COMMITMENTS

The mitigation measures contained in this section will be implemented during the design and construction phases of the project. Approval of the project as per this ROD is dependent upon mitigation commitments being honored.

LAND USE AND LAND COVER

Impacts to developed property will be avoided and minimized to the extent practicable. Excess right of way outside of safety zone will be allowed to revegetate naturally. A post-construction survey for invasive plant species will be conducted in order to identify possible problem areas and species.

VISUAL ENVIRONMENT

Excess right of way outside of safety zones will be allowed to revegetate naturally. AHTD's Standard Specifications include native wildflowers in the permanent seeding mix. Automobile salvage yards visible from the proposed facility will be purchased or screened.

AIR QUALITY

Air quality impacts will be minimized by the project contractor during the construction of the proposed facility through a combination of fugitive dust control, equipment maintenance and compliance with state and local regulations.

NOISE QUALITY

Based upon the preliminary data related to noise contour information, the Crystal Hill area and the Kellogg Acres, Oakdale, and Northlake subdivisions warrant additional and detailed studies for noise barrier analysis. This detailed noise mitigation analysis will be conducted as part of the design phase of the Selected Alternative. The focus of this analysis will be in

the areas that currently have existing and/or expanding residential development. The current residential development within the study area is increasing the number of sensitive receptors on a continuing basis. These changes will be evaluated and considered during the noise barrier feasibility evaluation. The AHTD's Policy of Reasonableness and Feasibility will be applied to the residential areas near the Selected Alternative that are identified as having the potential to be impacted by noise. Where opportunities occur to incorporate earth berms as part of the highway construction and placement of excavated waste materials, they will be evaluated as part of the design phase of the Selected Alternative.

SOCIOECONOMIC

Further steps to minimize relocations will be considered during final project design. Where avoidance is not possible, the acquisition and relocation process will be conducted in accordance with the Uniform Relocation Assistance and Real Property Policies Act of 1970 (Public Law 91-46) and the AHTD relocation policies and procedures as described in Appendix E of the FEIS. Relocation resources are made available to all residents and businesses without discrimination and comparable to the need of the relocatees.

Due to the location of the Selected Alternative between the Kellogg Acres and Oakdale communities, and between the Indianhead Lake Estates and Northlake Estates communities, the social impacts are expected to be similar for each. The Selected Alternative will result in relocation of individuals or clusters of homes and businesses. However, due to the grade separations connecting these particular neighborhoods, the relational aspect of the communities should remain intact. During the design phase of the project, feasible mitigation options will be presented to the local residents for comment and discussion.

HYDROGEOLOGY AND GROUNDWATER

Special provisions and actions will be required during the design and construction phase to protect groundwater in the vicinity of the Kellogg Mines. These commitments will include ditch paving through highly vulnerable areas, including areas where conduits directly leading to the groundwater are discovered during construction. Coordination with state and federal agencies involved with groundwater quality protection will be conducted as needed if concerns are identified.

WATER QUALITY

The AHTD will comply with all requirements of the Clean Water Act, as Amended, for the construction of this project. This includes Section 401, Water Quality Certification; Section 402, National Pollutant Discharge Elimination System; and Section 404, Permits for Dredged or Fill Material.

Impacts to streams within the project area will be minimized by constructing the project to the minimum width necessary to meet design safety standards. The project will be constructed on new alignment, thus minimizing temporary impacts associated with detours.

The AHTD will prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the requirements of the permit. Before construction begins, AHTD will file the requisite Notice of Intent with ADEQ. The SWPPP will include all specifications and best management practices (BMPs) needed for control of erosion and sedimentation. This will be prepared when the roadway design work has been completed in order to best integrate the BMPs with the project design.

General measures to be used to manage stormwater runoff include litter control, proper usage of deicing chemicals and herbicides, establishment and maintenance of vegetation, and reducing direct discharges to receiving waters when practicable.

Specific measures to be considered and used for management of potential stormwater pollution problems include grassed channels, overland flow through vegetation, wet detention basins, and wetlands.

If a material spill should occur during construction, clean-up procedures would be followed as outlined in the AHTD's *Standard Specifications for Highway Construction*. Measures taken to ensure accidental spill and runoff control while the facility is operating would be coordinated by the Arkansas State Police, the Arkansas Highway Police, AHTD, and a contracted hazardous spill containment team. The State Emergency Operations Center's HAZMAT Hot Line is notified for official notification and response.

FLOODWAYS AND FLOODPLAINS

All of the floodplain and floodway encroachments will be designed to comply with the respective community's local flood damage prevention ordinance. During project design,

hydraulic data and construction plans will be submitted to the communities for review, approval and/or permitting as specified by their ordinance.

