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TO COMMENTS RECEIVED DURING THE FORMAL SDEIS PUBLIC
REVIEW PERIOD**

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This Appendix A contains details regarding agency coordination and public involvement that occurred during the public review period for the August 2010 River Valley Intermodal Facilities Supplemental Draft Environmental Impact Statement (SDEIS). Section A.1 contains a summary of the SDEIS Public Hearing that was held on September 16, 2010. Section A.2 contains a summary of the comments and letters received during the official public review period for the SDEIS and includes FHWA's official response to those comments. Section A.3 contains copies of each of the letters and comment cards received during the official public review period for the SDEIS.

Earlier agency coordination and public involvement efforts for this project were documented and summarized in Appendix A of both the March 2006 DEIS and August 2010 SDEIS. Initial coordination was conducted for the project at the beginning of the EIS process to obtain comments and concerns from Federal, State, and local planning/resource management agencies, Native American Nations/Tribes, and private groups. In addition, an agency coordination meeting was held on January 26, 2005. Public involvement meetings were held on March 15, 2005, starting with a public officials meeting followed by a general public involvement open house presentation. Responses to the initial coordination process and comments received following the March 15, 2005 public involvement meetings were documented in the March 2006 DEIS. Copies of letters and comments received during the initial coordination and early public involvement meetings were also contained in the March 2006 DEIS.

A public hearing was held on April 18, 2006 to allow the general public to comment on the impacts discussed in the March 2006 DEIS. Appendix A of the August 2010 SDEIS contained a summary of comments and an FHWA response to comments received during the formal DEIS public review period. Copies of the original comment cards and letters associated with the public review of the March 2006 DEIS were also included in Appendix A of the August 2010 SDEIS.

A.1 SDEIS PUBLIC HEARING SUMMARY

A public hearing was held on September 16, 2010 to allow the general public to comment on the impacts discussed in the August 2010 SDEIS and other concerns they had regarding this proposed project. The public hearing was held at the London Elementary Multi-Purpose Building at 154 School Street, London, Arkansas. A total of 31 persons signed in at the public hearing. Copies of the original hearing sign-in sheets are contained on the following pages.

A handout that contained a description of the project purpose and need; maps and descriptions of the alternatives being considered in the SDEIS; a summary of pertinent information about the subject project, including the potential project benefits and adverse effects; and a blank comment card was distributed at the public hearing. An informational slide presentation was given to provide an overview of the project, the current status of the project, and general guidelines on the format of the public hearing process. Several poster boards were available for viewing that showed additional project details and maps of the various alternatives being considered. A court reporter was present and a comment card depository was available to allow further public input on issues pertaining to the proposed project and information contained in the SDEIS.

Project Name: River Valley Intermodal Facilities EIS



Project Number: 744286-10000

Date: September 16, 2010

Meeting Type: Public Hearing

Name (Please Print)	Address and Organization (if applicable)	Email (optional)
Jim Ellis	USACOE, Little Rock Dist.	jim.d.ellis@usace.army.mil
Kevin Abal	Parsons	
Luke Eggering	Parsons	luke.eggering@parsons.com
Tami Chandler	Russellville Schools	t.
Steve Chaulter	112 London Cove Dr London AR	cchandler@entergy.com
Chas. Halbert	Intermodal Board	chas.halbert@suddenlink.com
Gerhard LANGGUTH	Citizen witness	intermodal@gerhardlangguth.org
ETARI SANDERSON	149 CR 1790 - London, AR 72847	
Wayne Brenda Warner	1180 CR 1660 Knoxville	wayne038@centurytel.net
Joe Mullens	250 S. Emerald Russellville, AR 72869	bmullens@cei.net

Sign-in Sheet 1
River Valley Intermodal Facilities SDEIS - Public Hearing

Name (Please Print)	Address and Organization (if applicable)	Email (optional)
Matt Duffield		
Madelyn Ginsberg	Pope County Quorum Ct	madelynginsberg@suddenlink.net
Mike Ginsberg	DP Engineering, Ltd.	
Sid Bruin	RURIFA	
GENE HIGGINBOTHAM	CONGRESSMAN MIKE ROSS	gene.higginbotham@mail.house.gov
Jerry Gardner	1320 CR 1631 Knox TN	
Tonia K. Ray	(Court Reporter) 2345 West 4th, RSVI, AR 72801	toniaray@suddenlink.net
Randal Looney	FHWA	randal.looney@dot.gov
Tommy & Nora Hunt	415 Green St Dardanelle	CDITCH@yahoo.com
V E W T M G		
Ray Reaves	1601 Center Valley Rd. - Rsvi, on River Valley Intermodal Facility	rreaves@mylibertybank.com
Carlye McGee	City of Dardanelle	@mcgee@dardanelle.com

Sign-in Sheet 2
River Valley Intermodal Facilities SDEIS - Public Hearing

Name (Please Print)	Address and Organization (if applicable)	Email (optional)
Don Nichols	AHTD	don.nichols@arkansashighways.com
Dennis Ward		
Jan Sahly	981 CR 1660	RVOP @ centtill.net
Becky Reeves	1601 Center Valley Rd, RsvL	rebecca.joyce98@hotmail.com
JIM WOOD	Yell County Wildlife Fed 56 DELAWARE Bay Rd, Dardanelle	
Doyle McEntyre	City of Dardanelle	_____
LINDA Stumpff	Russellville School	
Yamete Hale	Popo A. Conservation District	
Sharon France	JP # 11	

Sign-in Sheet 3
River Valley Intermodal Facilities SDEIS - Public Hearing

A.2 SUMMARY OF COMMENTS AND RESPONSES TO COMMENTS RECEIVED DURING THE FORMAL SDEIS PUBLIC REVIEW PERIOD

Summaries of the comments received during the formal SDEIS public review period are included in subsections A.2.1 through A.2.4 below, followed by the FHWA response to each comment. Copies of the original comment cards and letters from which those summarized comments originated are contained in subsection A.3 of this appendix.

Overall there were 73 letters, comment cards, or emails received from public citizens and 13 local, state, and federal agency letters received during the formal public review period of the SDEIS, including those collected at the SDEIS public hearing. Therefore, a total of 86 citizens and agencies commented.

The following citizens and agencies sent letters containing their comments:

- Mr. Craig Weeks, U.S. Environmental Protection Agency, Region 6
- Ms. Myra G. Diaz, U.S. Department of Homeland Security, Federal Emergency Management Agency, Region VI, Mitigation Division
- Mr. Willie R. Taylor, U.S. Department of the Interior, Office of Environmental Policy and Compliance
- Ms. Francis McSwain, Arkansas Historic Preservation Program, The Department of Arkansas Heritage
- Mr. J. Randy Young, Arkansas Natural Resources Commission Technical Review Committee
- Mr. John Turner, Program Coordinator Arkansas Natural Resources Commission
- Arkansas Forestry Commission
- Mr. William Prior, Arkansas Geological Survey
- Mr. Craig K Uyeda, Arkansas Game and Fish Commission
- Mr. Bill Smith, City of Dardanelle, Floodplain Administrator
- Ms. Jeanette Hale, Pope County Conservation District and Floodplain Administrator
- Ms. Gloria Craig, Yell County Historical & Genealogical Association
- Mr. Jim Wood, Yell County Wildlife Federation and City of Dardanelle
- Mr. Paul Latture, Little Rock Port Authority
- Mr. Thomas C. Hunt
- Mr. Richard H. Mays
- Mr. Doyle McEnyre, City of Dardanelle Alderman
- Mr. Bobby L. Day, Russellville Regional Airport, Airport Manager

The following citizens commented via comment cards or e-mail:

- Ms. Ann Beavers
- Mr. Horace Beaver
- Mr. Charles Blachard
- Mr. Jim Bradley
- Mr. Sid Brain
- Mr. Dale Brown
- Ms. Nancy M. Canerday
- Ms. Amy Carpenter
- Mr. Kole Carpenter
- Ms. Brooke Chandler
- Mr. Tommy Chandler and Ms. Rita Chandler
- Mr. Richard Downes
- Mr. Jerry Duvall
- Mr. Lonnie Duvall
- Mr. Bill Eaton
- Ms. Sharron Eaton
- Ms. Becky Ellison
- Ms. Pam Ennis
- Mr. Jason Epperson
- Mr. David A. Freeman
- Ms. Donna Freeman
- Mr. Marvin Gerlach
- Mr. Jim Ed Gibson
- Mr. Sidney Gray
- Ms. Suzy Griffin
- Mr. Benny Harris
- Ms. Lavern Harris
- Ms. Debbie Hernandez
- Mr. Gerald Hook
- Ms. Rebecca Hopkins
- Mr. Marcus Huggard
- Mr. Paul Hull
- Mr. Kurt Jones
- Mr. Robert L. Laster
- Mr. Allen Laws
- Mr. Mike McCoy
- Ms. Laura McGuire
- Ms. Rhonda McKown
- Mr. Danny Minks
- Ms. Lisa M. Mize
- Mr. Johnny Morgan
- Ms. Debbie Motley
- Ms. Delores L. Motley
- Mr. Bert Mullens
- Mr. Charles W. Oates
- Ms. Stacy Pack
- Mr. Tommy Parker
- Mr. Jeff Pipkin
- Ms. Pamela Randle
- Ms. Rebecca Reaves
- Mr. Roy Reaves
- Ms. Joan Sadler
- Mr. Elner Shannon
- Mr. Bill Sorrells
- Mr. Steven Sparks
- Ms. Carmen Stump
- Ms. Fern Tucker
- Mr. Norman Watson
- Mr. Chad Wisler

- Ms. Hilda Wesley
- Ms. Hilery Wesley
- Mr. Matt White
- Ms. Annette Whittenburg
- Ms. Karen Whittenburg
- Mr. Robert D. Wiley
- Mr. Jared Wood
- Mr. Jeff Wright

Of the 86 individuals and agencies that commented, 73 supported the project and 4 were opposed to the project. Of those indicating support for the project, 67 expressed support for the Green Alternative, one supported the Red Alternative, and none expressed support for the Purple Alternative. Table A.1 contains a summary of the comments related to project support and what alternative those that supported the project selected as their preferred alternative.

Table A.1. Summary of Comments Related to Project Support and Alternatives.						
Project Support			Alternative Preferred by Those Supporting Project			
Supported	Opposed	No Preference	Green Alternative	Red Alternative	Purple Alternative	No Preference
73	4	8	67	1	0	5
<i>Source: Parsons, 2010</i>						

A.2.1 Federal Agencies

Mr. Craig Weeks, Acting Chief
U.S. Environmental Protection Agency
Region 6 Office, Office of Planning and Coordination (6EN-XP)

SUMMARY

“EPA rates the DEIS as “LO,” i.e., EPA has “Lack of Objections” to the proposed action as described in the SDEIS. However, we have enclosed some general comments for your consideration which we believe would strengthen the Supplemental Final EIS (SFEIS).”

RESPONSE

The EPA comments regarding the LO rating are noted. Reviewer’s comments have been evaluated; no change to the document is necessary.

SUMMARY

“Summary EJ Assessment: ...The SDEIS carefully analyzed the three alternate sites and the “No Action” Alternative, and it appears that environmental justice (EJ) considerations were taken into account in all the analyses and determinations. There is no indication in this SDEIS that low-income or minority communities would be impacted in a disproportionate or adverse manner as a result of the construction or maintenance of this project.”

RESPONSE

The EPA comments regarding Environmental Justice are noted. Reviewer’s comments have been evaluated; no change to the document is necessary.

SUMMARY

“EJ Implications: ...Mitigation measures are clearly laid out. Homeowners would receive replacement value for their properties, and although it is unfortunate that the residents would have to move, the whole region will benefit financially and the residents will be provided new homes if this project goes forward. There will be no disproportionate and adverse impact suffered by the low-income or minority residents impacted by this project as described in this SDEIS.”

RESPONSE

The EPA comments regarding Environmental Justice are noted. Reviewer’s comments have been evaluated; no change to the document is necessary.

SUMMARY

“one additional tribal nation should have been afforded an opportunity for consultation. The Wichita and Affiliated Tribes (Wichita Proper, Waco, Keechi, and Tawakoni) have occupied parts of western Arkansas and Eastern Oklahoma for many years prior to European contact. The Wichita people have also raised the issue of Spiro Mounds in eastern Oklahoma being related to the Keechi. Spiro is located east of the project area but still within the range of any aboriginal people living in the area. It seems the Arkansas SHPO should have advised the writers of the SDEIS to consult with the Wichita as well.

It appears that all other aspects of the consultation by the group is satisfactory...The SDEIS writers’ efforts have been satisfactory up to the date of the EIS.

...It appears that proper steps have been put in place to ensure that Tribal concerns are addressed in accordance with NEPA.”

RESPONSE

According to George McCluskey, Senior Archeologist and Section 106 Review Coordinator at the Arkansas Historic Preservation Program, the Wichita and Affiliated Tribes have only been concerned with the Fort Smith area. According to Mr. McCluskey, the Wichita may have had a larger presence in western Arkansas, but they have never expressed an interest to the SHPO for other areas in the state. The SHPO has no knowledge that they were ever in the Russellville area. Therefore, FHWA is relying on the SHPO's recommendation unless other tribes request to enter into consultation on the project.

*Ms. Mayra G. Diaz, Natural Hazards Program Specialist
U.S. Department of Homeland Security, Federal Emergency Management Agency
Region VI, Mitigation Division*

SUMMARY

We request that the counties floodplain administrators be contacted for the review and possible permit requirements for this project.

RESPONSE

The FEMA comments are noted. The SDEIS was sent to Mr. Bill Smith, Floodplain Administrator, City of Dardanelle and Ms. Jeanette Hale, CFM, Pope County Conservation District & Floodplain Administration. Their response letters are included in this appendix below.

*Mr. Willie R. Taylor
U.S. Department of the Interior
Office of Environmental Policy and Compliance*

SUMMARY

“The Department would concur with the determination by the Federal Highway Administration (FHWA) and the Arkansas Highway and Transportation Department (AHTD) that there are no properties eligible to be considered under Section 4(f) of the Department of Transportation Act of 1966 (48 U.S.C. 1653(f)) in the project area.”

“...should the FHWA and the AHTD become aware of eligible properties as the study progresses, an evaluation will then be prepared.”

RESPONSE

The U.S. Department of the Interior comment acknowledging that no Section 4(f) properties occur in the project area is noted. Reviewer's comments have been evaluated; no change to the document is necessary.

Should the status of any of the properties change to a status that makes them potentially eligible to be considered Section 4(f) properties, FHWA will prepare a Section 4(f) Evaluation and submit it to the U.S. Department of the Interior for review.

A.2.2 State Agencies

Ms. Francis McSwain

Arkansas Historic Preservation Program, Department of Arkansas Heritage

SUMMARY

“No preferred alternative is specifically identified in the EIS (although it seems apparent that either the North Dardanelle (Red) or the Russellville Bottoms (Green) are preferred) and the no action alternative did not receive serious consideration.”

RESPONSE

The preferred alternative will be presented in the final EIS and ROD, and the no action alternative was fully evaluated in the DEIS and SDEIS.

SUMMARY

“Most of the alternatives discussed have not been investigated for the presence of cultural resources, which makes comparison of the possible impacts of the alternatives difficult.”

RESPONSE

FHWA directed that cultural resources studies be conducted for the Red, Green, and Purple Alternatives and include the data from those surveys in the SDEIS. A lack of landowner ingress permission limited the amount of surveys possible for the purple alternative.

SUMMARY

“No archeologist participated in compiling the EIS, with the result that the potential commitment of time and resources for cultural resources investigations have been grossly understated. For example, at the Red and Green alternatives, the cost of test excavations alone could easily approach one million dollars and the cost of data recovery excavations could approach one million dollars per site.”

RESPONSE

Two Parsons cultural resources specialists with 10 years and 34 years of nationwide experience (including in Arkansas) prepared the cultural resources sections of the SDEIS. These specialists were inadvertently left out of the “List of Preparers.” They will be added to the “List of Preparers” for the Final Supplemental EIS. In addition, Mid-Continental Research Associates (MCRA) prepared the cultural report for the DEIS covering the Red and Green Alternatives, and Panamerican Consultants completed the

cultural report for the Purple Alternative. Parsons cultural staff summarized the results in the SDEIS. Cultural resources data was compiled from archaeological and architectural surveys, and Native American consultation conducted by qualified cultural resources subcontractors with project personnel that met or exceeded the Secretary of the Interior's Qualification Standards.

Costs are always subjective and may increase or decrease based on the extent of the archaeological deposits recovered during Phase II test excavations. The estimates for the Phase II testing were developed in coordination with Panamerican Consultants and reviewed by Parsons cultural resources staff. The SDEIS discussed the general unknown nature of the sites. Subsequent Phase II cultural surveys completed in 2011 and 2012 override the general concern expressed by the commenter.

Phase II Cultural Surveys were completed in 2011-2012 by Panamerican Consultants. Based upon the 2011-12 Phase II surveys, there are 7 NRHP-eligible archaeological sites located within the Green Alternative. Additional cultural resources Phase II investigations would be required for the 20 archeological sites that have not been evaluated to date. The 20 unevaluated sites would be tested to determine NRHP eligibility in accordance with the approved Programmatic Agreement (PA) that was developed for the FEIS. The SHPO has concurred with the PA and a copy of the approved PA and associated Work Plan are contained in Appendix C of the FEIS. The unevaluated sites are considered potentially eligible for the NRHP, pending further Phase II testing. The NRHP sites would be protected or mitigated in accordance with the procedures outlined in the approved PA. Such steps would include, but not be limited to, avoiding NRHP-eligible resources through project redesign, minimizing impacts if avoidance is not possible, and mitigating impacts to all NRHP-eligible sites that would be partially or entirely affected by the project, through the implementation of Phase III data recovery efforts. Please see the impacts summary for more detailed information on cultural resources.

Mr. J. Randy Young
Arkansas Natural Resources Commission
Technical Review Committee

SUMMARY

"The committee supports this project."

RESPONSE

FHWA has noted the support of the Arkansas Natural Resources Commission Technical Review Committee.

Mr. John Turner, Program Coordinator
Arkansas Natural Resources Commission

SUMMARY

No comments

RESPONSE

FHWA has noted Mr. Turner's review, and no response is necessary.

Arkansas Forestry Commission

SUMMARY

No comments

RESPONSE

FHWA has noted the Arkansas Forestry Commission's review, and no response is necessary.

William Prior
Arkansas Geological Survey

SUMMARY

Support. No comments.

RESPONSE

FHWA has noted the Arkansas Geological Survey's support, and no response is necessary.

Craig K. Uyeda
Arkansas Game and Fish Commission

SUMMARY

"Biologists from our agency have reviewed the River Valley Draft Supplemental Draft Environmental Impact Statement and recommend the proposed Green Alternative. This Alternative appears to lessen impacts to the shoreline of the Arkansas River and fish and wildlife resources."

RESPONSE

FHWA has noted the Arkansas Game and Fish Commission's support for the Green Alternative, and no response is necessary.

A.2.3 Local Agencies/Organizations

Mr. Bill Smith
City of Dardanelle Floodplain Administrator

SUMMARY

There is a discrepancy between the base flood elevations (BFE) for the city of Dardanelle on the Pope and Yale Counties' FIRMs.

Part of the study area is along the Dardanelle Levee System. In a letter to the chairman of the Carden Bottoms and Dardanelle Drainage Districts, Dated February 4, 1993, these levees were deemed unacceptable. In one instance, a portion of the levee had been restored to natural ground level. Was this taken into account when the floodplain analysis was conducted?

Any rise to the BFE will affect all areas within the floodplains of the areas between Dardanelle Lock and Dam and Morrilton Lock and Dam.

Historically, Dardanelle's flooding has been caused by a reduction of flood storage capacity in Smiley Bayou when the river level rises. Any increases to the BFE by the removal of 700 plus acres of floodplain would only serve to enhance flooding in Dardanelle. I feel that in the very least the area of study should have included the entire city of Dardanelle and the areas south of town up to and including where the bayou drains into the Arkansas River.

RESPONSE

There are differences in the base flood elevations for adjacent areas along the Arkansas River where the Yell County and Pope County Flood Insurance Rate Maps (FIRM) meet. The FIRM update for Yell County, effective in March 2002, based its mapping information along the Arkansas River through the project area based on the original study of the City of Dardanelle. It included analyses for the Arkansas River and Smiley Bayou, which were performed by the U.S. Army Corps of Engineers (USACE), Little Rock District, in 1969." The Pope County FIRM update, effective March 2010, used this information as well; however, Pope County also incorporated the more current "U.S. Department of the Army, Corps of Engineers, Restudy of Arkansas River: Navigation Pool 9 and Dardanelle Reservoir, 1986 (unpublished)." These models and hydrology for the 1% annual chance flood event have been approved by the USACE Southwestern Division. In addition, FEMA approved all of the models when requested by the National Flood Insurance Program participating communities. The base flood elevations differ due to changes in the channel geometry, more detailed topographic information, and the development of more accurate computer modeling software and data.

The Federal Highway Administration noted that the United States Geological Survey (USGS) actively maintains a gauge at the Highway 7 Bridge. The USGS fact sheet states that the flow (Q100) for the 1% annual chance flood event is 696,000 cubic feet per second (cfs). The USGS Q100 data was most likely developed prior to any major upstream flood control projects in Oklahoma being constructed as it compares favorably to USACE's 1960 unregulated Q100 of 760,000 cfs and USACE's 1972 unregulated Q100 of 700,000 cfs. The USACE Flood Plain Analysis Report in this EIS indicates that the Q100 is 485,000 cfs. This is consistent with the Pope County FIRM update of 2010.

The elevations from the Yell County FIRM should not be compared, because it is not based on the best and most recent information.

The base flood elevation of 321.98 feet at mile 202.09 is the elevation for existing conditions. This elevation does not include either the Red or Green alternatives. With the Red and Green alternatives, the Floodplain Analysis Report shows that the base flood elevations are raised by 0.06 feet and 0.03 feet respectively.

The “Notes to Users” portion of the March 4, 2002 FIRM map states, “Users should be aware the Base Flood Elevations shown on the FIRM represent rounded whole-foot elevations. These Base Flood Elevations are intended for flood insurance rating purposes only and should not be used as sole source of flood elevation information.” The USACE elevation measurements in the Floodplain Analysis Report are more accurate than those provided on FIRM maps and use the latest floodplain data and modeling. FHWA hydraulic engineers have reviewed the USACE Report and HEC-RAS modeling. The Flood Plain Analysis Report mapping is based on Light Detection and Ranging (LiDAR) information generated in 2000-2001, using a contour interval of 2 feet (precision ±1 foot).

Ms. Jeanette Hale, CFM
Pope County Conservation District & Floodplain Administration

SUMMARY

“I have reviewed the various alternatives in the proposed Russellville Intermodal facility. Various alternatives in this project do impact floodplains. It appears that none of the area (green or red alternatives) are located within a “floodway.” They are located in zones AE and/or in A, so they do require a floodplain development permit from the County. It is important that the cumulative increases in flood levels be maintained for whichever alternative is chosen. Permits may be required for specific aspects of the project, for example, buildings, fill, road, etc.”

RESPONSE

FHWA has noted the Pope County Conservation District & Floodplain Administration comments related to floodplains and permits. Permits will be obtained as required.

Ms. Gloria Craig
Yell County Historical & Genealogical Association

SUMMARY

“Intensive research of these sites [Red and Green Alternatives] have been undertaken by AR Tech U, Dr. Skip Abernathy and others over the years, and reveal the richest treasure of early Indian occupation between Little Rock and Ft. Smith. Cherokee, and a mixture of other Native American tribes, have occupied this floodplain adjacent to the Trail of Tears, now a historical landmark. Many current residents of Yell and Pope County descend in some measure from these tribes and place great value on preserving their cultural heritage. The SDEIS fails the sufficiency test of site-specific grading these sites or considering alternatives that would avoid their destruction.”

RESPONSE

In the SDEIS, the locations of each of the NRHP-eligible archaeological sites as identified from cultural resources investigations were compared to the boundaries of the Red and Green Alternatives. A detailed spreadsheet for all archaeological sites within the Red/Green Alternatives, including information on site type and NRHP eligibility was prepared for internal impact analysis. Adverse effects under Section 106 /significant impacts under NEPA were identified for the two alternatives in the document, and mitigation measures were presented for each alternative. Site locations were not provided in the SDEIS in accordance with Section 304 of the National Historic Preservation Act (protection of archaeological site locations).

Phase II Cultural Surveys were completed in 2011-2012 by Panamerican Consultants. Based upon the 2011-12 Phase II surveys, there are 7 NRHP-eligible archaeological sites located within the Green Alternative. Additional cultural resources Phase II investigations would be required for the 20 archeological sites that have not been evaluated to date. The 20 unevaluated sites would be tested to determine NRHP eligibility in accordance with the approved Programmatic Agreement (PA) that was developed for the FEIS. The SHPO has concurred with the PA and a copy of the approved PA and associated Work Plan are contained in Appendix C of this FEIS. The unevaluated sites are considered potentially eligible for the NRHP, pending further Phase II testing. The NRHP sites would be protected or mitigated in accordance with the procedures outlined in the approved PA. Such steps would include, but not be limited to, avoiding NRHP-eligible resources through project redesign, minimizing impacts if avoidance is not possible, and mitigating impacts to all NRHP-eligible sites that would be partially or entirely affected by the project, through the implementation of Phase III data recovery efforts. Please see the impacts summary for more detailed information on cultural resources.

SUMMARY

“Many of these sites apparently qualify for protection under the National Historic Preservation Act for they meet Criteria A: B: C: and D: 4.16.1 Affected Environment, page 324.”

RESPONSE

Some archaeological sites located within the boundaries of the Red and Green Alternatives are considered eligible for the National Register of Historic Places (NRHP) under Criterion D. Because these sites are NRHP-eligible, Section 106 of the National Historic Preservation Act dictates the process for identification and resolution of any adverse effects.

Phase II Cultural Surveys were completed in 2011-2012 by Panamerican Consultants. Based upon the 2011-12 Phase II surveys, there are 7 NRHP-eligible archaeological sites located within the Green Alternative. Additional cultural resources Phase II investigations would be required for the 20 archeological sites that have not been

evaluated to date. The 20 unevaluated sites would be tested to determine NRHP eligibility in accordance with the approved Programmatic Agreement (PA) that was developed for the FEIS. The SHPO has concurred with the PA and a copy of the approved PA and associated Work Plan are contained in Appendix C of the FEIS. The unevaluated sites are considered potentially eligible for the NRHP, pending further Phase II testing. The NRHP sites would be protected or mitigated in accordance with the procedures outlined in the approved PA. Such steps would include, but not be limited to, avoiding NRHP-eligible resources through project redesign, minimizing impacts if avoidance is not possible, and mitigating impacts to all NRHP-eligible sites that would be partially or entirely affected by the project, through the implementation of Phase III data recovery efforts. Please see the impacts summary for more detailed information on cultural resources.

SUMMARY

“Project sponsor, Parsons, FTN Associates, Corps of Engineers and FHWA have failed over the past 10 years to adequately evaluate and identify impacts the green/red alternatives present to Cultural Resources.”

RESPONSE

In the SDEIS, the locations of each of the NRHP-eligible archaeological sites as identified from cultural resources investigations were compared to the boundaries of the Red and Green Alternatives. A detailed spreadsheet for all archaeological sites within the Red/Green Alternatives, including information on site type and NRHP eligibility was prepared for internal impact analysis. Adverse effects under Section 106 /significant impacts under NEPA were identified for the two alternatives in the document, and mitigation measures were presented for each alternative. Site locations were not provided in the SDEIS in accordance with Section 304 of the National Historic Preservation Act (protection of archaeological site locations).

Phase II Archaeological Investigations occurred in 2011-2012 with the following conclusions for the Red and Green Alternatives:

Red Alternative

- Archaeological resources located in the Red Alternative include 7 NRHP-eligible archaeological sites, 39 sites that are not eligible, 2 unevaluated sites (access denied), and 1 destroyed site (Total =49).
- The locations of the 7 NRHP-eligible sites are primarily in the southern and southeastern portion of the Red Alternative which may provide options for avoidance of these sites through project redesign. Site 3PP740 is located in the middle of the Red Alternative parcel and avoidance may be problematic.
- The locations of the two unevaluated archaeological sites are at the southern boundary (site 3PP722) and in the north central portion (3PP743) which may provide options for avoidance of these sites through project redesign.

-
- Follow-on cultural resources investigations, as identified and executed in a Programmatic Agreement, will consist of Phase II testing of the 2 unevaluated sites and Phase III data recovery of 7-9 known NRHP-eligible sites (one or both of the unevaluated sites could be recommended as eligible after Phase II testing).

Green Alternative

- Archaeological resources located in the Green Alternative include 7 NRHP-eligible archaeological sites (in the overlap area with the Red Alternative), 45 sites that are not eligible, 20 unevaluated sites, and 1 destroyed site (Total =73).
- The locations of the eligible and unevaluated archaeological sites (7 NRHP-eligible and 20 unevaluated sites) are primarily in the central and southeastern portion of the Green Alternative (which reflects the lack of Phase II investigations in Sections 3 and 4).
- Based on the Phase II results and pending SHPO concurrence, follow-on cultural resources investigations, as identified and executed in a Programmatic Agreement, may consist of Phase II testing of the 20 unevaluated sites and Phase III data recovery of 7 known NRHP-eligible sites (some of the unevaluated sites could be recommended as eligible after Phase II testing and also require data recovery if avoidance through project redesign is not possible).
- Based upon the 2011-12 Phase II surveys, there are 7 NRHP-eligible archaeological sites located within the Green Alternative. Additional cultural resources Phase II investigations would be required for the 20 archeological sites that have not been evaluated to date. The 20 unevaluated sites would be tested to determine NRHP eligibility in accordance with the approved Programmatic Agreement (PA) that was developed for the FEIS. The SHPO has concurred with the PA and a copy of the approved PA and associated Work Plan are contained in Appendix C of the FEIS. The unevaluated sites are considered potentially eligible for the NRHP, pending further Phase II testing. The NRHP sites would be protected or mitigated in accordance with the procedures outlined in the approved PA. Such steps would include, but not be limited to, avoiding NRHP-eligible resources through project redesign, minimizing impacts if avoidance is not possible, and mitigating impacts to all NRHP-eligible sites that would be partially or entirely affected by the project, through the implementation of Phase III data recovery efforts.

SUMMARY

“The Alternative screening process is notably fabricated to disqualify Alternatives that would protect Cultural Resources.”

RESPONSE

Numerous potential Build Alternatives were analyzed during the alternatives development and public scoping processes, but they were later determined not to be reasonable due to various reasons including cost, environmental impacts, and ability to meet the purpose and need of the overall project. To date, no other reasonable alternative locations have been identified by the FHWA, AHTD, other agencies, or the

public within the six-county project study area that would allow for the construction of the full intermodal facilities. To meet the purpose and need of this project, a site would need to provide reasonable access to the National Highway System (NHS), railroad, and the Arkansas River. Locating sites with enough contiguous developable land located within a reasonable distance to all three modes of transportation was a limiting factor throughout much of the project area as was the cost to develop those alternative sites. Table 3.1 in the SDEIS lists the 14 screening criteria and rationale that were utilized to evaluate the various alternatives developed for the project and to determine which of the alternatives should be evaluated in detail in the SDEIS.

SUMMARY

“To correct this bias, our organization respectfully requests Independent External Peer Review of impacts the green and red alternatives present to archeological resources.”

