

**COUNCIL BLUFFS INTERSTATE SYSTEM
IMPROVEMENTS PROJECT
TIER 2, SEGMENT 4
POTTAWATTAMIE COUNTY, IOWA
IMN-029-3(166)54—13-78**

ENVIRONMENTAL ASSESSMENT

And Section 4(f) De Minimis Impact Finding

Submitted Pursuant to 42 USC 4332(2)(c)

By The

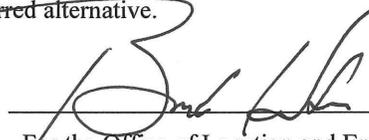
**U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION
And
IOWA DEPARTMENT OF TRANSPORTATION
OFFICE OF LOCATION AND ENVIRONMENT**

**Cooperating Agency
U.S. Army Corps of Engineers**

The signatures are considered acceptance of the general project location and concepts described in the environmental document unless otherwise specified by the approving officials. However, such approval does not commit to approve any future grant requests to fund the preferred alternative.



For the Iowa Division Administrator
Federal Highway Administration



For the Office of Location and Environment
Iowa Department of Transportation

7/17/2017

Date of Approval for Public Availability

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PREFACE

The Transportation Equity Act of the 21st Century (TEA-21) (23 CFR) mandated environmental streamlining in order to improve transportation project delivery without compromising environmental protection. In accordance with TEA-21, the environmental review process for this project has been documented as a Streamlined Environmental Assessment (EA). This document addresses only those resources or features that apply to the project. This allowed study and discussion of resources present in the study area, rather than expend effort on resources that were either not present or not impacted. Although not all resources are discussed in the EA, they were considered during the planning process and are documented in the Streamlined Resource Summary, shown in Appendix A.

The following table shows the resources considered during the environmental review for this project. The first column with a check means the resource is present in the project area. The second column with a check means the impact to the resource warrants more discussion in this document. The other listed resources have been reviewed and are included in the Streamlined Resource Summary.

Table 1: Resources Considered

SOCIOECONOMIC	NATURAL ENVIRONMENT
<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Land Use <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Community Cohesion <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Churches and Schools <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Environmental Justice <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Economic <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Joint Development <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Parklands and Recreational Areas <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Bicycle and Pedestrian Facilities <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Right of Way <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Relocation Potential <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Construction and Emergency Routes <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Transportation	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Wetlands <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Surface Waters and Water Quality <input type="checkbox"/> <input type="checkbox"/> Wild and Scenic Rivers <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Floodplains <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Wildlife and Habitat <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Threatened and Endangered Species <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Woodlands <input type="checkbox"/> <input type="checkbox"/> Farmlands
CULTURAL	PHYSICAL
<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Historical Sites or Districts <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Archaeological Sites <input type="checkbox"/> <input type="checkbox"/> Cemeteries	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Noise <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Air Quality <input checked="" type="checkbox"/> <input type="checkbox"/> Mobile Source Air Toxics (MSATs) <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Energy <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Contaminated and Regulated Materials Sites <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Visual <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Utilities
<input checked="" type="checkbox"/> CONTROVERSY POTENTIAL: Low	
<input checked="" type="checkbox"/> Section 4(f): Park or Recreation Areas - 4(f) <i>de minimis</i>	

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1.0 Description of the Proposed Action

This Tier 2 Environmental Assessment (EA) presents the results of studies and analyses conducted to determine the potential impacts of proposed improvements in Segment 4 of the Council Bluffs Interstate System (CBIS) program of infrastructure improvements located within the Council Bluffs, Iowa metropolitan area. This EA document is a second tier document related to the CBIS Tier 1 Draft and Final Environmental Impacts Statements (EIS) that evaluated impacts of the overall CBIS Improvements Project. For more information on the CBIS Tier 1 EIS and the tiering process, please refer to **Section 2.0 Project History**.

This EA document is being prepared under the direction of the Federal Highway Administration (FHWA), serving as the lead federal agency in compliance with the National Environmental Policy Act of 1969 (NEPA), as amended. The U.S. Army Corps of Engineers (USACE) is serving as a cooperating agency on the Segment 4 Project (the Project). This EA is also being prepared to meet the environmental documentation requirements of a Section 408¹ approval request in accordance with Engineering Circular 1165-2-216. This document follows the guidelines promulgated by the Council on Environmental Quality (CEQ) for implementing the procedural provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508. Additionally, CFR 1506.3(a) allows the cooperating agency to adopt a NEPA document prepared by the lead federal agency. The USACE would independently evaluate and verify the information and analysis undertaken in the EA and would take full responsibility for the scope and content contained herein.