WETLANDS AND WATERS OF THE UNITED STATES

Commitments to minimize harm to wetlands and streams are as follows:

- Dredged or fill material used for construction will be non-pollutional material in accordance with USEPA Guidelines for the Discharge of Dredged or Fill Material found in 40 CFR 230.
- All construction activity will be performed in a manner that would minimize increased turbidity of the water in the work area and otherwise avoid adverse effects on water quality and aquatic life.
- All dredged material not used as backfill will be placed on land and no runoff water from the disposal site will be allowed to enter the waterway.
- The discharge will not be located in the proximity of a public water supply intake.
- Erosion, both during and after construction, will be controlled as outlined in the latest edition of the AHTD's *Standard Specifications for Highway Construction*.
- The project will not significantly disrupt the movement of those species of aquatic life indigenous to the water body.
- Temporary work ramps or haul roads, when needed, will provide sufficient waterway openings to allow the passage of expected high flows.
- The contractor will take precautions in the handling and storage of hazardous materials including lubricants and fuels to prevent discharges or spillages that would result in degradation of water quality.

Although it is apparent that numerous streams will be impacted by this project, the extent of those impacts has yet to be determined. Following the design phase, a Stream Mitigation Plan to determine stream impacts and restoration requirements will be developed in cooperation with the US Army Corps of Engineers (USCOE).

Commitments to protect wetlands will include:

- Wetland areas will be avoided to the maximum extent practicable.
- Wetlands outside the construction limits will not be used for construction support activities (borrow sites, waste sites, storage, parking access, etc.) unless permitted by the USCOE.
- Heavy equipment working in wetlands will be placed on mats.
- Clearing of wetlands will be limited to the minimum amount necessary for the completion of the job.
- The contractor will be responsible for the protection of adjacent wetlands.

The AHTD proposes to mitigate the unavoidable wetland impacts associated with this project at the Rixey Bayou Wetland Mitigation Area. The Vicksburg District Corps of Engineers permitted the Selected Alignment in the FEIS on December 19, 1994, under Individual Permit Number CELMK-OD-FE14-PBH-G13-1. This permit expired on June 21, 2000. This permit required 50 acres (20 hectares) of mitigation from the Rixey Bayou Wetland Mitigation Area. If additional wetland mitigation is required for the Selected Alternative, additional mitigation acres are available at the Rixey Bayou Wetland Mitigation Area. The Rixey Bayou Wetland Mitigation plan is located in Appendix N of the 1994 FEIS.

DRINKING WATER SUPPLIES

If any permanent impacts to private drinking water sources occur as a result of this project, the AHTD will mitigate these impacts by providing an alternative water source, either by drilling a new well or connecting the residents to a community water system.

TERRESTRIAL AND AQUATIC COMMUNITIES

Impacts to terrestrial and aquatic communities will be minimized by limiting construction to the minimum width necessary to meet design safety. Erosion control methods will also be used to decrease the amount of sediments and pollutants entering the stream during construction. Further consideration will be given to wildlife corridors and passages during the design process.

CULTURAL RESOURCES

An architectural survey of the Selected Alternative has been completed and all standing structures 50 years old or older and any potential resources that might qualify as Section 4(f) properties have been identified. Five structural elements (Structural Elements A and C – F) and Structure XXX (Camp Robinson Bridge #2) have been determined as Section 4(f) properties and are eligible to the National Register of Historic Places as contributing elements to the previously recorded Camp Joseph T. Robinson Native Stone Architecture Historic District. An individual Section 4(f) Evaluation revealed no feasible and prudent avoidance alternative, and mitigation measures were developed and carried out by FHWA in consultation with the State Historic Preservation Officer (SHPO). The SHPO concurred that the mitigation is sufficient to resolve the anticipated adverse effect that the undertaking may have on these properties. None of the other structures identified within the Selected Alternative buffer zone or area of potential effect were determined to be eligible for nomination to the National Register and no further work is anticipated regarding standing structures in the study area.

Because much of the land along the Selected Alternative is privately owned, an intensive archeological survey of the Selected Alternative has not yet been completed. About 65% of the route has been examined during previous surveys and this accounts for the 18 previously recorded sites identified within the study area. Furthermore, until final project design is fully developed, project impacts to archeological resources cannot be fully addressed. In order to ensure that all outstanding fieldwork, site assessment, and mitigation are carried out in compliance with pertinent state and federal laws and regulations, a Programmatic Agreement (PA) was signed by the FHWA, SHPO and the AHTD. A copy of the PA is included in Appendix M of the FEIS. It will ensure that:

- An intensive cultural resources survey will be conducted of the entire project area once the final project design has been developed.
- All sites identified will be evaluated to determine if Phase II testing is necessary.
- All National Register eligibility determinations will be made by FHWA in consultation with the SHPO and other appropriate interested parties.

- Any sites determined eligible for the National Register will be avoided if possible. If avoidance is not possible, site specific treatment plans to mitigate or minimize impacts will be prepared and submitted to the SHPO, appropriate Indian tribes or other appropriate interested parties for review. Once approved, the treatment plans will be carried out at the earliest practicable time.
- Should any sites be found to qualify as Section 4(f) properties, there should be enough flexibility within the study corridor to modify final roadway designs to consider avoidance of all but the very largest sites (except where the route has been designated by Camp Robinson officials). If avoidance is not possible an Individual Section 4(f) statement will be prepared for the qualifying property as per 49 USC Section 303 and Title 23 USC Section 138.
- Standard documentation regarding all phases of the project will be provided to the SHPO for review and comment.
- All fieldwork, resource evaluation, treatment and reporting will conform to the Secretary of the Interior's "Standards and Guidelines for Archeology and Historic Preservation" (48 CFR 44716), "A State Plan for the Conservation of Archeological Resources in Arkansas" (Davis, 1982), the "2007 Integrated Cultural Resources Management Plan for Installations of the Arkansas Army National Guard" (ARNG, 2007) and all other pertinent state and federal laws and regulations.
- Consultation will continue with appropriate federally recognized Indian tribes throughout project duration.