RESPONSE

According to Section 2034 of the Water Resources Development Act, a USACE project must meet one of the mandatory criteria for IEPR. These criteria are:

- 1) total cost more than \$45 million;
- 2) Governor of Arkansas requests an IEPR;
- 3) Chief of Engineers determines project is controversial based on factors described in Paragraph (4) in Section 2034. A project study is controversial if:
 - a) there is a significant public dispute as to the size, nature, or effects of the project; or
 - b) there is a significant public dispute as to the economic or environmental costs or benefits of the project.

Mr. Jim Wood (9-22-2010 and 10-16-2010)
Yell County Wildlife Federation and City of Dardanelle

SUMMARY

From 9-22-2010 Letter:

“Yell County Wildlife Federation formally requests IEPR [Independent External Peer Review] be applied by a National Academy of Scientist Panel to issues of disputed environmental effects, including threats to community safety...”

From 10-16-2010 Letter:

Your response to our 4-24-06 request for Peer Review of USACE’s hydraulic modeling is, “USACE is the acknowledged expert to floodplain determination and is routinely responsible for such determinations,” fails to answer our challenge to accounting accuracy we consider mandated by 1502.24, Methodology and Scientific accuracy. Moreover, when a Lead Agency relies upon data provided by other Agencies or sources, the Lead Agency is responsible for assuring accuracy of such information in

order to provide “supporting evidence that the Agency has made the necessary environmental analysis” 1502.1. SDEIS fails to assure USACE accounting accuracy.

RESPONSE

Since “accounting accuracy” is not a technical term identified or specifically defined by 1502.24, it is not possible to develop a response to this portion of the comment. However, according to Section 2034 of the Water Resources Development Act (121 STAT.1086, PL 110-114), a project must meet one of the mandatory criteria for IEPR. These criteria are:

- 1) total cost more than \$45 million;
- 2) Governor of Arkansas requests an IEPR;
- 3) Chief of Engineers determines project is controversial based on factors describe in Paragraph (4) in Section 2034. A project study is controversial if:
 - a) there is a significant public dispute as to the size, nature, or effects of the project; or
 - b) there is a significant public dispute as to the economic or environmental costs or benefits of the project.

In addition, under Section 2034 (33 U.S.C 2343), discretionary IEPR may be considered by Chief of Engineer if the need of a Federal or state agency “...determines that the project is likely to have a significant impact on environmental, cultural, or other resources under the jurisdiction of the agency....” No Federal or state agency has requested an IEPR. The USACE is a cooperating agency on this project, and FHWA is the lead agency. FHWA hydraulic engineers have reviewed and approve the flood study for this project.

SUMMARY

From 9-22-2010 Letter:

“We find SDEIS fails to meet the Data Quality Act of 2000 Guidelines which mandate, “In those situations involving dissemination of influential scientific, financial, or statistical information, a high degree of transparency of data and methods must be ensured to facilitate the reproducibility of such information by qualified third parties.” We find the SDEIS Appendix B Floodplain Analysis Report fails this test and also seems to notably fail NEPA’s Sec. 102(2) to the fullest extent possible test.

From 10-16-2010 Letter:

The SDEIS continues to fail the NEPA Section 102(2)(C) sufficiency test to “determine the environmental impacts of the proposed action” on the entire floodway and presents a document largely repeating promotional type general statements and assumptions, absent a supporting accounting analysis, relying largely on little more than imagination. Although declared to be a “stand alone” SDEIS, it is absent a “hard look” that “rigorously explore and objectively evaluate all reasonable alternatives.” Objectivity of the NEPA process is destroyed by an Alternative screening process that, except for the new Lake Dardanelle Purple Alternative, fails to consider project locations that avoid base

floodplain encroachment and AR River Floodway functions that provide existing flood reduction benefits to the City of Dardanelle and Yell County property owners.”

RESPONSE

The quote above is not from the Data Quality Act of 2000 (*i.e.*, Section 515 of the Consolidations Appropriations Act, 2001). The quote comes from a DoD document titled, “Ensuring the Quality of Information Disseminated to the Public by the Department of Defense.” The purpose of this document is to “prescribe policy and procedures and assign responsibilities for ensuring and maximizing the quality (objectivity, utility, and integrity) of information (hereafter referred to as “quality standards”) disseminated to the public by the Department of Defense” and to “Issue guidelines that include administrative mechanisms for affected persons to seek and obtain correction of information maintained and disseminated to the public by Department of Defense Components that does not comply with the quality standards in these guidelines as based on the OMB guidelines (Federal Register, February 22, 2002, Volume 67, Number 36, page 8452).” The Floodplain Analysis Report was provided by the USACE and was produced using the most recent best data available.

The Floodplain Analysis Report is a stand-alone USACE document that was included as an Appendix to the SDEIS. It is not a NEPA document, and therefore, is not subject to Section 102(2) of NEPA. Information provided by the USACE in the Floodplain Analysis Report was used to analyze impacts to floodplains. All section of the SDEIS, including Section 4.13 – Floodplains, were written utilizing a systematic, interdisciplinary approach to insure the integrated use of the natural and social sciences.

SUMMARY

From 9-22-2010 Letter:

“...given the Federal Emergency Management Agency oversight policy to provide a leadership floodplain regulatory role at 44 CFR 60 and 40 CFR 1501.6 “jurisdiction by law” we reaffirm our previous request that FEMA be included as a Cooperating Agency in this NEPA process.”

RESPONSE

40 CFR 1501.6 states, “Upon request of the lead agency, any other Federal agency which has jurisdiction by law shall be a cooperating agency. In addition any other Federal agency which has special expertise with respect to any environmental issue, which should be addressed in the statement, may be a cooperating agency upon request of the lead agency.” The FHWA, being the lead agency, has not requested FEMA to be a cooperating agency. FEMA has been sent a coordination letter and a copy of the SDEIS; and their comments are included above and are addressed in the Final EIS.

SUMMARY

From 9-22-2010 Letter:

“Loss of flood storage function [to] the approximately 800 acres of the shared base floodplain presents to City of Dardanelle and Yell County portion of the floodway and floodplain, and potential such floodway encroachment presents to delineation of floodplain boundaries on the Dardanelle side of the river. Quantify using transparent, accurate accounting methods to site-specific, reveal proposed project impacts to FEMA Flood Insurance Rate Map and Special Flood Hazard Areas and Dardanelle’s Federal Flood Insurance Program.”

From 10-16-2010 Letter:

The SDEIS fails to map the entire affected AR River floodway for the proposed Red and Green alternatives, and thus lacks sufficiency in identifying the pre project existing baseline floodway situation essential to comparing alternatives. It fails to “succinctly describe the environment of the area(s) to be affected or created by the alternatives under consideration” (1502.15), and fails to rigorously analyze the sphere of potential floodway encroachment impacts to Dardanelle and Yell County. Appendix B is a brief listing of figures, but fails to “explain methodologies of research and modeling” (CEQ 40 FAQ’s).

RESPONSE

Floodplain impacts have been defined in the SDEIS utilizing the information provided by Floodplain Analysis Report. It is outside the scope of NEPA to discuss changes to FIRMs, aspects of the FIRMs, or the program that defines the FIRMs. The USACE has confirmed that the Floodplain Analysis Report utilizes the best and most recent floodplain analysis data and will supersede the elevation data presented in the current FIRM.

The SDEIS and Appendix B have described the impacts to the floodplain downstream to the extent where the increase in surface water elevation is zero. It is important to note that the Green Alternative would have 739 acres within a protective levee, and the Red Alternative would have approximately 691 acres within the intermodal facilities levee and not 800 acres. In addition excavation of the harbor will add a minor amount of flood storage capacity.

SUMMARY

From 9-22-2010 Letter:

“Locate, identify and grade each archaeological and Native American Cultural Resource site and impacts proposed alternatives present to each...”

From 10-16-2010 Letter:

“SDEIS provides no quantifiable or definitive mapping information as to the 49 referenced archeological sites in the Red Alternative or the 72 sites in the Green Alternative. Neither are nearby sites east of the two Alternatives mentioned although they are a connected part of New Hope Bottoms cultural resources. This lack of

definitive information notably fails 1500.01 Purpose that information must be available 'before decisions are made and before actions are taken.' ”

From 10-16-2010 Letter:

“Cultural Resources: Since early Indian settlement of this area (see Nov. '02 Intermodal Env. Assessment 3.5 Cultural Resources and Local History) the Red and Green Alternative sites have been well known rich Cultural and Archeological resources. Yet with an immense information base of site specific data for these two sites as declared by AR Archeological Survey, the SDEIS fails to provide a mapping of these resources. Environmental Consequences (1502.16), direct and indirect effects upon Cultural Resources, would be to destroy the “regional archeological record decreasing its overall research contribution.” Without Mitigation that avoids destruction of these Cultural Resources by expanding Alternatives considered to non floodplain locations.”

From 10-16-2010 Letter:

“Regarding Cultural Resource data, 1502.22(a) provides guidance that “if the information is not known and overall cost to obtain it is not exorbitant, the agency shall include the information in the EIS.” SDEIS has notably fabricated an alternative screening process that allows destruction of cultural resource sites. In the above referenced '02 EA Response to Comments, Dr. Skip Stewart-Abernathy from AR Archeological Survey ATU Station, alerted the Lead Agency about potential major impacts to archeological resources, yet the SDEIS continues to lack sufficiency in determining how these historically significant sites will be mitigated. Producing a Record of Decision absent this information is disallowed by NEPA.”

From 10-16-2010 Letter:

[Concerning Cultural Resources] “Mitigation is declared at SDEIS 4.16.2.2.4 to be labor intensive and costly. Therefore, in order to meet NEPA’s “before decisions are made or actions taken” test, to the fullest extent, cost to protect these resources must be subjected to a cost accounting analysis.”

RESPONSE

Cultural resources have been identified for the Red and Green Alternatives and have been documented in the cultural resources report that was reviewed by the SHPO and the subsequent Phase II Report that was completed in June 2012. Archaeological site locations are excluded from the SDEIS in accordance with Section 304 of the National Historic Preservation Act (NHPA) to protect the integrity of the archaeological deposits. Maps included by the commenter have been omitted from this document to ensure compliance with Section 304 of the NHPA. Additional archaeological survey will be conducted as needed for the Purple Alternative and consultation with the Arkansas SHPO is ongoing. Consultation with fourteen Native American groups to identify and protect sensitive Native American sites and traditional cultural properties (TCPs) was initiated, comments have been received and this coordination is also ongoing. A Programmatic Agreement will be prepared in consultation with the Arkansas SHPO and the Native American groups to mitigate any adverse effects to these important cultural

resources. Also, please see response to Yell County Historical & Genealogical Association above related to cultural resources.

SUMMARY

From 9-22-2010 Letter:

“Flood induced impacts to Dardanelle Bottoms and Holla Bend National Wildlife Refuge resulting from removing 800 acres of floodplain functions the Green and Red Alternatives present to historically unstable flood blowout areas of the shared floodplain...”

From 10-16-2010 Letter:

AR River at mile 200 is recognized by USACE as a historically unstable blow out area where flood events have produced catastrophic damage to farmlands, a situation that will likely be exacerbated by removing the project area’s 886 acres of base floodplain surge area. There is a notable failure to discuss how this levee and floodplain modification negatively or positively affects flood water levels at this unstable location, but is recognized by USACE at their EP 1165-2-1. The proposed Project poses threat to shift blowouts from major flood events down through Dardanelle Bottoms and through Holla Bend National Wildlife Refuge. SDEIS also fails to discuss the direct and indirect effects this situation presents to Environmental Consequences 1502.16. It appears that this situation qualifies as a “takings” Issue under US Constitution Amendment 5.

RESPONSE

Using the Floodplain Analysis Report provided by the USACE, the SDEIS has documented the expected floodplain impacts for each alternative downstream from the proposed action area until the increase in water surface elevation is zero (i.e., River Mile 198.22). The locations mentioned in the comment above are further downstream from River Mile 198.22. According to the USACE, no impacts two miles downstream would be anticipated. It is important to note that the Green Alternative would have 739 acres within a protective levee, and the Red Alternative would have approximately 691 acres within the intermodal facilities levee and not 800 acres. In addition excavation of the harbor will add a minor amount of flood storage capacity.

SUMMARY

From 9-22-2010 Letter:

“Provide a transparent economic benefit/cost analysis in specific accounting detail for each studied Alternative, sufficient to meet NEPA Section 102(2) to the fullest extent possible test. Methodology to grade the proposed projects worthwhile test must evaluate and compare cumulative long term local tax and sphere of economic benefits that would be traded off by forcing private riverside ports and regional transportation systems either out of business or to unfairly compete with non taxpaying subsidized project systems...”

From 10-16-2010 Letter:

“Failure to provide Economic Analysis: we disagree with FHWA’s response at page 1-

124 “NEPA regulations do not require a benefit/cost analysis” which we find contrary to 1508.8(b) Effects – “Effects and impacts as used in these regulations are synonymous.” Effects include – aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative. How can you reasonably account for Economic effects without meeting Judge Wilson’s quantifiable definitive information requirement? FHWA avoids an Economic Analysis on a flawed misplaced argument based on 1502.23 option to exclude requiring b/c ratios for actions having a purpose and need solely on “qualitative” instead of quantifiable economics. SDEIS describes a proposed project whose purpose is based almost exclusively upon imaginary general statements of Economic benefits that fails to be based upon supporting definitive information and analysis. SDEIS also fails to provide a supporting qualitative analysis as to the Effects and Impacts loss of floodplain/floodway functions, resulting from the Green and Red Alternatives, presents to others who benefit from retaining these existing health and safety qualitative functions and benefits. Effects and Impacts accounting fails NEPA sufficiency test without a “definitive” Economic Analysis that includes b/c accounting.”

From 10-16-2010 Letter:

“Purpose and Need for the project at ES.2 is to “promote economic development by creating new jobs, specifically higher wage jobs, improve transportation capacity and competitiveness...” NEPA is a site-specific process. Other than broad imaginary general statements, SDEIS is notably absent an accounting analysis as to how Effects from converting the existing privately owned and operating transportation system to a taxpayer subsidized system meets the “worth-while” test? We view Judge Wilson’s Order that “general statements about potential effects” fails to provide a hard look at quantifying whether an Alternative meets the test of providing more benefits than cost, or does the action trade off more of both qualitative and quantitative benefits than is gained? We hold to our previous conclusion that the SDEIS continues the same flaw in the DEIS of basing Purpose and Need, not upon high quality supporting evidence of Need, but upon some broad imaginary opinion that Need will occur at some unknown future time. A better qualitative and quantitative transparent analysis must be provided to support Need.”

RESPONSE

Preparation of the DEIS relied on many sources and resources including, but not limited to the following: AHTD, Planning and Research Division. Intermodal Transportation Needs-Economic Development Study: Potential Benefits and of Regional Transportation Center and Manufacturing-Freight Consolidation/Distribution Complex, August 1998; Dr. Gregory Hamilton et al. Economic Feasibility and Debt Capacity of the Russellville River Port Project, September 2002; Dr. Heather Nachtmann, Economic Evaluation of the Impact of Waterways on the State of Arkansas, July 2002; AHTD - Arkansas State Public Riverport Study and Needs Assessment, March 2005; and AHTD -Arkansas Statewide Long-Range Intermodal Transportation Plan, May 2002 and 2007 Update. In addition, interviews were conducted in January 2010 with industry experts, port operators, and economic development professionals in the port industry to gain a local, regional, and national perspective of ports and intermodal facilities and to apply it to the SDEIS.

Data from these and other sources was the most recent best available data to use to compare the proposed Build Alternatives to the No Action Alternative. The details provided in Appendix C of the SDEIS (Community Impact Assessment Technical Memorandum) and in the indirect impacts analysis for the Red and Green Alternative concerning adverse impacts to private ports in Dardanelle do satisfy NEPA Section 102(2) requirements. Specific economic extrapolation or forecasting using existing data would be speculative in nature and could be misleading to the public.

SUMMARY

From 9-22-2010 Letter:

“...since the Corps of Engineers is a Cooperating Agency, we question as to whether provisions of the 2007 Water Resource Development Act Section 2034 Independent External Peer Review applies to the Corps Appendix B analysis, given that the project is highly controversial with City of Dardanelle and others who share affected floodplain functions? The SDEIS is declared to meet the NEPA test as a Stand Alone document?”

RESPONSE

According to Section 2034 of the Water Resources Development Act (121 STAT.1086, PL 110-114), a project must meet one of the mandatory criteria for IEPR. These criteria are:

- 1) total cost more than \$45 million;
- 2) Governor of Arkansas requests an IEPR;
- 3) Chief of Engineers determines project is controversial based on factors describe in Paragraph (4) in Section 2034. A project study is controversial if:
 - a) there is a significant public dispute as to the size, nature, or effects of the project; or
 - b) there is a significant public dispute as to the economic or environmental costs or benefits of the project.

In addition, under Section 2034 (33 U.S.C 2343), discretionary IEPR may be considered by Chief of Engineer if the need of a Federal or state agency “...determines that the project is likely to have a significant impact on environmental, cultural, or other resources under the jurisdiction of the agency.” No Federal or state agency has requested an IEPR. The USACE is a cooperating agency on this project and FHWA is the lead agency. FHWA hydraulic engineers have reviewed and approve the flood study for this project. The SDEIS was a stand-alone NEPA document.

SUMMARY

From 10-16-2010 Letter:

Regarding cumulative impacts, and SDEIS general lack of analysis to support conclusions, Judge Wilson's 16 August 04 Order provides guidance and states, "This inquiry requires some quantifiable or detailed information...general statements about possible effects and some risk do not constitute a hard look absent a justification regarding why more definitive information could not be provided." We believe this SDEIS continues to fail Judge Wilson's 8-16-04 Order upon which he justified his "permanent injunction pending completion of an EIS." The document continues the same DEIS flaw in its failure to analyze cumulative impacts and consider Dardanella and Yell County portion of the floodplain as part of the Affected Environment, a data gathering function of FEMA's FIRM mapping periodic review process. Judge Wilson's Order further finds that "the various components of a project required a study of cumulative environmental impacts of the entire project," and we conclude the levee encircling 886 acres of this shared floodplain, and encroachment upon floodplain functions, is part of the "entire Project" and its sphere of influence upon Dardanella and Yell County lacks definitive documentation in the SDEIS Appendix B?

RESPONSE

The tables provided by the USACE Little Rock District found in Appendix B (Floodplain Analysis) and in Section 4.13 of the SDEIS (Floodplains) provided quantified and detailed information on the increases in water surface elevation downstream from the proposed action area by River Mile until the increases in water surface elevation is zero. A detailed cumulative impact analysis was prepared. No past, present, or reasonably foreseeable future projects were identified that could produce significant cumulative adverse impacts to floodplains.

SUMMARY

From 10-16-2010 Letter:

SDEIS response to our 4-26-06 comments follows a pattern of summarizing and language modification instead of providing a definitive response specifically answering the issue, concern, or question we raised. The following at 4.(d) (4-26-04 comments) is an example: "DEIS calculates to levy off 2/3 of the floodplain at Nav Mile 202.09, take out 800 acres of flowage area, and 485,000 cfs only raises flood level 0.06 feet (less than an inch). This is scientifically impossible." We further quoted Corps calculating guidance at EP 1165-2-1, Chapter 13-6, b. and c. regarding how levees and floodplain modifications affect flood water levels. Your response is "The USACE floodplain analysis document can be found in Appendix B of the SDEIS" which does not answer the accuracy issue we raised. This method of response falls short of Judge Wilson's "definitive detailed information" requirement. And is further supporting evidence that SDEIS Appendix B calculations need Independent External Peer Review which we requested in the DEIS and now reaffirm.

RESPONSE

The Floodplain Analysis Report contains quantifiable data produced by the USACE Little Rock District. These data were generated by qualified hydrological engineers and are the most recent best available to date. Of the 886-acre Green Alternative, the proposed levee would encompass 739 acres of the existing floodplain. Of the 832-acre Red Alternative, the proposed levee would encompass 691 acres of the existing floodplain. The discharge of 485,000 cfs for a 100-year flood event was used for the study. The discharge encompasses the entire Arkansas River and not just the 739 acres or 691 acres of floodplain that would be levee protected.

SUMMARY

From 10-16-2010 Letter:

“With exception to the additional Purple Alternative, the SDEIS is little more than a restatement of the same February 2006 DEIS and flawed Alternative screening process fabricated to limit Alternatives to the Green and Red, which are so alike as to be the same proposed action. Moreover the SDEIS fails NEPA’s (1502.14) test of “providing a clear choice among options by the decision maker and public.” Verbose descriptions of the affected Pope County environment are themselves no measure of the adequacy of an environmental impact statement (1502.15) Affected Environment. SDEIS illegally narrows the Affected Environment to Pope County without a definitive analysis of the expanded sphere of influence the Red and Green Alternatives present to the shared floodplain situation. In addition to our largely unanswered 4-26-06 comments, we will clarify several reasons why this SDEIS continues to fail NEPA’s sufficiency test.”

RESPONSE

The FEIS will contain a preferred alternative which will satisfy the statement in Section 1502.14 of the NEPA which states, “...and providing a clear basis for choice among options by the decision-maker and the public...”

Section 1502.15 of the NEPA states, “The environmental impact statement shall succinctly describe the environment of the area(s) to be affected or created by the alternatives under consideration. The descriptions shall be no longer than is necessary to understand the effects of the alternatives. Data and analyses in a statement shall be commensurate with the importance of the impact, with less important material summarized, consolidated, or simply referenced. Agencies shall avoid useless bulk in statements and shall concentrate effort and attention on important issues. Verbose descriptions of the affected environment are themselves no measure of the adequacy of an environmental impact statement.” Section 4.13 and Appendix B of SDEIS discussed the impacts to the floodplain two river miles beyond the extent of the Red and Green Alternative (i.e., to River Mile 198.22). The Floodplain Analysis Reports shows zero increase at this point in water surface elevation due to the proposed action.

SUMMARY

From 10-16-2010 Letter:

“Floodplain Impacts: 44 CFR 9 identifies a floodway as “that portion of the floodplain which is effective in carrying flow, within which this carrying capacity must be preserved and where the flood hazard is generally highest, where water depths and velocities are the greatest.” SDEIS 4.13.1 states, “The 100 year floodway was calculated – and then the proposed harbor was modeled within the floodway. The results showed the proposed harbor did not impact the 100 year flood elevation --.” SDEIS continues limiting base flood elevation impact modeling to using only the proposed harbor USACE data without considering consequence of the entire 886 acre encroachment, a notable disregard for Judge Wilson’s “environmental impacts of the entire project” requirement. The River separating Dardanelle from the Green and Red alternative areas clearly meets the “effective in carrying flow” test and both sides qualify as being part of the affected floodway environment. Does FHWA agree with this conclusion?”

RESPONSE

At the request of the USACE the text will be revised to read, “The 100 year *floodplain* was calculated...and then the proposed *intermodal facility* was modeled within the *floodplain*. The results showed the proposed *intermodal facility* did not impact the 100 year flood elevation....” Of the 886-acre encroachment for the Green Alternative, the proposed levee would encompass 739 acres of the existing floodplain. Of the 832-acre encroachment of the Red Alternative, the proposed levee would encompass 691 acres of the existing floodplain. In addition, excavation of the harbor will add a minor amount of flood storage capacity. The SDEIS does consider the consequence of the full encroachment of these alternatives on the floodplain.

SUMMARY

From 10-16-2010 Letter:

“SDEIS continues to avoid considering floodway impacts under a flawed claim that the project area does not have a regulated floodway. NEPA’s “to the fullest extent possible” test destroys such a claim, and requires that the floodway within the Red and Green alternatives sphere of influence are thresholds for decision and must be mapped and project encroachment upon floodway’s carrying capacity on both sides of the floodplain must be quantified for a base flood situation. Thus, SDEIS falls short of quantifying impacts to the Affected Environment.”

RESPONSE

The SDEIS states, “In the area of the proposed harbor (at the request of the USACE, “harbor” will be changed to “intermodal facility”), the Arkansas River does not have a designated 100-year floodway. This is a true statement. The SDEIS goes on to state, “To be consistent with EO 11988 and good floodplain management [44 CFR Section 60.3(c)], the proposed harbor cannot increase 100-year floodplain elevations by more than one foot. If this reach of the Arkansas River had a designated floodway, EO 11988

and 44 CFR would not allow the proposed harbor to increase 100-year floodway elevations at all.” This being stated, the impacts on the floodway would be nominal as discussed in Section 4.13 and Appendix B of the SDEIS.

All section of the SDEIS, including Section 4.13 – Floodplains, were written utilizing a systematic, interdisciplinary approach to insure the integrated use of the natural and social sciences.

SUMMARY

From 10-16-2010 Letter:

“FEMA revised on 3-4-02 FIRM mapping for City of Dardanelle base floodplain (100 year) adjacent to and opposite the proposed Red and Green Alternatives, as having an existing 320’ elevation, while SDEIS Appendix B analysis raises the existing elevation to 322’ for this same location? Thus, FEMA’s accounting for mile 202.09 is not 321.98’, but is 320’ causing your modeling to reveal that both Red/Green Alternatives will increase the base 100 year flood elevation more than two feet. Given that FHWA “uses the same methods as the FEMA flood insurance study” (SDEIS page 287) please clarify how using the same accounting methods FEMA produces an “existing” base flood elevation of 320’ and USACE 321.98’? This 1.98’ increase itself disqualify both Alternatives from meeting the one foot floodplain increase test of EO 11988. The SDEIS noticeably fails to consider the Issue of protecting the health and safety of City of Dardanelle and Yell County property owners. Thus we request Independent External Peer Review of the accounting methods FHWA is using to justify the Appendix B analysis.”

RESPONSE

Since “accounting accuracy” is not a technical term identified or specifically defined by 1502.24, it is not possible to develop a response to this portion of the comment.

There are differences in the base flood elevations for adjacent areas along the Arkansas River where the Yell County and Pope County Flood Insurance Rate Maps (FIRM) meet. The FIRM update for Yell County, effective in March 2002, based its mapping information along the Arkansas River through the project area based on the original study of the City of Dardanelle. It included analyses for the Arkansas River and Smiley Bayou, which were performed by the U.S. Army Corps of Engineers (USACE), Little Rock District, in 1969.” The Pope County FIRM update, effective March 2010, used this information as well; however, Pope County also incorporated the more current “U.S. Department of the Army, Corps of Engineers, Restudy of Arkansas River: Navigation Pool 9 and Dardanelle Reservoir, 1986 (unpublished).” These models and hydrology for the 1% annual chance flood event have been approved by the USACE Southwestern Division. In addition, FEMA approved all of the models when requested by the National Flood Insurance Program participating communities. The base flood elevations differ due to changes in the channel geometry, more detailed topographic information, and the development of more accurate computer modeling software and data.

The elevations from the Yell County FIRM should not be compared, because it is not based on the best and most recent information. The base flood elevation of 321.98 feet at mile 202.09 is the elevation for existing conditions. This elevation does not include either the Red or Green alternatives. With the Red and Green alternatives, the Floodplain Analysis Report shows that the base flood elevations are raised by 0.06 feet and 0.03 feet respectively.

The “Notes to Users” portion of the March 4, 2002 FIRM map states, “Users should be aware the Base Flood Elevations shown on the FIRM represent rounded whole-foot elevations. These Base Flood Elevations are intended for flood insurance rating purposes only and should not be used as sole source of flood elevation information.” The USACE elevation measurements in the Floodplain Analysis Report are more accurate than those provided on FIRM maps and use the latest floodplain data and modeling. FHWA hydraulic engineers have reviewed the USACE Report and HEC-RAS modeling.

SUMMARY

From 10-16-2010 Letter:

US Constitution Amendment 5 Takings Issue: The proposed Red and Green Alternatives clearly impacts to raise FEMA’s base floodplain delineation and FIRM mapping for City of Dardanelle. The Red and Green alternatives floodplain/floodway encroachment shifts impacts from major flood events over to Dardanelle property owners, and increase the number of homeowners required by lending institutions to purchase flood insurance as a condition of securing home loans. This situation raises a US Constitution “takings” Issue qualifying for SDEIS analysis under NEPA Sec. 102(2) and absolutely demands Independent External Peer Review to firm up accounting accuracy. Plain language (1502.8) and definitive information is absent as to why USACE’s Appendix B calculated existing base flood elevation is 2’ higher than FEMA’s FIRM mapped 320’ elevation. It is appropriate to point out that the Corps has a less than reliable record of accuracy in Pool 9 floodplain mapping. And it should be noted that the AR River Land Impact Study (January 1990) data, SDEIS now uses, was generated in response to successful private property flood damage lawsuits on AR River near Ft. Smith against USACE. It is also relevant to this proposed Project that in July ’09 the Federal Claims Court found that USACE had caused a \$7.3 million “takings” through a “super induced addition of water” upon Dave Donaldson Black River WMA. Flood or FIRM mapping impacts that the Red/Green alternatives shift over to Dardanelle appears to be a similar US Constitution “Takings” Issue that NEPA requires to be analyzed with definitive detailed information.

RESPONSE

There are differences in the base flood elevations for adjacent areas along the Arkansas River where the Yell County and Pope County Flood Insurance Rate Maps (FIRM) meet. The FIRM update for Yell County, effective in March 2002, based its mapping information along the Arkansas River through the project area based on the original study of the City of Dardanelle. It included analyses for the Arkansas River and

Smiley Bayou, which were performed by the U.S. Army Corps of Engineers (USACE), Little Rock District, in 1969.” The Pope County FIRM update, effective March 2010, used this information as well; however, Pope County also incorporated the more current “U.S. Department of the Army, Corps of Engineers, Restudy of Arkansas River: Navigation Pool 9 and Dardanelle Reservoir, 1986 (unpublished).” These models and hydrology for the 1% annual chance flood event have been approved by the USACE Southwestern Division. In addition, FEMA approved all of the models when requested by the National Flood Insurance Program participating communities. The base flood elevations differ due to changes in the channel geometry, more detailed topographic information, and the development of more accurate computer modeling software and data.

The elevations from the Yell County FIRM should not be compared, because it is not based on the best and most recent information.

The basis for this comment is rooted in the belief that the USACE Floodplain Analysis Report is inaccurate. The Floodplain Analysis Report was provided by the USACE and was produced using the most recent best data available. The FHWA hydraulic engineers have also reviewed the Floodplain Analysis Report and concur with the analysis and findings.

SUMMARY

From 10-16-2010 Letter:

Hydrologic/Hydraulic Analysis, Appendix B par 3: FHWA’s finding that USACE is the acknowledged expert in floodplain determination, is not supported by Yell County Wildlife Federation experience during our participation in the quoted January 1990 AR River Land Impact Study (ARLIS) for Pool 9/Rockefeller Lake from which you refer to at 3.1. Neither does your response meet NEPA’s “supporting evidence” test. This matter of disagreement is relevant to the SDEIS because FHWA relies upon ARLIS data that USACE themselves found in the 1990’s to be inaccurate. In May ’97 AR Attorney General Winston Bryant sued the Corps requesting a full EIS be developed to firm up accuracy of ARLIS hydraulic modeling. Midway of the \$33 million ARLIS flood impact/flowage easement project, USACE themselves found numerous errors in their HEC-RAS hydraulic modeling and chose to permanently terminate the project. The project area on Pool 9/Green and Red Alternative was the area of major hydraulic dispute. This disagreement alone reaffirms our conclusion that Appendix B USACE modeling be subjected to IEPR.

RESPONSE

The backwater models used in the ARLIS were developed using the LRD-1 computer model, and the results were approved by the United States Army Corps of Engineers Southwestern Division in 1986.

The statement that “Midway of the \$33 million ARLIS flood impact/flowage easement project, USACE themselves found numerous errors in their HEC-RAS hydraulic

modeling and chose to permanently terminate the project” is incorrect. ARLIS was completed and approved by the Southwestern Division. The Commander terminated the land acquisition for flowage easements phase of the project based on project expenditures to date and the projected project costs to continue the land acquisition phase.