1.1 Description of the Proposed Action

As part of the CBIS program of infrastructure improvements, the FHWA and the Iowa Department of Transportation (Iowa DOT) are proposing geometric, safety, and capacity improvements to the following:

- Interstate 29 (I-29) and the Interstate 480 (I-480) mainline roadways;
- Directional ramps that comprise the I-29/I-480 system interchange;
- I-480/41st Street interchange;
- The I-29/N. 35th Street and I-29/Avenue G interchange pair; and
- The I-29/9th Avenue interchange.

1.2 Tier 2 Study Area

The CBIS Segment 4 Tier 2 study area is displayed on **Exhibit 1-1**. Project termini include the following:

- On the south, the Union Pacific Railroad (UPRR) bridge over I-29;
- On the north, up to, but not including the I-29/25th Street interchange ramps;
- On the west, the east abutment of the I-480 bridge over the Missouri River; and

¹ Section 408 of the Clean Water Act, originating from Section 14 of the Rivers and Harbors Act of 1899 and codified in 33 USC 408, authorizes the Secretary of the Army, on the recommendation of the Chief of Engineers of the USACE, to grant permission for the alteration or occupation or use of a USACE civil works project (including levees) if the Secretary determines that the activity will not be injurious to the public interest and will not impair the usefulness of the project.

- On the east, I-29/I-480 system interchange ramps and connection to West Broadway (U.S. Highway 6 (Highway 6)) in Council Bluffs.

The study area boundary represents the logical limits for infrastructure improvements to provide sufficient analysis of the conceptual alternatives identified during the Tier 1 process and will accommodate minor changes or revisions to those alternatives.

2.0 Project History

In 2001, the FHWA, Iowa DOT, and Nebraska Department of Roads (NDOR) began the CBIS Improvements Project, a broad, long-term study of transportation issues in the I-80, I-29, and I-480 corridor in Omaha, Nebraska and Council Bluffs, Iowa. The agencies chose to split the NEPA analysis and decision making process into two stages using a tiered approach. Tier 1 considered broad, overarching proposals with further analysis of site-specific project elements occurring in the subsequent Tier 2 segment.

Tier 1 was designed to identify needed improvements to the overall Interstate system, develop broad alternatives to address the needed improvements, and conduct a high level analysis of the human and natural impacts of those alternatives. Under Tier 1, a preferred alternative was identified for improving the Interstate system and a segmentation plan was established which split the corridor into segments of independent utility for detailed study in Tier 2. In Tier 2, each segment is being evaluated as an individual project, with NEPA documents prepared for each individual segment using the appropriate level of NEPA documentation. For Segment 4, FHWA and Iowa DOT have determined that an EA is the appropriate level of documentation to comply with NEPA requirements.

During the Tier 1 process, FHWA and Iowa DOT recommended that Segment 4 include the section of I-480 from the I-480 Missouri River Bridge on the Iowa side eastward to the I-29/I-480/West Broadway system interchange, southward along I-29 to the 9th Avenue interchange, and northward along I-29 to the 25th Street interchange. During the Tier 2 process, some modifications were made to the northeast terminus of the Segment 4 as discussed in **Section 4.4** of this document. For more information on the Tier 2 Segments 1 through 3, please refer to the CBIS Tier 1 Environmental Impact Statement (EIS) or the Tier 2 NEPA documentation for each segment, which can be accessed on the Iowa DOT CBIS website at the following link: <http://councilbluffsinterstate.iowadot.gov/resources/program-docs/>. The Tier 2 segments are displayed on **Exhibit 2-1**.

The Tier 1 process concluded with a Record of Decision (ROD) in late 2005. Within Segment 4, the ROD approved full access between West Broadway and I-29, and improvements to geometrics to meet current engineering standards and to accommodate future traffic needs.

3.0 Project Purpose and Need

3.1 Purpose of the Proposed Action

The purpose of the overall CBIS Improvements Project was identified in the Tier 1 EIS and is fully applicable to the Segment 4 Project (the Project). The Tier 1 EIS identified the purpose of the overall CBIS Improvements Project as examining needed transportation improvements

to address existing and future travel demands within the I-80, I-29, and I-480 corridors. The purpose of the Tier 2 study of Segment 4 is to upgrade mobility specifically within the Segment 4 Project study area through improvements to I-29 and I-480.

3.2 Need for the Proposed Action

The proposed action will address the following needs:

- Improving system priority/linkage at the I-29/I-480 interchange;
- Improving the geometry of the roadway;
- Improving safety performance;
- Improving congestion and level of service; and
- Providing a direct connection to West Broadway from I-29.

Improving system priority/linkage at the I-29/I-480 interchange

The current configuration of the I-29/I-480 system interchange does not give priority to interstate-to-interstate movements. This configuration contributes to non-desirable merging of primary traffic movements and way finding issues. Reconfiguring the I-29/I-480 system interchange to give priority to interstate-to-interstate movements will reduce non-desirable merging and improve way finding through the interchange.