FARMLAND

Farm severance can be mitigated through the construction of frontage roads and overpasses, or severance damages can be paid to affected owners if damages are established through the appraisal process. The construction of any frontage roads must be economically feasible. Any severance payments, as determined by the appraisal process, will compensate farm owners for their lack of access to the severed portion of the farm.

The harvesting of timber on the right of way through Camp Robinson will be administered by the Camp prior to construction of the proposed facility.

HAZARDOUS MATERIALS

If the project requires acquisition and demolition of standing structures, an asbestos survey will be conducted on each building prior to the development of demolition plans. If the survey detects the presence of any asbestos-containing materials, plans will be developed to accomplish the safe removal of these materials prior to demolition. All asbestos abatement work will be conducted in conformance with Arkansas Department of Environmental Quality (ADEQ), USEPA and the Occupational Safety and Health Administration (OSHA) asbestos abatement regulations.

If a hazardous waste site is identified, observed, or discovered during construction within the right of way area, it will be AHTD's responsibility to determine the type and extent of the contamination. The AHTD will determine the remediation and disposal methods to be employed for that particular type of contamination. Any required remediation work will be conducted in conformance with ADEQ, EPA and OSHA regulations.

The AHTD's *Standard Specifications for Highway Construction* that will be utilized during the construction of the project requires the contractor to: 1) employ best management practices to prevent pollution by spills; 2) utilize proper storage and disposal techniques; and 3) limit the amount of hazardous materials stored on-site.

COMMENTS AND RESPONSE TO BE ADDRESSED DURING THE DESIGN PHASE

The issues identified in the following comments on the SDEIS and FEIS will be addressed during the design phase.

Source: U.S. Department of Interior (USDO I), April 16, 2007

SDEIS Comment: We note that the western-most end of the project will cross the Bell Route of the Trail of Tears; while we agree with the assessment of the FHWA that the area is developed, an intensive inventory for cultural resources sites associated with the trail has not been completed, nor is there evidence that the SHPO has concurred with the assessment of eligibility or effect. We add a note of caution that there are archeological sites in the project area. While these resources are not normally considered Section 4(f) properties if they are significant solely for the information they contain, there is always the concern that there may be some sites that are valuable enough to be preserved in place. Those sites would then be

eligible to be considered under Section 4(f).

Response: As noted in Section 4.11 of the FEIS, should any sites be found to qualify as Section 4(f) properties, there should be enough flexibility within the study corridor to modify final roadway designs to consider avoidance of all but the very largest sites. If avoidance proves impossible, a Section 4(f) Evaluation will be prepared for the qualifying sites as per 49 USC Section 303 and Title 23 USC Section 138.

Source: USDOJ, Fish and Wildlife Service, May 17, 2007

SDEIS Comment #1: The Service requests that the AHTD limit impacts to waters of the United States to the greatest extent possible during the design phase of the project by further avoidance of wetlands and stream crossings of other than perpendicular angles.

Response: Impacts to waters of the United States will be minimized to the greatest extent possible. This will be accomplished through avoidance where practical; however, consideration will be given to the minimization of impacts to streams and wetlands during the design of structures for these crossings.

SDEIS Comment #2: The Service requests that adequate consideration be given to wildlife passage issues in rural undeveloped areas such as surrounding Fears Lake and within the Camp Robinson military installation. The use of continuous median guardrails that prevent small animal passage should be avoided and adequate wildlife passage should be incorporated in final project design to reduce animal/vehicle collisions.

Response: Further consideration will be given to these issues during the design process.

Source: City of Sherwood, Resolution No. 14-2007, April 23, 2007

SDEIS Comment: The City hereby requests a grade separation north of Oakdale road and east of Mine Road.

Response: The requested grade separation will be evaluated during the design phase.

Source: Arkansas Army National Guard – Camp Robinson

FEIS Comment: A grade separation, in addition to those proposed in the FEIS, should be located at 10th Street. It is also recommended that the main lanes of the new facility pass

over the existing Camp roads due to the weight of vehicles using the Camp roads.

Response: Further coordination with the Camp will be conducted regarding these issues.

SUMMARY OF COMMENTS ON FINAL ENVIRONMENTAL IMPACT STATEMENT

The Notice of Availability of the FEIS was published in the Federal Register on July 18, 2008, with the period of availability ending on August 18, 2008. Copies of the FEIS were sent to public viewing locations throughout the study area and to various parties of interest, as listed in Section 8 of the FEIS. The FEIS was also available for viewing on the project website.