According to the USACE, the backwater (USACE suggests that the term “backwater” be changed to “base flood elevations”) effects of the encroachments in the Red or Green alternatives will not extend very far downstream of the proposed levees in a subcritical flow regime. As shown in the SDEIS, both alternatives have no impact below River Mile 201. The Holla Bend Refuge, which is located below River Mile 200, should not see any rise in backwater or base flood elevation due to either alternative.

From examination of aerial photos there appear to be several spur dikes that extend perpendicular into the Arkansas River on both the west and east banks south of the Highway 7 Bridge all the way down to the Holla Bend Refuge. The effects, if any, of increased base flood elevations (backwater) on the ability of these river training dikes to function properly is discussed in the FEIS. The proposed project will have negligible impacts to the river training dikes in the area.

The basis for this comment is rooted in the belief that the USACE Floodplain Analysis Report is inaccurate. The Floodplain Analysis Report was provided by the USACE and was produced using the most recent best data available. The FHWA hydraulic engineers have also reviewed the Floodplain Analysis Report and concur with the analysis and findings.

Mr. Paul Latture
Little Rock Port Authority

SUMMARY

“I am providing comments because I am concerned that the proposed multimodal facility near Russellville would not be economically viable if the wrong site is selected.

As the long-term director of a major intermodal operation, there are two major issues that stand out to me as critical to the success of the proposed facility near Russellville.

The first of the biggest challenges will be establishing and operating a short-line rail. I understand that some of the alternatives would require start up of a new short-line rail operation while others would not. In the absence of an immediate industry base to cash flow the start-up and operations cost of a new rail venture, I do not see how the endeavor could succeed. In other words, for an area like the River Valley, utilizing an existing short-line rail operation is essential.

The second issue is access to the navigation channel. Again, my understanding is that some alternatives would require maintenance dredging while others would not. The Corps of Engineers has stringent cost-benefit guidelines for conducting maintenance dredging. If a site were selected that required dredging, I think it would take decades

for the proposed facility in the River Valley to receive a line item in the Corps' annual budget to help pay for this necessary work. Funding the work with all local dollars would be a major impediment to the success of the overall facility.”

RESPONSE

Mr. Latture's comments on the project have been noted by the FHWA. No response is necessary.

A.2.4 Local Citizens/Other Stakeholders

Mr. Thomas C. Hunt

SUMMARY

“Upon review of the Supplemental Draft Environmental Impact Statement (EIS), discussions with Mr. [Roy] Reeves and the Corps representative, it became my understanding that only the Red and Green Alternatives were to be considered. The Purple Alternative, located in the vicinity of Knoxville, was not going to be pursued in that, according to Mr. Reeves, ‘He did not have the money.’”

RESPONSE

All of the alternatives in the SDEIS were considered reasonable. The purple alternative is considered in detail as an action alternative in the SDEIS. The preferred alternative (Green Alternative) has been selected and is discussed in this FEIS.

SUMMARY

“My thoughts turned back to the Supplemental EIS regarding how so few would be affected by the proposed facility, while in fact, so many were displaced by the expansion of AR Highway 247 from a two lane to a five lane major highway...the AR Highway and Transportation Department...has treated this as a separate entity from the Intermodal Facility. A new highway that will handle a high volume of traffic only a mile or two from Alternatives Red or Green (when neither one have not been approved as yet)...coincidence? I believe not!”

RESPONSE

Mr. Hunt's comments are noted. The Highway 247 project, which has been completed, and this project have independent utility. Therefore, the projects are not dependent upon the other for completion. Cumulative impacts from the proposed action and from the Highway 247 project were considered in the SDEIS.

SUMMARY

“This farm that has been in our family for over one hundred and sixty (160) years would be placed in jeopardy providing either of the Red or Green Alternatives were approved. If levees were constructed along the Russellville side of the Arkansas River to support

either of these alternatives, it would create a choke point that would channel water into a smaller area causing a swifter current and the erosion of water power on the existing dirt levees...”

“With a stronger current and the loss of the New Hope Bottoms Flood Plain, not only mine, but other farms, would be considered an imminent “Blowout Point” for the river during times of high water. A breach would not only affect me but several farms and businesses, some of which would be detrimental to the environment. A hog farm with the typical open raw sewage pit and Terra Renewal Service (TRS) with storage facilities for over a million gallons of Dissolved Air Flootation (DAF) Skimmings (Or Sludge), both of which require permits for application by Arkansas Department of Environmental Quality (ADEQ). Below these farms and businesses is Holla Bend National Wildlife Refuge with various natural habitat that would also be placed at risk.”

“It would be important to take note here that flood insurance IS NOT available in Yell County. I have been told by a member of the Intermodal Committee that they can get flood insurance for us (Me). My response to that was “I do not want to get washed away and collect money. I want to preserve the land and pass it along to my son!””

RESPONSE

According to the USACE, the base flood elevations (backwater) effects of the encroachments in the Red or Green alternatives will not extend very far downstream of the proposed levees in a subcritical flow regime. As shown in the SDEIS, both alternatives have no impact below River Mile 201. The Holla Bend Refuge, which is located below River Mile 200, should not see any rise in backwater due to either alternative.

From examination of aerial photos there appear to be several spur dikes that extend perpendicular into the Arkansas River on both the west and east banks south of the Highway 7 Bridge all the way down to the Holla Bend Refuge. The effects, if any, of increased base flood elevations (backwater) on the ability of these river training dikes to function properly is discussed in the FEIS. The proposed project will have negligible impacts to the river training dikes in the area.

The basis for this comment is rooted in the belief that the USACE Floodplain Analysis Report is inaccurate. The Floodplain Analysis Report was provided by the USACE and was produced using the most recent best data available. The FHWA hydraulic engineers have also reviewed the Floodplain Analysis Report and concur with the analysis and findings.

The maximum increase in velocity is 0.11 feet per second at cross section at River Mile 202.09. This is only a 1.1% increase in channel velocity and is largely negligible in respect to erosive force.

Flood insurance can be obtained in Yell County. Yell County does not participate in the NFIP; therefore an individual cannot obtain flood insurance through the NFIP, but there are other companies that provide this service.

Using the Floodplain Analysis Report provided by the USACE, the SDEIS has documented the expected floodplain impacts for each alternative downstream from the proposed action area until the increase in water surface elevation for a 500-year flood is zero (i.e., River Mile 198.22).

SUMMARY

“I sincerely feel that this is once again the case of the apathy of the few in Russellville that has been shown for the citizens of Dardanelle, its businesses, schools, land owners, and farmers. There have been public meetings at various sites but none in Dardanelle on the construction of this facility outlining its proposed Alternatives, good and bad points. It seems almost like someone has something to hide. It is for these reasons that I am in total agreement with the City of Dardanelle and the Yell County Wildlife Federation for their request to institute an Independent External Peer Review of the Intermodal Facility.”

RESPONSE

Preparation of the DEIS relied on many sources and resources including, but not limited to, the following: AHTD, Planning and Research Division. Intermodal Transportation Needs-Economic Development Study: Potential Benefits and of Regional Transportation Center and Manufacturing-Freight Consolidation/Distribution Complex, August 1998; Dr. Gregory Hamilton et al. Economic Feasibility and Debt Capacity of the Russellville River Port Project, September 2002; Dr. Heather Nachtmann, Economic Evaluation of the Impact of Waterways on the State of Arkansas, July 2002; AHTD - Arkansas State Public Riverport Study and Needs Assessment, March 2005; and AHTD -Arkansas Statewide Long-Range Intermodal Transportation Plan, May 2002 and 2007 Update. In addition, interviews were conducted in January 2010 with industry experts, port operators, and economic development professionals in the port industry to gain a local, regional, and national perspective of ports and intermodal facilities and to apply it to the SDEIS.

Data from these and other sources was the most recent best available data to use to compare the proposed Build Alternatives to the No Action Alternative.

According to Section 2034 of the Water Resources Development Act (121 STAT.1086, PL 110-114), a project must meet one of the mandatory criteria for IEPR. These criteria are:

- 1) total cost more than \$45 million;
- 2) Governor of Arkansas requests an IEPR;
- 3) Chief of Engineers determines project is controversial based on factors describe in Paragraph (4) in Section 2034. A project study is controversial if:
 - a) there is a significant public dispute as to the size, nature, or effects of the project; or
 - b) there is a significant public dispute as to the economic or environmental costs or benefits of the project.

In addition, under Section 2034 (33 U.S.C 2343), discretionary IEPR may be considered by Chief of Engineer if the need of a Federal or state agency "...determines that the project is likely to have a significant impact on environmental, cultural, or other resources under the jurisdiction of the agency...." No Federal or state agency has requested an IEPR. The USACE is a cooperating agency on this project and FHWA is the lead agency. FHWA hydraulic engineers have reviewed and approve the flood study for this project.

Mr. Richard H. Mays

SUMMARY (COMMENT #1)

"The SDEIS does not identify a preferred alternative. At page 36, it is stated that a preferred alternative will be identified in the FEIS after "full analysis of impacts has been conducted for all reasonable Build Alternatives and the No-Action Alternative discussed in the DEIS and SDEIS." Any additional analysis of the Build Alternatives and No-Action Alternative, and the identification of a preferred alternative (including the rationale for the selection of such alternatives as the preferred alternative) should be made available to the public for review and comment."

RESPONSE

The preferred alternative is identified in the FEIS as the Green Alternative, and the FEIS will be made available to the public for review and comment.

SUMMARY (COMMENT #2)

"Also at page 36, the SDEIS states that "Detailed mitigation measures for the proposed action would be developed primarily during the permitting stage of this project." The failure to develop mitigation measures for the proposed action that the public can review and comment upon prior to the issuance of permits is a violation of the National Environmental Policy Act ("NEPA") and its implementing regulations issued by the White House Council on Environmental Quality ("the CEQ Regulations") that are applicable to all major federal actions with a potentially significant effect on the environment. The proposed Intermodal Facilities have been determined to be a major Federal action. Consequently, proposed mitigation measures must be discussed and the public given an opportunity to comment upon them in a draft EIS.

Notwithstanding the disclaimer regarding detailed mitigation measures in the SDEIS mentioned above, mitigation measures are discussed in Section 7.0 of the SDEIS. However, most of the discussion regarding such measures state that it is anticipated that there would be no adverse impacts in most resource categories, and therefore mitigation would not be necessary, or that best management practice techniques or permit conditions would serve as mitigation. "Mitigation" should not include those things that an entity is already obligated to do as a result of law, regulation or a permit."

RESPONSE

The SDEIS states, “Detailed mitigation measures for the proposed action would be developed primarily during the permitting stage of this project. The Authority would work directly with the regulatory agencies responsible for the various resources that would be impacted by the intermodal facilities.”

Mitigation measures for the proposed action have been included in the SDEIS and will be further defined for the preferred alternative (Green Alternative) in the FEIS. The Authority would work directly with the appropriate regulatory agencies to determine specific details of mitigation measures to reduce impacts from the proposed action where necessary.

All of the specifics needed to apply for permits are not available during this NEPA process, and a final design of the facility has not been prepared. Once a Record of Decision has been signed by the decision maker, specific plans for the facility would be designed. Once these plans are available the permitting process would begin. Coordination between appropriate agencies and the Authority would take place during the permit process, and it is at this moment in time when specific details of mitigation are determined.

In most situations, mitigation is performed so an entity can remain in compliance with a law, regulation, and/or permit. As stated in 40 CFR 1508.20:

Mitigation includes:

- (a) Avoiding the impact altogether by not taking a certain action or parts of an action.
- (b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- (c) Rectifying the impact by repairing, rehabilitating, or restoring the affected environment.
- (d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- (e) Compensating for the impact by replacing or providing substitute resources or environments.

SUMMARY (COMMENT #3)

“The Screening Criteria utilized to identify reasonable alternatives to be considered in the SDEIS (see Table 3.1, p.38), lists 14 such criteria. One of those (Criteria No. 13) states that “Planning level development costs should be reasonable compared to currently available funds of approximately \$7,000,000.” However, each of the proposed Alternatives to be carried forward for additional analysis would cost substantially in excess of that amount, in some cases by several orders of magnitude. This leads to several possible conclusions:

-
- a. The project is beyond the financial capability of the Intermodal Authority, and should be abandoned unless another alternative not identified in the SDEIS with lower planning level development costs can be found; or
 - b. The available funds for development costs and the estimated development costs for the Red and Green Alternatives are understated to skew the results of the SDEIS to favor those Alternatives.”

RESPONSE

Cost estimates were prepared consistently across all alternatives. Red and Green Alternatives are less expensive than other alternatives because of slackwater harbor development costs due to site specific characteristics.

It should be noted that the cost savings associated with the Red and Green Alternatives are primarily due to the presence of the existing sand and gravel facility. The facility’s excavation drastically reduce the cost for excavation of the slackwater harbor. Constructing at another location, i.e. a location that would require excavating a harbor, greatly increases cost.

SUMMARY (COMMENT #4)

“The proposed Red and Green Alternatives cover much of the same area. They also appear to be the unofficial preferred alternatives, notwithstanding disclaimers in the SDEIS of there being no preferred alternative at this time. The overlap of area in the Red and Green Alternatives raise the issue of whether there is essentially only one alternative, divided into two separate alternatives to allow the appearance of having more alternatives.”

RESPONSE

The SDEIS had an additional build alternative added since the original DEIS. The Red and Green Alternatives were discussed as two alternatives as each alternative has differentiating environmental consequences for some resource categories. The SDEIS was in compliance with CEQ regulations concerning alternatives found in 40 CFR 1502.14. There are no CEQ regulations that state alternatives cannot share similar boundaries.

Although portions of the proposed Red and Green Alternatives overlap each other and the proposed slackwater harbor/river access point is in the same location, both alternatives are viable, reasonable, stand-alone alternatives that have enough differences in layout and environmental consequences to be distinguished from each other.

The primary differences between the Red Alternative and Green Alternative are that the 204 acres of the Green Alternative that differs from the Red Alternative avoids some of the higher quality wetlands, streams, and forested areas in the extreme northern portions of the Red Alternative. The Arkansas Game and Fish Commission provided

comments during scoping and on the SDEIS that supported the avoidance of the higher quality wetlands. The Green Alternative extends further south onto lands primarily used for agriculture (row-crops). The portion of the Green Alternative that differs from the Red Alternative also extends into an area found to contain a high number of archaeological sites. In addition, the layout of the two alternatives differs in that the Green Alternative would allow the proposed flood-protection levee system to be set-back from the edge of the Arkansas River to reduce flood impacts and allow much of the remnant riparian corridor to remain intact, whereas the Red Alternative would result in the levee being constructed immediately adjacent to the river and clearing of remaining riparian vegetation in that area.

SUMMARY (COMMENT #5)

“The application of the above mentioned Screening Criteria to the sites covered by the SDEIS does not appear to be uniform. Some sites with similar characteristics or factors based on the Criteria are eliminated from further consideration, while others are carried forward for further evaluation. For example, the Pittsburgh Road (Yellow) Alternative was eliminated from further consideration, while the Bend (Purple) Alternative was carried forward, notwithstanding that they appear to have much in common based on the Criteria. In the Yellow Alternative, the site terrain was deemed to be unsuitable for further analysis, whereas the Purple Alternative, with similar conditions and estimated development costs, was carried forward.”

RESPONSE

The Purple Alternative had more screening criteria that were met. A substantial difference between these two alternatives was the distance to the navigable channel of the Arkansas River. The Purple Alternative is approximately 4,000 feet closer to the Arkansas River channel than the Yellow Alternative and the slopes were more suitable for development.

SUMMARY (COMMENT #6)

“The Red and Green Alternatives would both require levees to be constructed along portions of those Alternatives to protect against upstream flooding and backwash. The estimated costs of operation and maintenance of those Alternatives in the SDEIS does not appear to include those levees, thereby substantially understating those costs.”

RESPONSE

Six of the nine pre-screened alternatives would require levees, and therefore, levee maintenance. The “Anticipated Operations and Maintenance Costs” screening criteria were developed qualitatively for comparison purposes.

SUMMARY (COMMENT #7)

“The scope of consideration of direct and indirect impacts of the proposed project for each alternative is entirely too narrow. The SDEIS limits the scope of consideration for

those impacts to the respective alternative sites. Obviously, a project of this size and nature would have direct and indirect impacts that affect areas beyond the project site itself, and those have not been adequately addressed.

For example, and without limiting the foregoing, the effect of the proposed Intermodal Project on future growth, while mentioned, is very superficial and inadequate. The SDEIS consists of many pages of promotional information regarding the beneficial effect of the project on economic development and growth, but fails to provide any real information regarding the effect of that growth on the human environment other than that it would provide more employment and economic prosperity. If the project is to have the kind of impact that its promoters claim it will have, the indirect impacts will be substantial and widespread and should be more adequately analyzed.”

RESPONSE

Direct and indirect impacts are defined in 40 CFR 1508.8 as:

- (a) Direct effects, which are caused by the action and occur at the same time and place.
- (b) Indirect effects, which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.

Effects and impacts as used in these regulations are synonymous. Effects includes ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative. Effects may also include those resulting from actions which may have both beneficial and detrimental effects, even if on balance the agency believes that the effect will be beneficial.

Preparation of the SDEIS relied on many sources and resources including, but not limited to, the following: AHTD, Planning, and Research Division. Intermodal Transportation Needs-Economic Development Study: Potential Benefits and of Regional Transportation Center and Manufacturing-Freight Consolidation/Distribution Complex, August 1998; Dr. Gregory Hamilton et al. Economic Feasibility and Debt Capacity of the Russellville River Port Project, September 2002; Dr. Heather Nachtmann, Economic Evaluation of the Impact of Waterways on the State of Arkansas, July 2002; AHTD - Arkansas State Public Riverport Study and Needs Assessment, March 2005; and AHTD -Arkansas Statewide Long-Range Intermodal Transportation Plan, May 2002 and 2007 Update. In addition, interviews were conducted in January 2010 with industry experts, port operators, and economic development professionals in the port industry to gain a local, regional, and national perspective of ports and intermodal facilities and to apply it to the SDEIS.

Data from these and other sources was the most recent best available data to use to compare the proposed Build Alternatives to the No Action Alternative. Beneficial, adverse, direct, and indirect impacts are discussed to a “reasonably foreseeable” level.

SUMMARY (COMMENT #8)

“The scope of the cumulative impact analysis is limited to “the geographic area that has the potential to be affected by implementation of any of the alternatives in the reasonably foreseeable future” (Page 122). It then states that for many of the resource categories considered, the cumulative impact geographic area of analysis is appropriately limited to lands within the project area boundaries.”

NEPA requires that the geographic area that may be affected by cumulative impacts of a project be defined and a rationale for the selection of that geographic area for the cumulative impact analysis be set forth in the environmental statement. There is no such rationale contained in the SDEIS, and the scope contained in the SDEIS as quoted above is illusory and fails to comply with the NEPA standard. To the extent that the SDEIS defines the scope of the cumulative impact analysis as lands within the project area boundaries, that scope is entirely too limited for a project of this size and scope.”

RESPONSE

Cumulative impacts are defined by 40 CFR 1508.7 as:

The impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

Table 4.1 on Pages 123 and 124 of the SDEIS listed each resource category, a physical description of the geographic area of analysis, and the rationale for the geographic area of analysis. Many of the resource categories have this geographic area defined as extending beyond the boundaries of the project area. No significant cumulative impacts were identified.

SUMMARY (COMMENT #9)

“While the scope of the analysis of cumulative impacts is inadequately defined in the SDEIS, such analysis of cumulative impacts that does appear in the SDEIS fails to provide any discussion of the impacts of the proposed project combined with the impacts of past, present and reasonably foreseeable future activities, whether by governmental or private entities. Instead, the discussion of cumulative impacts is a rehash of direct and indirect impacts of the proposed project. Direct and indirect impacts are not the same as cumulative impacts, and while cumulative impacts may be more difficult to quantify, they must be identified and analyzed.”

RESPONSE

For each resource category the SDEIS described cumulative impacts associated with The Arkansas River Navigation Project, Highway 247 Improvements, Industrial Development in the Arkansas River Bottoms near Russellville, Expansion of Soil and Gravel Excavation and Removal, Continuation of Agricultural Land Use, and Increases in Existing Arkansas River Commerce.

The analysis is consistent with *Sierra Club v. Marsh*, 976 F.2d 763, 767 (1st Cir. 1992), the court reviewed the issue of whether a particular indirect (secondary) impact was "...sufficiently likely to occur, that a person of ordinary prudence would take it into account in making a decision." The analysis is also consistent with FHWA guidance "Considering Cumulative Effects under the National Environmental Policy Act."

SUMMARY (COMMENT #9 cont.)

"The SDEIS also fails to provide adequate analysis of the potential direct, indirect, and cumulative effects of the anticipated increase of truck traffic as a result of the Intermodal Project. The SDEIS, in pages 12 through 21, discusses the vast difference in cargo capacity of barges over truck and rail capacity. For example, on p. 18 of the SDEIS appears a chart showing that one 15-barge tow has the carrying capacity of 2.25 100-car trains, and 870 large semi-trucks. Only one barge has the capacity of 58 large semi-trucks. However, the data in the SDEIS also shows that the vast majority of cargo in the United States is carried by truck."

RESPONSE

Table 4.3 of the SDEIS described the additional trucks estimated to be utilizing the general area once the intermodal facility is operating. In the SDEIS this table was located in the Affected Environment Section. This table and corresponding text will be moved to the indirect impacts section.

The facts listed in the example are not mutually exclusive. One barge does have the capacity of 58 semi-trucks, and the majority of cargo in the US is carried by truck. The development of Highway 247 and the cumulative effects were analyzed. The additional truck traffic would not measurably affect the Level of Service (LOS) for Highway 247 (Highway 247 Environmental Assessment FONSI, 2007).

SUMMARY (COMMENT #9 cont.)

"Obviously, if the Intermodal Project is successful, the transfer of barge cargo to trucks or trains will involve a much larger number of trucks in the area than are currently in use in the area. Unfortunately, the SDEIS also shows that the far greatest number of injuries and fatalities are sustained in connection with the truck mode of transportation than in barge or rail transportation, and that the number and volume of large spills of hazardous substances occur in connection with truck transportation than in rail or barge. Clearly, there will be direct, indirect and cumulative impacts from accidents and spills at or related to the proposed Intermodal Project that should be analyzed."

RESPONSE

Direct, indirect, and cumulative impacts associated with hazardous material spills are located in Section 4.17 of the document. The following paragraph will be added to indirect impacts in the land use sections of each action alternative: “Increased truck traffic associated with the intermodal facilities could result in minor long-term, adverse impacts to safety. Table 4.3 describes the increase in amount of truck traffic. This increase has the long-term potential to increase the number of accidents that occur on the roads in the general area surrounding the proposed project site.” However, by utilizing the Arkansas River for shipping, many trucks would have otherwise utilized regional highways will be removed from the highway network, thus increasing overall safety.

SUMMARY (COMMENT #9 cont.)

“Further, the concentration of truck, rail, and barge traffic at this proposed facility will cause large increases in air contamination due to emissions from diesel and gasoline engines, cargo, and spills of volatile liquids. The potential of the proposed facility for emission of greenhouse gases is inadequately analyzed and should be further evaluated, as well as the impact of those emissions on climate change.”

RESPONSE

Language will be added to the FEIS stating, “As shown on Table 4.3 of the SDEIS, a localized estimated increase of 9,437 truck loads/year is expected. This increase is expected to have a very minor long-term adverse impact on air quality due to emissions. Increased barge and rail traffic would also have minor long-term adverse impacts on air quality due to emissions. As mentioned in the affected environment, the Carbon Monoxide (CO) Microscale Analysis revealed CO levels much less than the NAAQS standards. Increases in emissions are not expected to increase CO or any VOC above NAAQS standards.

SUMMARY (COMMENT #9 cont.)

“Of particular concern to my clients is the potential direct, indirect, and cumulative impacts upon the City of Dardanelle and other low-lying areas should the Red or Green Alternatives – which appear to be favored in the SDEIS – be selected. If a levee is necessary to protect the Intermodal Project on either of those alternative sites from flooding in the Arkansas River during 100 and 500 year flood events, it seems intuitive that, due to filling of the floodplain on the north bank of the river directly across from Dardanelle, there would be an increase in the base flood elevation on the south bank of the river.

We note that the SDEIS contains Section 4.13 (p. 285), relative to Floodplains, that states that the Corps of Engineers conducted a floodplain study report that is contained in Appendix B of the SDEIS. The SDEIS also provides (p. 286) that the Red and Green Alternative hydraulic models “were developed by modifying the existing condition model using Authority supplied plans that included site plans and levees.” The Authority-

supplied plans for the site and levees were not included in Appendix B, and should be made available for public review and comment, as they clearly have an impact on the results of the modeling.

In addition, the modeling conducted by the Corps of Engineers shows an increase of 0.12 feet in water surface elevation at River Stations 203.38 and 202.10 during a 100-year flood, and of 0.27 and 0.26 feet, respectively, at those stations during a 500-year flood. However, there is no analysis of the direct, indirect, or cumulative impacts of an increase of that amount on the Project Area, including the south bank of the river. The analysis appears to be limited only to the Red and Green Alternative sites on the north bank.”

RESPONSE

The increase in water surface elevation for the proposed action is calculated from River Mile 205.25 to 198.22. Therefore, the analysis extends beyond the extent of the adjacent Red and Green Proposed Project Boundaries. The increases in water surface elevations reported in the Floodplain Analysis Report represent increases for the floodplain of the Arkansas River whether it be on the left or right (north or south) side of the river.

Section 3.3 of the Floodplain Analysis Report found in Appendix B states, “The Red and Green alternative hydraulic models were developed by modifying the existing condition model using Authority supplied plans.” Site mapping and elevation data is available from the Authority and can be supplied to the City of Dardanelle upon request, but it is not necessary to publish this mapping in the NEPA document.

SUMMARY (COMMENT #9 cont.)

In addition, the SDEIS fails to discuss the effect of the proposed Intermodal Project upon the existing barge terminals that are located immediately adjacent to the Red and Green Alternatives. The presence of an intermodal facility containing a slackwater harbor, and its socioeconomic and environmental impacts on those terminals, is a part of the human environment of the area and should be evaluated.

RESPONSE

Preparation of the DEIS relied on many sources and resources including, but not limited to, the following: AHTD, Planning and Research Division. Intermodal Transportation Needs-Economic Development Study: Potential Benefits and of Regional Transportation Center and Manufacturing-Freight Consolidation/Distribution Complex, August 1998; Dr. Gregory Hamilton et al. Economic Feasibility and Debt Capacity of the Russellville River Port Project, September 2002; Dr. Heather Nachtmann, Economic Evaluation of the Impact of Waterways on the State of Arkansas, July 2002; AHTD - Arkansas State Public Riverport Study and Needs Assessment, March 2005; and AHTD -Arkansas Statewide Long-Range Intermodal Transportation Plan, May 2002 and 2007 Update. In addition, interviews were conducted in January 2010 with industry experts, port operators, and economic development professionals in the port industry to gain a local,

regional, and national perspective of ports and intermodal facilities and to apply it to the SDEIS.

Data from these and other sources was the most recent best available data to use to compare the proposed Build Alternatives to the No Action Alternative. The details provided in Appendix C (Community Impact Assessment Technical Memorandum) and in the indirect impacts analysis for the Red and Green Alternative concerning adverse impacts to private ports in Dardanelle do satisfy NEPA Section 102(2) requirements.

SUMMARY (COMMENT #9 cont.)

Further, the SDEIS fails to consider or analyze the past development and current operations of the Port of Dardanelle and Oakley Port as part of the cumulative impacts of the Intermodal Project. The concentration of barge and truck traffic using those existing ports combined with the barge, truck, and rail traffic anticipated to use the proposed Intermodal Project has the synergistic potential to substantially increase air, noise, water, and surface pollution, and cause increased safety risks.

RESPONSE

The cumulative impacts for these facilities and others adjacent to the proposed project area have been discussed under “Industrial Development in the Arkansas River Bottoms near Russellville” and “Increase in Existing Arkansas River Commerce.” No substantial impacts were identified for air, noise, water, and surface pollution. In addition, no substantial safety risks were identified.

SUMMARY (COMMENT #9 cont.)

In addition, the SDEIS fails to consider or analyze the potential future cumulative impact of the discharge of wastewater from the City of Russellville’s wastewater treatment plant directly into the Arkansas River at a point that is on both the Red and Green Alternative sites. Since the early 2000s, the City of Russellville has proposed an amendment to its SPDES permit from its wastewater treatment plant that would allow it to discharge that wastewater into the Arkansas River. An amendment to its permit was granted by the Arkansas Department of Environmental Quality, but that permit was withdrawn by the City in 2008 for further environmental analysis.

The City of Russellville reportedly intends to pursue that permit amendment to allow such discharge, and has continued to conduct studies of the River and the surrounding area. It is therefore a reasonably foreseeable future project. The Arkansas River from the Dardanelle Dam to downstream of the proposed Intermodal Project has extended periods of very low, if any, flow. The City of Dardanelle’s intake for its drinking water system is located in the Arkansas River in that same reach of the River. Consequently, the cumulative impact of the addition of the Intermodal Project, with its slackwater harbor, and the proposed discharge from the City of Russellville should be carefully analyzed.”

RESPONSE

The wastewater treatment plant in Russellville has the capacity to treat the minor amount of wastewater that would be produced by the proposed project. No adverse impacts to wastewater treatment plant are expected, and no impacts to water quality due to wastewater produced by the proposed project are anticipated. Therefore, no cumulative impacts associated with the wastewater treatment plant are expected. However, should additional wastewater treatment capacity be necessary for specific intermodal facility users/operators, these users/operators would be responsible for appropriate permits and would coordinate with the ADEQ-Water Division.

Currently, the Russellville Wastewater Treatment Plant disposes its effluent into Whig Creek. Contact with the City of Dardanelle indicated that their primary drinking water supply was from a system of wells south and east of the city and not from the Arkansas River.

SUMMARY (COMMENT #10)

“Section 4.15 of the SDEIS, relative to endangered species, fails to give adequate consideration to the potential impact of the proposed Intermodal Project on the endangered Interior Least Tern, which nests on exposed river sandbars and reservoir beaches. The SDEIS notes that there is no suitable least tern habitat along the east side of the Arkansas River (we assume this is intended to apply only to the immediate area of the proposed Project), but does not mention whether there is a suitable least tern habitat along the west bank (also referred to herein as the south bank at this location). The aerial photographs and a visual inspection of the west/south bank indicates that there are sandbars present on that bank that may be suitable habitat for the interior least tern.

Notwithstanding that the proposed Intermodal development would occur on the east/north bank of the river, the potential for direct, indirect and cumulative impacts of the west/south bank from either construction or operation of the proposed Project is high, including impacts from noise, contamination, increased water levels that would flood the sandbars, and other sources. An investigation should be conducted to determine whether the interior least tern is present on any sandbank of the Arkansas River in the Project Area, which extends from Clarksville to Morrilton.”

RESPONSE

On page A-12 of Appendix A, the USFWS has stated that no federally listed endangered, threatened, or candidate species are present (USFWS 2010). If endangered species were to be effected by the proposed action, the USFWS would have requested Section 7 consultation in accordance with the Endangered Species Act. In addition, life history information for the interior least tern was reviewed. The types of preferred sandbar habitat (i.e., intermittently exposed bars that are not connected to land), does not exist in the project area.

