



I-84 HARTFORD PROJECT HARTFORD, CONNECTICUT FINAL SCOPING SUMMARY REPORT

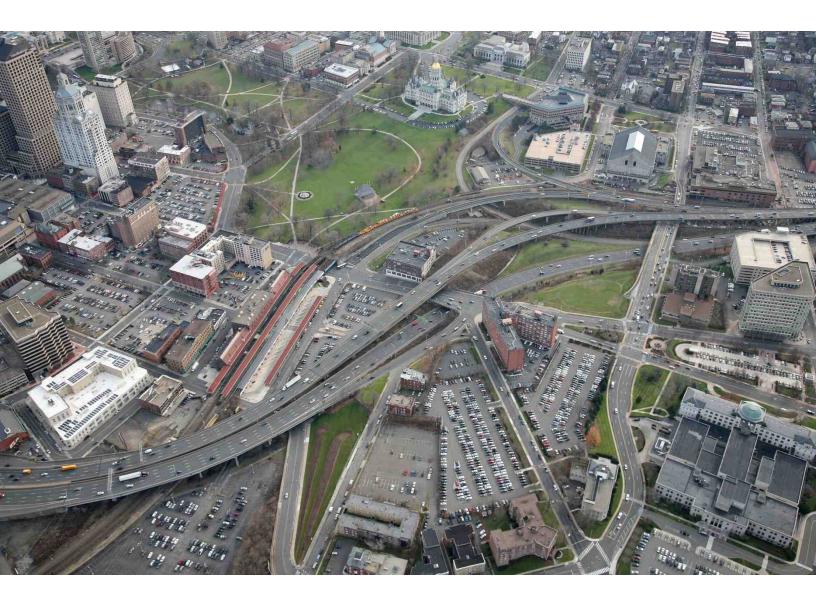


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I. Introduction

Connecticut Department of Transportation (CTDOT) is investigating the need to rehabilitate, reconstruct, or replace Interstate 84 (I-84) through Hartford: The I-84 Hartford Project. CTDOT initiated the environmental review process as required by the National Environmental Policy Act (NEPA) of 1969 and the Connecticut Environmental Policy Act (CEPA). CTDOT is coordinating with the Federal Highway Administration (FHWA) pursuant to Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU, as codified in 23 U.S.C. §139). FHWA is serving as the lead federal agency for this project, with CTDOT serving as joint lead agency.

The purpose of the I-84 Hartford Project is to address the structural deficiencies, improve traffic operations and safety conditions, and reduce congestion on the I-84 mainline and its interchanges. Addressing these deficiencies would allow I-84 to continue to serve as a vital link in the interstate highway system in the Northeast and provide needed access to Hartford business districts and the State Capitol. These improvements would also enhance access, safety and mobility for all modes of transportation within the project corridor including cars, trucks, buses, bicycles, pedestrians and transit. Goals of the I-84 Hartford Project are to reduce the highway's footprint on the City; lessen the highway's visual and physical impact on adjoining neighborhoods; better integrate the highway into the urban environment; create linkages to existing and proposed future modes of transportation; and support Hartford's economic development goals.

The I-84 Hartford Project corridor is approximately three miles in length and encompasses the interchanges and elevated bridge sections of the highway from as far west as Hamilton Street to the I-91 Interchange on the east (see Figure 1). Interchanges within the project corridor include exits 46 through 51 connecting to Sisson Avenue, Sigourney Street, Capitol Avenue/Broad Street/Asylum Street, Ann Uccello Street/High Street, Main Street/Trumbull Street/Morgan Street, and I-91 Northbound. The study area, a buffer around the project corridor, extends from Flatbush Avenue to I-91 and is approximately four miles in length and approximately one-half mile wide. Within the study area, the Project Team will analyze potential impacts to a range of project-related resources.

The bridge spans within this section of the highway are reaching the end of their intended life. While safe to drive over today, CTDOT currently has an ongoing maintenance and repair program to keep the bridges and roadway within the project corridor safe and passable. CTDOT has spent over \$60 million on bridge repairs since 2004, and will ultimately need to replace the structures in their entirety. This stretch of I-84 also has a higher daily vehicle use than any other stretch of highway in the State, with approximately 175,000 vehicles a day, far in excess of the initial capacity of 50,000 vehicles a day. Left-hand on- and off-ramps, weaving traffic, and eight interchanges in less than three miles, contributes to congestion that can stretch for miles. The accident rate within the project corridor is four times the state average, with nearly two accidents per day.

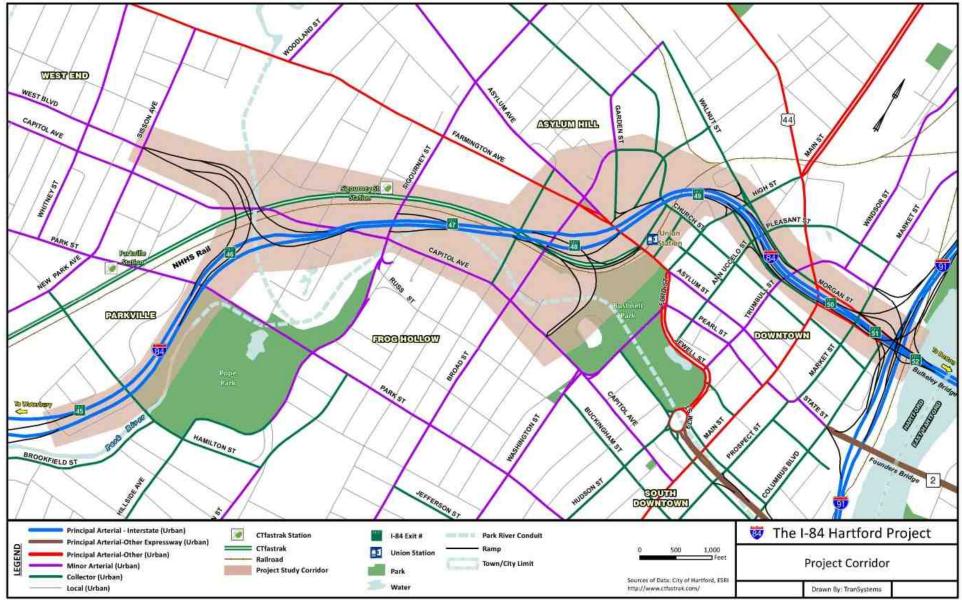


Figure 1: Project Corridor

Purpose of the Report

This report provides a summary of the scoping process and documents all comments provided by the public and the agencies during the scoping comment period. This report includes the following key elements:

- Summary of scoping process and format
- Documentation of all public and agency scoping comments
- Responses to all public and agency scoping comments
- Action items and next steps
- Updated environmental resource maps

As the Project Team conducts the Alternatives Analysis process, consideration of all comments will be critical towards refining the reasonable range of alternatives; shaping the scope of the environmental review process; and supporting the determination of whether the project proceeds as an Environmental Assessment (EA) or an Environmental Impact Statement (EIS).

NEPA/CEPA and the Scoping Process

Both the federal government and the State of Connecticut have environmental review processes, NEPA and CEPA respectively, to ensure that agencies consider the potential effects of projects that they are undertaking or approving. This project's environmental review will be conducted by CTDOT in accordance with NEPA, as amended; the Council on Environmental Quality (CEQ) regulations for implementing the procedural provisions of NEPA (40 CFR Parts 1500-1508); and CEPA. The environmental document will be dually compliant with both NEPA and CEPA requirements. In addition, CTDOT will adhere to FHWA's *NEPA Implementing Regulations* (23 CFR Part 771), and FHWA's *Guidance for Preparing and Processing Environmental and Section 4(f) Documents* (Technical Advisory 6640.8A, October 30, 1987). CTDOT will conduct the environmental review process in accordance with Section 6002 of SAFETEA-LU. The environmental document will address, as necessary, Section 106 of the National Historic Preservation Act; Section 4(f) of the Department of Transportation (DOT) Act of 1966 (49 U.S.C. 303); and other relevant federal and state laws and regulations. The environmental document will describe environmental conditions; analyze the possible social, economic, and environmental impacts and benefits of the project; and identify proposed mitigation measures, as warranted.

Scoping is the first step in the environmental process. The Project Team designed this scoping process to solicit input on areas of the project such as Purpose and Need, goals and objectives, the study area, alternatives, and potential impacts. Public scoping encourages early communication in the NEPA/CEPA process to help lead agencies gather public input and understand public concern on the project.

The scoping process consists of six major elements:

- Letter of Project Initiation
- Scoping Initiation Packet
- Agency and Public Scoping Meetings

- Public Scoping Comment Period
- Response to Comments
- Scoping Summary Report

While agency and public outreach has been ongoing for nearly two years, December 18, 2014, marked the "official" start of the NEPA/CEPA public scoping process (see Appendix A). CTDOT published notices advertising the scoping meetings in Connecticut CEQ's *Environmental Monitor*, *The Hartford Courant*, and *La Voz*, a Spanish publication. These notices ran several times in the weeks leading up to the meetings held in January 2015. Scoping materials, including items such as the presentation, and the display boards, were available on the project website prior to and immediately following the Public Scoping Meeting.