The comment letters are included as part of the project files and are included in the Appendix to this ROD. In accordance with the National Environmental Policy Act (NEPA), comments offered by public agencies, the general public, or other interested parties need to be addressed in the ROD. The FHWA has considered these comments along with other pertinent information in making the decision on this proposed project. The following section presents the responses to all public and agency review comments received for the FEIS.

PUBLIC COMMENTS

Four public comments were received during the 30-day public comment period for the FEIS. The issues identified within these comment letters were grouped together by subject matter and a common response was generated for each group of comments.

AIR QUALITY ISSUES

[Hall, 7/16/08] I understand that the report that you released said it would not have a significant impact on the area of the freeway. This, to my understanding, is an average of all of the areas where the freeway will run. You know that the valley that we live in will be the most effected, unlike the flat lands above and elsewhere, because they have more air movement. But for those of us in the valley, we hope you will reconsider the location of the freeway to an area that will not affect the health, well being, and the quality of life of the residents.

[Hall, 7/16/08] I have asthma and this will greatly impact my health and well being

[Riffle, 8/7/08] I am concerned that not enough evaluation has been done on the effect that this freeway would have on the air quality for areas next to this freeway in the Northlake,

Oakdale and Kellogg Areas where residences currently exist and many more residences are in the development or sale stage at this time.

[Riffle, 8/7/08] On page 3-17 of the EIS it says "based on historical monitoring data, the existing air quality of the county encompassing the project area (Pulaski) is designated as being in attainment for the National Ambient Air Quality Standards . . ." I ask that you review recent data.

[Riffle, 8/7/08] I believe we have been frequently out of attainment of the National Ambient Air Quality Standards in recent months.

[Riffle, 9/7/08] We have told the highway dept. that we could not continue to live here through the dust of construction or after construction as we believe the pollution from the freeway would be too great.

Response: The USEPA is responsible for setting the National Ambient Air Quality Standards (NAAQS) for ground-level ozone and five other criteria pollutants to protect public health, including the health of "sensitive" populations such as asthmatics, children, and the elderly. To determine if an area is in attainment of air pollution levels set by the USEPA, air monitoring is conducted and reported. The three-year average of the fourth-highest daily maximum eight-hour average ozone concentrations measured at each monitor within an area over each year is used to determine if the level set by the USEPA for ozone has been exceeded. The project area is currently designated as "in attainment" for the NAAQS set by the USEPA. The level of analysis conducted by the AHTD for potential air quality impacts of the proposed project meets the requirements for attainment areas as designated by the USEPA.

Mechanisms are available during the design and right of way acquisition processes to accommodate health issues related to construction of a project or vicinity to a proposed facility.

FUNDING AND PURPOSE OF PROJECT

[Pierce, 8/4/08] Considering the now lack of highway funds to fix the existing bridges and highways it is more logical you would consider spending the money on making our present highways safe. Also, in our neighborhood we have a small bridge on Main Street that runs

into the North Lake Housing Division that only allows one car to cross and floods every year which we wonder why you do not fix.

[Riffle, 8/7/08] The other issue is financial-I am told there is no money for this project at this time. The economy is slow, revenues are lower and the state as well as national transportation systems have not been able to keep up with maintenance on bridges and highways. Therefore, why should we be approving more? The location of Camp Robinson and the Camp's requirement for where the freeway can go creates a problem for the usefulness of this freeway. It circles out and then narrows back in to go through Camp Robinson-you have to ask, how much saving of time and fuel will this be to the masses. There currently is a street, Maryland Avenue, in Sherwood which is in the process of being made a through street from Brockington Road. Once this is made a through street, regular work traffic going to West Little Rock could take this route from Hwy. 67/167 down Maryland to Batesville Pike and then if a through street is made through the Camp to 1-430 everything would be cheaper and just as effective. Even if the freeway is built I am not sure truckers won't continue using 1-40 as I think this will be a shorter route than the proposed Northbelt around the city. It is my understanding that at one time Sherwood had Maryland Avenue as the location for the Northbelt Freeway. For security reasons we should not want the truckers taking this Northbelt route through Camp Robinson anyway.

Response: The justification for this project is outlined in Section 1, "Purpose and Need" of the FEIS. Once the purpose and need for a project is established, it is advantageous for the AHTD to pursue approval of a route for the project in order for the corridor to be preserved. Preservation of the corridor can lead to substantial cost savings for the AHTD and taxpayers, especially if it is not possible to build the project immediately.

PROCESS AND ALTERNATIVE SELECTION

[Pierce, 8/4/08] We prefer if you have to build such a route that you plan for the furthest north route C. If that is not possible than the furthest route south (Alternate A and B red and green in color) is our choice. We wish to avoid segment small (b) as it is to close to the North Lake housing area.

[Pierce, 8/4/08]..... now you wish to run such a highway through our residential area.

[Hall, 7/16/08] Instead, we will be looking up at the bottom of a bridge, hearing all the noise, and worst of all breathing all of the air and truck fumes.