SUMMARY (COMMENT #11)

“The No-Action Alternative is not sufficiently analyzed in the SDEIS. 42 CFR §1502.14 provides that the alternatives analysis is “the heart of the environmental impact statement;” that in preparing an alternatives analysis, agencies “shall rigorously explore and objectively evaluate all reasonable alternatives...,” and “include the alternative of no action.” This means that the no-action alternative should be as rigorously explored and objectively evaluated as all of the others. A mere conclusory statement that nothing will change, or that the anticipated benefits of the other alternatives being considered will not be realized, are not sufficient.”

RESPONSE

The no action alternative was fully evaluated in the SDEIS for every resource category listed.

Mr. Doyle McEntyre
City of Dardanelle, Alderman

SUMMARY

“...one of the main topics of concern was the removal of flood plain by the construction of a five hundred year flood levee around the proposed intermodal site. The study done on the flood plain, in the SDEIS, as it impacts the removal of that much flood surge holding area seems to be very limited in its scope. As this is one of the major points of contention with the whole project it would seem that this would have been a major thrust of the statement, but it is dealt with in a most cavalier manner in the very few pages dealing with this topic.”

RESPONSE

An extensive Floodplain Analysis Report has been provided in Appendix B. Floodplain impacts have been defined in the SDEIS utilizing the information provided by Floodplain Analysis Report. The USACE has confirmed that the Floodplain Analysis Report utilizes the best and most recent floodplain analysis data. The results from this analysis were used to develop the impacts to floodplains found in Section 4.13 of the SDEIS.

The SDEIS and Appendix B described the impacts to the floodplain downstream to the extent where the increase in surface water elevation is zero. The SDEIS has documented the expected floodplain impacts for each alternative downstream from the proposed action area until the increase in water surface elevation is zero (i.e., River Mile 198.22). It is important to note that the Green Alternative would have 739 acres within a protective levee, and the Red Alternative would have approximately 691 acres within the intermodal facilities levee and not 800 acres. In addition, excavation of the harbor will add a minor amount of flood storage capacity.

SUMMARY

“I have included some attachments of the planning area flood plain, as provided in the SDEIS, verses the flood plain as it is currently delineated on the Dardanelle FIRM (map number 05149C0160 E) on the opposite side of the river from the intermodal site. It appears that the study area was quite limited in its scope and neglected to take into consideration all of the Dardanelle flood plain. As can be seen looking at the study area, in the SDEIS, the Dardanelle flood plain stopped near the bank of the Arkansas River and failed to incorporate the part of the flood plain south and west of Dardanelle. Since this area is the location of the Dardanelle elementary, middle and high schools and associated infrastructures and several homes, not doing an exhaustive study of flood impact is not consistent with proper investigation as we believe NEPA requires.”

RESPONSE

There are differences in the base flood elevations for adjacent areas along the Arkansas River where the Yell County and Pope County Flood Insurance Rate Maps (FIRM) meet. The FIRM update for Yell County, effective in March 2002, based its mapping information along the Arkansas River through the project area based on the original study of the City of Dardanelle. It included analyses for the Arkansas River and Smiley Bayou, which were performed by the U.S. Army Corps of Engineers (USACE), Little Rock District, in 1969.” The Pope County FIRM update, effective March 2010, used this information as well; however, Pope County also incorporated the more current “U.S. Department of the Army, Corps of Engineers, Restudy of Arkansas River: Navigation Pool 9 and Dardanelle Reservoir, 1986 (unpublished).” These models and hydrology for the 1% annual chance flood event have been approved by the USACE Southwestern Division. In addition, FEMA approved all of the models when requested by the National Flood Insurance Program participating communities. The base flood elevations differ due to changes in the channel geometry, more detailed topographic information, and the development of more accurate computer modeling software and data.

The elevations from the Yell County FIRM should not be compared, because it is not based on the best and most recent information. The base flood elevation of 321.98 feet at mile 202.09 is the elevation for existing conditions. This elevation does not include either the Red or Green alternatives. With the Red and Green alternatives, the Floodplain Analysis Report shows that the base flood elevations are raised by 0.06 feet and 0.03 feet respectively.

The “Notes to Users” portion of the March 4, 2002 FIRM map states, “Users should be aware the Base Flood Elevations shown on the FIRM represent rounded whole-foot elevations. These Base Flood Elevations are intended for flood insurance rating purposes only and should not be used as sole source of flood elevation information.” The USACE elevation measurements in the Floodplain Analysis Report are more accurate than those provided on FIRM maps and use the latest floodplain data and modeling. FHWA hydraulic engineers have reviewed the USACE Report and HEC-RAS modeling.

Floodplain impacts have been defined in the SDEIS utilizing the information provided by Floodplain Analysis Report. The USACE has confirmed that the Floodplain Analysis Report utilizes the best and most recent floodplain analysis data and will supersede the elevation data presented in the current FIRM. FHWA hydraulic engineers have also reviewed the Floodplain Analysis Report.

The SDEIS and Appendix B have described the impacts to the floodplain downstream to the extent where the increase in surface water elevation is zero. It is important to note that the Green Alternative would have 739 acres within a protective levee, and the Red Alternative would have approximately 691 acres within the intermodal facilities levee and not 800 acres. In addition, excavation of the harbor will add a minor amount of flood storage capacity.

SUMMARY

“Past floods have proven to be problematic in this reach of the Arkansas River in that before a levee system was built early last century on the south side of the river, flooding blowout was a problem downstream of Dardanelle. As that old levee system, on the south side of the river, is no longer present, the squeeze caused by narrowing the channel by the intermodal levee and removing the surge area north of the river, a blowout condition will be facilitated. The old levee has not been kept up since no monies were allocated and the levee board maybe defunct. Roads and robbing of levee material has rendered this levee useless and is considered nonexistent by the USCOE. A blowout in this area would impact several farming, ranching and commercial operations and the Holla Bend National Wildlife Refuge as well as Dardanelle.”

“We believe that altering the flood plain in this reach of the river can be dangerous and far reaching in its impacts to the areas that are low lying and prone to water inundation.”

RESPONSE

Using the Floodplain Analysis Report provided by the USACE, the SDEIS has documented the expected floodplain impacts for each alternative downstream from the proposed action area until the increase in water surface elevation is zero (i.e., River Mile 198.22). The locations mentioned in the comment above are further downstream from River Mile 198.22. According the USACE, no impacts two miles downstream would be anticipated. It is important to note that the Green Alternative would have 739 acres within a protective levee, and the Red Alternative would have approximately 691 acres within the intermodal facilities levee and not 800 acres. In addition, excavation of the harbor will add a minor amount of flood storage capacity.

SUMMARY

“Another main topic of the informational meeting was the impact of the proposed intermodal facility on industry all ready established in the area near the site, most specifically the Port of Dardanelle. The unfair competition it will be subjected to when the intermodal slack water harbor is constructed and begins subsidized operation in

competition with the tax paying Port of Dardanelle located just north of the intermodal facility.”

“Since a large part of the industry on the north side of the river, in the area of the intermodal facility, is in the Dardanelle School District, the closing or moving of industry as a result of the intermodal facility is of concern. Again with this being a major concern of the people most affected by the building of the intermodal facility it would seem that a most careful study of these points would have been addressed in a logical and empirical manner instead of a rah-rah chamber of commerce fashion based on what they think or hope will happen. Facts are that the Oakley Port of Dardanelle has approached what industry is in the area and have not been rewarded with any increase in use. But the selling points of the intermodal study always base their benefits on an intermodal site with 30 plus industries locating and using the site. Empirical data does not hold true for such an influx of use due to the nature of the industry in the service area.”

RESPONSE

NEPA requires that all impacts, beneficial and adverse, are discussed in the SDEIS. However, a benefit/cost analysis is not essential or required to comply with NEPA regulations.

Preparation of the DEIS and SDEIS relied on many sources and resources including, but not limited to, the following: AHTD, Planning and Research Division. Intermodal Transportation Needs-Economic Development Study: Potential Benefits and of Regional Transportation Center and Manufacturing-Freight Consolidation/Distribution Complex, August 1998; Dr. Gregory Hamilton et al. Economic Feasibility and Debt Capacity of the Russellville River Port Project, September 2002; Dr. Heather Nachtman, Economic Evaluation of the Impact of Waterways on the State of Arkansas, July 2002; AHTD - Arkansas State Public Riverport Study and Needs Assessment, March 2005; and AHTD -Arkansas Statewide Long-Range Intermodal Transportation Plan, May 2002 and 2007 Update. In addition, interviews were conducted in January 2010 with industry experts, port operators, and economic development professionals in the port industry to gain a local, regional, and national perspective of ports and intermodal facilities and to apply it to the SDEIS.

Data from these and other sources was the most recent best available data to use to compare the proposed Build Alternatives to the No Action Alternative. The details provided in Appendix C (Community Impact Assessment Technical Memorandum) and in the indirect impacts analysis for the Red and Green Alternative concerning adverse impacts to private ports in Dardanelle do satisfy NEPA Section 102(2) requirements. Specific economic extrapolation or forecasting using existing data would be speculative in nature and could be misleading to the public.

SUMMARY

“If you only take the intermodal’s view of the project, the SDEIS does not even taken into consideration any increased rail traffic through Russellville and the impact it will

have on an elementary school the railroad track passes by, as to the transportation of any hazardous material causing the school to have evacuation plans or safe shelter areas and the increased traffic congestion caused by railroad street crossings.”

RESPONSE

Impacts associated with increased rail usage are discussed in Section 4.4.2.2.2 and impacts associated with potential spills were discussed in Section 4.17.2.2.2 of the SDEIS. Increased traffic capacity from improving Highway 247 would alleviate traffic congestion in and around Russellville.

SUMMARY

“These are but a few of the areas that we feel have not been addressed adequately in the SDEIS and thus would like to request an independent external peer review initiated by FHWA for the Chief of Engineers to determine that the project study is controversial considering the factors set forth to look at the project by an independent panel of experts and bring some true peace of mind to a lot of people affected by this project.”

RESPONSE

According to Section 2034 of the Water Resources Development Act (121 STAT.1086, PL 110-114), a project must meet one of the mandatory criteria for IEPR. These criteria are:

- 1) total cost more than \$45 million;
- 2) Governor of Arkansas requests an IEPR;
- 3) Chief of Engineers determines project is controversial based on factors describe in Paragraph (4) in Section 2034. A project study is controversial if:
 - a) there is a significant public dispute as to the size, nature, or effects of the project; or
 - b) there is a significant public dispute as to the economic or environmental costs or benefits of the project.

In addition, under Section 2034 (33 U.S.C 2343), discretionary IEPR may be considered by Chief of Engineer if the need of a Federal or state agency “...determines that the project is likely to have a significant impact on environmental, cultural, or other resources under the jurisdiction of the agency....” No Federal or state agency has requested an IEPR. The USACE is a cooperating agency on this project and FHWA is the lead agency. FHWA hydraulic engineers have reviewed and approve the flood study for this project.

Mr. Bobby L. Day, Airport Manager
Russellville Regional Airport

SUMMARY

“As the director of a part of the river valley transportation infrastructure, I see the intermodal project as an excellent compliment to existing area transportation facilities

and ongoing projects. Adequate transportation is a key prerequisite for the economic development of any area. The Arkansas River is one transportation mode which is not nearly developed to its potential in this area. A modern barge loading facility with efficient possibilities to transition loads to or from ground transportation for connection to the region would be an enabler for attracting various industries to the area. In the end, that raises the standard of living of everyone nearby.”

RESPONSE

Mr. Day’s comments on the project have been noted by the FHWA. No response is necessary.

Ms. Ann Beavers

SUMMARY

“Green. Fewer people displaced, no flooding issues, needed for economic growth.”

RESPONSE

Ms. Beavers’ comments on the project have been noted by the FHWA. No response is necessary.

Mr. Horace Beavers

SUMMARY

“Green gives no flooding issues, less displacement of people, good economic growth.”

RESPONSE

Mr. Beavers’ comments on the project have been noted by the FHWA. No response is necessary.

Mr. Charles Blanchard

SUMMARY

“Green – most convenient to serve industry, best cost, most efficient, closer to existing industry, currently served by Highway 247. Disappointed it has taken so long.”

RESPONSE

Mr. Blanchard’s comments on the project have been noted by the FHWA. No response is necessary.

Mr. Jim Bradley

SUMMARY

“I prefer the Green area because closer to existing industry, more economical to build infrastructure. We need the project to provide future economic development. One concern [I have] is the choice of the purple site which is away from the navigation channel and another cost driver is the additional dirt work (land prep) plus no access roads.”

RESPONSE

Mr. Bradley’s comments on the project have been noted by the FHWA. No response is necessary.

Mr. Sid Brain

SUMMARY

“The proposed project is very important to the continued economic growth and stability of this area. It should be completed as soon as possible. Our children and grandchildren should not have to go to the city to get a job!

The Green (and Red) Alternatives are closer to potential and existing users as well as being better located to use all modes of transportation. The Green has less impact on woodlands and views from the river.

The Green also has some less river load increase (although both are practically non-existent).”

RESPONSE

Mr. Brain’s comments on the project have been noted by the FHWA. No response is necessary.

Mr. Dale Brown

SUMMARY

“Red – location to highway and railroad. Would like to proceed as soon as possible due to the economy and the need for new jobs in the area. This project would be a start in the direction the Russellville area needs to be going in.”

RESPONSE

Mr. Brown’s comments on the project have been noted by the FHWA. No response is necessary.

Ms. Nancy M. Canerday

SUMMARY

“Green – the best site for local economic development.”

Issues and concerns about the project: “Length of time to get project completed.”

“This would be a great benefit to our area.”

RESPONSE

Ms. Canerday’s comments on the project have been noted by the FHWA. No response is necessary.

Ms. Amy Carpenter

SUMMARY

“Green – less people displaced. The project is vital to the growth of the River Valley!”

RESPONSE

Ms. Carpenter’s comments on the project have been noted by the FHWA. No response is necessary.

Mr. Kole Carpenter

SUMMARY

“Green – minimal flooding, less people affected. This project is essential to the vitality of the River Valley.”

RESPONSE

Mr. Carpenter’s comments on the project have been noted by the FHWA. No response is necessary.

Ms. Brooke Chandler

SUMMARY

“Green. There will be fewer people affected and it won’t have a big impact on the flooding. This project will be an economic improvement for the River Valley area.”

RESPONSE

Ms. Chandler’s comments on the project have been noted by the FHWA. No response is necessary.

Mr. Tommy Chandler and Mrs. Rita Chandler

SUMMARY

“We support the River Valley Intermodal project. We look forward to growth and development in the River Valley as a result of this project and hope for expansion and progress in the job markets.”

RESPONSE

Mr. and Ms. Chandler’s comments on the project have been noted by the FHWA. No response is necessary.

Mr. Richard Downes

SUMMARY

“Green. It will help out the river valley the most.”

RESPONSE

Mr. Downes comments on the project have been noted by the FHWA. No response is necessary.

Mr. Jerry Duvall

SUMMARY

“Green. I am Mayor of Pottsville. This location is the best for roads and rails. It will have the least environmental impact.”

RESPONSE

Mr. Duvall’s comments on the project have been noted by the FHWA. No response is necessary.

Mr. Lonnie Duvall

SUMMARY

“Green – this site will be better for the River Valley. This site will have better access. This site is closest to the existing industry. It will have lower maintenance cost.”

RESPONSE

Mr. Duvall’s comments on the project have been noted by the FHWA. No response is necessary.

Mr. Bill Eaton

SUMMARY

“Green – this is the most feasible site due to its location proximity to existing industry. The highway cross sections are more advantageous at this site. The navigation channel location to site location is an advantage at the Green site. As a city councilman of Russellville, the impact of having a site in Johnson County would be difficult for the city of Knoxville and the county itself to support.”

RESPONSE

Mr. Eaton’s comments on the project have been noted by the FHWA. No response is necessary.

Ms. Sharon Eaton

SUMMARY

“Green – it just makes sense to have it near Dardanelle and Russellville. The business will need houses for employees and it will be available here. The site would be closer to the channel.”

RESPONSE

Ms. Eaton’s comments on the project have been noted by the FHWA. No response is necessary.

Ms. Becky Ellison

SUMMARY

“Green – this would be the best site of economic growth in our area. It would be great to have this project completed to bring more business development to our area.”

RESPONSE

Ms. Ellison’s comments on the project have been noted by the FHWA. No response is necessary.

Ms. Pam Ennis

SUMMARY

“Green – good road access to this area, rail access close, close to the existing industry.”

Issues and concerns about the project: “the length of time this project has taken to complete.”

RESPONSE

Ms. Ennis's comments on the project have been noted by the FHWA. No response is necessary.

Mr. Jason Epperson

SUMMARY

"Green – we need the economic growth we have been missing out on."

RESPONSE

Mr. Epperson's comments on the project have been noted by the FHWA. No response is necessary.

Mr. David A. Freeman

SUMMARY

"Green – lower maintenance cost, closer to existing industry, access being put in place."

"This project has taken too long and needs to be completed."

RESPONSE

Mr. Freeman's comments on the project have been noted by the FHWA. No response is necessary.

Ms. Donna Freeman

SUMMARY

"Green – land usage looks better."

"Missing options for additional industry in Pope County. Project really moving slow. The County really needs this for additional industry."

RESPONSE

Ms. Freeman's comments on the project have been noted by the FHWA. No response is necessary.

Mr. Marvin Gerlach

SUMMARY

"The Green site is strategically located near rail and interstate. The other sites are not as suitable."

Issues and concerns about the project: “The city of Dardanelle’s concern about flooding.”

“This proposed project will be beneficial to existing industries and should serve to attract new industry.”

RESPONSE

Ms. Gerlach’s comments on the project have been noted by the FHWA. No response is necessary.

Mr. Jim Ed Gibson

SUMMARY

“Green – closer to local industry, currently has access by Highway 247, would serve the people of the River Valley better. Taken too long to complete.”

RESPONSE

Mr. Gibson’s comments on the project have been noted by the FHWA. No response is necessary.

Mr. Sidney Gray

SUMMARY

“Green – it would give better access, lower maintenance costs, and be closer to the existing industries.”

RESPONSE

Mr. Gray’s comments on the project have been noted by the FHWA. No response is necessary.

Ms. Suzy Griffin

SUMMARY

“I fully support the proposed Intermodal project. I favor the green alternative. This project needs to be fast-tracked. Two of the major benefits that I see as a result of the reduction in truck traffic are infrastructure maintenance costs going down, and the air quality improving. This project also puts our area in a more competitive position to attract new industry.”

RESPONSE

Ms. Griffin’s comments on the project have been noted by the FHWA. No response is necessary.

Ms. Jeanette Hale

SUMMARY

“The Green site would displace fewer families. There have been considerable road improvements to the highway servicing the Green site and is nearer a designated truck route. Since this project has been driven by Russellville citizens, for the most part, I feel that moving the project from the original Green site would diminish the local interest and success of the project.”

RESPONSE

Ms. Hale’s comments on the project have been noted by the FHWA. No response is necessary.

Mr. Benny Harris

SUMMARY

“Green proposal appears to be the best alternative decision considering flooding and displacement of people. Provide should provide a significant economic benefit to Pope and Yell County.”

RESPONSE

Mr. Harris’s comments on the project have been noted by the FHWA. No response is necessary.

Ms. Lavern Harris

SUMMARY

“Green appears to be more appealing and a much better alternative as fewer people are or will be affected with flooding issues. Pope and Yell County should both benefit economically with this project.”

RESPONSE

Ms. Harris’s comments on the project have been noted by the FHWA. No response is necessary.

Ms. Debbie Hernandez

SUMMARY

“Green – less people displaced, minimal flooding. This project is a very important part of growing and strengthening the River Valley.”

RESPONSE

Ms. Hernandez's comments on the project have been noted by the FHWA. No response is necessary.

Mr. Gerald Hook

SUMMARY

"Prefer 'Green' site due to proximity to rail and highway access. Also, this site is closer to navigation channel."

RESPONSE

Mr. Hook's comments on the project have been noted by the FHWA. No response is necessary.

Ms. Rebecca Hopkins

SUMMARY

"Green. Minor impact to floodplain and would be less noticeable. Jobs would be created during and following the project."

RESPONSE

Ms. Hopkins' comments on the project have been noted by the FHWA. No response is necessary.

Mr. Marcus Huggard

SUMMARY

"Green – This site will be better for the River Valley. This site will have better access. This site is closest to the existing industry. It will have lower maintenance cost."

RESPONSE

Mr. Huggard's comments on the project have been noted by the FHWA. No response is necessary.

Mr. Paul Hull

SUMMARY

"Green – location to city and appears to be cheaper to construct. I think the Green site is much better. The Green site looks like it would have more land for industry."

Issues and concerns about the project: "That it won't start within the next five years."

“This project would have my full support.”

RESPONSE

Mr. Hull’s comments on the project have been noted by the FHWA. No response is necessary.

Mr. Kurt Jones

SUMMARY

“Green – much closer to existing industry and infrastructure. Site is better suited for building. No negative concerns. I would like to see this project proceed as quickly as possible.”

RESPONSE

Mr. Jones’s comments on the project have been noted by the FHWA. No response is necessary.

Mr. Robert L. Laster

SUMMARY

“Green – cheapest. The grade on the Purple site does not work well for the rail road. Waterways Commission has commented on the needs of additional harbor sites.”

RESPONSE

Mr. Laster’s comments on the project have been noted by the FHWA. No response is necessary.

Mr. Allen Laws

SUMMARY

“Green, I feel this is the best, least disruptive alternative. It is least expensive and closest to existing industry and infrastructure. I would have liked to include airport facilities, but that is not possible.”

RESPONSE

Mr. Law’s comments on the project have been noted by the FHWA. No response is necessary.

Mr. Mike McCoy

SUMMARY

“Green – this alternative is the least expensive and closest to existing industry. This site appears to be the best for development. This project is very important for the economic development.”

RESPONSE

Mr. McCoy’s comments on the project have been noted by the FHWA. No response is necessary.

Ms. Laura McGuire

SUMMARY

“Green – this area will be close to the existing industry, lower cost, better location.”

RESPONSE

Ms. McGuire’s comments on the project have been noted by the FHWA. No response is necessary.

Ms. Rhonda McKown

SUMMARY

“Green – maintenance not as costly, closer proximity, access to facility put in place.”

RESPONSE

Ms. McKown’s comments on the project have been noted by the FHWA. No response is necessary.

Mr. Danny Minks

SUMMARY

“Green – because of its location. We have missed several industries coming to the area due to time delays. I just hope it starts soon.”

“I support this project and think it would be great for the future of this area.”

RESPONSE

Mr. Minks’ comments on the project have been noted by the FHWA. No response is necessary.

Ms. Lisa M. Mize

SUMMARY

“Green area best suited for this project, good access and close to existing industry.”

RESPONSE

Mr. Mize’s comments on the project have been noted by the FHWA. No response is necessary.

Mr. Johnny Morgan

SUMMARY

“Green – Pope and Yell counties have missed numerous opportunities due to lack of multi-modal facilities.”

“Purple site has too much slope for rail and site development.”

“The State of Arkansas and Waterways Commission have stated that more harbor sites are needed along river to improve efficiency.”

RESPONSE

Mr. Morgan’s comments on the project have been noted by the FHWA. No response is necessary.

Ms. Debbie Motley

SUMMARY

“Green – because it is closer to highway and rail access and cost would be less.”

“In today’s market competing for industries we need the river access to compete with other areas that already have intermodal facilities in place. This project needs to get underway ASAP so cost can be locked in.”

RESPONSE

Ms. Motley’s comments on the project have been noted by the FHWA. No response is necessary.

Ms. Delores L. Motley

SUMMARY

“Green. No flooding issues. Fewer people affected. Needed for economic growth.”

RESPONSE

Ms. Motley's comments on the project have been noted by the FHWA. No response is necessary.

Mr. Bert Mullens

SUMMARY

"Green Alternative – Easy access to Highway 247 which connects to Interstate 40. This site has access to a short line rail service. The location is near to present manufacturing facilities and offers the best opportunities for attracting new industry which would result in additional jobs and therefore create economic growth and development."

Issues and concerns about the project: "just getting it built as soon as possible."

"It is important we move forward on this project for the growth and development of the entire River Valley area."

RESPONSE

Mr. Mullens' comments on the project have been noted by the FHWA. No response is necessary.

Mr. Charles W. Oates

SUMMARY

"Green is the best site to use."

RESPONSE

Mr. Oates' comments on the project have been noted by the FHWA. No response is necessary.

Ms. Stacy Pack

SUMMARY

"Green – presently we have a major road upgrade in the area. It will be closer to existing industry. It will be more beneficial to the River Valley."

RESPONSE

Ms. Pack's comments on the project have been noted by the FHWA. No response is necessary.

Mr. Tommy Parker

SUMMARY

“Green – seems to be the best site for economic development.”

Issues and concerns about the project: “why it isn’t already done.”

RESPONSE

Mr. Parker’s comments on the project have been noted by the FHWA. No response is necessary.

Mr. Jeff Pipkin

SUMMARY

“The Green Alternative makes the most sense to me since the City of Russellville has already purchased almost 300 acres either within this site or adjacent to it. The City’s land is perfect for industrial use.”

“I’m only concerned about more possible delays whether it’s funding, litigation, environmental or whatever. We have been working on this way too long.”

RESPONSE

Mr. Pipkin’s comments on the project have been noted by the FHWA. No response is necessary.

Ms. Pamela Randle

SUMMARY

“Green. I think this is something that would be good for our areas – both Yell and Pope Counties. This project would be advantageous to all of the River Valley.”

RESPONSE

Ms. Randle’s comments on the project have been noted by the FHWA. No response is necessary.

Ms. Rebecca Reaves

SUMMARY

“I feel the Green Alternative would be the best choice. I feel this is a great project that will be most beneficial to the whole area.”

RESPONSE

Ms. Reaves' comments on the project have been noted by the FHWA. No response is necessary.

Mr. Roy Reaves

SUMMARY

"Green – has no significant impact on flooding! The dam around the project is set back from the river. The dam around the project is set back from the river."

"It will be a great economic stimulus to this area for many years to come."

RESPONSE

Mr. Reaves' comments on the project have been noted by the FHWA. No response is necessary.

Ms. Joan Sadler

SUMMARY

"Green – best for this area."

RESPONSE

Ms. Sadler's comments on the project have been noted by the FHWA. No response is necessary.

Mr. Elnor Shannon

SUMMARY

"Green – closer to existing industry, lower maintenance cost."

RESPONSE

Mr. Shannon's comments on the project have been noted by the FHWA. No response is necessary.

Mr. Bill Sorrells

SUMMARY

"The Green site is better situated and suited for the facility."

Issues and concerns about the project: "the timeframe to get the project initiated."

“Quicken the process.”

“This will be a wonderful economic attribute to the river valley area for existing industry and future ones.”

RESPONSE

Mr. Sorrells’ comments on the project have been noted by the FHWA. No response is necessary.

Mr. Steven Sparks

SUMMARY

“The Green site is the best option for development, closer to existing industry.”

“One should just look at our history of the railroad being built in Russellville to see what a project like this will do for our local economic development.”

RESPONSE

Mr. Sparks’ comments on the project have been noted by the FHWA. No response is necessary.

Ms. Carmen Stump

SUMMARY

“Green – need more economic development in the region. This Green option is the best on cost, has fewer impacts. The Purple alternative is too expensive and the operations and expenses are too high. ”

RESPONSE

Mr. Stump’s comments on the project have been noted by the FHWA. No response is necessary.

Ms. Fern Tucker

SUMMARY

“Green – lower cost, State is presently upgrading the access road in this area, close to railroad spur, close to other industry.”

RESPONSE

Ms. Tucker’s comments on the project have been noted by the FHWA. No response is necessary.

Mr. Norman Watson

SUMMARY

“I prefer the Green alternative because the infrastructure is either already in place or least costly to put in place. Operation and maintenance are the most reasonable.”

“The Purple alternative seems to be the most expensive to construct. There is no existing industry use this area near Knoxville.”

RESPONSE

Mr. Watson’s comments on the project have been noted by the FHWA. No response is necessary.

Mr. Chad Weisler

SUMMARY

“Green is the best option. This is because of the amount of land to develop. It also does not include a low or wet area.”

Issues and concerns about the project: “Time – this is a needed item for our area. It would help bring industry to both Russellville and Dardanelle, which in turn provides more jobs.”

Changes: “Rush!”

“I strongly support this project.”

RESPONSE

Mr. Weisler’s comments on the project have been noted by the FHWA. No response is necessary.

Ms. Hilda Wesley

SUMMARY

“Green has no significant impact on flooding and is most advantageous for Yell and Pope County. Less amount of people affected. The project will be an economic advantage to the River Valley.”

RESPONSE

Ms. Wesley’s comments on the project have been noted by the FHWA. No response is necessary.

Ms. Hilery Wesley

SUMMARY

“Green would be most effective for Pope and Yell County. Doesn’t change flooding much. Will benefit all of the Valley area.”

RESPONSE

Ms. Wesley’s comments on the project have been noted by the FHWA. No response is necessary.

Mr. Matt White

SUMMARY

“I would prefer the Green site due to its proximity to existing industry and my understanding that it would be less costly than some other site such as the purple site.”

Issues and concerns about the project: “The slow progress of the project. This project needs to move forward as soon as possible. Especially with the potential benefits it could bring to the River Valley.”

RESPONSE

Mr. White’s comments on the project have been noted by the FHWA. No response is necessary.

Ms. Annette Whittenburg

SUMMARY

“Green – this seems to be the most logical choice for a good road access that is close to the existing industry.”

RESPONSE

Ms. Whittenburg’s comments on the project have been noted by the FHWA. No response is necessary.

Ms. Karen Whittenburg

SUMMARY

“Green. Minimal flooding, less people dislodged. This project is vital to the growth of our River Valley!”

RESPONSE

Ms. Whittenburg's comments on the project have been noted by the FHWA. No response is necessary.

Mr. Robert D. Wiley

SUMMARY

"Green."

RESPONSE

Mr. Wiley's comments on the project have been noted by the FHWA. No response is necessary.

Mr. Jared Wood

SUMMARY

"Green Alternative would be the best option. This is a very important Project for Russellville and the River Valley."

RESPONSE

Mr. Wood's comments on the project have been noted by the FHWA. No response is necessary.

Mr. Jeff Wright

SUMMARY

"Green best location for the project."

RESPONSE

Mr. Wright's comments on the project have been noted by the FHWA. No response is necessary.

**A.3 COPIES OF ORIGINAL COMMENT CARDS AND LETTERS RECEIVED
DURING THE OFFICIAL SDEIS PUBLIC REVIEW PERIOD**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

OCT 5 2010

Randal Looney
Environmental Specialist
Federal Highway Administration
700 West Capitol Avenue
Little Rock, AR 72201-3298

Dear Mr. Looney:

In accordance with our responsibilities under Section 309 of the Clean Air Act, the National Environmental Policy Act (NEPA), and the Council on Environmental Quality (CEQ) Regulations for Implementing NEPA, the U.S. Environmental Protection Agency (EPA) Region 6 office in Dallas, Texas, has completed its review of the Supplemental Draft Environmental Impact Statement (SDEIS) for the proposed River Valley Intermodal Facilities, Pope County, Arkansas. The River Valley Intermodal Facility Authority seeks to establish intermodal facilities to promote economic development, transportation capacities, competitiveness, and job creation in the Arkansas River Valley.

EPA rates the SDEIS as "LO," i.e., EPA has "**Lack of Objections**" to the proposed action as described in the DSEIS. However, we have enclosed some general comments detailed comments for your consideration which we believe would strengthen the Supplemental Final EIS (SFEIS). Our classification will be published in the Federal Register according to our responsibility under Section 309 of the Clean Air Act to inform the public of our views on proposed Federal actions. If you have any questions, please contact Michael Jansky of my staff at 214-665-7451 or by e-mail at jansky.michael@epa.gov.