The Project Team developed and circulated the Scoping Initiation Packet (December 2014) prior to the Scoping Meetings to inform agencies and the public on the project; provide issues and regulations relevant to the project; and identify possible solutions to address the deficiencies in this section of the I-84 corridor.

The Project Team held an Agency Scoping Meeting on January 20, 2015, at the Lyceum in Hartford, and a Public Scoping Meeting on January 21, 2015, at the Hartford Public Library. At these meetings, the Project Team presented information about the project, answered questions, and received comments from the attendees.

CTDOT conducted the Public Scoping Comment period from December 18, 2014, to February 20, 2015. During the Public Scoping Comment period, CTDOT and the FHWA heard the public's concerns about the project, as well as a vision for a renewed I-84 corridor in Hartford, expressed by many of those in the community who submitted comments. CTDOT invited the public and agencies to submit comments at the scoping meeting, through the project website, or by mail. At the Public Scoping Meeting, the public had the opportunity to provide comments by giving oral public testimony, giving their statements one-one with a stenographer in private, or by submitting a comment card. There was also the option of mailing or emailing comments to CTDOT after the Public Scoping Meeting, using either the comment card or other written format. In order for the Project Team to be able to include a comment in the Scoping Summary Report, the commenter had to deliver or postmark the comment by February 20, 2015.

The majority of comments were submitted through the project website: <u>i84hartford.com</u>. The total number of comments received during the Public Scoping Comment period was 107, from 99 different individuals or organizations. The Project Team logged the comments daily during the comment period, into an Excel spreadsheet. Each comment was individually numbered and included the person's name and address (street address and/or email), if provided, and the comment. The Project Team classified the comment contents into topics and subjects. The I-84 Project Team reviewed all the comments and prepared individual responses to each comment (see Appendix D).

II. Agency Scoping Process and Comments

Five federal agencies, two state agencies and one Tribal Nation accepted invitations from CTDOT and FHWA to participate in the I-84 Hartford Project by serving as either a Cooperating or Participating Agency. Cooperating Agencies have a higher degree of authority, responsibility, and involvement in the environmental review process; at the request of the lead agency, they may assume responsibility for developing information and preparing environmental analyses, including portions of the environmental document for which that agency has special expertise. Participating Agencies are those agencies with an interest in the project. All Cooperating Agencies are by definition Participating Agencies, but not all Participating Agencies are Cooperating Agencies.

Table 1 shows the agencies who accepted CTDOT and FHWA's invitation to participate in the development of the I-84 Hartford Project.

Agency	Role
Federal Railroad Administration (FRA)	Cooperating
Federal Transit Administration (FTA)	Cooperating
Army Corps of Engineers (USACE)	Cooperating
Connecticut State Historic Preservation Office (SHPO)	Cooperating
U.S. Department of Housing and Urban Development (HUD)	Participating
U.S. Environmental Protection Agency (EPA)	Participating
Connecticut Department of Energy and Environmental Protection (CTDEEP)	Participating
Narragansett Indian Tribe	Participating

 Table 1: Cooperating and Participating Agencies

Summary of the Agency Scoping Meeting

CTDOT and FHWA hosted the Agency Scoping Meeting on January 20, 2015, at The Lyceum in Hartford, CT. All Cooperating and Participating Agencies identified above attended the meeting, while the FRA participated in the meeting by phone and WebEx (an online meeting application).

Meeting attendees received a packet of information containing the Scoping Initiation Packet, the Draft Agency Coordination Plan and detailed maps illustrating the environmental resources in the project study area (see Appendix C). Project Team members delivered a presentation covering the Purpose and Need, Alternatives Analysis process, environmental resources, and agency involvement.

After the Project Team's presentation, the attendees participated in a round table discussion, which provided opportunities for questions and comments. Inquiries included questions on the timeline and travel impacts during construction; the possibility of an alternative option that looks at a hybrid with an at-grade portion to connect neighborhoods; and the impacts a chosen alternative might have on the Park River Conduit. A detailed summary of the meeting minutes is included in Appendix B. Following the round table discussion, CTDOT and FHWA provided a tour of the I-84 corridor for those agencies wanting a close-up view of the project corridor and study area.

Summary of Agency Comments and Responses

Six public agencies and one Tribal Nation submitted formal comments (via letter or email; see Appendix A for copies of the formal Agency comments) during the Public Scoping Comment period. Those comments came from:

- CTDEEP
- EPA
- FRA
- HUD
- SHPO
- Narragansett Indian Tribe
- Connecticut Department of Health¹

The agency comments were generally supportive of the project Purpose and Need and appreciative of the opportunities given to both agencies and the public to participate in the process. The comments provided detailed direction to the Project Team regarding analysis methodology, updated guidance and regulations, and additional consultation. In addition, some agencies suggested incorporating certain treatment measures, mitigation technology, and/or design elements into the project. These measures would address improved conditions in the community related to traffic, air quality, noise, historic resources, and neighborhood cohesiveness. Comment topics included air quality, floodplains, environmental justice, green infrastructure, hazardous materials, and construction. Some items were specific to the ongoing Alternatives Analysis process, while others addressed the forthcoming design, NEPA/CEPA documentation, or preconstruction stages.

Action Items

The Cooperating and Participating Agencies requested that, at a minimum, the following recommendations and action items be included as part of the environmental review for the I-84 Hartford Project. These recommendations and action items take the form of consultations with specific agencies and authorities to conform to specific guidance, regulations, and findings from past projects; specific site investigations and assessments; and consideration of specific design elements. In addition to the rules and regulations that CTDOT will consider, the following lists include issues, programs, approaches or requirements that the various agencies identified for consideration by the Project Team as the I-84 Hartford Project progresses. The Project Team will consult with the following agencies, organizations and individuals regarding project-related issues. The following list identifies the recommendation and the agency that made it:

- Greater Hartford Flood Control Commission for flood zone requirements (CTDEEP)
- CTDEEP's Bureau of Management, Air Planning & Standards Division for air quality modeling (CTDEEP)
- HUD's Connecticut Field Office for environmental justice approaches (EPA)
- Capitol Region Council of Governments (CRCOG) for environmental justice approaches (EPA)

¹ Not a Cooperating or Participating Agency.

- Donald Cooke at EPA's Office of Ecosystem Air Quality Unit (EPA)
- Deborah Brown at EPA's Environmental Justice Program (EPA)
- Kathleen Nagle at EPA New England's Children's Environmental Health Office (EPA)
- Narragansett Indian Tribal Historic Preservation Office regarding cultural resource protocols (Narragansett Indian Tribe)
- Metropolitan District Commission for locations of water distribution mains (Connecticut Department of Public Health)
- Amtrak regarding the railroad line (FRA)

The Project Team will review the following guidance, regulations, and past projects relevant to the I-84 Hartford Project. The following list identifies the recommendation and the agency that made it:

- Connecticut Clean Air Initiative implemented for the I-95 New Haven Harbor Crossing Corridor (CTDEEP)
- Northeast Diesel Collaborative website for information on construction specifications, retrofitting equipment, and clean fuels (EPA)
- Air Quality and Ventilation of Subsurface and Tunnel Roadways from other projects in the Northeast (EPA)
- Council on Environmental Quality's *Draft Guidance for Greenhouse Gas Emissions and Climate Change Impacts* (12/18/14) (EPA)
- U.S. DOT Climate Adaptation Plan 2014: Ensuring Transportation Infrastructure and System Resilience (EPA)
- FHWA Order 5520, *Transportation System Preparedness and Resilience to Climate Change and Extreme Weather Events* (EPA)
- USACE's Policy and Procedural Guidance for Processing Requests to Alter US Army Corps of Engineers Civil Works Projects Pursuant to 33 USC 408, including Appendix D, Levee, Floodwall or Flood Risk Management Channel Projects (USACE)
- FTA's Transit Noise and Vibration Impact Assessment Manual (FTA)
- FRA's High-Speed Ground Transportation Noise and Vibration Impact Assessment (FRA)

Several agencies, as noted below, recommended that CTDOT utilize specific impact analysis methodologies. CTDOT will include, although not be limited to, the following specific impact analysis methodologies:

- Carbon monoxide hot spot analysis (EPA)
- Air quality modeling using MOVES2014 (EPA)
- FHWA's Traffic Noise Model (HUD)

The Project Team will, at a minimum, research and consider the following design elements as indicated by the agencies noted below:

- Treatment measures for stormwater collection (CTDEEP)
- Methods to reduce stormwater flows and discharges from Combined Sewer Overflows to the Connecticut River (EPA)

- Opportunities for daylighting (i.e., redirecting into an above-ground channel) and restoring of the water resources currently being handled through culverts, including the Park River Conduit (EPA)
- Charging/fueling stations in new parking lots built as a result of the project (CTDEEP)
- "Green and Complete" street networks that are safe for all users, including pedestrians and bicyclists, and incorporate strategies to manage and treat stormwater runoff (EPA)
- Green infrastructure (stormwater management, construction materials, operations and maintenance procedures) using FHWA's INVEST Sustainable Highways Self-Evaluation Tool (EPA)
- Intelligent Transportation Systems, also known as ITS (EPA)
- Passive or recreational park developments and/or open space preservation projects (HUD)
- Critical functional aspects and historic status of the rail line and station in Hartford (FRA)
- CT*fastrak* operations, both busway and stations (EPA)

