



I-49 Inner City Connector Build Alternative 3A Statement

The Northwest Louisiana Council of Governments (NLCOG) and the Metropolitan Planning Organization (MPO) has received a number of public comments concerning the current posture of the I-49 ICC Environmental Process, and in particular the current investigation into the viability of Build Alternative 3A. NLCOG appreciates the community's continued involvement in the process, and can appreciate that frustration may result from the monumental undertaking of an Environmental Impact Statement created for projects in urban areas. We have been diligently working through the federally required NEPA process for the I-49 Inner City Connector to develop alternatives that meet the project's purpose and need, while being mindful of the area's natural and built environment.

The National Environmental Policy Act (NEPA) process can be a long process and is complicated for major urban projects. Per DOTD, the I-49 South Connector process (in Lafayette) was 20+ years as were I-10 in Baton Rouge and Lake Charles. This issue was addressed by Dr. Eric Kalivoda, Secretary of the Louisiana Department of Transportation and Development, during an update on the state of the I-49 ICC Project at a recent NLCOG meeting:

- DOTD and the project team must thoroughly examine all reasonable, feasible alternatives.
- In addition to public engagement, we must consult and coordinate with numerous federal and state regulatory agencies (FHWA, Corps of Engineers, EPA, SHPO, etc.).
- We are presently working to address their concerns.
- That process sometimes involves looking at variations in alternatives to minimize or avoid impacts.
- Once the evaluations and consultations have been completed, a preferred alternative will be identified and a draft EIS will be published.
- For the inner-city alternatives, the intent has always been to work with local officials and citizens to use the project as a catalyst for community revitalization.
- If one of the inner-city alternatives, or some variation thereof, is selected as the preferred alternative, that commitment remains.
- Further, if one of the inner-city alternatives, or some variation thereof, is selected, we will need and expect the business sector to step forward, not to fund the infrastructure, but rather to invest in the community even if that investment does not show a near-term return.

A Record of Decision (ROD) is issued by FHWA after a draft EIS has been through a public review process, all comments have been addressed, and a final draft EIS has been provided with a draft ROD. NLCOG does not have the authority to issue the ROD. NLCOG must conclude the alternatives review in accordance with the process in order to develop the draft EIS before it is able to request final reviews that lead to the ROD. A ROD will only result from the proper and complete compliance with the NEPA process that is ongoing. Attempts to deviate that process would undermine the policy and purpose of NEPA and place the I-49 ICC project in jeopardy.

As a reference point, construction of the I-220 over Cross Lake was delayed for almost 20 years due to litigation over impacts to Cross Lake and then construction setbacks. The proposed I-49 Connector project is likely to face similar challenges regardless of the outcome of the NEPA process. There are many impassioned individuals on both sides of the project, and it has been one of the challenges of our team to develop alternatives that could be supported by all. It would not serve the good people of Caddo and

Bossier Parishes and the State of Louisiana to attempt to circumvent the NEPA process. We must follow the process and see it through to the issuance of a Record of Decision. The process is designed to identify the project (preferred alternative) that best meets the purpose and need while being protective of the natural and built environment.

The NEPA process sets out to identify the least damaging and most practical alternative in the EIS. With sufficient supporting data, the least damaging and most practical alternative is the one that could receive a favorable Record of Decision. If during the course of the study, new information or potentially less damaging concepts are revealed, they must be studied to ensure that we do not bias the process or eliminate an alternative without due process.

Public meetings that have been conducted pursuant to the NEPA process and required cultural resources surveys indicated the likelihood of adverse effect to jurisdictional resources, which was confirmed by the SHPO. The formal Section 106 consultation process was initiated thereafter, and we remain in this process. Public meeting summaries are available at www.i49shreveport.com under public involvement tab. On that tab, scroll down to Round 3 Community Meetings to view data related to the process.