EPA appreciates the opportunity to review the SFEIS. Please send our office two copies of the SFEIS when it is sent to the Office of Federal Activities, EPA (Mail Code 2252A), Ariel Rios Building, 1200 Pennsylvania Ave, N.W., Washington, D.C. 20460.

Sincerely yours,

for Craig Weeks, Acting Chief
Office of Planning and
Coordination (6EN-XP)

Enclosure

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Recycled Paper (40% Postconsumer)

**DETAILED COMMENTS
ON DETAILED
RIVER VALLEY INTERMODAL FACILITIES
SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT
US ARMY CORPS OF ENGINEERS AND FEDERAL HIGHWAY
ADMINISTRATION
Near Russellville, Arkansas**

Environmental Justice Comments:

Summary EJ Assessment: This Supplemental DEIS analyzes three possible options and a “no action alternative” regarding building an intermodal (rail, barge and highway) facility for the transport/delivery of goods on the Arkansas River near Russellville, Arkansas. The purpose of this project is to promote economic development and job creation in a six-county region in the Arkansas River Valley. The SDEIS carefully analyzed the three alternate sites and the “No Action” alternative, and it appears that environmental justice (EJ) considerations were taken into account in all the analyses and determinations. There is no indication in this SDEIS that low-income or minority communities would be impacted in a disproportionate or adverse manner as a result of the construction or maintenance of this project.

Recommendation: One additional tribal nation should have been afforded an opportunity for consultation. The Wichita and Affiliated Tribes (Wichita Proper, Waco, Keechi, and Tawakoni) have occupied parts of western Arkansas and eastern Oklahoma for many years prior to European contact. It seems the Arkansas SHPO should have advised the writers of the SDEIS to consult with the Wichita as well. (See Tribal Concerns section)

Background: The project would entail building a “slackwater harbor” (a port out of the main channel of the river to allow for loading/offloading of barges without impeding river traffic) and for rail/truck, truck/barge, and rail/barge loading and offloading. A complex of warehouses and material storage would also eventually be built. This facility would enable Arkansas to have access to the Mississippi River transportation corridor.

Potential Sites: Nine possible sites were selected originally for further study. A “No Action” alternative was also selected for consideration, and three of the nine were chosen for additional study, the “Red Alternative,” the “Green Alternative,” and the “Purple Alternative.” All the sites were on or very near the Arkansas River. Some would have more negative environmental impacts than others, but the information is well laid out.

EJ Implications: The three potential sites are in semi-rural areas that reflect minority levels lower than the State’s level, and two of the three have lower poverty levels than the State’s level.

- The Red and Green Alternatives have a population that is less than 5% minority, and a 22% poverty level.
- In the Purple Alternative, there are no minorities, and 16% of the population is below the poverty level.

- These figures contrast with Arkansas's 19.2 % minority population and 17.3% below poverty level.

This project will require the relocation of some households.

- The Red Alternative will potentially require the relocation of 8 households;
- The Green Alternative will potentially require the relocation of 6 households;
- The Purple Alternative will entail the location of 15 households, six of which would be considered businesses, since they are family farms

Mitigation measures are clearly laid out. Homeowners would receive replacement value for their properties, and although it is unfortunate that the residents would have to move, the whole region will benefit financially and the residents will be provided new homes if this project goes forward. There will be no disproportionate and adverse impact suffered by the low-income or minority residents impacted by this project as described in this SDEIS.

Tribal Concerns: Although no Indian Tribes reside in the area, Tribal consultation was employed to notify certain tribes about the potential areas of construction and to learn if they had concerns that sites in their historical lands might be impacted by the construction. Fourteen Native American groups may have historical ties to the project area. These groups include:

- Alabama-Quassarte Tribal Town of the Creek Nation of Indians, Oklahoma
- Caddo Nation of Oklahoma
- Cherokee Nation of Oklahoma
- Chicasaw Nation of Oklahoma
- Choctaw Nation of Oklahoma
- Eastern Band of the Cherokee Indian Nation, North Carolina
- Kialegee Tribal Town, Oklahoma
- Jena Band of the Choctaw Indians, Louisiana
- Mississippi Band of Choctaw Indians, Mississippi
- Osage Nation of Oklahoma
- Poarch Band of Creek Indians, Alabama
- Quapaw Tribe of Oklahoma
- Thlopthlocco Tribal Town of the Creek Indian Nation of Oklahoma, and
- United Keetoowah Band of Cherokee Indians

Consultation was begun with these groups in 2005, and they were asked to assist in identifying whether locations of religious/cultural significance might be found in the proposed project area. While these tribes listed above have had a presence in the project area (some for a much shorter time than others), one additional tribal nation should have been afforded an opportunity for consultation. The Wichita and Affiliated Tribes (Wichita Proper, Waco, Keechi, and Tawakoni) have occupied parts of western Arkansas and eastern Oklahoma for many years prior to European contact. The Wichita people have also raised the issue of Spiro Mounds in eastern Oklahoma being related to the Keechi. Spiro is located east of the project area but still within the range of any aboriginal people living in the area. It seems the Arkansas SHPO should have advised the writers of the SDEIS to consult with the Wichita as well.

It appears that all other aspects of the consultation by the group is satisfactory. The SDEIS provides a list of tribes contacted and the responses received back (from the Cherokee Nation and Quapaw Tribe. The SDEIS writers' efforts have been satisfactory up to the date of the EIS. The SDEIS does identify potential impacts to affected areas and tribes appear to have been given an opportunity to comment. Tribes listed by the Arkansas SHPO appear to have been contacted at least twice by mail (2005 & 2010) and one meeting was held in Arkansas.

At the Tribal scoping meeting, only representatives of the Caddo Nation of Oklahoma attended, but no other Tribal groups participated. Consultation will continue with the groups during the decision-making process. In the event that any concerns arise, proper channels and mechanisms will be followed to ensure the protection of historical Indian sacred sites and archeological treasures, according to the SDEIS. It appears that proper steps have been put in place to ensure that Tribal concerns are addressed in accordance with NEPA.



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

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PEP/NRM



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JES
RTZ
6AD

ER10/705

OCT 13 2010

Ms. Sandra L. Otto
Division Administrator
Federal Highway Administration
700 West Capitol Avenue, Room 3130
Little Rock, Arkansas 72201

Dear Ms. Otto:

As requested, the Department of the Interior (Department) has reviewed the Supplemental Draft Environmental Impact Statement for the **River Valley Intermodal Facilities near Russellville, Pope County, Arkansas**. The Department offers the following comments for your consideration.

Section 4(f) Comments

The Department would concur with the determination by the Federal Highway Administration (FHWA) and the Arkansas Highway and Transportation Department (AHTD) that there are no properties eligible to be considered under Section 4(f) of the Department of Transportation Act of 1966 (48 U.S.C. 1653(f)) in the project area. Alternatives with potential impacts to these types of properties were dismissed from further consideration in this study, with the caveat that should the FHWA and the AHTD become aware of eligible properties as the study progresses, an evaluation will then be prepared.

The Department has a continuing interest in working with the FHWA and the AHTD to ensure impacts to resources of concern to the Department are adequately addressed. For continued consultation and coordination with the issues concerning Section 4(f) resources, please contact Regional Environmental Coordinator Nick Chevence, Midwest Regional Office, National Park Service, 601 Riverfront Drive, Omaha, Nebraska 68102, telephone 402-661-1844.



We appreciate the opportunity to provide these comments.

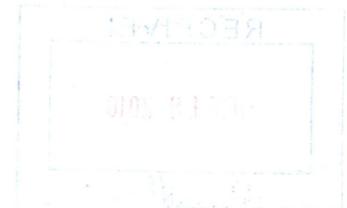
Sincerely,



Willie R. Taylor
Director, Office of Environmental
Policy and Compliance

cc:
Mr. Dan Flowers, Director
Arkansas State Highway and Transportation Department
Post Office Box 2261
Little Rock, Arkansas 72203

Mr. Sid Brain, Chairman
River Valley Intermodal Facility Authority
708 West Main Street
Russellville, Arkansas 72801



U. S. Department of Homeland Security
FEMA Region 6
800 North Loop 288
Denton, TX 76209-3698



FEMA

FEDERAL EMERGENCY MANAGEMENT AGENCY
REGION VI
MITIGATION DIVISION

**PUBLIC NOTICE REVIEW/ENVIRONMENTAL
CONSULTATION**

We have no comments to offer. We offer the following comments:

**WE WOULD REQUEST THAT THE COUNTIES FLOODPLAIN ADMINISTRATORS
BE CONTACTED FOR THE REVIEW AND POSSIBLE PERMIT REQUIREMENTS
FOR THIS PROJECT.**

REVIEWER: *Mayra G. Diaz*
Natural Hazards Program Specialist

DATE: *11/15/10*

If additional jurisdictions are involved in the project or if you have any questions, please contact me at 940-898-5541.

Our apologies for not answering sooner.



**The Department of
Arkansas
Heritage**

Mike Beebe
Governor

Cathie Matthews
Director

Arkansas Arts Council

*

Arkansas Natural Heritage
Commission

*

Delta Cultural Center

*

Historic Arkansas Museum

*

Mosaic Templars
Cultural Center

*

Old State House Museum



**Arkansas Historic
Preservation Program**

1500 Tower Building
323 Center Street
Little Rock, AR 72201
(501) 324-9880
fax: (501) 324-9184
tdd: (501) 324-9811

e-mail:

info@arkansaspreservation.org

website:

www.arkansaspreservation.com

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September 14, 2010

Mr. Luke F. Eggering PWS
EIS Project Manager
Parsons
400 Woods Mill Road South, Suite 330
Chesterfield, Missouri 63017-3426

RE: Pope County - Russellville
Section 106 Review - FHWA/COE
Russellville Intermodal Transportation Project.
AHPP Tracking No: 43922

Dear Mr. Eggering:

This letter is written in response to your inquiry regarding properties of architectural, historical, or archeological significance in the area of the referenced project. My staff has reviewed the revised draft Environmental Impact Statement (EIS) for the above-referenced undertaking, and we have the following comments to offer:

1. No preferred alternative is specifically identified in the EIS (although it seems apparent that either the North Dardanelle (Red) or the Russellville Bottoms (Green) are preferred) and the no action alternative did not receive serious consideration.
2. Most of the alternatives discussed have not been investigated for the presence of cultural resources, which makes comparison of the possible impacts of the alternatives difficult.
3. No archeologist participated in compiling the EIS, with the result that the potential commitment of time and resources for cultural resources investigations have been grossly understated. For example, at the Red and Green alternatives, the cost of test excavations alone could easily approach one million dollars and the cost of data recovery excavations could approach one million dollars per site.

Thank you for the opportunity to comment on this undertaking. If you have any questions, please contact Geroge McCluskey or Steve Imhoff of my staff at (501) 324-9880.

Sincerely,



Frances McSwain
Deputy State Historic Preservation Officer

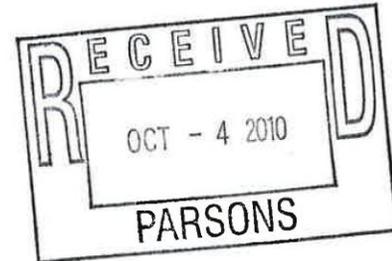
cc: Dr. Richard Allen, Cherokee Nation
Ms. Augustine Asbury, Alabama-Quassarte Tribal Town
Ms. Joyce Bear, Muscogee Nation of Oklahoma
Mr. Robert Cast, Caddo Nation
Mr. Terry Cole, Choctaw Nation of Oklahoma
Mr. Tracy L. Copeland, State Clearinghouse
Dr. Ann M. Early, Arkansas Archeological Survey
Dr. John Eddins, Advisory Council on Historic Preservation
Mr. Larry Harrison, Seminole Nation of Oklahoma
Dr. Andrea A. Hunter, Osage Nation
Ms. Lisa Larue-Stopp, United Keetoowah Band of Cherokees
Ms. Carol Legard, Advisory Council on Historic Preservation
Ms. Jennie Lillard, Kialegee Tribal Town
Mr. Randall Looney, Federal Highway Administration
Mr. Lynn P. Malbrough, Arkansas Highway & Transportation Dept.
Ms. Joyce C. Perser, Little Rock District, Corps of Engineers
Ms. Carrie V. Wilson, Quapaw Tribe of Oklahoma
Mr. Vernon Yarholer, Thlopthlocco Tribal Town



STATE OF ARKANSAS
**Department of Finance
and Administration**

OFFICE OF INTERGOVERNMENTAL SERVICES
1515 West Seventh Street, Suite 330
Post Office Box 8031
Little Rock, Arkansas 72203-8031
Phone: (501) 682-1074
Fax: (501) 682-5206
<http://www.arkansas.gov/dfa/igs>

September 29, 2010



Mr. Luke F. Eggering, PWS
EIS Project Manager
PARSONS
400 Woods Mill Road South, Ste. 300
Chesterfield, MO 63017-3426

RE: River Valley Intermodal Facilities – SUPPLEMENTAL DRAFT
ENVIRONMENTAL IMPACT STATEMENT – PARSONS PROJECT #744286
FEDERAL AID PROJECT #HPP-0268 (2) Arkansas Highway and Transportation
Project #080157

Dear Mr. Eggering:

The State Clearinghouse has received the above document pursuant to the Arkansas Project Notification and Review System.

To carry out the review and comment process, this document was forwarded to members of the Arkansas Technical Review Committee. Resulting comments received from the Technical Review Committee which represents the position of the State of Arkansas are attached.

The State Clearinghouse wishes to thank you for your cooperation with the Arkansas Project Notification and Review System.

Sincerely,

Tracy L. Copeland, Manager
State Clearinghouse

TLC/nd
Enclosure
CC: J. Randy Young



Arkansas Natural Resources Commission



J. Randy Young, PE
Executive Director

101 East Capitol, Suite 350
Little Rock, Arkansas 72201
<http://www.anrc.arkansas.gov/>

Phone: (501) 682-1611
Fax: (501) 682-3991
E-mail: anrc@arkansas.gov

Mike Beebe
Governor

MEMORANDUM

TO: Mr. Tracy Copeland, Manager
State Clearinghouse

FROM: Mr. J. Randy Young, P.E., and Chairman
Technical Review Committee

SUBJECT: River Valley Intermodal Facilities
SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT
STATEMENT - PARSONS PROJECT #744286
FEDERAL AID PROJECT #HPP-0268 (2)
Arkansas Highway and Transportation Project #080157

DATE: September 27, 2010



Members of the Technical Review Committee have reviewed the above referenced project; this project is intended to improve regional and national transportation, to serve existing industry, and to improve services necessary to promote economic development in the six-county Arkansas River Valley regional (Conway, Johnson, Logan, Perry, Pope, and Yell Counties.)

The Committee supports this project.

Agency comments are included for your review.

The opportunity to comment is appreciated.

JRY/ddavis



STATE OF ARKANSAS

OFFICE OF INTERGOVERNMENTAL SERVICES

Department of Finance and Administration

1515 West Seventh Street, Suite 412
Post Office Box 8031
Little Rock, Arkansas 72203-8031
Phone: (501) 682-1074
Fax: (501) 682-5206
http://www.arkansas.gov/dfa/igs

MEMORANDUM

TO: All Technical Review Committee Members
FROM: Tracy L. Copeland, Manager - State Clearinghouse
DATE: August 30, 2010
SUBJECT: River Valley Intermodal Facilities - Supplemental Draft Environmental Impact Statement - Parsons Project No. 744286 - Federal Aid Project No. HPP-0268 (2) Arkansas Highway and Transportation Project No. 080157

#2429

Please review the above stated document under provisions of Section 404 of the Clean Water Act, Section 102(2) of the National Environmental Policy Act of 1969 and the Arkansas Project Notification and Review System.

Your comments should be returned by September 15, 2010 to - Mr. Randy Young, Chairman, Technical Review Committee, 101 E. Capitol, Suite 350, Little Rock, AR 72203.

If you have no reply within that time we will assume you have no comments and will proceed with the sign-off.

NOTE: It is imperative that your response be in to the Arkansas Natural Resources Commission (ANRC) office by the date requested. Should your Agency anticipate having a response which will be delayed beyond the stated deadline for comments, please contact Ms. Debby Davis of the ANRC at (501) 682-3830 or the State Clearinghouse Office.

Support Do Not Support (Comments Attached)
Comments Attached Support with Following Conditions
No Comments Non-Degradation Certification Issues (Applies to ADEQ Only)

Name(print) John Turner Agency ANRC Date 9-22-2010
Telephone Number 501 682 6608



STATE OF ARKANSAS

OFFICE OF INTERGOVERNMENTAL SERVICES

Department of Finance and Administration

1515 West Seventh Street, Suite 412
Post Office Box 8031
Little Rock, Arkansas 72203-8031
Phone: (501) 682-1074
Fax: (501) 682-5206
http://www.arkansas.gov/dfa/igs

MEMORANDUM

TO: All Technical Review Committee Members
FROM: Tracy L. Copeland, Manager - State Clearinghouse
DATE: August 30, 2010
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- Support
Do Not Support (Comments Attached)
Comments Attached
Support with Following Conditions
No Comments
Non-Degradation Certification Issues (Applies to ADEQ Only)

Name(print) JAMES L. NORTON Agency AR FOR CORR Date 3/9/10
Telephone Number 501-298-1863



STATE OF ARKANSAS

OFFICE OF INTERGOVERNMENTAL SERVICES

Department of Finance and Administration

1515 West Seventh Street, Suite 412
Post Office Box 8031
Little Rock, Arkansas 72203-8031
Phone: (501) 682-1074
Fax: (501) 682-5206
http://www.arkansas.gov/dfa/igs

MEMORANDUM

TO: All Technical Review Committee Members
FROM: Tracy L. Copeland, Manager - State Clearinghouse
DATE: August 30, 2010
SUBJECT: River Valley Intermodal Facilities - Supplemental Draft Environmental Impact Statement - Parsons Project No. 744286 - Federal Aid Project No. HPP-0268 (2) Arkansas Highway and Transportation Project No. 080157

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- Support
Do Not Support (Comments Attached)
Comments Attached
Support with Following Conditions
No Comments
Non-Degradation Certification Issues (Applies to ADEQ Only)

Name(print) William Prior Agency AOS Date 9-8-2010
Telephone Number 683-0117



Keeping the Natural State natural.

Loren Hitchcock
Interim Director

Arkansas Game and Fish Commission

Mike Armstrong
Assistant Director

MEMORANDUM

TO: Randy Young, Chairman
Technical Review Committee

DATE: September 16, 2010

FROM: Craig K. Uyeda, Member
Ecological & Engineering Services

CC: USFWS, Conway, AR
State Clearinghouse ✓
USACE - MVM - LRD - VXD
Mark Oliver, AGFC
David Goad, AGFC

Subject: Public Notice

Responsive to the memorandums from the State Clearinghouse of August 30, 31, and September 7, 8, 9, 2010, this is to advise that we anticipate insignificant adverse impacts to fish and wildlife resources associated with these proposed activities. We have no objections to issuance of the following Public Notices; however, we have included comments.

RIVER VALLEY INTERMODAL FACILITIES – SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT – PARSONS PROJECT NO. 744286 – FEDERAL AID PROJECT NO. HPP-0268 (2) ARKANSAS HIGHWAY AND TRANSPORTATION PROJECT NO. 080157 – Biologists from our agency have reviewed the River Valley Supplemental Draft Environmental Impact Statement and recommend the proposed Green Alternative. This alternative appears to lessen impacts to the shoreline of the Arkansas River and fish and wildlife resources.

PUBLIC NOTICE NO: MVM-2010-264 (RDM) JOINT PUBLIC NOTICE, CORPS OF ENGINEERS & STATE OF ARKANSAS – MVM – USACE – The USACE, Memphis, Little Rock, and Vicksburg Districts, District Engineers proposes a Regional General Permit to authorize deposition of fill material into waters of the United States, as regulated by Section 404 of the Clean Water Act, associated with the relocation of agricultural drainage ditches in the state of Arkansas. This RGP authorizes the relocation of up to 3,000 linear feet of a previously constructed/channelized agricultural drainage ditch currently in use for established farming operations.

EMERGENCY STREAMBANK AND SHORELINE EROSION PROTECTION STUDY ON THE WHITE RIVER AT THE BATESVILLE SOUTHSIDE WATER TREATMENT PLANT INTAKE STRUCTURE – INDEPENDENCE COUNTY, ARKANSAS – LRD – USACE – The USACE, Little Rock District, has initiated an "Emergency Streambank and Shoreline Erosion Protection" study on the White River at the Batesville Southside Water Treatment Plant intake structure located approximately 0.75 miles above the Highway 167 bridge in Independence County, Arkansas.

RECEIVED

SEP 21 2010

2 Natural Resources Drive • Little Rock, AR 72205 • www.agfc.com
Phone (800) 364-4263 • (501) 223-6300 • Fax (501) 223-6448

INTERGOVERNMENTAL
SERVICES
STATE CLEARINGHOUSE

The mission of the Arkansas Game and Fish Commission is to wisely manage all the fish and wildlife resources of Arkansas while providing maximum enjoyment for the people.

**SPECIAL PUBLIC NOTICE – ONE-YEAR TRIAL IMPLEMENTATION PERIOD OF THE
EASTERN MOUNTAINS AND PIEDMONT INTERIM REGIONAL SUPPLEMENT TO THE
1987 WETLAND DELINEATION MANUAL – MVK – LRD – USACE.**

Thank you for the opportunity to comment on these proposed projects.

RECEIVED
SEP 21 2010
INTERGOVERNMENTAL
SERVICES
STATE CLEARINGHOUSE

2 Natural Resources Drive • Little Rock, AR 72205 • www.agfc.com
Phone (800) 364-4263 • (501) 223-6300 • Fax (501) 223-6448

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of Arkansas while providing maximum enjoyment for the people.*

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KENNARD K. HELTON
901 NORTH FRONT ST.
OFFICE 108 QUAY STREET

CLERK
FRANCES MYERS
P.O. BOX 580
OFFICE 120 N. FRONT

City of Dardanelle

P.O. BOX 360
DARDANELLE, ARKANSAS 72834
PHONE 479-229-4500 • FAX 479-229-4804

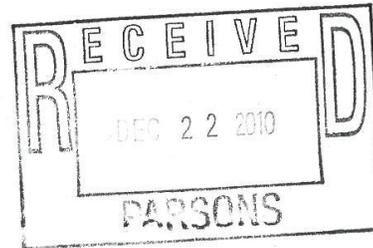
ALDERMAN WARD 1
KENNY GEORGE
KURT SPEARS

ALDERMAN WARD 2
JULIA ANN TAYLOR
DOYLE MCENTYRE

ALDERMAN WARD 3
KENNETH TAYLOR
JAMES H. GEORGE

December 15, 2010

Mr. Darren Mitchell
Parsons
400 Woods Mill Road South
Chesterfield, Missouri 62122



Re: SDEIS Comments

Dear Mr. Mitchell:

I appreciate the opportunity to comment on the SDEIS for the River Valley Regional Intermodal Facilities. I would first, like to point out that without the resources to properly model the study area, I must rely on data supplied within the SDEIS by your firm, the Pope & Yell County FIRM's and history as it relates to the flood plain within the city limits of Dardanelle.

After review of the draft, I feel the following comments are in order.

There appears to be a discrepancy between the FIRM's for the Pope County and Yell County BFE's along the Arkansas River. As used in your modeling, the Pope County FIRM shows a BFE of 323.00 at the Hwy 7 River Bridge. The BFE on the Yell County FIRM at the same location shows an elevation of 320.00. Depending upon which elevation is correct, the impact could be as much as 3.00 feet.

Part of the study area is along the Dardanelle Levee System. In a letter to the chairman of the Carden Bottoms and Dardanelle Drainage Districts, dated February 4, 1993, these levees were deemed unacceptable. In one instance, a portion of the levee had been restored to natural ground level. Was this taken into account when the floodplain analysis was conducted?

The study area mainly deals with the floodplain directly adjacent to the proposed project. However, I feel the implications of removing 700 plus acres from the undelineated floodway of the Arkansas River will have implications reaching from the Dardanelle Lock and Dam all the way to the Morrilton Lock and Dam. Any rise in Base Flood Elevation will affect all areas within the floodplains of the areas between the two dams.

Historically, Dardanelle's flooding is not directly caused by the Arkansas River, rather by the rivers affect on Smiley Bayou which runs along the western borders of Dardanelle. The flood prone areas of Dardanelle flow into the Smiley Bayou, which in turn drains into the river south of town in the Hollow Bend Refuge area. When the river rises during periods of heavy rains in the western states, the bayou backs up from the rising waters of the river. Then when heavy rainfall hits the local area, the backup of Smiley Bayou caused by the rise of the Arkansas River, creates flooding within Dardanelles western and southern floodplains. Any increase of rise caused by the removal of 700 plus acres of floodplain would only serve to enhance the flooding in these areas of Dardanelle. I feel that in the very least the area of study should have included the entire city of Dardanelle and the areas south of town up to and including where the bayou drains into the Arkansas River.

It is my belief that until these questions are answered, no permits should be issued for development within the floodplain as outline in the SDEIS.

Respectively,



Bill Smith, Floodplain Administrator
City of Dardanelle



POPE COUNTY CONSERVATION DISTRICT
& FLOODPLAIN ADMINISTRATION
420 N HAMPTON SUITE B
RUSSELLVILLE, AR 72802
479-968-3881 EXT. 101
FAX: 479-968-5933

November 23, 2010

Darren Mitchell
Parsons
400 Woods Mill Road South
Chesterfield, Missouri 63122

Dear Darren:

I have reviewed the various alternatives in the proposed Russellville Intermodal facility. Various alternatives in this project do impact floodplains. It appears that none of the area (green or red alternatives) are located within a "floodway". They are located in zones AE and/or in A, so they do require a floodplain development permit from the County. It is important that the cumulative increases in flood levels be maintained for whichever alternative is chosen. Permits may be required for specific aspects of the project, for example, buildings, fill, road, etc.

I will be happy to forward a copy of the ordinance and codes if you would like to review them.

Sincerely,

Jeanette Hale, CFM

Yell County Historical & Genealogical Association

Yell County, Arkansas
P.O. Box 622
Dardanelle, Arkansas 72834

September 28, 2010

Randal J. Looney
Environmental Specialist
700 West Capitol Ave., Room 3130
Little Rock, AR 72201-3298

Ms Gloria Craig, President
Yell County Historical &
Genealogical Association
11763 Oak Grove Road
Dardanelle, AR 72834

Ref: River Valley Intermodal Facilities Supplemental Draft Environmental Impact Statement, Section 106 Review/Archeological Sites.

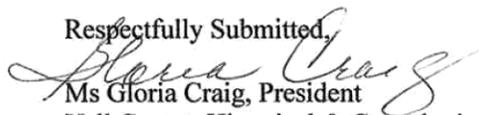
Dear Mr. Looney,

On behalf of Yell County Historical & Genealogical Association members, we offer the following issues and concerns regarding need to protect and preserve for future generations Native American archeological and cultural resource sites within the boundaries of the proposed Red and Green Alternatives. Intensive research of these sites have been undertaken by AR Tech U, Dr. Skip Abernathy and others over the years, and reveal the richest treasure of early Indian occupation between Little Rock and Ft. Smith. Cherokee, and a mixture of other Native American tribes, have occupied this floodplain adjacent to the Trail of Tears, now a historical landmark.

Many current residents of Yell and Pope County descend in some measure from these tribes and place great value on preserving their cultural heritage. The SDEIS fails the sufficiency test of site-specific grading these sites or considering alternatives that would avoid their destruction. Many of these sites apparently qualify for protection under the National Historic Preservation Act for they meet Criteria A; B; C; and D: 4.16.1 Affected Environment, page 324. Project sponsor, Parsons, FTN Associates, Corps of Engineers and FHWA have failed over the past 10 years to adequately evaluate and identify impacts the green/red alternatives present to Cultural Resources.

The Alternative screening process is notably fabricated to disqualify Alternatives that would protect Cultural Resources. To correct this bias, our organization respectfully requests Independent External Peer Review of impacts the green and red alternatives present to archeological resources. We appreciate your attention to our concerns.

Respectfully Submitted,


Ms Gloria Craig, President
Yell County Historical & Genealogical Association
Cc file
Ken Grunwald, Dept. of AR Heritage
1500 Tower Building
323 Center Street
Little Rock, AR 72201



P.O. Box 508
Dardanelle, AR 72834

Randal Looney
Environmental Specialist
Federal HWY Administration
700 West Capitol Ave., Room 3130
Little Rock, AR 72201-3298

Jim Wood, Chairman
Intermodal Study Committee
Yell County Wildlife Fed.
56 Delaware Bay Road
Dardanelle, AR 72834
September 22, 2010

Dear Randal,

The below is a follow up to our Sept. 16 conversation with you at the public information meeting regarding my request for FHWA to institute a Independent External Peer Review Panel to examine methodology and accounting analysis of the River Valley Intermodal Facilities Supplemental Draft EIS. Yell County Wildlife Federation and City of Dardanelle formally requests IEPR be applied by a National Academy of Scientist Panel to issues of disputed environmental effects, including threats to community safety.

We find SDEIS fails to meet the Data Quality Act of 2000 Guidelines which mandate, "In those situations involving dissemination of influential scientific, financial or statistical information, a high degree of transparency of data and methods must be ensured to facilitate the reproducibility of such information by qualified third parties". We find the SDEIS Appendix B Floodplain Analysis Report fails this test and also seems to notably fail NEPA's Sec. 102(2) to the fullest extent possible test. Moreover, given the Federal Emergency Management Agency oversight policy to provide a leadership floodplain regulatory role at 44 CFR 60 and 40 CFR 1501.6 "jurisdiction by law" we reaffirm our previous request that FEMA be included as a Cooperating Agency in this NEPA Process.

We conclude that IEPR is a proper mechanism for elevating this document to a quality necessary to meet NEPA's sufficiency test and ask that it be applied to quantifying potential project impacts to the following issues of significant public dispute.

1. Loss of flood storage function the approximately 800 acres of the shared base floodplain presents to City of Dardanelle and Yell County portion of the floodway and floodplain, and potential such floodway encroachment presents to delineation of floodplain boundaries on the Dardanelle side of the River. Quantify using transparent, accurate accounting methods to site-specific, reveal proposed project impacts to FEMA Flood Insurance Rate Map and Special Flood Hazard Areas and Dardanelle's Federal Flood Insurance Program.



-
2. Locate, identify and grade each archeological and native American Cultural Resource site and impacts proposed Alternatives present to each.
 3. Flood induced impacts to Dardanelle Bottoms and Holla Bend National Wildlife Refuge resulting from removing 800 acres of floodplain functions the Greene and Red Alternatives present to historically unstable flood blowout areas of the shared floodplain.
 4. Provide a transparent economic benefit/cost analysis in specific accounting detail for each studied Alternative, sufficient to meet NEPA Sec. 102(2) to the fullest extent possible test. Methodology to grade the proposed projects worthwhile test must evaluate and compare cumulative long term local tax and sphere of economic benefits that would be traded off by forcing private riverside ports and regional transportation systems either out of business or to unfairly compete with non taxpaying subsidized project systems.
 5. Additionally, since the Corps of Engineers is a Cooperating Agency, we question as to whether provisions of the 2007 Water Resource Development Act Sec. 2034 Independent External Peer Review applies to the Corps Appendix B analysis, given that the project is highly controversial with City of Dardanelle and others who share affected floodplain functions? The SDEIS is declared to meet the NEPA test as a Stand Alone Document?