The agency comments listed several specific site investigations and appropriate reconnaissance activities. The list below identifies specific recommendations from CTDEEP:

- Certified soil scientist to identify any areas that may be regulated as wetlands or watercourses, as defined by the Connecticut General Statutes
- Land Use Evaluation reports (CTDOT standard procedures, Task 110) and Preliminary Evaluation reports (Task 120) to evaluate the potential to encounter contamination
- Survey of rodent nesting and feeding areas
- Biological assessments, if species are identified by updated findings in the Natural Diversity Data Base

In addition to specific measures recommended by CTDEEP, to ensure air quality mitigation, hazardous materials handling, and safe waste disposal during construction, the Project Team will prepare, at a minimum, the following plans prior to construction:

- Site-specific hazardous materials management plan (CTDEEP and EPA)
- Health and safety plan for construction workers (CTDEEP)
- Spill Prevention, Containment, and Countermeasure Plan (EPA)
- Rodent management plan (in coordination with municipal health officials) that includes monitoring (CTDEEP)

III. Public Scoping Process and Comments

CTDOT officially initiated the Public Scoping Comment period on December 18, 2014, and closed it at the end of the day, on February 20, 2015. During that period, CTDOT and FHWA conducted a rigorous outreach to invite the public to comment. The Project Team solicited comments through many methods including through the website, by email, U.S. Postal Service, telephone, and at the Public Scoping Meeting.

Summary of the Public Scoping Meeting

On January 21, 2015, from 3:00 to 7:30 p.m., CTDOT hosted the Public Scoping Meeting at the Hartford Public Library in downtown Hartford. The purpose of this meeting was to give a brief overview of the I-84 Hartford Project and obtain input from the public. A detailed summary of the public meeting is included in Appendix B. The meeting began as an Open House, with 20 informational boards displayed around the room, each staffed by a Project Team member. The public was encouraged to view the boards and speak with members of the Project Team regarding any questions or comments. There was a 3-D video rendering of a flyover of the existing project corridor projected on a large screen during the Open House portion of the meeting. In addition, there were several copies of each of the following documents available for review: the Needs and Deficiencies Report, Purpose and Need Statement, and 11" x 17" printouts of the environmental resource maps. At 5:30 p.m., the Project Team gave a presentation with a detailed overview of the project, Purpose and Need, Alternative Analysis process, environmental process and public participation opportunities.

Publicity for the meetings throughout the Hartford area occurred with legal notices, display advertisements, an official CTDOT press release, a notice on the CEQ *Environmental Monitor*, and several newspaper articles. In addition, the project website (<u>i84Hartford.com</u>) provided information about the meeting both before and afterwards with all of the materials that were available at the meeting.

Approximately 120 people attended the Public Scoping Meeting. Fifteen speakers provided oral comments; six gave public testimony; and nine provided their comments in private to a stenographer. Attendees included representatives from city government, neighborhood groups, bicycling advocacy groups, major employers in Hartford, members of the media, and a representative from a U.S. Senator's office.

Summary of Public Comments and Responses by Category

During the Public Scoping Comment period, 99 members of the public submitted 107 comments. For comments that addressed multiple topics, the Project Team separated the original comment into multiple entries – one for each separate topic – resulting in 178 distinct comments. Themes emerged and the Project Team classified the parsed comments into topics and subjects. The Project Team identified six main topics: Purpose and Need, Traffic and Transportation, Alternatives, Environmental, Financing, and Public Involvement; then further divided the topics into 29 distinct subjects. Table 2 identifies the topics and subjects of the comments submitted by the public.

Table 2: Number of	Scoping Comments	Categorized by	Topic and Subject

Торіс	Subject	Number of Comments
Traffic and		87
Transportation	Multimodal	41
	Interchanges	14
	Sigourney Street Interchange	10
	Mobility	9
	East Coast Greenway	8
	Parking	3
	Freight	2
Alternatives		49
	Tunnel*	24
	Lowered Highway*	14
	Options	7
	Bypass	4
Environmental		15
	Land Use	6
	Air and Noise	5
	Parks and Recreation	2
	Historic Resources	1
	Socioeconomic	1
Purpose and Need		13
	Redevelopment	4
	Safety	3
	Mobility	3
	Operations	3
Public Involvement		11
	Effectiveness	5
	Meetings (Notification and Venue)	4
	Nonprofits	1
	Survey	1
Financing		3
U U	Tolls	2
	Options	1
TOTAL		178

*Includes comment that favored Tunnel and Lowered Highway alternatives equally.

Generalized Comments with Project Team Response

The following pages provide a summation of the comments on each of the topics and subjects (seen in the blue boxes). To help illustrate varying perspectives on a topic, quotes from individual comments are in italicized font, following the blue box. The response from the Project Team appears below it. Where there were several comments on the same topic and subject eliciting the same response, the report only provides one response. Some editing for spelling and clarity has occurred in this report, but the original comments are verbatim in the comment/response matrix included in Appendix D.

Topic: Traffic and Transportation

The Traffic and Transportation topic received the most comments – a total of 87. The table to the right shows the subjects and the number of comments received. While the public was concerned with the removal of some interchanges, an overwhelming majority wanted the project to incorporate multimodal features, placing a focus on bicycle and pedestrian mobility and safety.

87 Traffic and Transportation Comments	
Subject	Number of Comments
Multimodal	41
Interchanges	14
Sigourney Street	10
Interchange	
Mobility	9
East Coast	8
Greenway	
Parking	3
Freight	2

Topic: Traffic and Transportation, Subject: Multimodal

Comments that addressed bicycling and pedestrian issues together, or in combination with another mode of transportation, were grouped under the subject multimodal. These comments generally expressed that the I-84 Hartford Project Team should consider incorporating design features that benefit not only motorists, but cyclists and pedestrians as well.

Example Comment on Multimodal: "No matter which option ultimately is chosen, I strongly urge the I-84 Hartford Project planners to consider design features that can be incorporated into this project in order to benefit not only motorists, but cyclists and pedestrians as well." (#84.1)

<u>Project Team Response:</u> CTDOT is committed to finding a solution that will both address the need to replace the existing highway and to support better and safer use of transit, bicycling, and pedestrian modes of travel on local roads impacted by the project. However, for local city roads not impacted by the project, and for overall safe bike routes throughout the City, the Project Team will share your comments with the City and CRCOG for their consideration.

Example Comment on Multimodal: "...Also in this vein, since for environmental reasons I believe it is critical we begin to dramatically enhance the rail and light-rail options both for through traffic and regional commuting, the engineering of the highway should allow for possible build-out of the existing rail infrastructure... I would love to see Hartford become a place people talk about because of the ease with which visitors, residents and commuters can move around in it." (#78.2)

<u>Project Team Response:</u> CTDOT is committed to finding a solution that will both address the need to replace the existing highway and to support better and safer use of transit, bicycling, and pedestrian modes of travel on local roads impacted by the project. The Project Team is aware of the need to improve transit use in the City and the development of alternatives will support, and by no means preclude, reasonable foreseeable transit improvements.

Example Comment on Multimodal: "...I am concerned about the expected relocation of the train station and busway that this alternative [Lowered Highway] might necessitate. Union Station is already on the western/northern fringe of downtown; moving it farther from the City's center would isolate it from business and cultural destinations. I have the same concern about relocating the busway, and wonder if there would be any way to keep these functions where they are or perhaps take the opportunity to move them closer to the center of downtown (i.e., closer to the Old State House)..." (#11.1)

<u>Project Team Response</u>: Union Station will remain in its current location for all of the alternatives being considered. There could be several options/alternatives for its use if the railroad tracks are relocated north of the highway. Moving the rail station, or an annex to Union Station, farther away from downtown could be mitigated with local bus service and/or enhanced pedestrian walkways. In terms of the busway, several alternatives are being considered including terminating at the existing Union Station or at the potential relocated station. The Project Team is still early in the Alternatives Analysis process and has much to study. One of the project's goals is to increase mobility and integrate transit - including CT*fastrak* - into all the design alternatives. The Project Team will present more comprehensive solutions to these issues as the Alternatives Analysis phase progresses.

Topic: Traffic and Transportation, Subjects: Interchanges / Sigourney Street Interchange As the preliminary alternatives identified at this stage include removing some interchanges in the project corridor, commenters had strong concerns over which exits should remain and which should be removed. Of the 24 comments received on interchanges, almost half focused on the Sigourney interchange and the overwhelming majority preferred that it not be removed. Many also expressed the need to remove left hand exits and entrances to reduce the dangerous weaving situation on I-84.