Improving the geometry of the roadway

I-29 and I-480 were constructed in the late 1960s and early 1970s to the design standards of the time. Today, the facilities do not conform to current design standards for Interstate highways. Specific design elements that will be upgraded include horizontal alignment, vertical clearance and alignment, stopping and decision sight distance, cross sections, exit and entrance ramp design, ramp spacing, partial interchanges, and driver expectancy issues. **Table 3-1** displays current locations within the Segment 4 study area that do not meet current design standards.

Table 3-1: Locations Not Meeting Current Design Standards

Design Criteria	Locations Not Meeting Current Design Standards
Horizontal alignment	<ul style="list-style-type: none"> • I-29 curve north of Avenue G
Vertical clearance and alignment	<ul style="list-style-type: none"> • I-29 vertical clearance at 9th Ave., 2nd Ave., Avenue G, and 41st Street.
Stopping sight distance	<ul style="list-style-type: none"> • Existing directional ramp bridges within the I-29/I-480 system interchange.
Decision sight distance	<ul style="list-style-type: none"> • I-29 NB approach to 9th Ave.
Cross section	<ul style="list-style-type: none"> • I-29 inside shoulder throughout Project area
Ramp design	<ul style="list-style-type: none"> • I-29 NB exit and entrance ramps at Nebraska Avenue • I-29 SB entrance ramp at Nebraska Avenue • I-29 NB & SB entrance ramps from 9th Avenue • I-29 SB entrance and exit ramps from Avenue G • I-480 EB exit ramp • I-480 WB entrance ramp taper
Ramp spacing	<ul style="list-style-type: none"> • I-29 NB entrance ramp from 9th Avenue to I-480 WB fly-over ramp • I-29 SB, I-480 SB fly-over to exit ramp to 9th Avenue • I-480 EB between 41st St. and the NB/SB I-29 Split • I-480 WB between 41st St. and the NB/SB I-29 Split • I-29 SB entrance ramp from Avenue G to I-29/I-480 System Interchange
Partial interchanges	<ul style="list-style-type: none"> • I-29 and 35th Street

Design Criteria	Locations Not Meeting Current Design Standards
	<ul style="list-style-type: none"> I-29 and Avenue G I-480 and 41st Street
Driver expectancy	<ul style="list-style-type: none"> I-29 NB, left entrance and exit I-480 EB, left exit to West Broadway

NB = Northbound, SB = Southbound, EB = Eastbound, WB = Westbound

Improving safety performance

The facilities nonconformance to current design standards for Interstate highways has led to crash rates higher than the statewide average. **Table 3-2** displays those locations within Segment 4 where crash rates are higher than the statewide average for similar roadway facilities. Design features to be upgraded throughout the Project area include horizontal alignment, vertical clearance and alignment, stopping and decision sight distance, cross sections, exit and entrance ramp design, and ramp spacing. Proposed roadway and bridge upgrades may all have a positive impact on the safety performance of the facility.

Table 3-2: Locations with Higher than Average Crash Rates

Link/Segment	Crash Rate, 2010-2014	Statewide Crash Rate	% Greater than Statewide Average
I-29 NB I-480 merge through N 35 th Street diverge	176 crashes/HMVMT*	100 crashes/HMVMT	76%
I-29 SB Ave G diverge through I-480 weave off-ramp	355 crashes/HMVMT	100 crashes/HMVMT	255%
I-29 SB I-480 on-ramp (weave) to railroad crossing	131 crashes/HMVMT	100 crashes/HMVMT	31%
I-480 EB State line through I-480/Broadway and I-29 NB/SB split	193 crashes/HMVMT	100 crashes/HMVMT	93%
I-480 WB I-48/Broadway and I-29 ramps to state line	172 crashes/HMVMT	100 crashes/HMVMT	72%

*NOTE: HMVMT (one hundred million vehicle miles traveled) is a standardized measurement used to compare crash rates among similar facilities.

Improving congestion and level of service

Traffic analyses completed during the Tier 2 process have shown that expected traffic growth in the Project study area will have a negative impact upon future level of service (LOS) for certain mainline segments of I-29. Level of service is a standardized assessment to correlate numerical traffic volumes to qualitative descriptions of traffic performance. Categories range from “A” (best) to “F” (worst). For the Segment 4 Project, FHWA and Iowa DOT have determined that LOS C is the desired level of service.

LOS for the mainline segments of I-29 and I-480 within Segment 4 range from A to C in 2015 and from to A to D under the future design (2040) scenario. **Table 3-3** describes those areas not meeting the acceptable LOS C in 2040.

