

CITY OF HENDERSON
240 Water Street
P. O. Box 95050
Henderson, NV 89009-5050

July 14, 2014

Ms. Sondra Rosenberg
Nevada Department of Transportation
1263 South Stewart Street
Carson City, NV 89712

Subject: I-11 and Intermountain West Corridor Study
City of Henderson Comments

Dear Ms. Rosenberg:

Please accept the following comments to be included in the official record of the referenced project. The City of Henderson reiterates previous statements of strong support for the overall I-11 corridor. We strongly believe I-11 will expand the economic vitality of the Las Vegas region by connecting the two largest metropolitan areas in the country not currently connected by an interstate highway.

The following comments should not be construed as a statement against the advancement of the I-11 corridor. Rather, the comments reflect concerns with the criteria and judgments made by the NDOT team in conceptually evaluating the alternatives within the Las Vegas Valley. We also express concern with the efforts of the NDOT team to provide opportunities for discussion and input from the Public, particularly with those that could be most impacted.

I. Public Outreach and Comments

A series of public meetings were scheduled to receive comments on the documents recently released on the project website, representing the final comment period for this study. City of Henderson staff, in the comment letter submitted during the February Virtual Public Meeting requested that, due in large part to the advent of the new BB-QQ

alignment proposal, any subsequent public comment period include a “face to face” meeting in Henderson. NDOT originally acknowledged this request but failed to schedule a meeting in Henderson during the current public involvement period. As has been stated several times throughout the study period and in fact is stated again in the current project documents, the NDOT Team recommends the BB-QQ alignment as the preferred alignment for the Las Vegas metropolitan area. It is highly objectionable that the NDOT team would make such a recommendation without providing for direct public discussion and input from those most affected.

II. Evaluation Results: Las Vegas Metropolitan Area

The following comments pertain to the evaluation results that can be found in the “Technical Memorandum: Level 2 Evaluation Results Summary – DRAFT”, dated June 2014 (hereinafter referred to as “Study”). Much of the information referenced below can be found on pages 15-16 and pages 57-75 of that document. The comments are organized in order of the Evaluation Category, page 15.

- Modal Interrelationships: The study evaluated opportunities for a combined highway, rail and utility corridor. This appears to be a relevant strategy for the largely undeveloped corridors between the metropolitan areas, but is a less valid consideration when evaluating the urbanized areas which are already served by rail corridors. In the Las Vegas metropolitan area, only alignment BB-QQ is shown as a “Feasible I-11 Highway / Rail / and Utility Corridor” (ref. Figure 9, page 13). However, when questioned by City staff in the May stakeholder meeting, Ms. Rosenberg stated that due to the cost of crossing the Colorado River, it was not feasible to consider a new alignment for rail entering the Las Vegas Valley and following the I-11 alignment. Therefore, including modal interrelationships as an evaluation criterion for the Las Vegas Valley alternatives inappropriately skews the overall evaluation and comparison of the alignments.

Recommendation: Remove “Modal Interrelationships” from the Evaluation Categories for the Las Vegas Valley alignments or identify the criteria as not applicable for the Las Vegas metropolitan area.

- Economic Vitality: Alternative Y is ranked “Less Favorable”.
 - This ranking does not appear to acknowledge the LTA areas in West Henderson or the approximate 2,500 acres of commercial and industrial land use in the Clark County CMA along the southern beltway.
 - It does not address access to McCarran International Airport, Henderson Executive Airport or the confluence of rail lines that occurs in the southwest part of the valley.
 - It also does not address the fact that much of the industrial operators wish to be positioned as close as possible to the southern California market and not

have to pass through the congestion of the spaghetti bowl. This congestion can be the difference between a driver being able to make the round trip in a single day.

Recommendation: *Give credence to existing commercial and industrial areas in the southwest part of the valley which are located more proximate to the Los Angeles "Megapolitan" area.*

- Transportation Plan / Policies: Alternatives Y, Z and BB-QQ are ranked "Moderately Favorable".
 - The approach for this category states, "Qualitative analysis: based on how much of the alternative is documented in transportation plans." Alternatives Y and Z have significant improvements planned for each as documented in the Regional Transportation Plan (RTP). Alternative Y was constructed to accommodate up to 5 lanes of traffic in each direction such that bridges over the I-215 were built to span this planned widening. It is difficult to understand how a new alternative (BB-QQ) could rank equally to existing alignments with planned improvements included in the RTP.

Recommendation: *Re-evaluate the rankings for the alternatives based on the stated evaluation criteria and approach.*

- Environmental Sustainability: Alternative BB-QQ is ranked "Less Favorable". Page 72 of the Study states the following for the BB-QQ alignment:
 - "Per NDOW, occupied Bighorn sheep distribution exists within portion of the project area."
 - "Per BLM, segments 58 and 68 (of Alternative BB-QQ) traverse the Rainbow Gardens and River Mountains ACEC's and the LMNRA. Northern beltway within close proximity to Eglington Plant Preserve."
 - "Per BOR, potential conflicts and impacts with vital infrastructure of the SNWA system and proposed power transmission corridors. Recreational impacts including possible disruption of River Mountains Loops Trail."

Recommendation: *Re-evaluate the ranking for the BB-QQ alternative based on the stated extensive impacts. Consider "Least Favorable" ranking.*

- Land Use and Ownership: Alternative BB-QQ is ranked "Somewhat Favorable". The Approach for this ranking criteria states, "Qualitative analysis: based on consistency with land use and resource plans" and, "Qualitative analysis: based on compatibility with land ownership patterns....".
 - As stated above, the BB-QQ alternative passes through occupied bighorn sheep distribution; traverses the Rainbow Gardens, River Mountains ACEC's and the LMNRA; the northern beltway passes within close proximity to Eglington Plant Preserve; the alignment passes through rural neighborhood preservation areas, passes through the Old Vegas, Cadence, Lake Las Vegas,

Lakemoor Canyon and other residential developments adjacent to Lake Mead Parkway; passes through commercial developments adjacent to Lake Mead Parkway; impacts the River Mountain Loop Trail, Lake Mead Trail, Golda Trailhead and other recreation and open space facilities.