Example Comment on Interchanges: "...I am concerned about the placement of the exit/on-ramps in the end. Eliminating some and straightening the remainder, I believe, will be very important to improving safety conditions and help reduce the congestion caused by people changing lanes to reach them." (#2)

<u>Project Team Response</u>: The Project Team is evaluating the location of interchanges and entrance and exit ramps as part of the Alternatives Analysis, taking into account safety, access, and congestion. Once that evaluation is complete, detailed information about the potential locations of ramps and interchanges will be available to the public for review and comment.

Example Comment on Interchanges: "...the Parkville Neighborhood wants the Sisson on and off ramps to remain in any final alternative selected. This is the only on and off ramp that provides access to the West Central neighborhoods of the City of Hartford, without encountering heavy traffic from the major employment centers and institutions in Downtown Hartford." (#106.1)

<u>Project Team Response:</u> The Project Team is evaluating alternatives to find the best solution for providing access to and from Hartford while reducing the number of entrance and exit ramps on the I-84 mainline. There are many vehicles traveling to and from Hartford that use the Sisson Avenue interchange. The Project Team understands the importance of maintaining the interchange at Sisson Avenue and is examining potential improvements that could be made for enhanced access to and from the interstate at this location. The Project Team is completing a detailed traffic analysis that will

evaluate traffic impacts on the surrounding local roadway network, and which will be made available for public comment and review as part of the NEPA/CEPA document.

Example Comment on Interchanges: "All of the alternative concepts expressed in the scoping initiation packet (with the exception of the No Build Alternative), include the statement that the number of interchanges would be reduced. The motivation for this reduction appears to be a concern for the safety of those using the viaduct. This is a laudable concern, but there is no evidence that spacing of half a mile would be any more dangerous than spacing of one mile. Proponents of reducing the number of interchanges point to the fact that the new standard for interchange spacing for interstate highways is one mile, but fail to recognize that a waiver of this standard can be, and frequently is, obtained from the Federal Highway Administration when appropriate. In this case, where shorter interchange spacing would not only promote efficient commuting, but would also decrease negative impacts on the surrounding community and the environment, such a waiver should not be difficult to obtain. Most major cities, especially those in the northeastern United States, have interchanges with much less spacing than one mile for these same reasons." (#87.1)

Project Team Response: According to the American Association of State Highway and Transportation Officials (AASHTO), the design guidance for interchange spacing in an urban area is one mile. This guidance is based on general knowledge of the interaction between highway and ramp traffic. Mainline free flow speeds are impacted by ramp traffic due to the mixing of slower vehicles with higher speed vehicles. When interchanges are spaced far enough apart, this mixing of vehicles is confined to the area around the ramps and is independent from other interchanges. When interchanges are closely spaced, it causes mainline traffic exiting the highway to compete for gaps with ramp traffic entering the highway. This creates turbulence within the mainline lanes and is a significant cause of congestion. Once the mainline traffic is affected by multiple interchanges, the interchanges are no longer independent and, therefore, the friction is compounded. It is well known that congestion is a cause of higher accident rates. The project corridor includes sections between closely spaced interchanges where the accident rate is four times the state average. There are eight full or partial interchanges within this three-mile segment of highway. Increasing the distance between interchanges means some ramps would have to be eliminated. Addressing safety deficiencies and improving traffic operations are defined needs of this project. The Project Team is evaluating alternatives to meet these needs while providing adequate access to and from downtown Hartford. To do this, the Project Team is completing a detailed traffic analysis that will evaluate traffic impacts on the surrounding local roadway network, which will be made available for public comment and review as part of the NEPA/CEPA document.

Example Comment on Sigourney Street Interchange: *"I drive from Meriden to Hartford every day and take the Sigourney Street exit to my job. This exit is already clogged because of the crosswalk at the end of the exit ramp. If you close this exit, you will cause a nightmare for the 5000+ people who work right off the exit at Aetna. I also understand that there are thousands who work for the State of CT right off this ramp. If you close the Sigourney Street ramp, you will have a nightmare on Farmington Avenue with cars having to back track from Sisson to Sigourney Street just to get to work. There is no alternative in my opinion but to leave this exit ramp open during any projects you plan to start in the area." (#6)*

Example Comment on Sigourney Street Interchange: "...we do not support any scenario that would result in the elimination of the Sigourney Street interchange, unless the interchange is replaced with an even demonstrably more effective option. That interchange is currently the most effective transportation solution for the approximately six thousand Aetna employees, visitors and vendors, as well as thousands of other commuters, who come to the campus every day. To satisfy NEPA, the new viaduct design must take into account the multitude of negative impacts that would necessarily result from forcing those that work for Aetna, The Hartford, Saint Francis Hospital, the State Capitol complex, and the many other businesses surrounding the viaduct to use fewer interchanges and drive longer distances when commuting to their places of employment." (#87.3)

<u>Project Team Response:</u> The Project Team is evaluating alternatives to find the best solution for providing access to and from Hartford while reducing the number of entrance and exit ramps on the I-84 mainline. There are many vehicles traveling to and from Hartford that use the Sigourney Street interchange. The Project Team understands the importance of maintaining the interchange at Sigourney Street, and continues to explore potential improvements for access to and from the interstate at this location. The Project Team is completing a detailed traffic analysis that will evaluate traffic impacts on the surrounding local roadway network, and which will be made available for public comment and review as part of the NEPA/CEPA document.

Topic: Traffic and Transportation, Subject: Mobility

Commuters using I-84 voiced concern for design deficiencies that contribute to traffic delays such as limited merging areas, the highway alignment, lack of shoulders (breakdown lanes) and connection to local streets.

Example Comment on Mobility: "The reestablishing, reconnecting, and possible new street connections need to be an integral part of the I-84 realignment project. Great care must be taken in reestablishing the city streets that will be impacted by the realignment. This will allow for new north-south city streets as well as connecting streets that were previously cut off by I-84." (#60.4)

<u>Project Team Response</u>: As the Alternatives Analysis progresses, the Project Team will consider the design and function of the local streets impacted by the highway and its interchanges. Local streets may need to be realigned, or new connections made within the local street network. The Project Team is also evaluating potential impacts from the proposed alternatives to the local bicycle and pedestrian networks. The Project Team will share that evaluation with the public as part of the NEPA/CEPA process.

Example Comment on Mobility: "The Myrtle Street connection between Asylum Hill and downtown must be preserved. This is a popularly traveled route by both Hartford residents and commuters. It is a critical connection to downtown. It must remain open especially considering that a southern connection was lost by closing Flower Street." (#83)

<u>Project Team Response</u>: The Project Team has heard from several people about the importance of maintaining the Myrtle Street connection and understands the sensitivity of losing another north/south connection within the corridor. The Project Team is evaluating ways to maintain a connection, whether

it is vehicular or pedestrian/bicycle only, between Asylum Hill and Downtown that does not involve significant property impacts.

Example Comment on Mobility: "As a truck driver using all of the different corridors, I-84 is the worst. The merge going eastbound, with traffic trying to merge from three lanes to one, is horrific. There should be a division after a certain point that can't be crossed. The lack of a division causes most of the backup, along with the volume." (#7)

<u>Project Team Response</u>: The Project Team is evaluating alternatives to find the best solution for providing access to and from Hartford while minimizing the number of entrance and exit ramps on the I-84 mainline. These efforts will reduce the amount of merging and cross traffic in this area. The Project Team will take your comment into consideration during the Alternatives Analysis process, particularly your suggestion of a "division."

Topic: Traffic and Transportation, Subject: East Coast Greenway

Those who commented on the East Coast Greenway considered it a very important project on its own, as well as a component of the I-84 Hartford Project. Many felt that a separated, ADA (Americans with Disabilities Act) accessible path for bicyclists and pedestrians must be part of a modern transportation network.

Example Comment on the East Coast Greenway: "This is a wonderful opportunity to integrate the East Coast Greenway bike route into a major improvement project. No matter what design ends up being adopted this will add minimal cost and greatly enhance the overall project, benefiting every resident." (#32)

<u>Project Team Response</u>: CTDOT is committed to finding a solution that will both address the need to replace the existing highway and to support better and safer use of transit, bicycling, and pedestrian modes of travel on local roads impacted by the project. This includes support for CRCOG's efforts to complete the East Coast Greenway. The Project Team will share your comments with the City and CRCOG for their consideration.

Example Comment on the East Coast Greenway: "Provide a two-way cycle track as an integral part of the highway and as the "mainline" of the East Coast Greenway from at least the new Capitol-Laurel interchange across the Connecticut River, with an exit at the new Spring/Myrtle/Edwards interchange and possibly one or two other, bike-only, on- and off-ramps." (#42.12)

<u>Project Team Response</u>: Bike routes cannot be part of an interstate, as it is a fully-controlled limited access highway which prohibits bike/pedestrian access for safety reasons. CTDOT will continue to work with the City and CRCOG to coordinate and support their efforts to complete the East Coast Greenway. Your comments will be shared with both the City and CRCOG for consideration in completion of the East Coast Greenway.

Topic: Traffic and Transportation, Subject: Parking

Three people commented on the issue of parking in downtown Hartford, noting that a significant number of parking spaces located beneath the viaduct may be displaced by the project. These comments suggested that parking is related to a larger policy issue regarding both transportation and land use that should be considered in the Alternatives Analysis process.