Table 3-3: Locations not Meeting Acceptable LOS in 2040

Interstate Highway	Locations Not Meeting LOS C	2015 LOS	2040 LOS
I-29	NB I-29 to 9th Ave. diverge	C (AM peak period)	D (AM peak period)
I-29	NB weave from 9th Ave. to I-480 along I-29	C (AM peak period)	D (AM peak period)
I-480 to I-29	SB weave from I-480 to 9th Ave. along I-29	C (PM peak period)	D (PM peak period)

Providing a direct connection to West Broadway from I-29

West Broadway is a primary commercial corridor within Council Bluffs. Currently, there is no direct access from northbound or southbound I-29 to West Broadway. Access to West Broadway from I-29 is provided indirectly from the Avenue G/35th Street and 9th Avenue interchanges, both located approximately 3/4-mile north and south of West Broadway respectively. Access routes from both the Avenue G/35th Street and 9th Street interchanges to West Broadway require travel through residential neighborhoods, mostly on two lane streets that function as residential collectors and minor arterials. The result is that large commercial vehicles are forced to navigate through residential neighborhoods to access the West Broadway commercial corridor, resulting in increased noise, vibration, and vehicle pollution in the residential neighborhoods.

4.0 Alternatives

The Tier 1 Draft EIS established a range of alternatives considered for the overall CBIS Improvements Project. Those alternatives included the following:

- The Construction Alternative, which would reconstruct all or part of the CBIS network;
- The No-Build Alternative, which included committed capacity and access improvements in the study corridor and all planned off-system improvements per the MAPA’s 2025 Long Range Transportation Plan (LRTP);
- Improvements to alternate modes of transportation (enhance transit accommodations and expand bicycle and pedestrian trails);
- Transportation management strategies;
- Improvements to other metro-area roadways; and
- Construction of a new crosstown roadway.

Among the alternatives considered in the Tier 1 Draft EIS, only the Construction Alternative and the No-Build Alternative were carried forward for detailed evaluation in the Tier 1 Final EIS. The Construction Alternative was carried forward because it satisfied the current and projected transportation needs of the CBIS network. The No-Build Alternative was retained as a baseline for comparing Project impacts and to meet the NEPA requirement that the impacts of no action be considered.

One important decision affecting Segment 4 improvements was made in Tier 1. It was determined that full access would be provided between West Broadway and I-29 versus maintaining existing or similar access. There is currently no direct access linking I-29 and West Broadway, while current access in the Project study area is provided indirectly via local streets and Avenue G, 35th Street, and 9th Avenue interchanges.

Tier 1 ended with the signing of the Record of Decision (ROD) on October 26, 2005. The ROD identified the Construction Alternative, which was the preferred alternative in the Draft and Final EISs, as the selected alternative for the CBIS Improvements Project.

4.1 Tier 1 Alternatives

Two different access scenarios to provide direct access from West Broadway to I-29 (Option 1 and Option 2) were identified in the Tier 1 process and carried forward for further refinement, analysis, and evaluation during the Tier 2 process for Segment 4. In the Tier 1 process, Option 1 provided direct access from I-29 to Broadway via the I-29/I-480/West Broadway System Interchange. Option 2 maintained the existing (or similar) access from I-29 via 35th Street or 9th Avenue, but no direct access linking I-29 and West Broadway would be provided. The Tier 1 decision regarding a Preferred Alternative was Option 1. In this Tier 2 EA document, Alternative 1 refers to Option 1, and Alternative 2 refers to Option 2. These alternatives are displayed on **Exhibits 4-1** and **4-2** and are described in this section.

4.1.1 Alternative 1

Alternative 1 consists of reconstructing I-29 and I-480 within the Project study area, including new ramps connecting I-480 to I-29 and West Broadway. In addition, on I-29 a split diamond interchange configuration between Avenue G and 9th Avenue would be constructed. One-way frontage roads would connect Avenue G and 9th Avenue along the east and west sides of I-29. Access from I-29 to West Broadway would be provided via the one-way frontage roads from the north and south. Select local system connections to the proposed frontage roads would provide interstate access to the adjacent residential neighborhoods.

The existing partial interchange at Avenue G would be reconfigured to provide direct access to and from I-29 and the partial interchange on I-29 at 35th Street would be removed. The existing partial interchange at I-480 and 41st Street would be relocated approximately one block east to 40th Street. West Broadway will directly connect with the new 40th Street interchange ramp terminals, providing West Broadway access to and from I-480. Local roadway network connections at the 40th Street interchange will provide access to adjacent existing residential and proposed residential, commercial, and office developments.