The Yell County Wildlife Federation and City of Dardanelle respectfully request that the Lead Agency/Federal HWY Administration provide Independent External Peer Review of the above issues at controversy regarding the River Valley Intermodal Facilities Supplemental Draft Environmental Impact Statement. Should you have questions, please contact either Mayor McGee or Jim Wood at the below phone No.

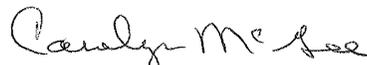
Respectfully Submitted,



Jim Wood, Chairman
Intermodal Study Committee
Yell County Wildlife Federation
Ph 479-229-4449

Cc. file

Guy Lowes, Civil Engineer (Arkansas)
Federal Emergency Management Agency
800 North Loop 288
Denton, TX 76201-3698



Honorable Carolyn McGee
Mayor, City of Dardanelle
479-229-4500



P.O. Box 508
Dardanelle, AR 72834

Randal Looney
Environmental Specialist
Federal HWY Administration
700 West Capitol Avenue, Room 3130
Little Rock, AR 72201-3298

From: Jim Wood, Chairman
Intermodal Study Comm.
Yell County Wildlife Fed.
56 Delaware Bay Road
Dardanelle, AR 72834
October 16, 2010

Ref: Federal HWY Administration solicitation of comments regarding Supplemental Draft Environmental Impact Statement for the proposed River Valley Intermodal Facility.

Dear Randal,

The following constitutes Yell County Wildlife Federations response to the above SDEIS solicitation. Our organization has participated in this Project NEPA Process over the past 10 years and continue to have an elevated interest in this proposed extensive floodplain development Facility. We offer the following comments and appreciate your attention to our Issues and Concerns.

The SDEIS continues to fail the NEPA Section 102(2)(C) sufficiency test to “determine the environmental impacts of the proposed action” on the entire floodway and presents a document largely repeating promotional type general statements and assumptions, absent a supporting accounting analysis, relying largely on little more than imagination. Although declared to be a “stand-alone” SDEIS, it is absent a “hard look” that “rigorously explore and objectively evaluate all reasonable alternatives.” Objectivity of the NEPA Process is destroyed by a Alternative screening process that, except for the new Lake Dardanelle Purple Alternative, fails to consider Project locations that avoid base floodplain encroachment and AR River floodway functions that provide existing flood reduction benefits to the City of Dardanelle and Yell County property owners.

Regarding cumulative impacts, and SDEIS general lack of analysis to support conclusions, Judge Wilson’s 16 August 04 Order provides guidance and states, **“This inquiry requires some quantifiable or detailed information...general statements about possible effects and some risk do not constitute a hard look absent a justification regarding why more definitive information could not be provided.”** We believe this SDEIS continues to fail Judge Wilson’s 8-16-04 Order upon which he justified his “permanent injunction pending completion of an EIS.” The document continues the same DEIS flaw in its failure to analyze cumulative impacts and consider Dardanelle and Yell County portion of the floodplain as part of the Affected Environment, a data gathering function of FEMA’s FIRM mapping periodic review process. Judge Wilson’s Order further finds that **“the various components of a project required a study of the cumulative environmental impacts of the entire project”**



we conclude the levee encircling 886 acres of this shared floodplain, and encroachment upon floodway functions, is part of the “entire Project” and its sphere of influence upon Dardanelle and Yell County lacks definitive documentation in the SDEIS Appendix B?

SDEIS response to our 4-24-06 comments follows a pattern of summarizing and language modification instead of providing a definitive response specifically answering the issue, concern or question we raised. The following at 4.(d) (4-24-06 comments) is an example: “DEIS calculates to levy off 2/3 of the floodplain at Nav Mile 202.09, take out 800 acres of flowage area, and 485,000 cfs only raises flood level 0.06 feet (less than an inch). This is scientifically impossible.” We further quoted Corps calculating guidance at EP 1165-2-1, Chapter 13-6, b. and c. regarding how levees and floodplain modifications affect flood water levels. Your response is “The USACE floodplain analysis document can be found in Appendix B of the SDEIS” which does not answer the accuracy issue we raised. This method of response falls short of Judge Wilson’s “definitive detailed information” requirement. And is further supporting evidence that SDEIS Appendix B calculations need Independent External Peer Review which we requested in the DEIS and now reaffirm.

With exception to the additional Purple Alternative, the SDEIS is little more than a restatement of the same February 2006 DEIS and flawed Alternative screening process fabricated to limit Alternatives to the Green & Red, which are so alike as to be the same proposed action. Moreover the SDEIS fails NEPA’s (1502.14) test of “providing a clear choice among options by the decision maker and the public.” Verbose descriptions of the affected Pope County environment are themselves no measure of the adequacy of an environmental impact statement (1502.15) Affected Environment. SDEIS illegally narrows the Affected Environment to Pope County without a definitive analysis of the expanded sphere of influence the Red & Green Alternatives present to the shared floodplain situation. In addition to our largely unanswered 4-24-06 comments, we will clarify several reasons why this SDEIS continues to fails NEPA’s sufficiency test.

1. Floodplain Impacts: 44 CFR 9 identifies a Floodway as “that portion of the floodplain which is effective in carrying flow, within which this carrying capacity must be preserved and where the flood hazard is generally highest, where water depths and velocities are the greatest.” SDEIS 4.13.1 states, “The 100 year floodway was calculated---and then the proposed harbor was modeled within the floodway. The results showed the proposed harbor did not impact the 100 year flood elevation---“. SDEIS continues limiting base flood elevation impact modeling to using only the proposed harbor USACE data without considering consequence of the entire 886 acre encroachment, a notable disregard for Judge Wilson’s **environmental impacts of the entire project** requirement. The River separating Dardanelle from the Green and Red alternative areas clearly meets the “effective in carrying flow” test and both sides qualify as being part of the affected floodway environment. Does FHWA agree with this conclusion?

(a) The SDEIS fails to map the entire affected AR River floodway for the proposed Red and Green alternatives, and thus lacks sufficiency in identifying the pre project existing baseline floodway situation essential to comparing alternatives. It fails to “succinctly

describe the environment of the area(s) to be affected or created by the alternatives under consideration” (1502.15), and fails to rigorously analyze the sphere of potential floodway encroachment impacts to Dardanelle and Yell County. Appendix B is a brief listing of figures, but fails to “explain methodologies of research and modeling” (CEQ 40 FAQ’s).

(b) SDEIS continues to avoid considering floodway impacts under a flawed claim that the project area does not have a regulated floodway. NEPA’s “to the fullest extent possible” test destroys such a claim, and requires that the floodway within the Red and Green alternatives sphere of influence are thresholds for decision and must be mapped and project encroachment upon floodway’s carrying capacity on both sides of the floodplain must be quantified for a base flood situation. Thus, SDEIS falls short of quantifying impacts to the Affected Environment.

(c) FEMA revised on 3-4-02 FIRM mapping for City of Dardanelle base floodplain (100 year) adjacent to and opposite the proposed Red and Green alternatives, as having an existing 320’ elevation, while SDEIS Appendix B analysis raises the existing elevation to 322’ for this same location? Thus, FEMA’s accounting for mile 202.09 is not 321.98’, but is 320’ causing your modeling to reveal that both Red/Green Alternatives will increase the base 100 year flood elevation more than two feet. Given that FHWA “uses the same methods as the FEMA flood insurance study” (SDEIS pg 287) please clarify how using the same accounting methods FEMA produces a “existing” base flood elevation of 320’ and USACE 321.98’? This 1.98’ increase itself disqualify both Alternatives from meeting the one foot floodplain increase test of EO 11988. The SDEIS noticeably fails to consider the Issue of protecting the health and safety of City of Dardanelle and Yell County property owners. Thus we request Independent External Peer Review of the accounting methods FHWA is using to justify the Appendix B analysis.

2. US Constitution Amendment 5 Takings Issue: The proposed Red & Green Alternatives clearly impacts to raise FEMA’s base floodplain delineation and FIRM mapping for City of Dardanelle. The Red & Green alternatives floodplain/floodway encroachment shifts impacts from major flood events over to Dardanelle property owners, and increase the number of homeowners required by lending institutions to purchase flood insurance as a condition of securing home loans. This situation raises a US Constitution “takings” Issue qualifying for SDEIS analysis under NEPA Sec. 102(2) and absolutely demands Independent External Peer Review to firm up accounting accuracy. Plain language (1502.8) and definitive information is absent as to why USACE’s Appendix B calculated existing base flood elevation is 2’ higher than FEMA’s FIRM mapped 320’ elevation. It is appropriate to point out that the Corps has a less than reliable record of accuracy in Pool 9 floodplain mapping. And it should be noted that the AR River Land Impact Study (January 1990) data, SDEIS now uses, was generated in response to successful private property flood damage lawsuits on AR River near Ft. Smith against USACE. It is also relevant to this proposed Project that in July ‘09 the Federal Claims Court found that USACE had caused a \$7.3 million “takings” through a “super induced addition of water” upon Dave Donaldson Black River WMA. Flood or FIRM mapping impacts that the Red/Green alternatives shift over to Dardanelle appears to be a similar US Constitution

“takings” Issue that NEPA requires to be analyzed with definitive detailed information.

(a) Your response to our 4-24-06 request for Peer Review of USACE’s hydraulic modeling is, “USACE is the acknowledged expert to floodplain determination and is routinely responsible for such determinations”, fails to answer our challenge to accounting accuracy we consider mandated by 1502.24, Methodology and Scientific accuracy. Moreover, when a Lead Agency relies upon data provided by other Agencies or sources, the Lead Agency is responsible for assuring accuracy of such information in order to provide “supporting evidence that the Agency has made the necessary environmental analysis” 1502.1. SDEIS fails to assure USACE accounting accuracy?

(b) Hydrologic/Hydraulic Analysis, Appendix B par 3: FHWA’s finding that USACE is the acknowledged expert in floodplain determination, is not supported by Yell County Wildlife Federation experience during our participation in the quoted January 1990 AR River Land Impact Study (ARLIS) for Pool 9/Rockefeller Lake from which you refer to at 3.1. Neither does your response meet NEPA’s “supporting evidence” test. This matter of disagreement is relevant to the SDEIS because FHWA relies upon ARLIS data that USACE themselves found in the 1990’s to be inaccurate. In May ‘97 AR Attorney General Winston Bryant sued the Corps requesting a full EIS be developed to firm up accuracy of ARLIS hydraulic modeling. Midway of this \$33 million ARLIS flood impact/flowage easement project, USACE themselves found numerous errors in their HEC-RAS hydraulic modeling and chose to permanently terminate the project. The project area on Pool 9/Green & Red Alternative, was the area of major hydraulic dispute. This disagreement alone reaffirms our conclusion that Appendix B USACE modeling be subjected to IEPR.

(c) AR River at mile 200 is recognized by USACE as a historically unstable blow out area where flood events have produced catastrophic damage to farmlands, a situation that will likely be exacerbated by removing the Project areas 886 acres of base floodplain surge area. There is a notable failure to discuss how this levee and floodplain modification negatively or positively affects flood water levels at this unstable location, but is recognized by USACE at their EP 1165-2-1. The proposed Project poses threat to shift blowouts from major flood events down through Dardanelle Bottoms and through Holla Bend National Wildlife Refuge. SDEIS also fails to discuss the direct and indirect effects this situation presents to Environmental Consequences 1502.16. It appears that this situation qualifies as a “takings” Issue under US Constitution Amendment 5?

3. Failure to provide Economic Analysis: We disagree with FHWA’s response at page A-124 “NEPA regulations do not require a benefit/cost analysis” which we find contrary to 1508.8(b) Effects---“Effects and impacts as used in these regulations are synonymous.” Effects include----aesthetic, historic, cultural, **economic**, social or health, whether direct indirect, or cumulative. How can you reasonable account for economic Effects without meeting Judge Wilson’s **quantifiable definitive information** requirement? FHWA avoids an Economic Analysis on a flawed misplaced argument based on 1502.23 option to exclude requiring b/c ratios for actions having a purpose and need solely on

“qualitative” instead of quantifiable economics. SDEIS describes a proposed project whose purpose is based almost exclusively upon imaginary general statements of Economic benefits that fails to be based upon supporting definitive information and analysis. SDEIS also fails to provide a supporting qualitative analysis as to the Effects and Impacts loss of floodplain/floodway functions, resulting from the Green and Red Alternatives, presents to others who benefit from retaining these existing health and safety qualitative functions and benefits? Effects and Impacts accounting fails NEPA sufficiency test without a “definitive” Economic Analysis that includes b/c accounting.

(a) Purpose and Need for the project at ES.2 is to **promote economic development by creating new jobs, specifically higher wage jobs, improve transportation capacity and competitiveness** ---. NEPA is a site-specific process. Other than broad imaginary general statements, SDEIS is notably absent an accounting analysis as to how Effects from converting the existing privately owned and operating transportation system to a taxpayer subsidized system meets the “worth-while” test? We view Judge Wilson’s Order that “general statements about potential effects” fails to provide a hard look at quantifying whether an Alternative meets the test of providing more benefits than cost, or does the action trade off more of both qualitative and quantitative benefits than is gained? We hold to our previous conclusion that the SDEIS continues the same flaw in the DEIS of basing Purpose and Need, not upon high quality supporting evidence of Need, but upon some broad imaginary opinion that Need will occur at some unknown future time. A better qualitative and quantitative transparent analysis must be provided to support Need.

4. Cultural Resources: Since early Indian settlement of this area (see Nov. ‘02 Intermodal Env. Assessment 3.5 Cultural Resources and Local History) the Red and Green Alternative sites have been well known rich Cultural and Archeological resources. Yet with an immense information base of site specific data for these two sites as declared by AR Archeological Survey, the SDEIS fails to provide a mapping of these resources. Environmental Consequences (1502.16), direct and indirect effects upon Cultural Resources, would be to destroy the “regional archeological record decreasing its overall research contribution”. Without Mitigation that avoids destruction of these Cultural Resources by expanding Alternatives considered to non floodplain locations.

(a) Mitigation is declared at SDEIS 4.16.2.2.4 to be labor intensive and costly. Therefore, in order to meet NEPA’s “before decisions are made or actions taken” test, to the fullest extent, cost to protect these resources must be subjected to a cost accounting analysis.

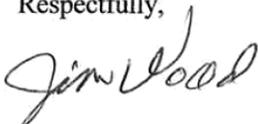
(b) SDEIS provides no quantifiable or definitive mapping information as to the 49 referenced archeological sites in the Red Alternative or the 72 sites in the Green Alternative. Neither are nearby sites east of the two Alternatives mentioned although they are a connected part of New Hope Bottoms cultural resources. This lack of definitive information notably fails 1500.1 Purpose that information must be available “before decisions are made and before actions are taken.”

(c) Regarding Cultural Resource data, 1502.22(a) provides guidance that “if the

information is not known and overall cost to obtain it is not exorbitant, the agency shall include the information in the EIS.” SDEIS has notably fabricated a alternative screening process that allows destruction of cultural resource sites. In the above referenced ‘02 EA Response to Comments, Dr. Skip Stewart-Abernathy from AR Archeological Survey ATU Station, alerted the Lead Agency about potential major impacts to archeological resources, yet the SDEIS continues to lack sufficiency in determining how these historically significant sites will be mitigated. Producing a Record of Decision absent this information is disallowed by NEPA.

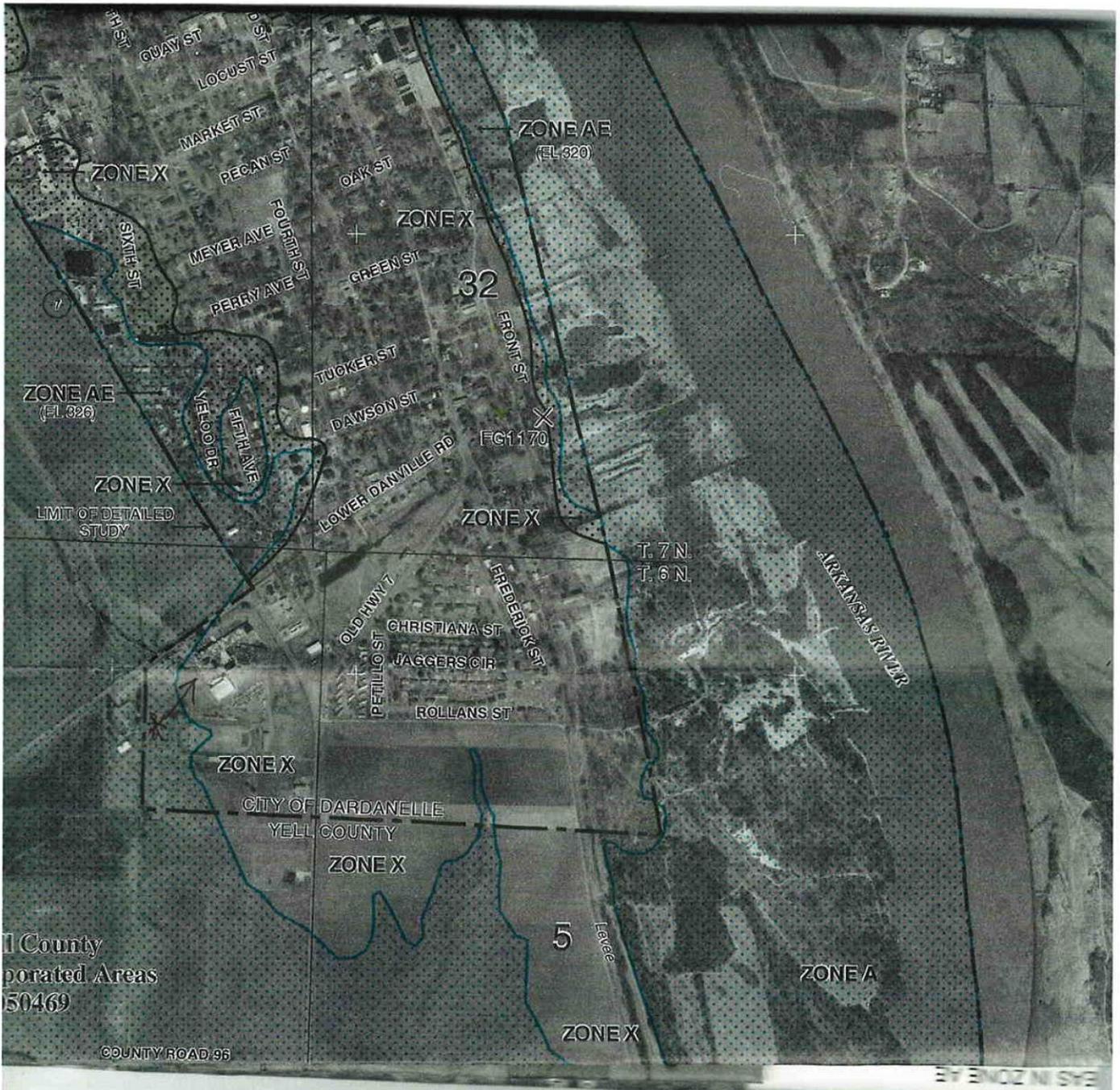
We find the SDEIS to largely fail NEPA’s sufficiency test. The document fails to take a hard look at a range of reasonable alternative sites that would avoid encroaching upon floodplain/floodway functions essential to protecting City of Dardanelle FEMA FIRM mapping and health and safety of the community. Given that FEMA and not FHWA or USACE has the legal regulatory role by law to determine 100 year base flood delineations and modifications for City of Dardanelle, we question why FHWA fails to included FEMA as a Cooperating Agency or at least have consulted with them in developing this SDEIS? Excluding FEMA appears to be a scheme by Project sponsors to avoid an analysis of impacts the Red and Green Alternative presents to City of Dardanelle’s FIRM mapping and Federal Flood Insurance Program. SDEIS relies largely upon promotional broad assumptions about economic benefits but fails to provide quantifiable definitive information or accounting formulas to support these figures? Based upon similar situations both Red and Green Alternatives appear to violate the US Constitution through creating a “takings” situation upon City of Dardanelle and property owners, and if either Alternative is approved, raises an Issue as to whether FHWA or some other government entity will be subject to damage claims? Of the three Alternatives now considered in the SDEIS, the Bend (Purple) Alternative is the only action that avoids a “takings” issue under the US Constitution. We appreciate this opportunity to comment on this proposed floodplain development project SDEIS.

Respectfully,

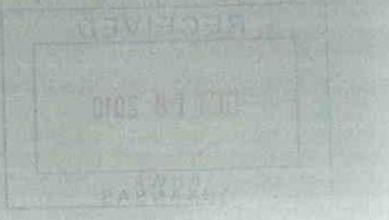


Jim Wood, Chairman
Intermodal Study Committee
Yell County Wildlife Federation
Cc file
Enclosures

Guy Lowes, Civil Engineer (Arkansas)
FEMA, Federal Regional Center
Denton, TX 76201-3698

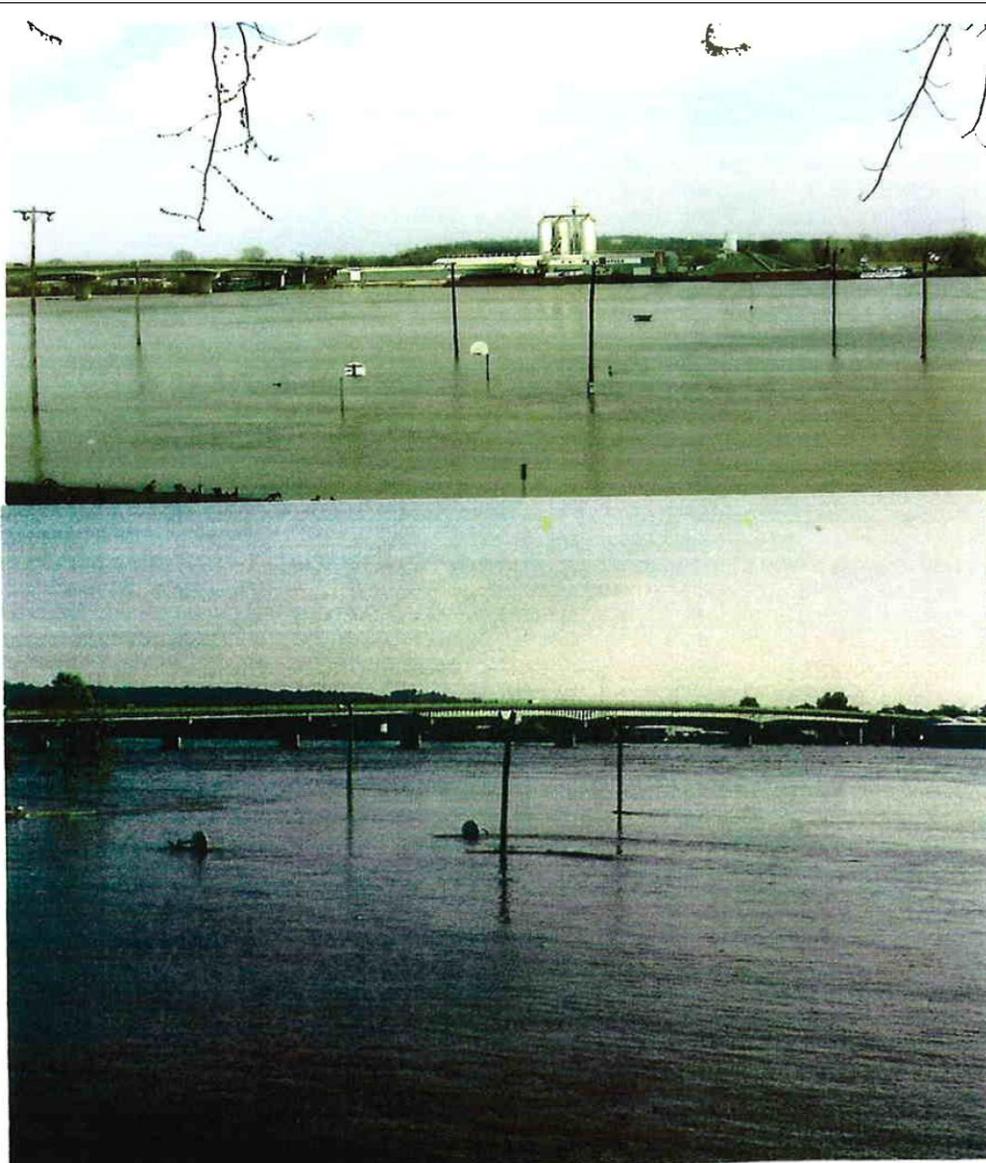


Note that Dardanelle's existing 100 year base flood elevation is depicted by the blue line Zone AE, is at 320' elevation and the school complex * would be affected as well as many residential properties and businesses with only a minor raising of the base flood delineation. It is mathematically impossible to shift 800 acres of flood surge over to Dardanelle without a major impact to Flood Insurance Rate Mapping.





The above photo #1 shows the base floodplain type landscape across the lower portion of the Red and Green Alternatives. Photo #2 taken on 3-19-08 of the same area displays how at 321,000 cfs flow (164,000 cfs below a base flood) the area becomes part of the AR River floodway to evacuate floodwaters. The floodplain's existing function serves to lower base flood impacts upon Dardanelle and helps protect the communities health and safety. Appendix B calculation that shifting 800 acres of these flood waters for a 485,000 cfs base flood event only raises level at Dardanelle .06 feet is mathematically impossible and seems to indicate an effort to falsify information in an official government document.



Both photos are of the same view of Dardanelle Riverfront Veterans Park. Photo #1 taken 3-19-08 the River flow was 321,000 cfs. Photo #2 taken May 5, 1990 with River flowing at 433,000 cfs (52,000 cfs below a 485,000 cfs base flood). This depicts the floodway benefits that would be totally lost by either the Red or Green Alternatives. And reveals threats both Alternatives present to health, safety and property within Dardanelle and Yell County. Corps accounting in Appendix B analyzes only the slack water harbor and fails to consider Environmental Impacts the 800 acre floodplain/floodway encroachment presents to others who share this riverside environment. SDEIS lacks sufficiency to comply with NEPA. Appendix B .06 foot elevation increase for a base flood event is inaccurate.

Porath, Rebecca

From: Parsons, RiverValleyEIS
Sent: Tuesday, October 26, 2010 1:31 PM
To: Randal.Looney@dot.gov; Lynn.Malbrough@arkansashighways.com;
Don.Nichols@arkansashighways.com
Cc: 'Sid Brain'; Roy Reaves; David Manns; Porath, Rebecca
Subject: FW: Intermodal Project Comment

[Interesting comments from the Little Rock Port Authority.](#)

From: Paul Latture [mailto:platture@yahoo.com]
Sent: Saturday, October 23, 2010 4:29 PM
To: Parsons, RiverValleyEIS
Cc: dmanns@provident-strategies.com; Jeff Pipkin
Subject: Intermodal Project Comment

I have been the executive director at the Little Rock Port Authority for 12 years and have been in economic development for almost 40 years. I have been following with great interest the proposed intermodal project for the Arkansas River Valley . I am providing comments because I am concerned that the proposed multimodal facility near Russellville would not be economically viable if the wrong site is selected.

As the long-term director of a major intermodal operation, there are two major issues that stand out to me as critical to the success of the proposed facility near Russellville.

The first of the biggest challenges will be establishing and operating a short-line rail. I understand that some of the alternatives would require start up of a new short-line rail operation while others would not. In the absence of an immediate industry base to cash flow the start-up and operations cost of a new rail venture, I do not see how the endeavor could succeed. In other words, for an area like the River Valley, utilizing an existing short-line rail operation is essential.

The second issue is access to the navigation channel. Again, my understanding is that some alternatives would require maintenance dredging while others would not. The Corps of Engineers has stringent cost-benefit guidelines for conducting maintenance dredging. If a site were selected that required dredging, I think it would take decades for the proposed facility in the River Valley to receive a line item in the Corps' annual budget to help pay for this necessary work. Funding the work with all local dollars would be a major impediment to the success of the overall facility.

Thank you for allowing the public an opportunity to review and comment on the Supplemental Draft Environmental Impact Statement.

Sincerely,
Paul Latture
Little Rock Port Authority

P. O.Box 304
Dardanelle, AR 72834
September 24, 2010

Mr. Randal Looney
Environmental Specialist
Federal Highway Administration
700 West Capitol Avenue, Room 3130
Little Rock, AR 72201-3298

Dear Mr. Looney,

This correspondence is written in reference to the proposed River Valley Intermodal Facilities and to express my disapproval, as a farmer and private land owner, for its construction.

During a public information meeting on September 16, I had the opportunity to meet with representatives for the project, particularly Mr. Roy Reeves and the Corps of Engineers. Upon review of the Supplemental Draft Environmental Impact Statement (EIS), discussions with Mr. Reeves and the Corps representative, it became my understanding that only the Red and Green Alternatives were to be considered. The Purple Alternative, located in the vicinity of Knoxville, was not going to be pursued in that, according to Mr. Reeves, "He did not have the money". My thoughts turned back to the Supplemental EIS regarding how so few would be effected by the proposed facility, while in fact, so many were displaced by the expansion of AR Highway 247 from a two lane to a five lane major highway. Of course, the AR Highway and Transportation Department, with its District Headquarters located in Russellville, has treated this as a separate entity from the Intermodal Facility. A new highway that will handle a high volume of traffic only a mile or two from Alternatives Red or Green (When neither one have not been approved as yet)...coincidence? I believe not!

I am the fifth generation of farmers in my family. This farm that has been in our family for over one hundred and sixty (160) years would be placed in jeopardy providing either of the Red or Green Alternatives were approved. If levees were constructed along the Russellville side of the Arkansas River to support either of these alternatives, it would create a choke point that would channel water into a smaller area causing a swifter current and the erosion of water power on the existing dirt levees (You might make a comparison similar to hydraulic mining around the turn of the century). Our land is located in Section 16, Township 6, Range 20 and Section 21, Township 6, Range 20. This property is in the bend of the Arkansas River just below the proposed Red or Green sites. With a stronger current and the loss of the New Hope Bottoms Flood Plain, not only mine, but other farms, would be considered an imminent "Blowout Point" for the river during times of high water. A breach would not only effect me but several farms and business, some of which would be detrimental to the environment. A hog farm with the typical open raw sewage pit and Terra Renewal Service (TRS) with storage facilities for over a million gallons of Dissolved Air Flootation (DAF) Skimmings (Or Sludge), both of which require permits for application by Arkansas Department of Environmental Quality (ADEQ). Below these farms and businesses is Holla Bend National Wildlife Refuge with various natural habitat that would also be placed at risk. As recent as 1980, had it not been for the natural flood plain of the New Hope Bottoms, the river would have breeched somewhere along the south bank creating the typical flood destruction of a levee break. It would be important to take note here that flood insurance IS NOT available in Yell County. I have been told by a member of the Intermodal

Committee that they can get flood insurance for us (Me). My response to that was "I do not want to get washed away and collect money. I want to preserve the land and pass it along to my son!" It seems to me more and more every day that so many are only interested in money. The bankers and business people of Russellville speak so highly of how the Intermodal facility and how much the economy will flourish if this facility is built. You never hear them mention how much money they can make, directly or indirectly, at others expense or concern (Displacement of people, potential devastation of a flood, etc.).

Please understand, Mr. Looney, it does not set well with me to complain or sit around all day long and think of things to gripe about. And, I most certainly am not opposed to progress in any form or fashion as long as all stand to benefit. However, I am not reluctant to express myself in regards to the selfishness on the part of some who use others for their own benefit. I sincerely feel that this is once again the case of the apathy of the few in Russellville that has been shown for the citizens of Dardanelle, its businesses, schools, land owners and farmers. There have been public meetings at various sites but none in Dardanelle on the construction of this facility outlining its proposed Alternatives, good and bad points. It seems almost like someone has something to hide. It is for these reasons that I am in total agreement with the City of Dardanelle and the Yell County Wildlife Federation for their request to institute an Independent External Peer Review of the Intermodal Facility.