Build Alternative 3A was collaboratively derived during the Section 106 Consulting Parties Process. The Section 106 process is undertaken when a project evaluated under NEPA may be adverse effects to cultural resources, such as historic properties and archeological sites. The Consulting Parties group involves representatives from DOTD, FHWA, the State Historic Preservation Office (SHPO), Advisory Council on Historic Preservation (independent federal agency whose 24 members are Presidentially appointed), National Trust for Historic Preservation (nonprofit), project consulting team cultural resources experts, and several representatives from Shreveport that represent both the public and private sector.

Build Alternative 3A was the product of a consulting parties meeting and comments concerning the status of the St. Paul's Bottoms National Historic District. Because it had been identified that some of the conditions regarding the historic district had changed, the Consulting Parties Group determined that re-considering Build Alternative 3, with some modifications, to minimize impacts to cultural resources was necessary. A concept for Build Alternative 3A was discussed during the meeting, with specific reference to avoiding adverse impact to the Shreveport Water Works Museum, Shreveport Railroad Museum, Mount Moriah Park, and the new apartment development. Because the Section 106 Consulting Parties process is designed specifically as a collaborative one, there is no single agency or individual to attribute authorship of the alternative route.

SHPO, the National Trust for Historic Preservation, and the Advisory Council on Historic Preservation felt that continuing north rather than turning west just south of the AEP power plant, assuming the Shreveport Water Works Museum could be avoided and no additional unknown sites were encountered on the northern route, might be the least impactful to cultural resources and needed to be considered in the NEPA process. The Consulting Parties decided that a conceptual alignment would need to be sketched out and studied in enough detail to determine if it was viable before we could continue with the Section 106 process.

One of the chief tenets of NEPA is to consider all reasonable alternatives when evaluating a project. Alternatives that are collaboratively developed during the NEPA process must be considered. We are bound by NEPA's implementing regulations to consider the viability of Build Alternative 3A. The feasibility study is designed to determine viability and includes preliminary engineering that will assess the ability to route the alternative to the west of known cultural resources and east of a known recreational resource and the apartment development.

The Build Alternative 3A route is considered a NEPA-derived route that must be reviewed to determine if it is viable. This requires a level of engineering design to be performed by the project design engineers from Stantec. The results of the engineering study will be provided to NLCOG, DOTD, and FHWA. DOTD and FHWA will make the determination relative to the viability of the route. If it is added to the EIS study as a viable alternative, the NEPA process moves forward with 5 build alternatives and the no build concept. Initial study data will be used to generate an alternatives comparison table with all the build alternatives and a public meeting would then be held to present the updated alternatives to the public and gain additional feedback. After this meeting, the project team will conduct necessary individual studies to identify the least damaging alternative, knowing that the no-build could still be selected. The timeframe to completion will depend on these outcomes.

Build Alternative 5 was also generated during the NEPA process, a product of comments received during the 2012 public meetings. Like Build Alternative 3A, we were required to conduct enough study of the conceptual route for Build Alternative 5 to assess if it was a viable alternative. Build Alternative 5 adversely impacts Cross Lake, a recreation area, and efforts to avoid or minimize impacts must be considered. Build Alternative 3A aims to not only lessens impacts to cultural resources in the inner city, but also avoid impacts to the Cross Lake recreational rea.

Upon completion of the initial feasibility study, if Build Alternative 3A is found viable, then a summary of potential adverse effects will be developed and a public meeting will be held to gain public input on the five build alternatives and the no build option.

The NEPA process can be a long process and is complicated for major urban projects. Per DOTD, the I-49 South Connector process (in Lafayette) was 20+ years as were I-10 in Baton Rouge and Lake Charles. NEPA involves studies that are not available for public consumption until they are completed and studies that involve potentially sensitive resources that require freedom of information act requests to obtain even after they are completed (this applies to cultural studies to ensure that sites are not disturbed). It is because of the studies and actions that are "unseen" that we have a previously unidentified build alternative under consideration. The project team has committed to keeping the City of Shreveport more informed of the work that is occurring to move the project forward to alleviate concerns that there has been no action.

The members of NLCOG and the MPO are fully aware of the frustration with this process throughout the community. As noted above, the initial study is designed to determine viability of this alternative we are unable to remove it from further consideration. We thank you for your continued participation in this vital process.