4.1.2 Alternative 2

Alternative 2 is configured similar to Alternative 1; however, this alternative removes the partial access interchanges at both Avenue G and 35th Street and does not replace access to I-29 at Avenue G. Traffic currently using the existing Avenue G and 35th Street interchanges would be served by a split diamond interchange between West Broadway and 9th Avenue and the existing 25th Street interchange. One-way frontage roads would connect West Broadway and 9th Avenue with local access connections to the frontage road system providing access to adjacent residential neighborhoods. North of West Broadway, no direct local system access will be provided to the ramps to and from West Broadway and I-29.

The proposed configuration of the southbound frontage road between West Broadway and 9th Avenue west of I-29 would require the removal of Dodge Riverside Drive. In

the absence of Dodge Riverside Drive, the local roadway network in this area will be served by the southbound frontage road.

During the Tier 2 process, both alternatives were evaluated for their ability to meet the purpose and need for the Project (as described in **Section 3.0**), for their ability to meet current preferred design criteria, and for their performance against high-level environmental and engineering screening criteria. Both alternatives met the purpose and need for the Project and similar engineering modifications were made so that both alternatives met most preferred design criteria. As a result of their similar performance, the alternatives were compared on high-level environmental and engineering screening criteria to decide the alternative to be carried forward into NEPA for further evaluation. **Sections 4.2, 4.3, and 4.4** discuss the No-Build Alternative, screening results and the Alternatives to be Carried Forward.

4.2 No Build Alternative

The No Build Alternative takes no action with regard to reconfiguration of the I-29/I-480 interchange and associated ramps. The alternative does not meet the purpose and need established in **Section 3.0** of the EA. The potential impacts associated with the No Build Alternative are discussed in **Section 5.0** to provide a basis of comparison to the Proposed Alternative.

4.3 Alternatives Considered but Dismissed

As described in **Section 4.0**, a number of possible alternatives for the overall CBIS Improvements Project were considered and dismissed during the Tier 1 process. Alternatives 1 and 2, in their identified Tier 1 configurations for Segment 4, were compared on their ability to satisfy the purpose and need for the Segment 4 Project. Both Alternatives met all elements of the purpose and need, and performed similarly when an initial high-level environmental and engineering screening was conducted. The high-level environmental and engineering screening comparison is displayed in **Table 4-1**.

Table 4-1: High-Level Environmental & Engineering Screening

Resource Area/Topic	Alternative 1 Impacts	Alternative 2 Impacts
Total ROW Acquisition	13.0 Acres	14.4 Acres
Anticipated Displacements	42 residential displacements. 10 partial residential and 4 commercial acquisitions.	38 residential displacements, 67 partial residential and 6 commercial acquisitions.
Historic Property Impacts	0.02 Acres	No impacts.
Section 4(f) Impacts	3.2 Acres	3.3 Acres
Constructability	Good	Poor
Maintenance of Traffic	Minimal closures for primary Interstate ramps, longer term closures and detours for non-primary ramps.	All Interstate ramps with long-term closures and traffic detours.
Preliminary Construction Cost	\$190,000,000	\$180,000,000

However, when the two Alternatives were compared on their constructability, their ability to maintain traffic during construction, and an examination of possible detour routes, Alternative

2 performed poorly in comparison to Alternative 1. Alternative 2 would require the long-term closure of all ramp connections between I-29 and I-480 during construction, including the primary northbound I-29 to westbound I-480 and eastbound I-480 to southbound I-29 ramps for approximately two and a half to three years. Closure of these primary interstate-to-interstate traffic movements would require Interstate traffic to utilize detour routes on the local system for long periods, including West Broadway while it is under reconstruction. This would result in severe congestion during peak periods that otherwise would not occur with Alternative 1. The frontage road system in Alternative 1 provides the opportunity to detour I-29 through traffic to other interstate routes to reconstruct I-29 between 9th Avenue and Avenue G, and provide access to the local roadway network. The frontage road system could provide access between local streets to I-480, and to I-29 south of 9th Avenue and north of Avenue G. Detouring I-29 to other interstate routes would require the Iowa DOT to notify State and Local governments impacted, the general public, and the trucking industry. A comparison of the two alternatives’ ability to maintain Interstate system ramp traffic throughout construction is displayed in **Table 4-2**.

Table 4-2: Major Interstate System Ramp Closures During Construction

Ramp	Construction (2025) ADT	Alternative 1 Impacts	Alternative 2 Impacts
NB I-29 to WB I-480	10,700	No closures during construction.	3-year closure, detour uses West Broadway and reconstructed frontage road system.
EB I-480 to SB I-29	11,100	1-year closure, detour uses reconstructed frontage road system	2.5-year closure, detour uses West Broadway and reconstructed frontage road system.
EB I-480 to NB I-29	3,500	3-year closure, detour uses West Broadway and reconstructed frontage road system.	4-year closure, detour uses West Broadway and 35 th Street.
SB I-29 to WB I-480	4,800	4.5-year closure, detour uses reconstructed frontage road system.	4-year closure, detour uses West Broadway and 35 th Street.