Your immediate and positive attention to this matter will be most appreciated. Should you require any additional information or clarification on any points, I may be contacted at (Home) 1-479-229-2347 or (Cell) 1-479-453-0004.

Sincerely,



Thomas C Hunt

MAYS & WHITE, PLLC
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CAROL BALDERREE
cbalderree@mayswhite.com
Social Security
Consultant
(not a licensed attorney)

October 22, 2010

Mr. Randal Looney
Environmental Specialist
Federal Highway Administration
700 West Capitol Avenue - Room 3130
Little Rock, AR 72201-3298

Re: River Valley Intermodal Facilities --
Supplemental Draft Environmental Impact Statement, August, 2010

Dear Mr. Looney:

This firm represents the City of Dardanelle, Arkansas, and the Yell County Wildlife Federation, whose offices are located in Dardanelle.

At their request, I have reviewed the River Valley Intermodal Facilities Supplemental Draft Environmental Impact Statement (hereafter referred to as "the SDEIS") dated August, 2010, and have the following comments. These comments are supplemental to, and not in substitution of, any other comments submitted by any other official or person on behalf of or from the City of Dardanelle or the Yell County Wildlife Federation, Mr. Jim Wood or Mr. Doyle McEntyre.

The comments contained herein are those that have been developed to this date from a review of the SDEIS. At the time of submission of these comments, the matters expressed herein appear to be significant flaws, omissions or areas of concern in the DEIS. Additional review of the SDEIS and comments from other persons, firms or organizations may disclose additional flaws, omissions or areas of concern. The failure to include any such matters in these comments does not prohibit Dardanelle from raising any such matters in subsequent comments or proceedings relative to the DEIS or a final environmental impact statement. We also reserve the right to rely upon comments submitted by or on behalf of any other person, firm or entity on the SDEIS.

Dardanelle/Yell County Wildlife Federation Comments
On River Valley Intermodal Facility SDEIS

Page 1

Our comments to date are as follows:

Comment No. 1: The SDEIS does not identify a preferred alternative. At page 36, it is stated that a preferred alternative will be identified in the FEIS after “full analysis of impacts has been conducted for all reasonable Build Alternatives and the No-Action Alternative discussed in the DEIS and SDEIS.” Any additional analysis of the Build Alternatives and No-Action Alternative, and the identification of a preferred alternative (including the rationale for the selection of such alternative as the preferred alternative) should be made available to the public for review and comment.

Comment No. 2: Also at page 36, the SDEIS states that “Detailed mitigation measures for the proposed action would be developed primarily during the permitting stage of this project.” The failure to develop mitigation measures for the proposed action that the public can review and comment upon prior to the issuance of permits is a violation of the National Environmental Policy Act (“NEPA”) and its implementing regulations issued by the White House Council on Environmental Quality (“the CEQ Regulations”) that are applicable to all major federal actions with a potentially significant effect on the environment. The proposed Intermodal Facilities have been determined to be a major Federal action. Consequently, proposed mitigation measures must be discussed and the public given an opportunity to comment upon them in a draft EIS.

Notwithstanding the disclaimer regarding detailed mitigation measures in the SDEIS mentioned above, mitigation measures are discussed in Section 7.0 of the SDEIS. However, most of the discussion regarding such measures state that it is anticipated that there would be no adverse impacts in most resource categories, and therefore mitigation would not be necessary, or that best management practice techniques or permit conditions would serve as mitigation. “Mitigation” should not include those things that an entity is already obligated to do as a result of law, regulation or a permit.

Comment No. 3: The Screening Criteria utilized to identify reasonable alternatives to be considered in the SDEIS (see Table 3.1, p. 38), lists 14 such criteria. One of those (Criteria No. 13) states that “Planning level development costs should be reasonable compared to currently available funds of approximately \$7,000,000.” However, each of the proposed Alternatives to be carried forward for additional analysis would cost substantially in excess of that amount, in some cases by several orders of magnitude. This leads to several possible conclusions:

- a. The project is beyond the financial capability of the Intermodal Authority, and should be abandoned unless another alternative not identified in the SDEIS with lower planning level development costs can be found; or

-
- b. The available funds for development costs and the estimated development costs for the Red and Green Alternatives are understated to skew the results of the SDEIS to favor those Alternatives.

Comment No. 4: The proposed Red and Green Alternatives cover much of the same area. They also appear to be the unofficial preferred alternatives, notwithstanding disclaimers in the SDEIS of there being no preferred alternative at this time. The overlap of area in the Red and Green Alternatives raise the issue of whether there is essentially only one alternative, divided into two separate alternatives to allow the appearance of having more alternatives.

Comment No. 5: The application of the abovementioned Screening Criteria to the sites covered by the SDEIS does not appear to be uniform. Some sites with similar characteristics or factors based on the Criteria are eliminated from further consideration, while others are carried forward for further evaluation. For example, the Pittsburgh Road (Yellow) Alternative was eliminated from further consideration, while the Bend (Purple) Alternative was carried forward, notwithstanding that they appear to have much in common based on the Criteria. In the Yellow Alternative, the site terrain was deemed to be unsuitable for further analysis, whereas the Purple Alternative, with similar conditions and estimated development costs, was carried forward.

Comment No. 6: The Red and Green Alternatives would both require levees to be constructed along portions of those Alternatives to protect against upstream flooding and backwash. The estimated costs of operation and maintenance of those Alternatives in the SDEIS does not appear to include those levees, thereby substantially understating those costs.

Comment No. 7: The scope of consideration of direct and indirect impacts of the proposed project for each alternative is entirely too narrow. The SDEIS limits the scope of consideration for those impacts to the respective alternative sites. Obviously, a project of this size and nature would have direct and indirect impacts that affect areas beyond the project site itself, and those have not been adequately addressed.

For example, and without limiting the foregoing, the effect of the proposed Intermodal Project on future growth, while mentioned, is very superficial and inadequate. The SDEIS consists of many pages of promotional information regarding the beneficial effect of the project on economic development and growth, but fails to provide any real information regarding the effect of that growth on the human environment other than that it would provide more employment and economic prosperity. If the project is to have the kind of impact that its promoters claim it will have, the indirect impacts will be substantial and widespread and should be more adequately analyzed.

Comment No. 8: The scope of the cumulative impact analysis is limited to “the geographic area that has the potential to be affected by implementation of any of the alternatives in the reasonably foreseeable future.” (Page 122) It then states that for many of the resource categories considered, the cumulative impact geographic area of analysis is appropriately limited to lands within the project area boundaries.”

NEPA requires that the geographic area that may be affected by cumulative impacts of a project be defined and a rationale for the selection of that geographic area for the cumulative impact analysis be set forth in the environmental statement. There is no such rationale contained in the SDEIS, and the scope contained in the SDEIS as quoted above is illusory and fails to comply with the NEPA standard. To the extent that the SDEIS defines the scope of the cumulative impact analysis as lands within the project area boundaries, that scope is entirely too limited for a project of this size and scope.

Comment No. 9: While the scope of the analysis of cumulative impacts is inadequately defined in the SDEIS, such analysis of cumulative impacts that does appear in the SDEIS fails to provide any discussion of the impacts of the proposed project combined with the impacts of past, present and reasonably foreseeable future activities, whether by governmental or private entities. Instead, the discussion of cumulative impacts is a rehash of direct and indirect impacts of the proposed project. Direct and indirect impacts are not the same as cumulative impacts, and while cumulative impacts may be more difficult to quantify, they must be identified and analyzed.

The SDEIS also fails to provide adequate analysis of the potential direct, indirect and cumulative effects of the anticipated increase of truck traffic as a result of the Intermodal Project. The SDEIS, in pages 12 through 21, discusses the vast difference in cargo capacity of barges over truck and rail capacity. For example, on p. 18 of the SDEIS appears a chart showing that one 15-barge tow has the carrying capacity of 2.25 100-car trains, and 870 large semi-trucks. Only one barge has the capacity of 58 large semi-trucks. However, the data in the SDEIS also shows that the vast majority of cargo in the United States is carried by truck.

Obviously, if the Intermodal Project is successful, the transfer of barge cargo to trucks or trains will involve a much larger number of trucks in the area than are currently in use in the area. Unfortunately, the SDEIS also shows that the far greatest number of injuries and fatalities are sustained in connection with the truck mode of transportation than in barge or rail transportation, and that the number and volume of large spills of hazardous substances occur in connection with truck transportation than in rail or barge. Clearly, there will be direct, indirect and cumulative impacts from accidents and spills at or related to the proposed Intermodal Project that should be analyzed.

Further, the concentration of truck, rail and barge traffic at this proposed facility will cause large increases in air contamination due to emissions from diesel and gasoline engines, cargo, and spills of volatile liquids. The potential of the proposed facility for emission of greenhouse gases is inadequately analyzed and should be further evaluated, as well as the impact of those emissions on climate change.

Of particular concern to my clients is the potential direct, indirect and cumulative impacts upon the City of Dardanelle and other low-lying areas should the Red or Green Alternatives – which appear to be favored in the SDEIS -- be selected. If a levee is necessary to protect the Intermodal Project on either of those alternative sites from flooding in the Arkansas River during 100 and 500 year flood events, it seems intuitive that that, due to filling of the floodplain on the north bank of the river directly across from Dardanelle, there would be an increase in the base flood elevation on the south bank of the river.

We note that the SDEIS contains Section 4.13 (p. 285), relative to Floodplains, that states that the Corps of Engineers conducted a floodplain study report that is contained in Appendix B of the SDEIS. The SDEIS also provides (p. 286) that the Red and Green Alternative hydraulic models “were developed by modifying the existing condition model using Authority supplied plans that included site plans and levees.” The Authority-supplied plans for the site and levees were not included in Appendix B, and should be made available for public review and comment, as they clearly have an impact on the results of the modeling.

In addition, the modeling conducted by the Corps of Engineers shows an increase of .12 feet in water surface elevation at River Stations 203.38 and 202.10 during a 100-year flood, and of .27 and .26 feet, respectively, at those stations during a 500-year flood. However, there is no analysis of the direct, indirect or cumulative impacts of an increase of that amount on the Project Area, including the south bank of the river. The analysis appears to be limited only to the Red and Green Alternatives sites on the north bank.

In addition, the SDEIS fails to discuss the effect of the proposed Intermodal Project upon the existing barge terminals that are located immediately adjacent to the Red and Green Alternatives. The presence of an intermodal facility containing a slackwater harbor, and its socioeconomic and environmental impacts on those terminals, is a part of the human environment of the area and should be evaluated.

Further, the SDEIS fails to consider or analyze the past development and current operations of the Port of Dardanelle and Oakley Port as part of the cumulative impacts of the Intermodal Project. The concentration of barge and truck traffic using those existing ports combined with the barge, truck and rail traffic anticipated to use the

proposed Intermodal Project has the synergistic potential to substantially increase air, noise, water and surface pollution and cause increased safety risks.

In addition, the SDEIS fails to consider or analyze the potential future cumulative impact of the discharge of wastewater from the City of Russellville's wastewater treatment plant directly into the Arkansas River at a point that is on both the Red and Green Alternative sites. Since the early 2000s, the City of Russellville has proposed an amendment to its SPDES permit from its wastewater treatment plant that would allow it to discharge that wastewater into the Arkansas River. An amendment to its permit was granted by the Arkansas Department of Environmental Quality, but that permit was withdrawn by the City in 2008 for further environmental analysis.

The City of Russellville reportedly intends to pursue that permit amendment to allow such discharge, and has continued to conduct studies of the River and the surrounding area. It is therefore a reasonably foreseeable future project. The Arkansas River from the Dardanelle Dam to downstream of the proposed Intermodal Project has extended periods of very low, if any, flow. The City of Dardanelle's intake for its drinking water system is located in the Arkansas River in that same reach of the River. Consequently, the cumulative impact of the addition of the Intermodal Project, with its slackwater harbor, and the proposed discharge from the City of Russellville should be carefully analyzed.

Comment No. 10: Section 4.15 of the SDEIS, relative to endangered species, fails to give adequate consideration to the potential impact of the proposed Intermodal Project on the endangered Interior Least Tern, which nests on exposed river sandbars and reservoir beaches. The SDEIS notes that there is no suitable least tern habitat along the east side of the Arkansas River (we assume this is intended to apply only to the immediate area of the proposed Project), but does not mention whether there is a suitable least tern habitat along the west bank (also referred to herein as the south bank at this location). The aerial photographs and a visual inspection of the west/south bank indicates that there are sandbars present on that bank that may be suitable habitat for the interior least tern.

Notwithstanding that the proposed Intermodal development would occur on the east/north bank of the river, the potential for direct, indirect and cumulative impacts of the west/south bank from either construction or operation of the proposed Project is high, including impacts from noise, contamination, increased water levels that would flood the sandbars, and other sources. An investigation should be conducted to determine whether the interior least tern is present on any sandbank of the Arkansas River in the Project Area, which extends from Clarksville to Morrilton.

Comment No. 11: The No-Action Alternative is not sufficiently analyzed in the SDEIS. 42 C.F.R. §1502.14 provides that the alternatives analysis is "the heart of the

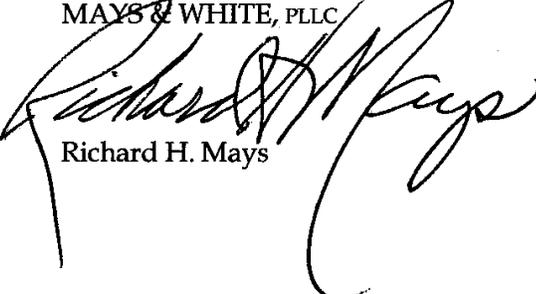
environmental impact statement;" that in preparing an alternatives analysis, agencies "shall rigorously explore and objectively evaluate all reasonable alternatives..." and "include the alternative of no action." This means that the no-action alternative should be as rigorously explored and objectively evaluated as all of the others. A mere conclusory statement that nothing will change, or that the anticipated benefits of the other alternatives being considered will not be realized, are not sufficient.

We also incorporate comments submitted by the undersigned to you dated May 1, 2006, regarding the Draft Environmental Impact Statement on this proposed Project.

My clients and I appreciate the opportunity to submit these comments to you. If you have any questions concerning them, please give me a call.

Sincerely,

MAYS & WHITE, PLLC



Richard H. Mays

cc: Mayor Carolyn McGee
Councilman Doyle McEntyre
Mr. Jim Wood
Parsons Engineering

Doyle McEntyre
Dardanelle, AR 72834

October 3, 2010

Randal Looney
Environmental Coordinator
FHWA - Arkansas Division Office
700 West Capitol Avenue, Rm 3130
Little Rock, AR 72201-3298

Dear Mr. Lonney;

I would like to thank you for the opportunity to comment and for the public meeting at London on the SDEIS for the River Valley Intermodal project and answering our questions in such a professional manner. We attendees from the Dardanelle area later held a meeting at Dardanelle City Hall and invited some of the area residents that have voiced concerns in the past, and relayed some of the information put forth at the public meeting at London and answered some of their questions.

In our discussion about the SDEIS, one of the main topics of concern was the removal of flood plain by the construction of a five hundred year flood levee around the proposed intermodal site. The study done on the flood plain, in the SDEIS, as it impacts the removal of that much flood surge holding area seems to be very limited in its scope. As this is one of the major points of contention with the whole project it would seem that this would have been a major thrust of the statement, but it is dealt with in a most cavalier manner in the very few pages dealing with this topic.

I have included some attachments of the planning area flood plain, as provided in the SDEIS, verses the flood plain as it is currently delineated on the Dardanelle FIRM (map number 05149C0160 E) on the opposite side of the river from the intermodal site. It appears that the study area was quite limited in its scope and neglected to take into consideration all of the Dardanelle flood plain. As can be seen looking at the study area, in the SDEIS, the Dardanelle flood plain stopped near the bank of the Arkansas River and failed to incorporate the part of the flood plain south and west of Dardanelle. Since this area is the location of the Dardanelle elementary, middle and high schools and associated infrastructures and several homes, not doing an exhaustive study of flood impact is not consistent with proper investigation as we believe NEPA requires.

Past floods have proven to be problematic in this reach of the Arkansas River in that before a levee system was built early last century on the south side of the river, flooding blowout was a problem down stream of Dardanelle. As that old levee system, on the south side of the river, is no longer present, the squeeze caused by narrowing the channel by the intermodal levee and removing the surge area north of the river, a blowout condition will be facilitated. The old levee has not been kept up since no monies were

allocated and the levee board maybe defunct. Roads and robbing of levee material has rendered this levee useless and is considered non existent by the USCOE. A blowout in this area would impact several farming, ranching and commercial operations and the Holla Bend National Wildlife Refuge as well as Dardanelle.

We believe that altering the flood plain in this reach of the river can be dangerous and far reaching in its impacts to the areas that are low lying and prone to water inundation.

Another main topic of the informational meeting was the impact of the proposed intermodal facility on industry all ready established in the area near the site, most specifically the Port of Dardanelle. The unfair competition it will be subjected to when the intermodal slack water harbor is constructed and begins subsidized operation in competition with the tax paying Port of Dardanelle located just north of the intermodal facility.

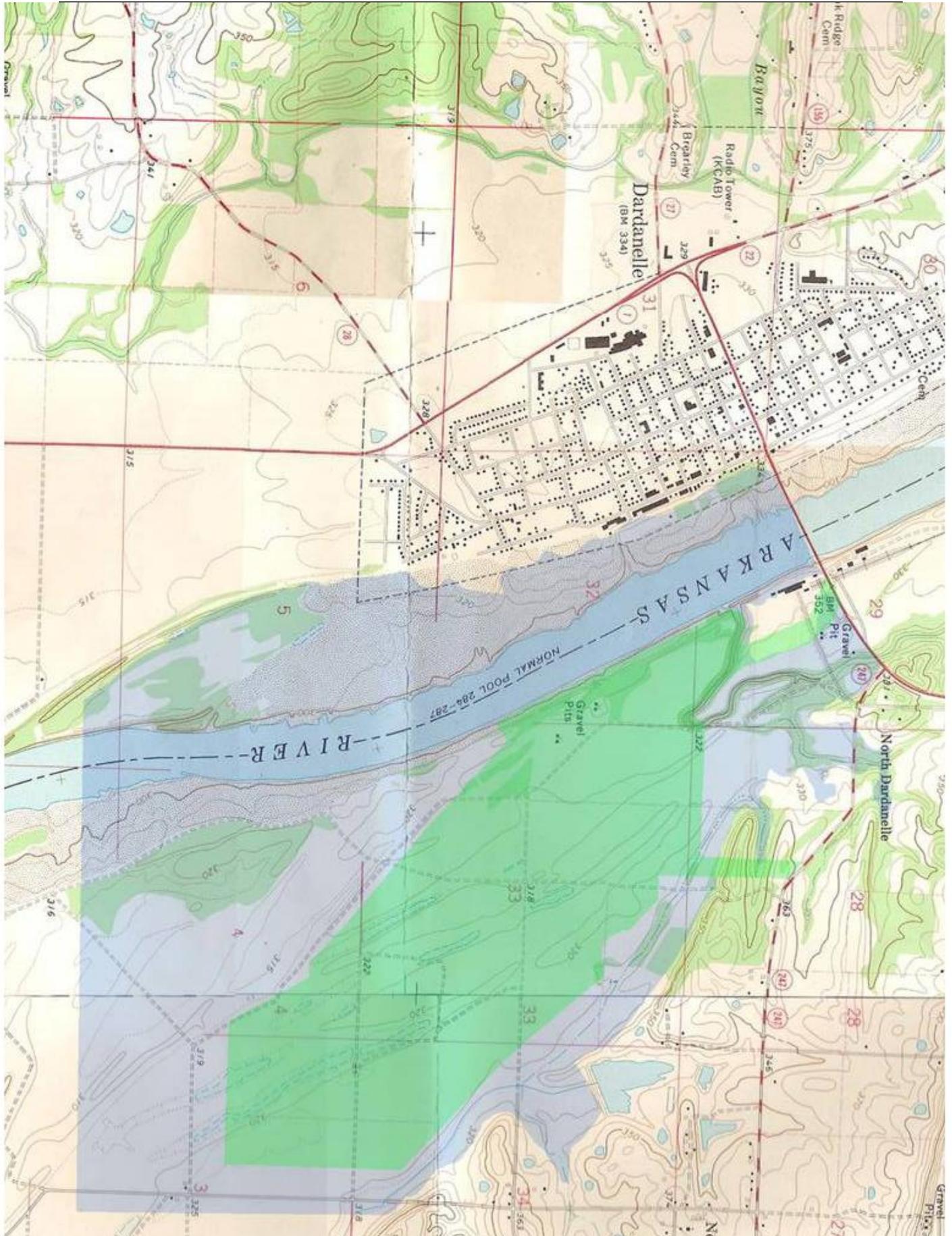
Since a large part of the industry on the north side of the river, in the area of the intermodal facility, is in the Dardanelle School District, the closing or moving of industry as a result of the intermodal facility is of concern. Again with this being a major concern of the people most effected by the building of the intermodal facility it would seem that a most careful study of these points would have been addressed in a logical and empirical manner in stead of a rah-rah chamber of commerce fashion based on what they think or hope will happen. Facts are that the Oakley Port of Dardanelle has approached what industry is in the area and have not been rewarded with any increase in use. But the selling points of the intermodal study always base their benefits on an intermodal site with 30 plus industries locating and using the site. Empirical data does not hold true for such an influx of use due to the nature of the industry in the service area.

If you only take the intermodal's view of the project, the SDEIS does not even taken into consideration any increased rail traffic through Russellville and the impact it will have on an elementary school the railroad track passes by, as to the transportation of any hazardous material causing the school to have evacuation plans or safe shelter areas and the increased traffic congestion caused by railroad street crossings.

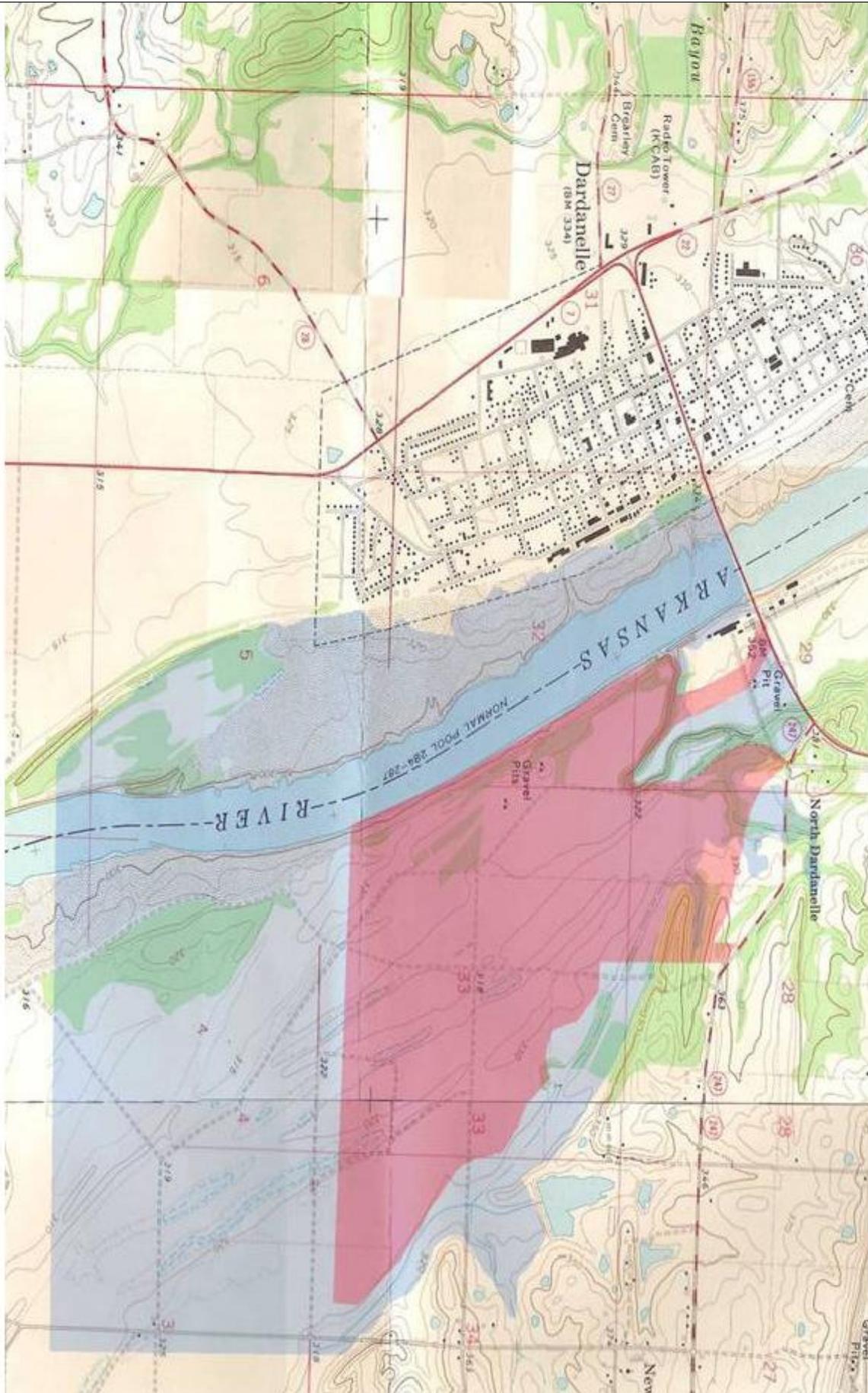
These are but a few of the areas that we feel have not been addressed adequately in the SDEIS and thus would like to request an independent external peer review initiated by FHWA for the Chief of Engineers to determine that the project study is controversial considering the factors set forth to look at the project by an independent panel of experts and bring some true peace of mind to a lot of people effected by this project.

Doyle McEntyre
City of Dardanelle, Alderman

Cc: Mr. Richard Mays
Mayor Carolyn McGee
Mr. Jim Wood







Porath, Rebecca

From: Parsons, RiverValleyEIS
Sent: Tuesday, October 26, 2010 1:33 PM
To: Porath, Rebecca
Subject: FW: River Valley Intermodal Project Comment

From: KRUE [mailto:KRUE@russellvillearkansas.org]
Sent: Wednesday, October 20, 2010 2:24 PM
To: Parsons, RiverValleyEIS
Subject: River Valley Intermodal Project Comment

As the director of a part of the river valley transportation infrastructure, I see the intermodal project as an excellent compliment to existing area transportation facilities and on going projects. Adequate transportation is a key prerequisite for the economic development of any area. The Arkansas River is one transportation mode which is not nearly developed to its potential in this area. A modern barge loading facility with efficient possibilities to transition loads to or from ground transportation for connection to the region would be an enabler for attracting various industries to the area. In the end, that raises the standard of living of everyone nearby.

Bobby L. Day



Name: Ann Beavers
Street Address: 275 Campbell Rd
City: Russellville State: Ar Zip: 72802

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <u>X</u>

We are interested in your comments about the proposed project. Please indicate:
The alternative you like best (No Build, Red, Green or Purple) and tell us why: _____

fewer people displaced

What issues and concerns you have about the project: no flooding issues
~~no people to be displaced~~

Any changes you would make to the project: none

Other Comments: needed for economic growth

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Comments must be postmarked by October 9, 2010. Thank you for your participation in this public involvement effort.
Comments may be emailed to: RiverValleyEIS.Parsons@parsons.com

River Valley Intermodal Facilities

Comment Date: 10-21-10

Supplemental Draft EIS

Name: Harce Beaden

Street Address: 275 CAMBELL Rd

City: Furrellville State: AR Zip: 72802

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <u>x</u>

We are interested in your comments about the proposed project. Please indicate:
The alternative you like best (No Build, Red, Green or Purple) and tell us why:

Green given no Flooding issues less displacement of
Peopl

What issues and concerns you have about the project: none

Any changes you would make to the project: none

Other Comments: good economic growth

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Comments must be postmarked by October 9, 2010. Thank you for your participation in this public involvement effort.

Comments may be emailed to: RiverValleyEIS.Parsons@parsons.com

Name: Charles Blanchard
Street Address: 202 East Shore
City: Russellville State: AR Zip: 72802

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen _____

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: Green -
Most convenient to serve industry
Best Cost - Most Efficient
Closer to existing industry
Currently served by Highway 247

What issues and concerns you have about the project: Disappointed
it has taken so long.

Any changes you would make to the project: _____

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

Charles A Blanchard

Name: Jim Bradley
Street Address: 1003 S. Ingleside
City: Russellville State: AR Zip: 72801

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <u>X</u>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: _____
I prefer the green area because closer to
existing industry, more economical to build
infrastructure.

What issues and concerns you have about the project: We need the project
to provide faster economic development. One
concern is the choice of the purple side which is
away from the navigation channel and another cost
driver is the additional dirt work (land prep) plus
no access roads.

Any changes you would make to the project: connectivity.

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

Name: Sid Brain
Street Address: 1001 Dalewood Court
City: Russellville State: AR Zip: 72801

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <u>X</u>

We are interested in your comments about the proposed project. Please indicate:
The alternative you like best (No Build, Red, Green, or Purple) and tell us why: _____

The proposed project is very important to the continued economic growth and stability of this area. It should be completed AS SOON AS POSSIBLE. Our children and grandchildren should not have to go to the city to get a job!

~~What issues and concerns you have about the projects~~

The green (and red) alternatives are closer to potential and existing ^{potential} users as well as being better located to use all modes of transportation.

The green has less impact on woodlands and views from the river.

~~Any changes you would make to the project:~~

The green also has some less river level increase. (although both are practically non-existent)

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Comments must be postmarked by October 9, 2010. Thank you for your participation in this public involvement effort.

Comments may be emailed to: RiverValleyEIS.Parsons@parsons.com

River Valley Intermodal Facilities

Comment Date: 10/21/10

Supplemental Draft EIS

Name: Dale Brown

Street Address: 2676 BR 105 NO

City: Ark. Mo State: Ark Zip: 72823

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <input checked="" type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: Location

to Highway & Railroad

What issues and concerns you have about the project: Would like the proceed

As soon as possible, due to the economy + the need for
new jobs in the area.

Any changes you would make to the project: _____

Other Comments: This project would be a ~~good~~ start in the
direction the Russellville Area needs to be going in

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Comments must be postmarked by October 9, 2010. Thank you for your participation in this public involvement effort.

Comments may be emailed to: RiverValleyEIS.Parsons@parsons.com

Name: Nancy M. Canerday
Street Address: 2507 W. 2nd St
City: Russellville State: AR Zip: 72801

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <input checked="" type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: The best site for local economic development

What issues and concerns you have about the project: length of time to get project completed

Any changes you would make to the project: this would be a great benefit to our area

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

River Valley Intermodal Facilities

Comment Date: 10-2-10

Supplemental Draft EIS

Name: Amy Carpenter

Street Address: 126 Salmon Lane

City: Russellville State: AR Zip: 72802

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <u>X</u>

We are interested in your comments about the proposed project. Please indicate:
The alternative you like best (No Build, Red, Green, or Purple) and tell us why: _____

Green - less people displaced

What issues and concerns you have about the project: _____

NONE

Any changes you would make to the project: _____

Don't know of any

Other Comments: This project is vital to the growth of the River Valley!

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Comments must be postmarked by October 9, 2010. Thank you for your participation in this public involvement effort.