[Knodel, 7/08] Once Highway Dept. had the money, but they used it elsewhere, and had the EIS. Then we were told the final alternative route was chosen. And about 7 years later, we were told no it was not, even though it was in the newspapers. So they opened up and started all over, the EIS expired. Another was started, and finished, but now they say they have no money. Then they say but we must buy up Right Of Way with Four Million Dollars they can come up with. They chose to use it along Hwy 107 where it is bare land, and just ignore residents who are in the "alternative chosen path".

[Knodel, 7/08] We would sleep better if Federal or State would come out and say what they are doing. The engineers involved say "ask Ar Hwy Dept., they know and will inform you". Not so.

[Knodel, 7/08] We can't get specific answers.

[Knodel, 7/08] Years ago Hwy Dept and residents, accepted the alternative route, and as I said thought it was final, but then it raises it's ugly countenance again! 20 years later! We can't sell, who wants to buy something right in the middle of a so-called "planned" Freeway Loop Route? Some residents have tried to sell, but cannot.

[Knodel, 7/08] Won't the Fed. Dept urge the AR.Hwy Dept. to fish or cut bait??

[Knodel, 7/08] Tell us something. Do something.

Response: The Alternatives section of the FEIS describes the process followed to choose the Preferred Alternative Bab. The Preferred Alternative meets the project's purpose and need, minimizes overall impacts, balances the benefits expected from the project with the overall impacts and provides good access to communities and other regional highway facilities.

The Coordination, Public Involvement, Comments, and Response section of the FEIS details the extensive public involvement efforts during the environmental process that were used to inform the public of the project's status and to take comments. The approval of this Record of Decision will allow for design work and right of way acquisition to proceed. A design public hearing will be held in the future when design is available. Construction of the project will be dependant upon the availability of funding.

SUMMARY

For the foregoing reasons, and based upon consideration of all the social, economic and environmental evaluations contained in the SDEIS and FEIS, and with the input received from other resource agencies, organizations and the public, FHWA has determined that the Selected Alternative is the environmentally preferred alternative. Therefore, the Selected Alternative is adopted as the proposed action for the Highway 67 – I-40 West Project.

APPROVAL OF RECORD OF DECISION

Approving Official: 
Federal Highway Administration

Date: 9/23/2008

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Appendix

Public Comment Letters

August 2008

Mr. Randal Looney
Federal Highway Administration
Arkansas Division Office 700 West Capitol
3130 Federal Office Building
Little Rock, AR 72201

Dear Mr. Looney:

We have been told we can again express our concerns and they will be circulated to federal offices involved with Northbelt Freeway for the Record of Decision.

I've lived at 1106 Kellogg Acres Road since 1972. My goal was to enjoy the magnificent natural beauty of the area, and work toward getting the property ready to accommodate growing older. Ever since the 70's I've been upset and told The Freeway Loop was coming through here. I fought it with petitions, phone calls, walking the different neighborhoods, gathering and distributing information to the public when there was a meeting pending. I did this with enthusiasm, until I find myself fighting in the 80's, 90's and now in the 2000's. Metroplan "holds the purse strings" we are told. A Sherwood Mayor said in a public meeting "Sherwood gets what Sherwood wants". In spite of input from we who are directly involved, that has been the result each and every time it comes up.....We speak, we plead, we gather facts, and the gavel goes down against us at the end of input at the meeting. Needless to say that would kill anyone's enthusiasm, but thankfully we have "new" people in the areas now. They are as upset as we are, and perhaps can take up the battle as others of us who are physically impaired, and/or elderly have to slow down.

Being unincorporated by choice, we have no representation, money, nor are we organized formally to defend ourselves. I've seen/heard/and been to meetings that were in direct conflict with what I learned at an earlier meeting. That's the way it has gone. Once Highway Dept. had the money, but they used it elsewhere, and had the EIS. Then we were told the final alternative route was chosen. And about 7 years later, were told no it was not, even tho it was in the newspapers. So they opened up and started all over; the EIS expired. Another was started, and finished, but now they say they have no money. Then they say but we must buy up Right Of Way.....with Four Million Dollars they can come up with. They chose to use it along Hwy 107 where it is bare land, and just ignore residents who are in the "alternative chosen path". I am in the dead middle of it, taking front, back, both sides of my house, outbuildings and property. It is heartbreaking. Yes, I'll survive, as will my friends. But it simply is not fair nor is it right. God knows I am unable to handle the unending frustration, and I've turned this over to Him to guide me. I will be content under His will. In the meantime, I will do the "leg work" and the fact finding, and everything I can for my part in supporting my community, neighbors and friends.

We would sleep better if Federal or State would come out and say what they are doing. The engineers involved say "ask Ar Hwy Dept., they know and will inform you". Not so. I have memories here, as well as a beautiful waterfall and fish pond I built after I retired.

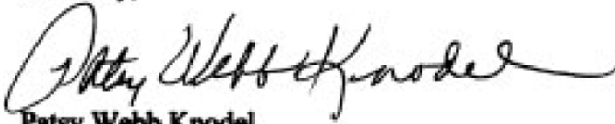
I can't take that, nor can I take the clean air, God's natural beauty, nature's inhabitants, nor can I carry out on my back the result of spending many hard earned dollars improving my property!!