As a result of the constructability, maintenance of traffic impact analysis, and review of detour routes, Alternative 2 was dismissed from consideration for implementation.

4.4 Proposed Alternative

Alternative 1 was selected as the proposed alternative for the CBIS Segment 4 Project and is displayed on **Exhibit 4-1**. Alternative 1 was selected over the No-Build Alternative due to its ability to meet the purpose and need for the Project as described in **Section 3.0**. Alternative 1 was preferred over Alternative 2 for the following additional factors:

- Ability to maintain traffic on primary Interstate system ramps or longer periods during construction;
- Ability to maintain access to adjacent residential and commercial developments during interchange construction due to maintaining I-29 access at Avenue G;
- Provide generally equal to or better future traffic operations levels of service as Alternative 2;

- Have relatively similar environmental impacts to the social and natural environment in comparison to Alternative 2; and
- Be constructed at a roughly equal cost compared to Alternative 2.

After selection of Alternative 1 as the Proposed Alternative, engineering refinements were made to further enhance maintenance of traffic during construction, to reduce right of way and residential displacements where possible, to improve access from I-480 to the 9th Avenue interchange, and to avoid substantial impacts to a historic structure. The refined Proposed Alternative is displayed on **Exhibit 4-3**. Those engineering refinements included:

- Extensions of eastbound and westbound I-480 ramp flyover bridges over 40th Street;
- Moving the alignment of the northbound I-29 frontage road north of West Broadway to the west;
- Moving the east (northbound) I-29 and Avenue G ramp terminal to the west;
- Adding slip ramps between I-480 and the frontage roads south of West Broadway; and
- Adding slip ramps between frontage roads and I-480 ramps, south of 2nd Avenue.

5.0 Environmental Analysis

This section describes the existing socioeconomic, cultural, natural and physical environments in the Segment 4 Project (the Project) area that would be affected by the Proposed Alternative and the No Build Alternative. The resources with a check in the second column on Table 1, located at the beginning of the document are discussed below.

5.1 Socioeconomic Impacts

5.1.1 Land Use

Existing land use information was gathered from the City of Council Bluffs, including the Bluffs Tomorrow 2030 Comprehensive Plan, district plans, and current zoning maps available on the City of Council Bluff's website and through field visits. The Metropolitan Area Planning Agency (MAPA) Draft 2050 Long Range Transportation Plan (LRTP) was also reviewed. The study area is a mixture of single and multi-family residential neighborhoods, recreational uses, and sporadic commercial and industrial uses. Residential land uses are spread throughout the study area along I-29 and I-480. Commercial and industrial uses are concentrated along West Broadway or interchanges at Avenue G, North 35th Street and 9th Avenue.

Park and recreational facilities are situated generally along I-29 south of West Broadway. Westwood Park is located at South 35th Street and 12th Avenue. Dodge Riverside Golf Course is located in the western portion of the Project area along I-29 and portions of I-480. Westwood Golf Course is also within the Project area, abutting I-29 and the Union Pacific Railroad.

No Build Alternative impacts: The No-Build Alternative would not impact existing and future land uses, because no construction would occur. The Project study area is primarily developed, and those areas available for future development are currently being redeveloped. Beyond current redevelopment efforts, land uses are not reasonably expected to change in the future.

Proposed Alternative impacts: The Proposed Alternative would impact existing land uses adjacent to the Project area, including 8.6 acres of total acquisitions of residential uses, 1.8 acres of partial acquisitions of residential uses, 3.7 acres of partial acquisitions of park/recreational uses, 0.9 acre of partial acquisitions of public (city or county) right of way uses, 0.02 acre of partial acquisition of semi-public use, 0.07 acre of partial acquisitions of non-recreational commercial land use, and 0.6 acre of full acquisition of commercial land. However, mitigation of impacts would include compensation to property owners for acquired land and reconstruction of impacted facilities (if appropriate), as well as provisions for relocation assistance, as discussed in **Sections 5.1.2, 5.1.3, 5.1.4, 5.1.7, 5.1.9 and 5.1.10**. The Proposed Alternative would also provide improved access and would facilitate future residential, commercial, and mixed-use development, consistent with the City’s future land use plans. For these reasons, the impacts on land use would be minor but not considered significant, and the proposed Project is anticipated to provide benefits to existing and future land uses adjacent to the corridor.