Comments may be emailed to: RiverValleyEIS.Parsons@parsons.com

Name: Kyle Carpenter
Street Address: 1216 Salmon Lane
City: Russellville State: AR Zip: 72802

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <input checked="" type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate:
The alternative you like best (No Build, Red, Green, or Purple) and tell us why: _____

Green - minimal flooding, less people affected

What issues and concerns you have about the project: none

Any changes you would make to the project: don't know of any

Other Comments: This project is essential to the vitality of the River Valley.

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Comments must be postmarked by October 9, 2010. Thank you for your participation in this public involvement effort.

Comments may be emailed to: RiverValleyEIS.Parsons@parsons.com

River Valley Intermodal Facilities

Comment Date: 10-22-10

Supplemental Draft EIS

Name: Brooke Chandler

Street Address: 420 Ellis Road

City: Pottsville State: AR Zip: 72858

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <input checked="" type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate: The alternative you like best (No Build, Red, Green or Purple) and tell us why: There will be fewer people affected and it won't have a big impact on the flooding.

What issues and concerns you have about the project: _____

Any changes you would make to the project: _____

Other Comments: This project will be an economic improvement for the River Valley area.

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Comments must be postmarked by October 9, 2010. Thank you for your participation in this public involvement effort.
 Comments may be emailed to: RiverValleyEIS.Parsons@parsons.com

Porath, Rebecca

From: Parsons, RiverValleyEIS
Sent: Tuesday, October 26, 2010 1:31 PM
To: Porath, Rebecca
Subject: FW: River Valley Intermodal Project

From: ritachandler@centurylink.net [mailto:ritachandler@centurylink.net]
Sent: Thursday, October 21, 2010 6:34 AM
To: Parsons, RiverValleyEIS
Subject: River Valley Intermodal Project

To Whom It May Concern:

We support the River Valley Intermodal project. We look forward to growth and development in the River Valley as a result of this project and hope for expansion and progress in the job markets.

Sincerely,
Tommy and Rita Chandler
170 Oak Street
Hector, AR 72843

Name: RICHARD POWERS

Street Address: 1302 E. 15TH

City: Russellville State: AR Zip: 72802

Which describes your primary interest in the project:	
Affected Resident <input checked="" type="checkbox"/>	Affected Landowner <input type="checkbox"/>
Affected Business <input checked="" type="checkbox"/>	Concerned Citizen <input type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: Green,
it will help out the RIVER VALLEY the most.

What issues and concerns you have about the project: _____

Any changes you would make to the project: _____

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

Name: Jerry Duvall
Street Address: 1023 E 5th
City: Pottsville State: AR Zip: 72858

Which describes your primary interest in the project:	
Affected Resident <input checked="" type="checkbox"/>	Affected Landowner <input type="checkbox"/>
Affected Business <input type="checkbox"/>	Concerned Citizen <input type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: Green
I am Mayor of Pottsville This location
is the Best for Roads & Rails. It will have
the least environmental impact

What issues and concerns you have about the project: None

Any changes you would make to the project: None

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

Name: Lonnie Duvall
Street Address: 502 S.E 4th St.
City: Atkins State: AR. Zip: 72823

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <u>X</u>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green or Purple) and tell us why: GREEN
This site will be Better for the River Valley
This site will have Better Access
This site is closest to the existing Industry
It will have Lower Maintenance cost

What issues and concerns you have about the project: _____

Any changes you would make to the project: _____

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

Name: BILL EATON

Street Address: 2111 W. 6TH ST, Bill Eaton

City: RUSSELLVILLE State: AR Zip: 72801

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <u>X</u>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: GREEN
THIS IS THE MOST FEASIBLE SITE DUE TO
ITS LOCATION PROXIMITY TO EXIST. INDUSTRY.
THE HIGHWAY CROSS SECTIONS ARE MORE
ADVANTAGEOUS AT THIS SITE. THE NAVIGATION CHAN,
LOCATION TO SITE LOCATION IS AN ADVANTAGE
AT THE GREEN SITE.

What issues and concerns you have about the project: AS A CITY COUNCILMAN
OF RUSSELLVILLE, THE IMPACT OF HAVING
A SITE IN JOHNSON COUNTY WOULD BE
DIFFICULT FOR THE CITY OF KNOXVILLE AND
THE COUNTY ITSELF TO SUPPORT

Any changes you would make to the project: NONE AT PRESENT

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

River Valley Intermodal Facilities

Comment Date: _____

Supplemental Draft EIS

Name: Sharon Eaton

Street Address: 211 W. 6th St.

City: Russellville State: Ar Zip: 72801

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <u>X</u>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: _____

It just makes sense to have it near Dardanelle and Russellville. The business will need houses for employees and it will be available here. The site would be closer to the channel.

What issues and concerns you have about the project: _____

N/A

Any changes you would make to the project: _____

N/A

Other Comments: N/A

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Comments must be postmarked by October 9, 2010. Thank you for your participation in this public involvement effort.

Comments may be emailed to: RiverValleyEIS.Parsons@parsons.com

River Valley Intermodal Facilities

Comment Date: _____

Supplemental Draft EIS

Name: Beeley Ellison

Street Address: 507 Fair Oaks Lane

City: Russellville State: AR Zip: 72801

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <input checked="" type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green or Purple) and tell us why: _____

This would be the best site of economic growth in our area.

What issues and concerns you have about the project: _____

Any changes you would make to the project: _____

Other Comments: It would be great to have this project completed to bring more business development to our area.

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

Name: Pam Ennis
Street Address: PO Box 397
City: Atkins State: AR Zip: 72823

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <u>X</u>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: Green
Good Road access to this area,
Rail access close
to the existing industry.

What issues and concerns you have about the project: The length of
time this project has taken to
complete.

Any changes you would make to the project: _____

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

Name: Jason Epperson
Street Address: 2003 S. Frankfort Ave
City: Russellville State: AR Zip: 72802

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <input checked="" type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: _____

We need the economic growth we have been missing
out on.

What issues and concerns you have about the project: _____

Any changes you would make to the project: _____

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

Name: David A. Freeman
Street Address: 261 Carruth Lane
City: Russellville State: AR Zip: 72802

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <input checked="" type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green or Purple) and tell us why: Lower maintenance cost, closer to existing industry, access being put in place.

What issues and concerns you have about the project: This project has taken to long and needs to be completed.

Any changes you would make to the project: _____

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

Name: Donna Freeman
Street Address: 728 Bud Chesney Rd.
City: Russell State: AR Zip: 72802

Which describes your primary interest in the project:	
Affected Resident <input checked="" type="checkbox"/>	Affected Landowner <input type="checkbox"/>
Affected Business <input type="checkbox"/>	Concerned Citizen <input type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate:
The alternative you like best (No Build, Red, Green, or Purple) and tell us why: Green -
land usage looks better

What issues and concerns you have about the project: Missing ~~options~~
options for additional industry in Pope co. Project
really moving slow.

Any changes you would make to the project: none

Other Comments: The County really needs this for additional
industry, ●

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Comments must be postmarked by October 9, 2010. Thank you for your participation in this public involvement effort.
Comments may be emailed to: RiverValleyEIS.Parsons@parsons.com

Name: MARVIN GERLACH
Street Address: 430 TANGLEWOOD
City: RUSSELLVILLE State: AR Zip: 72801

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business <u>→</u>	Concerned Citizen _____

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: THE GREEN SITE IS STRATEGICALLY LOCATED NEAR RAIL AND INTERSTATE. THE OTHER SITES ARE NOT AS SUITABLE.

What issues and concerns you have about the project: THE CITY OF DANDANELLE'S CONCERN ABOUT FLOODING.

Any changes you would make to the project: NONE

Other Comments: THIS PROPOSED PROJECT WILL BE BENEFICIAL TO EXISTING INDUSTRIES AND SHOULD SERVE TO ATTRACT NEW INDUSTRY.

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

Name: Jim Ed Gibson
Street Address: 100 West Main
City: Russellville State: AR Zip: 72801

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <input checked="" type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: Green
Closer to local industry
currently has access by Hwy 247
would serve the people of the River Valley better

What issues and concerns you have about the project: Taken too long to
complete

Any changes you would make to the project: _____

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

Name: Sidney Gray
Street Address: 201 Youth Camp Rd.
City: Russellville State: AR Zip: 72802

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <input checked="" type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: Green
It would give better access, lower
maintenance costs, and be closer to
the existing industries.

What issues and concerns you have about the project: _____

Any changes you would make to the project: _____

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

Porath, Rebecca

From: Parsons, RiverValleyEIS
Sent: Tuesday, October 26, 2010 1:31 PM
To: Porath, Rebecca
Subject: FW: comment

From: Suzy Griffin [mailto:sgriffin@russellville.org]
Sent: Thursday, October 21, 2010 9:20 AM
To: Parsons, RiverValleyEIS
Subject: comment

I fully support the proposed Intermodal project. I favor the green alternative. This project needs to be fast-tracked. Two of the major benefits that I see as a result of the reduction in truck traffic are infrastructure maintenance costs going down, and the air quality improving. This project also puts our area in a more competitive position to attract new industry.

Suzy Griffin
309 Candlewick Lane
Russellville AR 72801
sgriffin@russellville.org

Name: Janette Oak
Street Address: 3007 Heistop Place
City: Russellville State: AR Zip: 72802

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <u>✓</u>

We are interested in your comments about the proposed project. Please indicate:
The alternative you like best (No Build, Red, Green, or Purple) and tell us why: _____

The GREEN site would displace fewer families. There have been considerable road improvements to the highway servicing the GREEN site and is near a designated truck route.

What issues and concerns you have about the project: _____

Any changes you would make to the project: _____

Other Comments: Since this project has been driven by Russellville citizens, for the most part, I feel that moving the project from the original (RTFA) site would diminish the local interest & success of the project.

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Comments must be postmarked by October 9, 2010. Thank you for your participation in this public involvement effort.
Comments may be emailed to: RiverValleyEIS.Parsons@parsons.com

Name: Benny HARRIS
Street Address: 50 Sumac Cove
City: Russellville State: AR Zip: 72802

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <input checked="" type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate:
The alternative you like best (No Build, Red, Green, or Purple) and tell us why: _____
Green proposal appears to be the best
alternative when considering flooding and
displacement of people.

What issues and concerns you have about the project: None

Any changes you would make to the project: None

Other Comments: Project should proceed in regard to
economic benefit to Ark & yield continuity

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Comments must be postmarked by October 9, 2010. Thank you for your participation in this public involvement effort.
Comments may be emailed to: RiverValleyEIS.Parsons@parsons.com

Name: Lark Harris

Street Address: 50 Sumac Cove

City: Russellville State: AR Zip: 72802

Which describes your primary interest in the project:			
Affected Resident	_____	Affected Landowner	_____
Affected Business	_____	Concerned Citizen	<input checked="" type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate: The alternative you like best (No Build, Red, Green, or Purple) and tell us why:

Appears to be more appealing and a much better alternative as fewer people are or will be affected with flooding issues.

What issues and concerns you have about the project: _____

Any changes you would make to the project: _____

Other Comments: Polk + Yell County should both benefit economically with this project.

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Comments must be postmarked by October 9, 2010. Thank you for your participation in this public involvement effort.
Comments may be emailed to: RiverValleyEIS.Parsons@parsons.com

River Valley Intermodal Facilities

Comment Date: 10-22-10

Supplemental Draft EIS

Name: Debbie Hernandez

Street Address: 1002 Ave 1 NW

City: ARKINS State: AR Zip: 72823

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <u>X</u>

We are interested in your comments about the proposed project. Please indicate:
The alternative you like best (No Build, Red, Green, or Purple) and tell us why: _____

Green - less people displaced - minimal flooding

What issues and concerns you have about the project: That a few are opposed

Any changes you would make to the project: don't have any

Other Comments: This project is a very important part of growing & strengthening the River Valley.

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Comments must be postmarked by October 9, 2010. Thank you for your participation in this public involvement effort.

Comments may be emailed to: RiverValleyEIS.Parsons@parsons.com

River Valley Intermodal Facilities

Comment Date: _____

Supplemental Draft EIS

Name: GERALD HOOK

Street Address: 2102 W. 8TH ST

City: RUSSSELLVILLE State: AR Zip: 72301

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <u>X</u>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: _____

PREFER 'GREEN' SITE DUE TO PROXIMITY TO RAIL & HIGHWAY ACCESS - ALSO, THIS SITE IS CLOSE TO NAVIGATION CHANNEL.

What issues and concerns you have about the project: _____

I HAVE NO NEGATIVES ABOUT THIS PROJECT

Any changes you would make to the project: _____

N/A

Other Comments: _____

N/A

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Comments must be postmarked by October 9, 2010. Thank you for your participation in this public involvement effort.

Comments may be emailed to: RiverValleyEIS.Parsons@parsons.com

River Valley Intermodal Facilities

Comment Date: 10-22-10

Supplemental Draft EIS

Name: Belucca Hopkins

Street Address: 1321 Winterwood Circle

City: Nardanelle State: AR Zip: 72834

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <input checked="" type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate:
The alternative you like best (No Build, Red, Green, or Purple) and tell us why: _____

Minor impact to flood plains and would
be less noticeable

What issues and concerns you have about the project: _____

Any changes you would make to the project: _____

Other Comments: Jobs would be created during
and following the project

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Comments must be postmarked by October 9, 2010. Thank you for your participation in this public involvement effort.
Comments may be emailed to: RiverValleyEIS.Parsons@parsons.com

River Valley Intermodal Facilities

Comment Date: 10/22/10
Supplemental Draft EIS

Name: MARCUS HUBBARD

Street Address: 210 West 13TH

City: Russellville State: AR Zip: 72801

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <u>X</u>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green or Purple) and tell us why: GREEN

This site will be better for The River Valley

This site will have better Access

This site is closest to The existing Industry

It will have lower maintenance cost.

What issues and concerns you have about the project: _____

Any changes you would make to the project: _____

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

Name: Paul Hull
Street Address: 4562 SR 164 West
City: Dover State: Ar. Zip: 72837

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business <input checked="" type="checkbox"/>	Concerned Citizen _____

We are interested in your comments about the proposed project. Please indicate:
The alternative you like best (No Build, Red, Green, or Purple) and tell us why: _____

Location to city & Appears to be cheaper
to construct.
I think the Green site is much better.
The Green site looks like it would have more
land for industry

What issues and concerns you have about the project: That won't start
within the next five years.

Any changes you would make to the project: None at this time!

Other Comments: This project would have my full
support.

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Comments must be postmarked by October 9, 2010. Thank you for your participation in this public involvement effort.
Comments may be emailed to: RiverValleyEIS.Parsons@parsons.com

Name: KURT LONES
Street Address: 500 WEST MAIN, SUITE 201
City: RUSSELLVILLE State: AR Zip: 72801

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <input checked="" type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: _____
GREEN - MUCH CLOSER TO EXISTING INDUSTRY
& INFRASTRUCTURE. SITE IS BETTER SUITED FOR
BUILDING

What issues and concerns you have about the project: NO NEGATIVE
CONCERNS. I WOULD LIKE TO SEE THIS
PROJECT PROCEED AS QUICKLY AS POSSIBLE

Any changes you would make to the project: NONE

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

Name: Robert L. LASTER
Street Address: 3103 EAST MAIN
City: Russ State: AK Zip: 72801

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <input checked="" type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: GREEN
Cheapest

What issues and concerns you have about the project: The Grade on the
Purple site does not work well for
the rail road

Any changes you would make to the project: _____

Other Comments: Water ways Commission has
commented on the needs of additional
harbor sites

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

River Valley Intermodal Facilities

Comment Date: _____

Supplemental Draft EIS

Name: Allen Laws

Street Address: 318 Quapan Dr.

City: Russellville State: AR Zip: 72802

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <input checked="" type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why:
Green, I feel this is the best, least disruptive
alternative. It is least expensive & closest to
existing industry & infrastructure

What issues and concerns you have about the project: None

Any changes you would make to the project: I would have liked
to include airport facilities, but that is not
possible

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

Name: MIKE MCCOY

Street Address: 204 RIVER OAKS LANE

City: RUSSELLVILLE State: AR Zip: 72802

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen _____

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: _____
GREEN - THIS ALTERNATIVE IS THE LEAST EXPENSIVE AND CLOSEST
TO EXISTING INDUSTRY. THIS SITE APPEARS TO BE THE BEST FOR
DEVELOPMENT.

What issues and concerns you have about the project: _____

Any changes you would make to the project: _____

Other Comments: THIS PROJECT IS VERY IMPORTANT FOR THE ECONOMIC
DEVELOPMENT.

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

Name: Laura McGuire
Street Address: 255 Spring Hill Ave
City: London State: Ark Zip: 72847

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <u>X</u>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: Green
This area will be close to the existing industry, lower cost,
better location

What issues and concerns you have about the project: _____

Any changes you would make to the project: _____

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

Name: Rhonda McKown
Street Address: 1704 S. Baltimore
City: Russellville State: AR Zip: 72802

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <input checked="" type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: Maintenance not as costly. Closer proximity, access to facility put in place.

What issues and concerns you have about the project: _____

Any changes you would make to the project: _____

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

River Valley Intermodal Facilities

Comment Date: 10/21/10

Supplemental Draft EIS

Name: DANNY MINKS

Street Address: 73 GEORGE BROWN COVE

City: DOVER State: AR Zip: 72837

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <input checked="" type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate: The alternative you like best (No Build, Red, Green, or Purple) and tell us why: _____

GREEN - BECAUSE OF ITS LOCATION.

What issues and concerns you have about the project: _____

WE HAVE MISSED SEVERAL INDUSTRIES COMING TO THE AREA DUE TO TIME DELAYS

Any changes you would make to the project: _____

I JUST HOPE IT STARTS SOON.

Other Comments: _____

I SUPPORT THIS PROJECT AND THINK IT WOULD BE GREAT FOR THE FUTURE OF THIS AREA.

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Comments must be postmarked by October 9, 2010. Thank you for your participation in this public involvement effort.

Comments may be emailed to: RiverValleyEIS.Parsons@parsons.com

Name: Lisa M. Mize

Street Address: 2103 Ave 7 NE

City: Atkins State: AR Zip: 72823
~~72801~~

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <input checked="" type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: Green
Area best suited for this project, good access and close to existing industry.

What issues and concerns you have about the project: _____

Any changes you would make to the project: _____

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

Name: JOHNNY MORGAN
Street Address: 216 HILTOP DRIVE
City: RUSS State: AR Zip: 72802

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <u>X</u>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: GREEN.
Popul Yell Counties have missed numerous
opportunities do to lack of multi-modal facilities.

What issues and concerns you have about the project: Purple site has too
Much slope for rail + site development.

Any changes you would make to the project: —

Other Comments: The State of Ark + Waterways Commission
have stated that more harbor sites are needed along
River to improve efficiency.

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

River Valley Intermodal Facilities

Comment Date: 10/21/10

Supplemental Draft EIS

Name: Debbie Motley

Street Address: 908 West Norrisstown Circle

City: Russellville State: AR Zip: 72802

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <u>X</u>

We are interested in your comments about the proposed project. Please indicate:
The alternative you like best (No Build, Red, Green, or Purple) and tell us why: GREEN

Because it is closer to Highway and Rail Access and cost
would be less.

What issues and concerns you have about the project: In today's market completing
for industries we need the River access to complete with
other areas that already have intermodal facilities in place.
This project needs to get underway ASAP so cost can be
lock in.

Any changes you would make to the project:

Other Comments:

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Comments must be postmarked by October 9, 2010. Thank you for your participation in this public involvement effort.
Comments may be emailed to: RiverValleyEIS.Parsons@parsons.com

River Valley Intermodal Facilities

Comment Date: 10-22-10

Supplemental Draft EIS

Name: Delores L Motley

Street Address: 277 Sparksford Drive

City: Russ State: W Zip: 72802

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <input checked="" type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: _____

No Flooding Issues, Fewer people
Effectives

What issues and concerns you have about the project: _____

Any changes you would make to the project: _____

Other Comments: Needed for Economic Growth

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Comments must be postmarked by October 9, 2010. Thank you for your participation in this public involvement effort.

Comments may be emailed to: RiverValleyEIS.Parsons@parsons.com

River Valley Intermodal Facilities
Comment Date: _____
Supplemental Draft EIS

Name: Bert Mullens
250 South Enid

Street Address: _____

City: Russellville, _____ State: AR Zip: 72801

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <u>X</u> _____

We are interested in your comments about the proposed project. Please indicate:
The alternative you like best (No Build, Red, Green, or Purple) and tell us why: Green Alternative

Easy access to highway 247 which connects to I40. This site has access to a short line rail service. The location is near to present manufacturing facilities and offers the best opportunities for attracting new industry which would result in additional jobs and therefore create economic growth and development

What issues and concerns you have about the project: just getting it built as soon as possible I am in favor of the Green Alternative

Any changes you would make to the project: None

Other Comments: It is important we move forward on this project for the growth and development of the entire River Valley area

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Comments must be postmarked by October 9, 2010. Thank you for your participation in this public involvement effort.
Comments may be emailed to: RiverValleyEIS.Parsons@parsons.com

Name: Charles W Dates

Street Address: 6368 SR 247

City: Dottsu, Mo State: Ar Zip: 72818

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <input checked="" type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: _____

Green is the best site to use.

What issues and concerns you have about the project: _____

Any changes you would make to the project: _____

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Comments must be postmarked by October 9, 2010. Thank you for your participation in this public involvement effort.

Comments may be emailed to: RiverValleyEIS.Parsons@parsons.com

Name: Stacy Pack
Street Address: 1801 N Church St
City: Atkins State: AR Zip: 72823

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <input checked="" type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: Green -
Presently we have a major road upgrade in
the area. It will be closer to existing
industry. It will be more beneficial to
the River Valley.

What issues and concerns you have about the project: _____

Any changes you would make to the project: _____

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

Name: Tommy PARKER

Street Address: 2303 West 8th

City: Russellville State: AR Zip: 72801

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <u>X</u>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: _____

Seems to be the best site for economic development

What issues and concerns you have about the project: _____

Why it isn't already done

Any changes you would make to the project: NONE

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

Name: Jeff Pipkin
Street Address: 708 W. Main
City: Russellville State: AR Zip: 72801

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <input checked="" type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate:
The alternative you like best (No Build, Red, Green, or Purple) and tell us why: _____

The green alternative makes the most sense to me since the City of Russellville has already purchased almost 300 acres either within this site or adjacent to it. The city's land is perfect for industrial use.

What issues and concerns you have about the project: I'm only concerned about more possible delays, whether it's funding, litigation, environmental or whatever. We have been working on this way too long.

Any changes you would make to the project: _____

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Comments must be postmarked by October 9, 2010. Thank you for your participation in this public involvement effort.

Comments may be emailed to: RiverValleyEIS.Parsons@parsons.com

River Valley Intermodal Facilities

Comment Date: 10-22-10

Supplemental Draft EIS

Name: Amela Randle

Street Address: P.O. Box 113

City: Dardanelle State: Ar. Zip: 72834

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <input checked="" type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: _____

I think this is something that would be good for our area's. Both Jeff & Pope Counties.

What issues and concerns you have about the project: _____

Any changes you would make to the project: _____

Other Comments: This Project would be advantageous to all of the River Valley.

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Comments must be postmarked by October 9, 2010. Thank you for your participation in this public involvement effort.

Comments may be emailed to: RiverValleyEIS.Parsons@parsons.com

River Valley Intermodal Facilities

Comment Date: 9/16/10

Supplemental Draft EIS

Name: Rebecca Reaves

Street Address: 1601 Center Valley Rd

City: Russellville State: AR Zip: 72802

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <u>X</u>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: _____

I feel the Green alternative would be
the best choice

What issues and concerns you have about the project: I feel this is

a great project that will be most
beneficial to the whole area.

Any changes you would make to the project: _____

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Comments must be postmarked by October 9, 2010. Thank you for your participation in this public involvement effort.

Comments may be emailed to: RiverValleyEIS.Parsons@parsons.com

River Valley Intermodal Facilities

Comment Date: _____

Supplemental Draft EIS

Name: Roy Reaves

Street Address: 1601 Center Valley Rd

City: Russellville State: AR Zip: 72802

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <input checked="" type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: _____

Has No significant impact on flooding!
The Dam around the project is set back from the River

What issues and concerns you have about the project: _____

Any changes you would make to the project: None

Other Comments: It will be a great economic stimulus to this area for many years to come.

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Comments must be postmarked by October 9, 2010. Thank you for your participation in this public involvement effort.

Comments may be emailed to: RiverValleyEIS.Parsons@parsons.com

Name: Jean Sadler
Street Address: 734 McHenry Road
City: Russellville State: AR Zip: 72802

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <input checked="" type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: Green
Best for this area

What issues and concerns you have about the project: _____

Any changes you would make to the project: _____

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

Name: Elber Shannm
Street Address: 188 Country Acres Rd.
City: Atkins State: AR Zip: 72823

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <input checked="" type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: Green -
Closer to existing industry, Lower maintenance
cost

What issues and concerns you have about the project: _____

Any changes you would make to the project: _____

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

Name: BILL SORRELLS

Street Address: 2011 W. 9th

City: Russellville State: AR Zip: 72801

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <u>X</u>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: _____

The green site is better situated and suited for the facility.

What issues and concerns you have about the project: The timeframe

to get the project initiated.

Any changes you would make to the project: Quicken the process

Other Comments: This will be a wonderful economic attribute to the river valley area for existing industry and future ones.

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Comments must be postmarked by October 9, 2010. Thank you for your participation in this public involvement effort.

Comments may be emailed to: RiverValleyEIS.Parsons@parsons.com

River Valley Intermodal Facilities

Comment Date: _____

Supplemental Draft EIS

Name: Steven Sparks

Street Address: 309 N Vancouver

City: Russellville State: AK Zip: 72801

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <input checked="" type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green or Purple) and tell us why: _____

The green site is the best opt. for development
closer to existing industry

What issues and concerns you have about the project: N/A

Any changes you would make to the project: N/A

Other Comments: One should just look at our history of the rail road
being built in Rust to see what a project like this will do for
our local economic development

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

Name: Carmen Stump
Street Address: 918 W Norrisdowner
City: Rsu1 State: Arz Zip: 72802

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen _____

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: _____

Red
More economic development in the region.
This green option is the best option
in cost? has fewer impacts.

What issues and concerns you have about the project: _____

The purple alternative is too expensive
& the operations & expenses are too high.

Any changes you would make to the project: _____

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

Name: Fern Tucker
Street Address: 370 Bowen Est. Rd
City: Russellville State: Ar Zip: 72802

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <input checked="" type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: Green
Lower Cost, State is presently upgrading the access road
in this area close to railroad spur. Close to other
industry.

What issues and concerns you have about the project: _____

Any changes you would make to the project: _____

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

River Valley Intermodal Facilities

Comment Date: _____

Supplemental Draft EIS

Name: Norman Watson

Street Address: 407 Skyline Vista Lane

City: Russellville State: AR Zip: 72802

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen _____

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: _____

Green - I prefer the green alternative
because the infrastructure is either
already in place or least costly to
put in place. Operation + maintenance
are the most reasonable

What issues and concerns you have about the project: _____

The purple alternative seem to be the most
expensive to construct. There is existing
industry use this area near Knoxville

Any changes you would make to the project: _____

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

River Valley Intermodal Facilities

Comment Date: _____

Supplemental Draft EIS

Name: Chad Weisler

Street Address: 704 South Ducrest

City: Russellville State: AR Zip: 72809

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <u>X</u>

We are interested in your comments about the proposed project. Please indicate:
The alternative you like best (No Build, Red, Green, or Purple) and tell us why: _____

Green is the best option. This is because of the amount of
land to develop. It also does not include a low or
wet area.

What issues and concerns you have about the project: _____

Time - this is a good needed item for our area. It
would help bring industry to both Russellville & Dardanelle.
Which in turn provides more jobs

Any changes you would make to the project: Rush!

Other Comments: I strongly support this project.

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Comments must be postmarked by October 9, 2010. Thank you for your participation in this public involvement effort.

Comments may be emailed to: RiverValleyEIS.Parsons@parsons.com

Name: Quida Wesley
Street Address: 10696 Bryce Manor Cir.
City: Dardanelle State: Ar. Zip: 72834

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <input checked="" type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green or Purple) and tell us why: Was 40
significant impact on flooding and is most
advantageous for Yell and Pope County.
Less, amount of people affected.

What issues and concerns you have about the project: _____

Any changes you would make to the project: _____

Other Comments: The Project will be an economic advantage
to the River Valley.

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

River Valley Intermodal Facilities

Comment Date: 9/16/10

Supplemental Draft EIS

Name: Nancy Wesley

Street Address: 10690 Boyce Manor Ct

City: Dardanelle State: Ar Zip: 72834

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <input checked="" type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: Would

be most effective for Pope + Yell County.
Doesn't change flooding much!

What issues and concerns you have about the project: _____

Any changes you would make to the project: _____

Other Comments: Will benefit all of the Valley area.

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Comments must be postmarked by October 9, 2010. Thank you for your participation in this public involvement effort.

Comments may be emailed to: RiverValleyEIS.Parsons@parsons.com

Name: Matt White
Street Address: 1509 West Main St-
City: Russellville State: AR Zip: 72801

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <u>✓</u>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: I would prefer the Green site due to its proximity to existing industry and my understanding that it would be less costly than some other site such as the purple site.

What issues and concerns you have about the project: The slow progress of the project. This project needs to move forward asap. Especially with the potential benefits it could bring to the river valley.

Any changes you would make to the project: _____

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

River Valley Intermodal Facilities

Comment Date: 10-22-10
Supplemental Draft EIS

Name: Annette Whittenburg
Street Address: 2540 St. Hwy 247
City: Atkins State: AR Zip: 72823

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <u>X</u>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: Green
This seems to be the most logical choice for a
good road access that is close to the
existing industry.

What issues and concerns you have about the project: _____

Any changes you would make to the project: _____

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

River Valley Intermodal Facilities

Comment Date: 10-22-10

Supplemental Draft EIS

Name: Karen Whittenberg

Street Address: 112 McKennon Road

City: Morrilton State: AR Zip: 72110

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <input checked="" type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: _____

Green - Minimal flooding - less people displaced.

What issues and concerns you have about the project: _____

none

Any changes you would make to the project: _____

none

Other Comments: This project is vital to the growth of our River valley!

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Comments must be postmarked by October 9, 2010. Thank you for your participation in this public involvement effort.

Comments may be emailed to: RiverValleyEIS.Parsons@parsons.com

Name: ROBERT DWILEY

Street Address: 711 S DENVER AVE

City: RUSSELLVILLE State: AK Zip: 72801

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen _____

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: _____

What issues and concerns you have about the project: _____

Any changes you would make to the project: _____

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

Name: Jared Wood
Street Address: 124 Tarpon Place
City: Russellville State: AR Zip: 72802

Which describes your primary interest in the project:	
Affected Resident _____	Affected Landowner _____
Affected Business _____	Concerned Citizen <input checked="" type="checkbox"/>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: Green
alternative would be the best option.

What issues and concerns you have about the project: No Cons. This is a
very important part of Russellville - the River Valley

Any changes you would make to the project: No

Other Comments: _____

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

Name: Jeff Wright
Street Address: 214 N. Shore Dr.
City: Russellville State: Ar Zip: 72802

Which describes your primary interest in the project:			
Affected Resident	_____	Affected Landowner	_____
Affected Business	_____	Concerned Citizen	<u>X</u>

We are interested in your comments about the proposed project. Please indicate:

The alternative you like best (No Build, Red, Green, or Purple) and tell us why: Green
Best location for the project

What issues and concerns you have about the project: _____

Any changes you would make to the project: No changes at this time.

Other Comments: None

Please place your completed form in the drop box in the meeting entrance area or mail to the address on the reverse side. Thank you for your participation in this public involvement effort.

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