Every time any of us try to make future plans, we are caught in the Freeway Loop trap! We can't get specific answers. Every time we want to plant a tree, we must visualize a bulldozer crashing it down!! Years ago Hwy Dept and residents, accepted the alternative route, and as I said thought it was final, but then it raises it's ugly countenance again! 20 years later! We can't sell, who wants to buy something right in the middle of a so-called "planned" Freeway Loop Route? Some residents have tried to sell, but cannot. We have no reference point to guess at how much money we'd end up with, toward re-establishing ourselves in our old age. I think "those in power" should exempt everyone over age 65, and everyone who is impaired, handicapped, or otherwise disabled. This can be done.

Our Freeway story is so widespread, it would be hard to find anyone in nearby states, who do not know about the fiasco! Won't the Fed. Dept urge the AR Hwy Dept. to fish or cut bait?? So many entanglements. We can't figure the economics of the plans, especially when this area is known for it's natural beauty, wetlands, streams, wildlife, and a peaceful valley. Hwy dept is taking a route that makes no sense whatsoever. It is not accommodating anyone traffic-wise, or otherwise. Then we are told "Hwy Dept. can and will make variances, we are allowed to do that, go around some properties, etc." We can't count on that because nobody in charge admits it is possible. Frankly I'd prefer to be bought out and bulldozed down than be so close to it I have to breathe pollution from traffic as well as contend with the noise. And witness our haven out here destroyed for a giant Freeway Loop!!!

All this to say HELP. Tell us something. Do something. Or close the adventure completely. The future results of a project can be best determined by what's happened in it's past. And that would be on-again, off-again, yes, no, maybe so, certainly. Procrastination. Right where we have been for over 35 years. With nothing gained nothing resolved.

Sincerely,



Patsy Webb Knodel
1106 Kellogg Acres Road
North Little Rock, AR 72120
501 835 6158

RECEIVED
AHTD

JUL 22 2008

ENVIRONMENTAL
DIVISION

Ruby Jordan
Environmental Div.
Ark. State Hwy. & Transportaion Dept.
PO Box 2261
LR, AR 72203-2261

Barbara Hall
PO Box 94727
NLR, AR 72190
July 16, 2008

Dear Sirs:

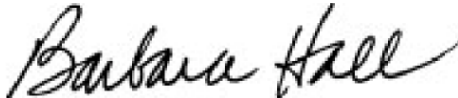
I am writing you about the environmental impact statement that was just release for the North Belt Freeway that is planned for central Arkansas. My husband and I own a home on Kellogg Acres Road in Kellogg Valley in Pulaski County. My family bought there in 1957 as our familial residence. We now own it, after the death of my parents in 2003. This was a wonderful, quiet place to grow up and now a good place to live as an adult.

My house, 1012 Kellogg Acres Rd., will be the one next to the freeway that they *won't* be buying. Instead, we will be looking up at the bottom of a bridge, hearing all the noise, and worst of all breathing **all** of the car and truck fumes. I have asthma and this will greatly impact my health and well being, as the fumes will hang in the valley due to lack of air circulation.

Several days this week, in central Arkansas, we are having ozone action days. I went out of my air-conditioned home yesterday for about an hour and came home having symptoms of wheezing, runny nose and sneezing. I understand that the report that you released said it would not have a significant impact on the *area* of the freeway. This, to my understanding, is an average of all of the areas where the freeway will run. You know that the valley that we live in will be the most effected, unlike the flat lands above and elsewhere, because they have more air movement. But for those of us in the valley, we hope you will reconsider the location of the freeway to an area that will not affect the health, well being, and the quality of life of the residents.

Thank for your time and consideration,

Barbara Hall



TO: Arkansas Highway and Transportation Department
Environmental Division
P.O. Box 2261
Little Rock, Arkansas
72203-2261

FROM: Julian and Kyoko Pierce
4 Redwing Court
Jacksonville, Arkansas
72076

RECEIVED
AHTD
AUG - 5 2008
ENVIRONMENTAL
DIVISION

Re: North Belt Freeway

Please note my wife and I are very upset in the first place that you have changed your plans originally to put that North Belt Freeway in Sherwood and now you are moving it to Jacksonville. We purposefully moved to the North Lake Housing area to get away from the highway noise and traffic and now you wish to run such a highway through our residential area.

Considering the now lack of highway funds to fix the existing bridges and highways it is more logical you would consider spending the money on making our present highways safe. Also, in our neighborhood we have a small bridge on Main Street that runs into the North Lake Housing Division that only allows one car to cross and floods every year which we wonder why you do not fix.

Anyway, here is our comment about the preferred alternate route in north Pulaski County between U.S. 67/167 and the interstate 40/430 interchange. We prefer if you have to build such a route that you plan for the furthest north route ©. If that is not possible than the furthest route south (Alternate A and B red and green in color) is our choice. We wish to avoid segment small (b) as it is to close to the North Lake housing area.

Thank you for your consideration,

Julian Pierce and Kyoko Pierce

The image shows two handwritten signatures in black ink. The top signature is for Julian Pierce and the bottom signature is for Kyoko Pierce. Both signatures are written in a cursive, flowing style.