Example Comment on Parking: "Currently, significant portions of the land under and around the elevated section of I-84 serve as surface parking lots, and this parking is utilized by the State of Connecticut employees and major area corporations. The reconstruction of this section of I-84 based on Alternative 3 - Lowered Highway - could result in the loss of as many as 25,000 parking spaces. ...In the case of State workers, free parking as a right of employment will need to be renegotiated between the State and its employee unions. Addressing this parking issue presents a huge challenge and needs to be addressed starting right now." (#60.5)

<u>Project Team Response</u>: The Project Team has conducted an inventory of off-street and on-street parking in order to determine the potential impacts that the range of alternatives will have and to identify the need for any replacement parking. The Project Team is taking your comments into consideration as the Alternatives Analysis process progresses and methods to replace parking are evaluated. In terms of your comments on the state policy regarding free parking, that is not within CTDOT's jurisdiction. However, the Project Team will share these comments with the Governor's office for their consideration.

Topic: Traffic and Transportation, Subject: Freight

There was concern expressed that I-84 needs to continue to operate as an interstate and maintain the flow of people and products through the state.

Example Comment on Freight: "We understand that I-84 needs to be replaced, and we hope we can fix the problems. But it's most important that I-84 continue to function as an interstate highway. As we make changes, we need to ensure that the current and future traffic can move through Hartford and beyond safely and efficiently. Truck traffic is projected to continue to increase in the years ahead, and that traffic must be accommodated." (#43)

<u>Project Team Response</u>: The Project Team is cognizant of the need to ensure that this interstate highway corridor continues to serve the needs of freight movement and passenger vehicles. This is important for trips that originate and/or terminate within the project limits, as well as those coming from and/or going to locations far outside the City of Hartford and the State of Connecticut. Any improvements or adjustments to lane width will take into consideration freight traffic and the need to accommodate vehicles of a variety of widths and lengths.

The Project Team is evaluating alternatives to find the best solution for providing access to and from Hartford while reducing the number of entrance and exit ramps, which will likely improve the flow of through traffic on the I-84 mainline. In doing so, the Project Team is currently working with major employers (several of which are on the Public Advisory Committee) to address their needs, particularly in terms of access to their facilities. The Project Team will share additional information on these design

features as the range of reasonable alternatives is fully developed and made available at public and PAC meetings as the project progresses. This iterative and collaborative process will be thoroughly documented in the NEPA/CEPA document, which will be made available for public review and comment.

Topic: Alternatives

The Scoping Initiation Packet presented four alternatives to the public – No Build, Elevated Highway, Lowered Highway, and the Tunnel Alternative. The Project Team received 49 comments addressing alternatives, but not one of those comments supported the Elevated Highway Alternative. Many supported the Lowered Highway or the Tunnel; one commenter suggested a

49 Alternatives Comments		
Subject	Number of Comments	
Tunnel*	24	
Lowered Highway*	14	
Options	7	
Bypass	4	
*Includes comment that favored Tunnel and Lowered		
Highway alternatives equally.		

combination of both the Lowered Highway and the Tunnel. Some of the comments suggested options for the alternatives, focusing on specific elements that the Preferred Alternative should possess. The table above identifies the number of comments that each subject regarding alternatives received, including comments on a bypass.

Topic: Alternatives, Subject: Tunnel

Of the four alternatives presented, several who submitted comments favored the Tunnel Alternative and saw it as a way to reconnect the City, recognizing that it would be vastly more expensive than the other alternatives. Some commenters felt the long-range benefits of the tunnel would outweigh the disruption from construction and be worth the expense, while others stated that the benefits did not justify the expense. There were also commenters who noted that this option precludes a Sigourney Street interchange and fear the ramifications of that loss of access to a large employment area.

Example Comment on the Tunnel Alternative: "I've decided that burying the highway is the best option for the City. I think it all but eliminates that "cut off" feeling that now divides the City. It will allow for greenways and new economic development above the highway...This may be the most expensive option, but I think it's the best option for my beautiful city." (#77)

<u>Project Team Response</u>: In addition to the No Build Alternative, the Project Team is currently evaluating three Build Alternatives for reconstruction of I-84: Elevated Highway; Lowered Highway; and Tunnel. In comparing these alternatives, it is reasonable to assume that a tunnel alternative may maximize potential economic redevelopment opportunities above the highway, although the railroad and *CTfastrak* would still act as physical barriers. However, the other alternatives may present their own opportunities of redevelopment and addition of green space. Promoting economic development of vacant tracts of land abutting the corridor is a project goal and represents a rare opportunity to improve the quality of life in the City of Hartford. However, it is not within CTDOT or FHWA's purview to sponsor any such redevelopment. The City of Hartford and the State's Department of Economic and Community Development (DECD) will be responsible for planning, design, and construction of any such redevelopment projects. The Project Team will share additional information as the range of reasonable alternatives is fully developed with the City and DECD and will be presented at a series of stakeholder

meetings to be conducted throughout this process. This iterative and collaborative process will be thoroughly documented in the NEPA/CEPA document, which will be made available for public review and comment.

Example Comment on the Tunnel Alternative: "The current I-84 viaduct is unseemly, and has created a physical barrier that has had many negative ramifications for the Hartford community over the years. Putting 84 underground will connect disconnected neighborhoods, increase green space, improve the aesthetics of the City, and make winter travel easier and safer by reducing accidents and backups caused by snow and ice. As climate change projections indicate that winter precipitation will increase in our region, I think this is very important to approach this project with climate change in mind. Boston's Big Dig, though costly, was transformative for the City. Please make the smart choice as opposed to the easy one and put 84 underground." (#93)

<u>Project Team Response</u>: The Project Team is aware of the physical barrier that was created with the construction of the I-84 Viaduct in the 1960s. The Project Team is currently evaluating three Build Alternatives for reconstruction of I-84: Elevated Highway; Lowered Highway; and Tunnel. As part of this analysis, the Project Team is evaluating ways of better integrating I-84 through the City to reduce the highway's visual and physical impact, although the railroad and *CTfastrak* would still act as physical barriers. These design concepts will be shared with the public and stakeholders through a series of meetings conducted throughout the course of the project.

Topic: Alternatives, Subject: Lowered Highway

The second most preferred of the alternatives was the Lowered Highway. This alternative is attractive to some because of the relative economics of this approach, as well as options available for configuring the intersections, that are not available with the tunnel.

Example Comment on the Lowered Highway Alternative: "It seems clear both from a planning and budgetary perspective that Alternative 3 - Lowered Highway - is the preferred, best option. This brings so many benefits that I would hope this option could be established as the preferred choice so that the focus can turn to addressing the many challenges that will have to be resolved with this selection." (#60.1)

<u>Project Team Response:</u> The Project Team is currently evaluating three Build Alternatives for reconstruction of I-84: Elevated Highway; Lowered Highway; and Tunnel. Further design details, engineering, analysis of impacts, and preliminary cost and funding information on those alternatives will be documented as part of the NEPA/CEPA process, and will be the subject of many public meetings and workshops to come.

Example of Comment on the Lowered Highway Alternative: "I think that the best long-term solution would be a ground level highway widened to three or four thru lanes from West Hartford to East Hartford. A tunnel would be a nightmare! Just look at Boston's tunnel projects and you will shudder." (#70)

<u>Project Team Response:</u> The Project Team is currently evaluating three alternative profiles for reconstruction of I-84: Elevated Highway; Lowered Highway; and Tunnel. The scope of the I-84 Hartford

Project does not include adding travel lanes; rather it focuses on safety, operational, and mobility issues, such as the lack of shoulders and the merging and crossing of traffic on I-84, which is likely to improve existing congested conditions. The Project Team is evaluating alternatives to find the best solution for providing access to and from Hartford while reducing the number of entrance and exit ramps. In addition, all the Build Alternatives will have wider shoulders to accommodate disabled vehicles, thus removing the vehicles from the travel lanes, and reducing delay. The Project Team will share additional information on these design features as the range of reasonable alternatives is fully developed and will be presented at a series of public and stakeholder meetings to be conducted throughout this process. This iterative and collaborative process will be thoroughly documented in the NEPA/CEPA document, which will be made available for public review and comment.

Topic: Alternatives, Subject: Options

Commenters offered suggestions for incorporating design features into the preliminary alternatives, including: constructing a berm, redevelopment of the area currently occupied by the viaduct or interchanges, relocating the railroad tracks, and creating a new transportation center. Three comments included recommendations for express lanes.

Example Comment on Options for the Alternatives: "That is why I would recommend an "Express Hwy" (possibly 4 lanes) in addition to a "Local Hwy" (possibly 2-3 lanes). The Express Lane will only have exits for I-91N-S. The local will have exits for Hartford commuters. Preferably, two separate highways, not just lanes with a white line dividing." (#10.1)

<u>Project Team Response</u>: The Project Team has studied additional lanes separate from the mainline to service the interchange ramps. This concept is generally a very efficient way of removing the friction on the mainline caused by traffic entering and exiting the highway. However, the mix of traffic within the I-84 Hartford corridor does not lend itself to this type of solution. There is approximately a 60/40 split between ramp traffic and mainline through traffic. During peak hours, this unusual distribution of traffic means the service roads would require more travel lanes than the mainline, which is not feasible in this spatially constrained corridor. In addition, the closely spaced interchanges would result in significant traffic congestion on the service roads.