5.1.2 Community Cohesion

A mixture of single and multi-family residential neighborhoods are located throughout and adjacent to the Project study area. The Project study area also contains several properties likely to be facilities important to the surrounding community, including:

- Prospect Park Baptist Church (3657 Avenue G);
- Open Door Baptist Church (2701 Avenue N);
- Crossroads Church (1307 N 28th Street);
- Northwest Christian Church (714 Benson Street);
- Westwood Park (Avenue G and N. 37th Street);
- Dodge Riverside Golf Course (2 Harrah’s Boulevard);
- Harrah’s Casino (1 Harrah’s Boulevard); and
- Westwood Golf Course (421 Harrah’s Boulevard).

No Build Alternative impacts: Under the No-Build Alternative, there would be no improvement in community cohesion, because there would be no improved access to neighborhoods and community facilities, and no improvement of safety and mobility. In the long term, the result could be significant impacts to community cohesion.

Proposed Alternative impacts: Construction of the Proposed Alternative would improve community cohesion by providing improved access to neighborhoods and services in the vicinity of the Project, as well as providing improved safety and mobility. Specifically, new frontage road connections to West Broadway would provide new or improved access to and from existing neighborhoods and to the remainder of the City of Council Bluffs. Construction of the improvements would not permanently isolate or create new barriers for any portion of the existing community. For these reasons, the proposed Project would have beneficial impacts to community cohesion.

Prospect Park Baptist Church and daycare, Dodge Riverside Golf Course, Westwood Golf Course, and Westwood Park are community facilities that would have temporary construction impacts (noise, detours, dust) and permanent property acquisition impacts. Land acquisition impacts to these properties would be minor, requiring minimal amounts in relation to total property size, and would not permanently affect the functions, features, structures, or character

of the properties that make them community resources. For these reasons, the impacts of the proposed Project would be considered minor but not significant. Impacts to these facilities are discussed in more detail in **Sections 5.1.7** and **5.2.1**.

During construction, accessibility between the neighborhoods and community resources along the local street network may be temporarily disrupted with short-term roadway closures. Detour routes would be provided and closures would be clearly signed and posted. Exact roadway closures will be determined during later Project design phases. For these reasons, the temporary construction-related impacts would not be considered significant.

5.1.3 Churches and Schools

Four churches are located within the Project study area. The Prospect Park Baptist Church and daycare (3657 Avenue G) the Northwest Christian Church (714 Benson Street), the Open Door Baptist Church (2701 Avenue N), and the Crossroads Church (1307 N 28th Street). No public schools are located within or immediately adjacent to the Project study area; however, the Liberty Christian School is a private school adjoining the Open Door Baptist Church.

No Build Alternative impacts: The No Build Alternative would not involve construction and therefore would have no impacts to existing churches or schools within the Project study area.

Proposed Alternative impacts: The Proposed Alternative would impact a portion of property owned by the Prospect Park Baptist Church; however, no other churches nor the private school would be impacted.

Construction of the Proposed Alternative would require the permanent acquisition of approximately 0.02 acre of land, containing only turf grass, from the Prospect Park Baptist Church property to accommodate the ramp terminal at the intersection of the I-29 northbound frontage road and Avenue G. The acquisition would occur on the northwest corner of the property. The existing frontage road (N. 37th Street) would be closed on the west side of the property, severing access to the existing church parking lot. As mitigation for these impacts, access to the church parking lot would be added along Avenue G, requiring the relocation of basketball courts and a segment of the playground to elsewhere on the property. It is anticipated that mitigation costs would be determined during appraisal and right of way negotiations, including the costs for relocating the basketball courts and part of the playground to a safe location, which would be determined by the church staff. Based on the minimal amount of property acquisition and the proposed mitigation measures, the impacts to the church are considered to be minor but not significant.

5.1.4 Environmental Justice

Executive Order 12898, *Federal Action to Address Environmental Justice in Minority and Low-Income Populations*, dated February 11, 1994 states that, to the extent practicable and permitted by law, neither minority nor low-income populations may receive disproportionately high and adverse impacts because of a proposed project.

Demographic statistics from the 2010-2014 American Community Survey (ACS) were compiled using the Environmental Protection Agency's (EPA's) Environmental Justice Screening and Mapping Tool website, and the US Census' American Fact Finder. The study

area boundary was placed on the EPA’s base map, which compiled population characteristic percentages within the study area boundary, as well as showing individual census block group percentages for minority and low-income populations. For purposes of the Environmental Justice assessment, the most refined level of Census data used for a refined analysis was the Census Block Group Level. **Exhibit 5-1.1** shows census block groups containing the Project study area.