Recommendation: *Re-evaluate the ranking for the BB-QQ alternative based on the stated extensive impacts and non-compliance with any existing land use plans or ownership. The only possible ranking is “Least Favorable”.*

- Community Acceptance: Alternative BB-QQ is ranked “Moderately Favorable”. The NDOT Team conservatively approximated that fully seventy-five percent (75%) of the comments received from the public regarding the impressions of Alternative BB-QQ “Strongly Oppose” the Alternative and seventy-two percent (72%) “Strongly Disagree” with Alternative BB-QQ being a reasonable alternative that could be carried into more detailed, future studies. The City of Henderson and several of the federal resource agencies are on record with significant concerns about the impacts of the alignments. It is not understood how the NDOT Team could come up with a “Moderately Favorable” ranking for Community Acceptance for BB-QQ. It is also misleading to publish a ranking as being representative when there has not been a community based public meeting to discuss and solicit input on the Alternatives with those that could be impacted.
Recommendation: *Properly reflect Community Acceptance ranking based on comments received and properly represent the limited level of outreach done in the communities that could be impacted.*
- Cost: Alternatives Y and BB-QQ are ranked “Somewhat Favorable”, Alternative Z is ranked “Least Favorable”. The cost of Alternative Z is stated to be \$2.863B and the threshold for reaching Least Favorable ranking is arbitrarily set at \$2.8B, resulting in the Least Favorable (most costly) ranking. Alternative BB-QQ received a “planning level” estimate of \$1.16B.
 - CoH staff has previously requested the costing assumptions for Alternative Z. The I-515 alternative has already been studied for widening to accommodate growing traffic volumes resulting from growth in the Las Vegas Valley. The costs for this widening and for the reconstruction of the aging viaduct downtown are not attributable to the I-11 designation and thus should not be a factor in this study. The costs for the widening and maintenance must be undertaken regardless of what alternative is selected and thus should be removed from the cost consideration of Alternative Z. *The RTP list of projects as included in Appendix H of the Study reflects \$1.390 billion for “I-515 Charleston Ave to US 95 at Rancho Dr: widen to 10 lanes, HOV lanes and interchanges”.* This cost should not be included in the cost comparison for the Study.

- In addition, the NDOT Project Team was unable to respond to questions about how much additional traffic is added to each of the alignments as a result of the I-11 designation and the assumed increase in interstate traffic. It would appear that this information would be necessary to determine the level, and thus cost, of improvement needed for each Alternative. Without this information, it is difficult to determine what improvements are needed and conduct an appropriate cost comparison

Recommendation: Better identify traffic volumes resulting from interstate connectivity (not local traffic growth, which must be addressed regardless of the I-11 project). Use this data to determine the necessary level of improvements. Prepare costs based on the needed level of improvements. Do not include costs necessitated by local traffic growth or maintenance of aging infrastructure.

III. Summary of Recommended Reasonable and Feasible Corridors – Las Vegas Metropolitan Area Section (Page 75).

After reading the four paragraphs that comprise this section of the Study, it appears there is a strong bias toward the BB-QQ alignment as evidenced by the statement, “Alternative BB-QQ appears to be the strongest alternative”.

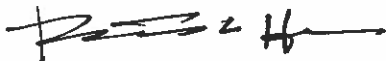
- For the BB-QQ alternative, the Study states, “While somewhat out-of-direction for travel between Phoenix and Reno and points beyond, this alternative provides a more direct route from Phoenix to the major logistics facilities and land uses in the metropolitan area (located in the northeast corner of the Valley)...”.
- However, for Alternative Y, this out of direction travel is portrayed as a negative, “it might not be used as a north-south interstate trade corridor because it is somewhat out of direction and lacks regional logistics facilities and land uses...”.
 - This comment apparently is directed toward the industrial area around the Speedway but does not acknowledge the LTA areas in West Henderson or the approximate 2,500 acres of commercial and industrial land use in the Clark County CMA along the southern beltway.
 - It does not address access to McCarran International Airport, Henderson Executive Airport or the confluence of rail lines that occurs in the southwest part of the valley.
 - It also does not address the fact that much of the industrial operators wish to be positioned as close as possible to the southern California market. This proximity can be the difference between a driver being able to make the round trip in a single day.

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July 14, 2014
Page 6 of 6

In closing, I wish to be very clear that it is not the City's intent to pit one alternative against the other. Although many of the above comments may appear to concentrate on the rankings of the BB-QQ alternative, the goal of these comments is to try to "level the playing field" toward an unbiased, factual evaluation of all three alternatives. One of the strongest statements in the Study states, "Alternative BB-QQ appears to be the strongest alternative". I believe it is much too early in the process to be recommending one alternative over the other or predetermine an alternative outside of the NEPA process. As evidenced by the length of this letter, the conceptual nature of the Study, and the limited level of involvement of the public that could be most impacted, we have a lot to learn about each of the alternatives.

Thank you for the opportunity to comment and for the efforts of the NDOT Team on this Study.

Thank you,

A handwritten signature in black ink, appearing to read "Robert Herr", with a stylized flourish at the end.

Robert Herr
Assistant Director of Public Works

RH:cm

cc: Robert Murnane, Senior Director Public Works, Parks and Recreation
Stephanie Garcia-Vause, Community Development and Services Director
Javier Trujillo, Intergovernmental Relations Manager
Daniel Fazekas, Planner II