Example Comment on Options for the Alternatives: "If the I-84 project happens, please make it a minimum of 3 thru lanes through Hartford each way with exits and on ramps adding to the 3 thru lanes." (#21)

<u>Project Team Response</u>: While the scope of the I-84 Hartford Project does not include adding travel lanes, the safety, operational, and mobility improvements made to the highway is likely to improve existing congested conditions. This project would reconstruct the highway and address safety deficiencies, such as lack of shoulders and the merging and crossing of traffic on I-84. The Project Team is evaluating alternatives to find the best solution for providing access to and from Hartford while reducing the number of entrance and exit ramps. In addition, all the Build Alternatives will have wider shoulders to accommodate disabled vehicles, thus removing the vehicles from the travel lanes, and reducing delay. The Project Team will share additional information on these design features as the range

of reasonable alternatives is fully developed and will be presented at a series of public and stakeholder meetings to be conducted throughout this process. This iterative and collaborative process will be thoroughly documented in the NEPA/CEPA document, which will be made available for public review and comment.

Topic: Alternatives, Subject: Bypass

Four people suggested a bypass as a solution to downtown Hartford's connectivity and traffic issues.

Example Comment on a Bypass Alternative: *"I think the I-84 downtown corridor should be abandoned and a Hartford bypass developed. The present corridor should be torn down and revert to city streets."* (#98)

<u>Project Team Response</u>: The Project Team is developing an "I-84 Hartford Project Alternate Routes White Paper" (the "Bypass White Paper"), which evaluates a series of historic potential bypass routes, as well as others that have recently been proposed. Some of these historic bypass routes were completed; others cancelled for a variety of reasons. The Project Team determined that the recently proposed Hartford bypass routes were not feasible for three overarching reasons. First, and primary to the Purpose and Need for the I-84 Hartford Project, is the need to address the structural deficiencies of the viaduct, which would not be achieved with any bypass route. Secondly, the majority of the I-84 traffic on the project corridor during the morning and evening peak hours is not through traffic, but local traffic that gets on and/or off the highway in Hartford, such that a bypass route would not provide measurable congestion relief to I-84. Lastly, the bypass routes evaluated have been associated with significant environmental and right-of-way impacts. Given these issues, CTDOT has determined that none of the bypass routes warrants further consideration. Once complete, the final Bypass White Paper will be available on the project website for public review, as well as incorporated into the NEPA/CEPA document, which will be made available for public review and comment.

Topic: Environmental

The Project Team classified 15 comments under the Environmental topic. Commenters had concerns about the location of Union Station; health effects from air and noise; parks and recreation; historic preservation versus highway development; and economic impacts of the project to the City.

15 Environmental Comments			
Subject	Number of Comments		
Land Use	6		
Air and Noise	5		
Parks and Recreation	2		
Historic Resources	1		
Socioeconomic Impacts	1		

Topic: Environmental, Subject: Land Use

On the issue of land use, several expressed their concern about planned and future potential redevelopment of vacant land in areas surrounding the I-84 project corridor, such as the minor league baseball stadium north of Downtown. Two comments suggested re-use of Union Station, given the potential relocation of the railroad as part of the alternatives currently being considered.

Example Comment on Land Use: "...Union Station, as an established architectural landmark must remain, but let it be repurposed in the context of transit oriented development." (#60.2)

<u>Project Team Response</u>: Union Station will remain in its current location for all of the alternatives under consideration. Union Station is a key architectural landmark in Hartford and listed on the National Register of Historic Places. There could be several options/alternatives for its use if the railroad tracks (and likewise a new train station) are relocated north of the highway. The Project Team is aware that the City of Hartford is interested in exploring redevelopment opportunities around Union Station as an element of its Transit Oriented Development (TOD) programs, and will continue to share any opportunities for such redevelopment with the City.

Topic: Environmental, Subject: Air and Noise

Five comments addressed the negative health effects that can result from living near highways. They stated that reducing traffic congestion should be a top priority in designing the highway to help improve air and noise quality.

Example Comment on Air and Noise: "...The current design options would lead to an increase in congestion, primarily on the local city grid and nearby neighborhoods, which would in turn lead to increased emissions and fuel consumption. Removing interchanges would also result in an increase in commuting distance, requiring more vehicles to pass through residential areas, thereby impacting the residents with emissions, noise and the many other dangers associated with high levels of traffic in/near residential neighborhoods." (#87)

<u>Project Team Response</u>: The Project Team is conducting a detailed traffic analysis of the I-84 Hartford Project, which will evaluate traffic impacts on the mainline, as well as impacts to the local roadway network. In part, this analysis will compare existing congestion with future build congestion once the project is complete.

The Project Team will conduct detailed Air Quality and Noise Analyses to evaluate the impacts of the various alternatives under consideration. These analyses will be based on traffic and design data and will provide information on the positive and negative air and noise impacts generated both during construction and for permanent operation of the I-84 Hartford Project. The Project Team is coordinating with regulatory agencies including CTDEEP and USEPA regarding the most appropriate air quality and noise modeling methodologies. This information will be available for the public to review in the NEPA/CEPA document.

Example Comment on Air and Noise: "...Placing the highway at, or slightly below, grade will do nothing to reconnect the City...Option 3 will force this same division through a greater length of our city...Where currently all vehicle emissions are discharged above the existing residences, Option 3 brings the emissions down and distributes them into the surrounding neighborhoods. Option 3 does the same with the noise pollution associated with the highway. Option 4 is the only option that meets all of the goals set forth by the DOT." (#88.1)

<u>Project Team Response</u>: Local roadway connections over a potential lowered highway are currently being evaluated by the Project Team as part of the Alternatives Analysis process. These local road connections could be very effective in reconnecting the City. Detailed air quality and noise impact

analyses will be performed to evaluate the air quality and noise impacts of all reasonable alternatives during temporary construction activities and for permanent operation of the I-84 Hartford Project. These technical evaluations will be included in the NEPA/CEPA document, which will be available for public review and comment.

Topic: Environmental, Subject: Parks and Recreation One comment clarified the location of Pope Park North for the purpose of environmental review. Another comment suggested that the Park River be daylighted (or brought above ground) to improve Colt Park (outside of study area) and the East Coast Greenway.

Example Comment on Parks and Recreation: "This plan should also seek to daylight as much of the Park River as possible, while accounting for flood concerns, in order to restore long ago destroyed ecosystems, beautify the City, re-knit Colt Park, and create a pleasant urban path for the East Coast Greenway." (#104.1)

<u>Project Team Response</u>: At the Agency Scoping Meeting conducted on January 20, 2015, the United States Army Corps of Engineers (USACE) expressed concern on the potential relocation or rechannelization of the Park River Conduit, which is under USACE jurisdiction. The Project Team is coordinating with USACE to determine impacts to the Park River Conduit from the current alternatives. While the Project Team acknowledges the potential aesthetic, recreational, and biological benefits of daylighting the Park River Conduit, those must be considered in accordance with flood control requirements. If impact to the Park River Conduit is unavoidable, the Project Team will secure all required authorizations. In particular, the Project Team will demonstrate compliance with the USACE's "Policy and Procedural Guidance for Processing Requests to Alter US Army Corps of Engineers Civil Works Projects Pursuant to 33 USC 408."

Topic: Environmental, Subject: Historic Resources

One comment referred to historic resources in the context of accommodating the highway redevelopment regardless of the age of structures.

Example Comment on Historic Resources: "Lastly, please don't preserve anything because of age. If something needs to be removed, please remove it to accommodate a highway which will be used for the next 100 years or more." (#10.3)

<u>Project Team Response</u>: Both state and federal laws require protection of historic sites that are eligible for, or listed on, the State or National Registers of Historic Places. The alternatives will attempt to avoid and/or minimize impacts to these sites to the extent practicable. However, if a site is impacted, CTDOT will need to mitigate for this impact. The State Historic Preservation Office (SHPO) and other consulting party coordination is currently underway and the Project Team will document the process in the NEPA/CEPA document, which will be made available for public review and comment.

Topic: Environmental, Subject: Socioeconomic Impacts

One comment questioned how much weight the economic impacts to the community were given in the decision making process for the selection of alternatives. For example, the Tunnel Alternative would be the most expensive to construct, but may also have the greatest positive economic impact on the City of Hartford.

Example Comment on Socioeconomic Impacts: "...how much is the economic impact weighed in the decision process? Although the tunneling option is certainly the most expensive, I also think it has the most potential for a positive economic impact on the City of Hartford, and I think that needs to be weighted more heavily in this whole process." (#59)

<u>Project Team Response</u>: The economic impact of the current range of alternatives, both positive and negative, is one of many criteria that will be considered during the Alternatives Analysis process. The Project Team will develop a Preferred Alternative that best meets project Purpose and Need while best achieving the project's goals and objectives, one of which is to increase opportunities for economic development. While fiscal constraints will be considered in determination of the Preferred Alternative, the level to which an alternative creates economic development opportunities in the City of Hartford will also be acknowledged. The weight that economic impact will be given will be determined by the Project Team based upon agency coordination and public input.

