



QUAPAW
QUARTER
ASSOCIATION

August 21, 2017

Mr. Randall Looney
Environmental Coordinator
Arkansas Division
Federal Highway Administration
700 Capitol Avenue
Suite 3130
Little Rock, AR 72201

RE: 30 Crossing, Section 106 Consultation

Dear Mr. Looney:

As an organization with a demonstrated interest in the undertaking...due to our concern with the undertaking's effects on historic properties the Quapaw Quarter Association (QQA) is a consulting party for the above-referenced undertaking in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, and 36 CFR 800.2 (c(5)). We write to provide comments on "30 Crossing" project to replace the I-30 bridge and modify interchanges on both sides of the Arkansas river and related matters.

When this project was initially introduced, we distributed a statement with our comments and concerns, which may be found at: [<http://www.quapaw.com/welcome.html>]. Now that this project has progressed, the QQA Board revisited our initial statement and has decided to provide updated comments, specifically addressing concerns to impacts on historic neighborhoods by the 30 Crossing project and subsequent projects that could follow 30 Crossing. The letter then addresses specific requests regarding the Section 106 process, including the QQA's desire to be an invited signatory.

30 Crossing Alternatives and Impacts on Downtown Neighborhoods. Now that all 30 Crossing project alternatives have been identified we are able quantify the impacts to known historic properties each presents. We understand that almost all the work for this project, regardless of which alternative is selected, will take place within the existing right of way, and that little land acquisition is necessary. With respect to direct impacts on historic properties, none are anticipated to those historic properties currently identified within the area of potential effect, however, there may be discoveries, primarily archeological sites, during construction. Though

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direct impacts to historic standing structures are not anticipated now, we do anticipate indirect impacts to historic properties if any alternative, other than no build, moves ahead. As we stated during the Metroplan public hearing on May 17, 2017:

“The mission of the Quapaw Quarter Association is preserving greater Little Rock's historic places. I just have a brief statement I'd like to share with you. As this undertaking evolves, we will continue to advocate to avoid and minimize adverse effects on historic properties, in accordance with Section 106 of the National Historic Preservation Act. "Historic properties" includes significant individual properties, historic districts, and archaeological sites. At this point we do not know if there will be direct or indirect impacts to historic properties. We do request an assessment of all the impacts to historic properties, because in the end, we may save the buildings but if the environment is so heavily compromised and the quality of life has eroded, people will not want to live or work there. We ask that the decision-makers keep this in mind as they move ahead with this project.”

The alternatives under consideration are as follows:

- No build
- 6-Lane with Collector Distributor lanes with a single point urban interchange (SPUI)
- 6-Lane with Collector Distributor lanes with a split-diamond interchange
- 8-Lane General Purpose with a SPUI
- 8-Lane General Purpose with a split-diamond interchange

The greatest concern from the perspective of the QQA is the impact on the MacArthur Park National Register Listed Historic District, and the United States Arsenal, Little Rock, a National Historic Landmark as part of Steel's Camden Expedition. The MacArthur Park Historic District and the United States Arsenal, Little Rock, are impacted most directly by 30 Crossing alternatives featuring the split diamond interchange, because increased traffic will be directed off the Interstate and on to Capitol, 6th, and 9th Streets. The no-build option, or the options with the SPUI, would have less impact on the MacArthur Park neighborhood and the NHL United States Arsenal, Little Rock.

That said, the QQA recognizes that the attempts to improve the current dangerous interchange feeding interstate traffic into the pedestrian heart of the River Market are complex, with no perfect answers. Our Board is not of one mind when evaluating the SPUI versus split diamond options. We acknowledge that the SPUI does not adequately address safety issues in the River Market, and perpetuates some of the same problems with the present interchange. But we also have very serious concerns about the split diamond options and the resulting increased traffic pressures on Capitol Avenue, 6th Street, and 9th Street, which run through the heart of the MacArthur Park Historic District, adjacent to United States Arsenal, Little Rock, and an up-and-coming North Main Street corridor. As a preservation organization, we cannot advocate removing street parking so that exiting vehicles can rush through these historic and important neighborhoods, just as the River Market's dramatic revitalization, and the pedestrian culture

that has accompanied it, move south into these areas. Any split diamond implementation should include a Memorandum of Agreement, which could only be modified through consultation and agreement by signatories and consulting parties that will:

- Limit frontage roads to two lanes;
- Aggressively slow traffic through enforced speed limits;
- Maintain all street parking currently on Capitol, 6th, and 9th;
- Install traffic devices allowing pedestrians to cross Capitol, 6th, and 9th.

In short, the Split Diamond must not destroy the energy and revitalization in the MacArthur Park Historic District and the North Main Street corridor nor adversely affect the United States Arsenal, Little Rock.

The Aftermath of 30-Crossing and “Major Widening” Concerns About I-630. The QQA is disappointed with the amendment to Metroplan’s long-range metropolitan transportation plan, *Imagine Central Arkansas*, to replace the words “Operational Improvements” with “Capacity Improvements,” which includes within its definition “major widening” of current freeways based on anticipated congestion. The QQA does not support this amendment. At a briefing of the QQA by the Arkansas Department of Transportation and Metroplan on June 8, 2017, the Highway Department representative indicated the amendment was not necessary for 30 Crossing, although the Metroplan representative appeared to disagree with the notion that the Highway Department had not advocated for the amendment.

Regardless of whose idea it was, a Metroplan list of illustrative projects that may need capacity improvements, including “major widening,” in the aftermath of 30 Crossing includes I-630 from I-30 past Louisiana Street. QQA opposes any widening of I-630. The role that I-630’s construction played in destroying vibrant 9th Street commerce, eliminating or devaluing key structures, physically dividing the community, mostly along racial lines, and dealing an almost fatal blow to the vibrancy of downtown Little Rock is well -documented. Widening I-630 once again would have a devastating impact on historic neighborhoods along its route. If traffic flow needs to be eased, we urge Metroplan and its member city and county governments, the Department of Transportation and all interested parties to look to alternative traffic routes and creative urban planning to enhance, not further divide, the center of our city.

Section 106: Request to be Invited Signatory and Other Issues. In accordance with Section 36 CFR 800.6 (c(2(i))) *Resolution of adverse effects; Signatories; Invited Signatories*, the QQA respectfully requests to be invited serve as a signatory on any agreement documents associated with the 30 Crossing project. The QQA has been an integral part of historic preservation in Little Rock since 1968 and is uniquely qualified to serve in this capacity.

At the last Section 106 Consultation meeting, a discrepancy with the boundary of the MacArthur Park Historic District was identified. Since the noise measurements we reviewed were limited to impacts on historic properties, we seek to get information on the noise levels at

Marshall Square and Rockefeller Elementary, which may in fact, fall within the MacArthur Park Historic District. We anticipate additional discussions about the options and desirability of noise walls to minimize the traffic noise both north and south of the river.

The simulations and plans presented at public meetings are helpful, but it is challenging to gain a sense of the scale of the proposed roads, overpasses, bridges, and frontage roads in relation to the existing built environment and especially the historic properties. We would request that the project proponents construct a scale model so that the magnitude and relationship of the proposed projects is easier to comprehend.

The QQA appreciates this opportunity to participate in Section 106 Consultation on this important project. We look forward to further collaboration as this project moves forward.

Please do not hesitate to contact any of us if you have any questions.

Sincerely,



Patricia M. Blick
Executive Director



Charles Cliett
QQA Board President



Laura Sergeant
QQA Vice President,
Advocacy

C: John Fleming, ARDOT
Stacy Hurst, SHPO
Tab Townsell, Metroplan