WAYNE and BOBBIE RIFFLE

1205 KELLOGG ACRES ROAD

NORTH LITTLE ROCK, AR 72120 501-834-5025

August 7, 2008

Mr. Randal Looney
Federal Highway Administration
Arkansas Division Office
700 West Capitol
3130 Federal Office Building
Little Rock, AR 72201

Dear Mr. Looney,

Please copy and forward this letter to all federal offices currently evaluating the Northbelt Freeway for the Record of Decision.

I am concerned that not enough evaluation has been done on the effect that this freeway would have on the air quality for areas next to this freeway in the Northlake, Oakdale and Kellogg Areas where residences currently exist and many more residences are in the development or sale stage at this time. In the Oakdale/Kellogg Road area the preferred alternative runs north of a ridgeline known as Purdum Hill and creates a valley below. This will create a barrel type effect for air and noise pollution to settle in. On page 3-17 of the EIS it says "based on historical monitoring data, the existing air quality of the county encompassing the project area (Pulaski) is designated as being in attainment for the National Ambient Air Quality Standards . . .". I ask that you review recent data. I am enclosing just one article from the paper (and there have been many in the past 2 years) showing that we are having an Ozone advisory. The ozone levels and ways to solve the problem have been a frequent topic at Metroplan meetings. However, it seems everyone just keeps on doing the same things and making matters worse. I believe we have been frequently out of attainment of the National Ambient Air Quality Standards in recent months.

The other issue is financial—I am told there is no money for this project at this time. The economy is slow, revenues are lower and the state as well as national transportation systems have not been able to keep up with maintenance on bridges and highways. Therefore, why should we be approving more? The location of Camp Robinson and the Camp's requirement for where the freeway can go creates a problem for the usefulness of this freeway. It circles out and then narrows back in to go through Camp Robinson—you have to ask, how much saving of time and fuel will this be to the masses. There currently is a street, Maryland Avenue, in Sherwood which is in the process of being made a through street from Brockington Road. Once this is made a through street, regular work traffic going to West Little Rock could take this route from Hwy. 67/167 down Maryland to Batesville Pike and then if a through street is made through the Camp to I-430

WAYNE and BOBBIE RIFFLE

1205 KELLOGG ACRES ROAD

NORTH LITTLE ROCK, AR 72120 501-834-5025

everything would be cheaper and just as effective. Even if the freeway is built I am not sure truckers won't continue using I-40 as I think this will be a shorter route than the proposed Northbelt around the city. It is my understanding that at one time Sherwood had Maryland Avenue as the location for the Northbelt Freeway. For security reasons we should not want the truckers taking this Northbelt route through Camp Robinson anyway.

We have lived at our current address for 25 years. My daughter and I both have physical problems which involve respiratory problems, speaking and hearing difficulties, etc. We have made our current home handicap accessible and we currently have HEPA air filters in both our bedrooms. We are told the proposed ROW on the North edge where it crosses Kellogg will be through our lower driveway. We have told the highway dept. that we could not continue to live here through the dust of construction or after construction as we believe the pollution from the freeway would be too great.

We have attended Metroplan and Highway Public Hearings on this and even done public petitions on this in the past. From our viewpoint much of the "public hearings" have only been window dressings and those who have been really listened to have been the political people, the Mayors, especially Sherwood. Those of us in the county have not had any representation as the county judge is not going to speak up against the other cities in the county.

I hope what I have written will truly be considered. Thank you.

Sincerely,



Bobbie Riffle

cc: Ruby Jordan
Environmental Division
Arkansas State Highway and Transportation Department
P. O. Box 2261
Little Rock, AR 72203-2261

Ozone advisory for four counties

7/18
2008
ARKANSAS DEMOCRAT-GAZETTE

Metroplan has issued an Ozone Action Advisory for today for Pulaski, Faulkner, Lonoke and Saline counties.

Metroplan is the agency responsible for monitoring ozone levels in central Arkansas. The forecast is orange, which means that outdoor activities may be unhealthy for sensitive groups, according to a news release.

Ozone, a colorless gas, is the main component of smog.

It can cause health problems, especially among children, the elderly and those with respiratory ailments.

Ozone occurs naturally in the stratosphere and can form at ground level when car exhaust, gasoline vapors or industrial emissions react to sunlight.

The daily ozone forecast can be checked online at www.ozoneactiondays.org.

Agency Comment Letters

United States Department of Agriculture



Natural Resources Conservation Service
Room 3416, Federal Building
700 W. Capitol Avenue
Little Rock, Arkansas 72201-3225

AUG 14 2008

Mr. Don Nichols
Environmental Division
Arkansas State Highway and Transportation Department
P.O. Box 2261
Little Rock, Arkansas 72203-2261

Dear Mr. Nichols

This letter is in response to your request for comments regarding the Final Environmental Impact Statement (FEIS) for Job Number R60101, Highway 67--I-40 West. The Natural Resources Conservation Service (NRCS) has provided information regarding farmland classification of soils in the corridor area. NRCS has no additional comments regarding the selected corridor in the FEIS.

Should you have any questions or need additional information, please call me at (501) 301-3172.