Topic: Purpose and Need

The Project Team determined 13 comments addressed the topic of Purpose and Need. Those comments were divided into the following subjects: Redevelopment; Safety; Mobility; and Operations.

13 Purpose and Need Comments		
Subject	Number of Comments	
Redevelopment	4	
Safety	3	
Operations	3	
Mobility	3	

Topic: Purpose and Need, Subjects: Redevelopment, Safety, Mobility, Operations

The comments that addressed Purpose and Need issues were primarily concerned with redevelopment around the I-84 corridor, safety, mobility, and operations on the highway. They cited concerns with traffic merging, traffic delays, and the lack of connections between downtown and neighborhoods.

Example Comment on Redevelopment: "Design and develop the large area between the new Bushnell Park West and Flower Street. With the highway ramps gone, develop this acreage mainly for office/residential and to serve as a seamless connection among the Asylum Hill neighborhood, Downtown, the State Capitol complex and the Frog Hollow neighborhood." (#42.8)

<u>Project Team Response</u>: The Purpose and Need of the I-84 Hartford Project is threefold: 1) to address structural deficiencies of the viaduct; 2) improve traffic, operational, and safety deficiencies; and 3) address mobility deficiencies as exhibited by existing constrained connectivity between the north and south sides of the highway. Promoting economic development of vacant tracts of land abutting the corridor is a project goal and represents a rare opportunity to improve the quality of life in the City of Hartford. However, it is not within CTDOT or FHWA's purview to sponsor redevelopment of such

properties. The City of Hartford and the State's Department of Economic and Community Development (DECD) will be responsible for planning, design, and construction of any such redevelopment projects.

Example Comment on Safety: "You also need to consider taking the curves out and replacing with a road that is straight and less dangerous. So many trucks and cars travel this highway during high volume times. The curves cannot accommodate the speeds that motorists travel. We can all blame it on high speed and irresponsible driving; however, the roads play a huge part in the danger. When you come into the tunnel area, a curve can blind a driver to a vehicle broken down in there. If one is locked into a lane, a crash is sure to happen.... The entrance and exit lanes need to be made safer also... Many accidents happen with folks trying to jockey for position to get off 84 onto a city street... I actually hope that the busway is used to capacity. This is a great chance for the State of CT to move forward in a good way. Our highway system is a disaster as it is now. I do observe rot under the bridges and it scares me enough to try to avoid an area that might one day collapse..." (#86.1)

Example Comment on Operations: "If Route 84 is not going to be three lanes all the way through Hartford in both directions, we're wasting our money. There's a traffic jam here twice a day because it merges from three lanes to two lanes." (#52)

<u>Project Team Response:</u> While the scope of the I-84 Hartford Project does not include adding travel lanes, safety, operational, and mobility improvements to the highway are likely to improve existing congested conditions. This project would reconstruct the highway and address safety deficiencies, such as structural deficiencies, lack of shoulders and the merging and crossing of traffic on I-84. The Project Team is evaluating alternatives to find the best solution for providing access to and from Hartford while reducing the number of entrance and exit ramps. In addition, all the Build Alternatives will have wider shoulders to accommodate disabled vehicles, thus removing the vehicles from the travel lanes, and reducing delay. The Project Team will share additional information on these design features as the range of reasonable alternatives is fully developed and present this information at a series of public and stakeholder meetings to be conducted throughout this process. This iterative and collaborative process will be thoroughly documented in the NEPA/CEPA document, which will be made available for public review and comment.

Example Comment on Mobility: "We believe that any future plans for I-84 should improve the connection between the Asylum Hill neighborhood and the downtown/Bushnell Park area." (#81.2)

<u>Project Team Response</u>: The Project Team is looking at ways of improving connections across I-84, including the Asylum Avenue corridor. The Project Team will share additional information on these design features as the range of reasonable alternatives is fully developed and present this information at a series of public and stakeholder meetings to be conducted throughout this process. This iterative and collaborative process will be thoroughly documented in the NEPA/CEPA document, which will be made available for public review and comment.

Example Comment on Mobility: "The major corporations located in Asylum Hill are an asset to the neighborhood. Although their needs are not always the same as ours, we need to find a solution that is workable for both the corporations and the residents." (#83.3)

<u>Project Team Response</u>: The Project Team is currently working with major employers (several of which are on the Public Advisory Committee) to address their needs, particularly in terms of access to their facilities. The Project Team will share additional information on these design features as the range of reasonable alternatives is fully developed and present this information at a series of public and stakeholder meetings to be conducted throughout this process. This iterative and collaborative process will be thoroughly documented in the NEPA/CEPA document, which will be made available for public review and comment.

Topic: Public Involvement

Eleven comments addressed the topic of Public Involvement. The table to the right identifies the four subject areas that these comments addressed.

11 Public Involvement Comments		
Subject	Number of Comments	
Effectiveness	5	
Meetings (Notification and	4	
Venue)		
Nonprofits	1	
Survey	1	

Topic: Public Involvement, Subjects: Effectiveness, Meetings, Nonprofits, Survey

The comments on public involvement issues, such as effectiveness and meeting notifications, included some praise and some criticism. The praise was for the many opportunities afforded those who wished to comment during the Public Comment Scoping Period by including stenographers, particularly for those who are uncomfortable speaking in public. One negative comment focused on the outcome, not the effort. The commenter was disappointed that more people did not attend and provide comments at the Public Scoping Meeting. Another was concerned that there was not sufficient notice. Other commenters expressed dissatisfaction with the venue and particularly parking options at the venue. The comment classified as "nonprofit" was a representative of the Connecticut Association of nonprofits providing a new contact name and the "survey" comment recommended the use of UConn's Public Policy Department to provide polling or survey services. The Project Team is taking this advice under advisement.

Example Comment on Meetings: "I attended the Scoping Meeting which went well. I only read about it in Wednesday's Courant and wondered if others had received earlier notice." (#41)

<u>Project Team Response:</u> CTDOT provided online notifications for the scoping meeting in the Connecticut *Environmental Monitor* on December 16, 2014; January 6, 2015; January 20, 2015; February 3, 2015; and February 17, 2015. CTDOT placed ads in the *Hartford Courant* on December 16, 2014; January 6, 2015; January 18, 2015; and January 20, 2015. CTDOT also placed ads, in Spanish, in *La Voz* on December 18, 2014; January 8, 2015; and January 15, 2015. Additionally, notice was posted on the project website, <u>i84hartford.com</u>.

All scoping attendees who left their name/address on the sign in list will be included on the mailing list and will therefore receive all future meeting notifications. Please visit the project website (<u>i84hartford.com</u>) for relevant and up to date information on all project related events.

Example Comment on Meetings: "When are you going to hold these meetings at outlying towns? Surely, there are meetings places where the parking is more convenient than going to Hartford library! At the first meeting last fall that I attended, I asked this same question! You are "time considerate" of the workers in Hartford, please be "place considerate "of the people who also use I-84, but do not live or work in Hartford!" (#3)

<u>Project Team Response</u>: The Project Team will be holding public meetings in locations outside of the City of Hartford in October 2015. Such venues will be more convenient for people living outside of the City and will have more accommodating parking facilities. In addition, the Project Team is conducting one-day Open Planning Studio Workshops throughout the City of Hartford on a monthly basis to provide alterative venues for the public to attend. Information about these is posted on the project website (<u>i84hartford.com</u>).

Example Comment on Effectiveness: "At this early but key point in the lengthy process for re-designing and reconstructing an interstate highway through an urban area, there exists a chance to repair decades of damage done by the original construction and to stimulate a revival of the City in the best way possible through the new design and development opportunities that are opened by the total re-thinking of the project.

The public involvement process that the DOT and its consultant team have conducted has been open and welcoming. I believe you are listening and that I have been heard." (#42)

<u>Project Team Response:</u> CTDOT is committed to listening to the stakeholders and public, and ultimately ensuring that this project enjoys broad support for the Preferred Alternative. CTDOT is very appreciative of the work of the Public Advisory Committee and the many other stakeholders who have provided valuable time and energy in understanding the various complex issues associated with the rehabilitation, reconstruction or replacement of I-84 in Hartford.

Example Comment on Effectiveness: "Concern that we are starting scoping too early in the project before the rail study had been completed and before CTfastrak had been up and running for a while, and may not know what our impacts to transit would be.... She also asked if there would be more public meetings besides what had occurred this week; she felt that more people should have been at the public scoping meeting and made comments as well advertised as it was." (This was a record of a phone call.) (#22)

<u>Project Team Response:</u> Scoping is intended to be an early coordination and communication milestone. CTDOT and FHWA believe that scoping has occurred at the appropriate time, and not too early. The NEPA/CEPA process will last several years and will appropriately incorporate the findings of the Rail Relocation Study planned for completion in the latter half of 2015. Additionally, CT*fastrak* will be incorporated into the traffic analysis and modeling to be conducted for the I-84 Hartford Project.