Sincerely,

A handwritten signature in black ink that reads "Edgar Mersiofsky".

EDGAR MERSIOFSKY
Assistant State Soil Scientist

COORDINATION / ROUTING

MAJ Curtright

A	ACTION	F	COORDINATION	K	INVESTIGATE	P	SEE ME
B	APPROVAL	G	FILE	L	SUSPENSE	Q	SIGNATURE
C	AS REQUESTED	H	REVIEW	M	NOTE AND RETURN	R	OTHER
D	CIRCULATE	I	FOR CORRECTION	N	PER CONVERSATION	S	FOR CLEARANCE
E	COMMENT	J	FOR INFORMATION	O	PREPARE REPLY	T	

OFFICE	CODE	CONCUR	NON-CONCUR	COMMENTS (attach additional pages if required and <input type="checkbox"/> box below)	DATE
TAG	H	<i>[Signature]</i>		<input type="checkbox"/>	15 Aug 08
DAG	H	<i>[Signature]</i>		<input type="checkbox"/>	
CoS	H	<i>[Signature]</i>		<input type="checkbox"/>	14 Aug 08
				<input type="checkbox"/>	14 Aug
				<input type="checkbox"/>	
				<input type="checkbox"/>	
				<input type="checkbox"/>	
				<input type="checkbox"/>	
				<input type="checkbox"/>	

ACTION OFFICER/GRADE	OFFICE SYMBOL	PHONE NUMBER	SIGNATURE	DATE
MAJ Marty P. Curtright	DCSEN -ENV	501-212-5870	<i>Marty P. Curtright</i>	8 Aug 08

SUBJECT: FINAL Environmental Impact Statement (EIS) HWY 67-I-40

SUMMARY:
The Final EIS for review and comment as done by the Arkansas State Highway and Transportation Department

NUMBER OF ATTACHMENTS: 1

RECOMMENDATIONS:
Review and Comment as necessary as action affects AR ARNG Training Site

COMMENTS/NOTES:
DCSEN-Environmental Comments: Figure 3.15-1 and page H-3 refer to abandoned underground storage tanks (UST) at the AASF aboveground fueling site. Two large above ground fuel storage tanks exist at the facility but no UST's have ever been located at the facility. Delete comments concerning UST's at the location. *phone # 212-5875*

DCSEN Master Planner comments: See attached comment sheet. *phone # 212-5865*

Review and provide comments to MAJ Curtright no later than 15 Aug 2008 for submittal to the AHTD.

RECEIVED
AHTD

AUG 18 2008

ENVIRONMENTAL
DIVISIONProvided by
Bill Waverling

FEIS MP Review

Sir,

This document does not specifically address any subject other than environmental issues. The 'path' or buffer through the RTMA does not deviate from the information provided to us by the AHTD during the MP evolution conducted in December of 2007.

The RTMA Master Plan itself has little detail on the project. Part 3, Existing Conditions, page 3-29, item #8 states;

"The North Belt Bypass is a strip of land dedicated to a future elevated roadway to be constructed by the State of Arkansas. From an east to west routing, the roadway will enter Camp Robinson at the east side across the top of Maryland Avenue. From that point, the routing moves south of New York Avenue to about the midpoint of the cantonment area where it will swing to the north to pass around the landfill, the Troop Complex and other functions while staying away from the 77th Aviation Brigade and the Army Aviation Support Facility. There is to be no access to or from this highway onto Camp Robinson."

Part 4, Factors Influencing Development, page 4-2, paragraph three states;

"The North Belt Bypass' current planned alignment will generally run east-west across Camp Robinson property, between the cantonment area on the south and the Firing Ranges & Army Aviation Support Facility on the north. The right-of-way corridor will be restricted to/from Camp Robinson property. Planned development in the vicinity of the proposed alignment should coordinate with Arkansas State Highway and Transportation Department (AHTD).

The bypass is mentioned within the RTMA MP document on one more occasion; in Part 5 Objectives and Needs, page 5-54 item #8. This section essentially repeats the statement shown in Part 3, Existing Conditions, page 3-29, item #8.

Other Comments & Suggestions;

Figure S-2, page S-13: Shows a total of five (5) grade separations within the boundary of the RTMA. These grade separations occur at Nebraska Avenue, Missouri Avenue, H Avenue, New York Avenue, and 6th Street.

A sixth grade separation is recommended for 10th Street in order to facilitate access to ranges 8, 9, and 11.

While not specifically addressed in the FEIS; an agreement needs to be established as to the bypass being elevated above these major post arteries. Access to the northern-most training areas within the post is accomplished via these routes, and vehicle loads are such

that 'bridging' these roads over the bypass would require extraordinarily robust structures. It is suggested that the bypass be elevated over these arteries.

In addition to the six (6) above mentioned grade separations (five illustrated and one additional suggested); an accord must be established with regard to the other portions of the post road network intersected as a result of construction. Specifically agreements need to be reached on the following roadways; North Dakota, 14th Street, 16th Street, and 3rd Street. Master Planning recommendation is to terminate all at the point where they intersect the bypass buffer zone.