Topic: Financing

In the Scoping Initiation Packet, the Project Team presented a cost range for each of the preliminary alternatives. Only three commenters were concerned with financing the project, and provided their viewpoint on tolls or other options to pay for the I-84 Hartford Project.

	3 Financing Comments		
y	Subject	Number of Comments	
d	Tolls	2	
nt	Options	1	

Topic: Financing, Subjects: Tolls, Options

One comment was against tolling I-84 on the basis that it was an unacceptable tax. Another comment was in favor of utilizing variable congestion pricing to help distribute traffic more evenly. The third comment suggested a variety of options be considered to finance the project including reviewing Oregon's Vehicle Miles Traveled (VMT) tax; studying Colorado's regional funding methods; and researching the proposed federal infrastructure development bank.

Example Comment on Tolls: "Employ congestion pricing for highway use that varies with time of day in order to discourage frivolous use of the highway and spread traffic more evenly. This method is being studied for this section of I-84 and for I-95. Such a device could help finance the I-84 project." (#42.14)

<u>Project Team Response:</u> CTDOT is currently undertaking two congestion pricing studies funded through FHWA's Value Pricing Pilot Program (VPPP) in the I-95 corridor and on I-84 in Hartford. The purpose of these two studies is to determine whether a strategy of congestion pricing and highway improvements can provide real congestion relief. Any congestion pricing will be done using All Electronic Tolling (AET). CTDOT expects that it will reduce congestion in the corridor, and potentially help finance highway and transit improvements. If tolls were implemented in Connecticut, only AET would be considered, which requires no tollbooths and no slowing of traffic at tolling locations. Much success has been achieved in other states utilizing AET to reduce congestion and to provide an additional funding mechanism in the face of shrinking gas tax receipts and aging infrastructure with huge price tags. These two congestion pricing studies will provide the necessary traffic and financial information so CTDOT can make informed decisions about the applicability of AET in these two Connecticut corridors. These studies will be completed in the latter part of 2015.

Any decisions to employ tolling as a means to alleviate congestion would require federal agreements and approvals, such as environmental assessments, including CT legislative action. For more information on the congestion pricing studies, visit the Congestion Management website at <u>http://www.ct-congestion-relief.com</u>. Also, for information about the successful implementation of congestion pricing and congestion relief in other states, watch the roundtable discussions held on June 4 and 5, 2014, in Bridgeport and Hartford where representatives from other regions spoke of congestion management projects in their areas. View this at <u>http://www.ct-congestion-relief.com/dialogue</u>.

Example Comment on Options: "It is important to think beyond merely raising the gas tax and beyond the congestion pricing study already under way. A review of a VMT tax such as that in Oregon, a study of Colorado's funding methods for a regional light rail system over an area the size of Connecticut, an

infrastructure development bank such as has been proposed repeatedly at the federal level, and any other mechanisms that might pay for this and many other projects should be undertaken now with a statewide perspective and the blessing of the Governor and the General Assembly." (#42.16)

<u>Project Team Response:</u> CTDOT will develop a financial plan for the project that will identify potential funding sources for construction. The Project Team is considering several funding sources, including the potential of tolling. CTDOT is conducting a separate study investigating the feasibility of tolling, specifically congestion pricing tolling, on I-84 in the Hartford area (refer to the project's website for more information: <u>http://www.ct-congestion-relief.com/</u>). CTDOT anticipates completing this study in late 2015, and any pertinent recommendations from this report will be included in the NEPA/CEPA document for this project. In addition, the Governor has appointed a panel to examine funding options and develop recommendations for financing a long-term transportation plan. See this website for further details: <u>http://www.governor.ct.gov/malloy/cwp/view.asp?a=3997&q=563282</u>.

IV. Next Steps

FHWA and CTDOT will use the scoping comments from both the public and the agencies to help further define the reasonable range of alternatives and shape the scope of the environmental review.

Alternatives Analysis Process

The Project Team continues to use many sources of information, including public and stakeholder input, to help generate alternatives and evaluate those alternatives. The Alternatives Analysis process, as specified in NEPA/CEPA and as integrated into the planning and design process for the I-84 Hartford Project, ensures that all reasonable transportation alternatives are considered, that environmental and socioeconomic impacts are fully assessed and disclosed, and that the public continues to have a role in the planning process.

In order for an alternative to be considered reasonable, it must be technically and economically feasible; satisfy the primary objectives of the Purpose and Need Statement; connect logical termini; and not restrict consideration of alternatives for other reasonably foreseeable transportation improvements.

CTDOT is using a four-step Alternatives Analysis process to identify, review, and revise the range of alternatives analyzed in the environmental document. The Project Team is analyzing each alternative based on its ability to meet the project Purpose and Need, and its ability to achieve project stated goals and objectives. In addition, the Preferred Alternative must be physically and financially constructible. To further compare the alternatives, CTDOT will evaluate each alternative, or any specific element of an alternative, for potential impacts on community, environmental, cultural and historic resources.

The four steps of the Alternatives Analysis process are:

• Initial Screening – Eliminate alternatives and/or elements of an alternative that do not have a realistic chance of being designed or built (i.e., alternatives that are fatally flawed). Screen out alternatives that clearly do not meet Purpose and Need.

- Comparative Screening Qualitatively compare alternatives or elements based on impacts on environmental resources, construction costs, or community disruption.
- Detailed Screening Fully defined and designed "Build Alternatives" are quantitatively analyzed to identify the strengths and weaknesses of each.
- Alternative Refinement Remaining alternatives are fully evaluated during the environmental phase with the assessment of impacts and mitigation in the environmental document.

CTDOT is currently considering four preliminary alternatives including the "No Build" Alternative and three "Build" Alternatives – Elevated Highway, Lowered Highway, and Tunneled Highway. Some of these alternatives may have options for interchange or highway alignments, in one or more locations, due to the complexity of the roadway network.

Class of Action

FHWA must make a determination of the Classification of Action for the I-84 Hartford Project. Pursuant to NEPA, there are three potential "classes of action":

- Environmental Impact Statements (EISs) are for actions where it is known that the action will have a significant effect on the environment.
- Environmental Assessments (EAs) are for actions in which the significance of the environmental impact is not clearly established. If it is determined that significant impacts will result, an EIS will be prepared. If it is determined that there will be no significant impacts, a Finding of No Significant Impact (FONSI) will be prepared.
- Categorical Exclusions (CEs) are for actions that are known, based on past experience with other actions, to not involve significant impacts on the environment

The proposed action is within a dense, urban corridor with many known historic resources and a large environmental justice population. In addition, the proposed construction period may be lengthy and disruptive to regular traffic patterns. There are potential impacts to traffic, parking, air quality, noise, residential communities, historic resources, water resources, visual and aesthetic characteristics, and parks. As this project is in the early phases of alternatives development, the significance of potential impacts in the project corridor are not yet clearly established. Therefore, CTDOT is recommending that an EA be prepared for the project, per 23 CFR 771.115(c), to determine the appropriate environmental document.

Once scoping has been completed, and the range of alternatives has been further refined, it will be possible to better identify potential impacts. At that time, FHWA will make a determination as to the precise Classification of Action for this project. If an EIS is the appropriate documentation for the I-84 Hartford Project, the FHWA will publish a Notice of Intent (NOI) to prepare an EIS in the Federal Register. If FHWA determines an EIS is the appropriate level of environmental documentation, this scoping process will qualify as the required EIS scoping process, and the project will not need to be rescoped.

Ongoing Agency and Public Involvement

As the environmental review process continues, the Project Team will discuss impact assessment methodologies with the Cooperating and Participating Agencies and will keep these agencies apprised as the analysis proceeds. CTDOT and FHWA will also provide regular briefings to local agencies, the Public Advisory Committee (PAC) and other interested stakeholders.

There will be additional public meetings held during the process of developing a Reasonable Range of Alternatives and preparing the environmental document. These meetings will provide input to the public and provide a conduit for public input as CTDOT evaluates the environmental and transportation effects of the project.

If potential significant adverse effects are identified, CTDOT will develop and evaluate avoidance, minimization and mitigation measures. The analysis will consider direct, indirect, and cumulative effects. Build Alternative impacts will be compared to the No Build Alternative. Once the environmental document is published, it will be made available for public review and a Public Hearing will be held. In addition to the required public hearing, CTDOT will hold several public informational meetings and daylong Open Planning Studios.

Agency and public involvement is a critical component to the success of the I-84 Hartford Project and will be ongoing throughout the course of the project. While comments from the public will inform CTDOT of the community's concerns, guidance and recommendations received from the agencies (Cooperating and Participating Agencies) will help shape the project's direction and analysis. CTDOT is committed to providing opportunities for the public to comment on the I-84 Hartford Project. Those interested in keeping up to date on the I-84 Hartford Project can check the project website (<u>i84hartford.com</u>) or join the project mailing list to receive news and developments.