Table 5-1a displays the percentage of minority populations by racial composition for block groups (BG) within the Project study area in comparison to those of Council Bluffs, Pottawattamie County, and the State of Iowa, which are the communities of comparison (COC). The table also shows the amount that is equal to 125% of the COC’s minority population, which is the Iowa DOT threshold for a potential environmental justice impact. This percentage is used for the Proposed Alternative impact analysis discussed below. The two census block groups with the highest percentages of minorities (29% and 43%) are located northeast of the I-29/I-480 interchange, on the east and south sides of I-29. The remaining block groups range from 8 percent to 16 percent.

Table 5-1a: Minority Populations in Block Groups - by Racial Composition

	Census Block Groups within Project Study Area						Community of Comparison (COC)		
	Tract 304.01 BG 2	Tract 304.01 BG 3	Tract 304.01 BG 4	Tract 304.02 BG 2	Tract 304.02 BG 3	Tract 303 BG 4	Council Bluffs	Pott. County	State of Iowa
Total Population	1262 100%	1067 100%	624 100%	696 100%	1505 100%	868 100%	62,230 100%	93,153 100%	3,078,116 100%
White	901 71.4%	897 84.1%	355 56.9%	628 90.2%	1380 91.7%	751 86.5%	54,065 86.9%	82,987 89.1%	2,702,644 87.8%
Black/African American	44 3.5%	9 0.8%	31 5.0%	15 2.2%	0 0.0%	0 0.0%	1,110 1.8%	1,016 1.1%	93,293 3.0%
American Indian, Eskimo, Aleut	0 0.0%	0 0.0%	0 0.0%	0 0.0%	0 0.0%	0 0.0%	257 0.4%	283 0.3%	7,867 0.3%
Asian, Native Hawaiian, or Pacific Islander	24 1.9%	0 0.0%	0 0.0%	0 0.0%	63 4.2%	0 0.0%	463 0.7%	589 0.6%	60,898 2.0%
Other Race	0 0.0%	0 0.0%	0 0.0%	0 0.0%	0 0.0%	0 0.0%	35 0.1%	201 0.2%	2,300 0.1%
Two or More Races	4 1.32%	0 0.0%	0 0.0%	9 1.3%	0 0.0%	30 3.5%	1,023 1.6%	1,670 1.8%	48,004 1.6%
Hispanic or Latino (of any race)	252 20.0%	161 15.1%	238 38.1%	44 6.3%	62 4.1%	87 10.0%	5,277 8.5%	6,407 6.9%	163,110 5.3%
Total Minority Population	361 28.6%	170 15.9%	269 43.1%	68 9.8%	125 8.3%	117 13.5%	8,165 13.1%	10,166 10.9%	375,472 12.2%
125% of COC							16.4%	13.6%	15.2%
Potential Minority EJ Impact	Yes	Yes	Yes						

Source: 2010-2014 ACS Demographic and Housing Five Year Estimates

The review of minority populations at the census “block group” level was done as a preliminary assessment to determine the extent of minorities within and adjacent to the Project study area. A subsequent review of minority populations at the census “block” level, which is a smaller geographic area, was conducted because there would be residential displacements in some of the census blocks adjacent to the Project; and to also determine a more accurate estimate of the location and extent of those minority populations in census blocks that are greater than 125% of the COC’s minority populations, and that would be affected by property acquisitions, as presented in **Table 5-1b**. The number of total property acquisitions (requiring displacements) are shown in the table. All the census blocks that would experience property acquisitions (whether greater than or less than 125% of the COC’s minority populations), as well as the respective number of total acquisitions requiring displacements, are shown in the table in **Appendix B**. Those census blocks and identification numbers are shown in **Exhibit 5-1.2**.

Table 5-1b: Minority Populations in Census Blocks Greater than 125% of COC

	Census Blocks with Minorities Greater than 125% of Communities of Comparison					Community of Comparison (COC)		
	Tract 304.02 BG 3 B 3002	Tract 304.02 BG 2 B 2009	Tract 304.02 BG 2 B 2002	Tract 304.01 BG 3 B 3010	Tract 304.01 BG 2 B 2022	Council Bluffs	Pott. County	State of Iowa
Total Population	32 100%	131 100%	25 100%	91 100%	34 100%	62,230 100%	93,153 100%	3,078,116 100%
White	27 84.4%	107 81.7%	15 60.0%	78 85.7%	15 86.5%	54,065 86.9%	82,987 89.1%	2,702,644 87.8%
Black/African American	0 0.0%	7 5.3%	0 0.0%	2 2.2%	0 0.0%	1,110 1.8%	1,016 1.1%	93,293 3.0%
American Indian, Eskimo, Aleut	0 0.0%	2 1.5%	0 0.0%	1 1.1%	0 0.0%	257 0.4%	283 0.3%	7,867 0.3%
Asian, Native Hawaiian, or Pacific Islander	1 3.1%	4 3.1%	1 4.0%	0 0.0%	0 0.0%	463 0.7%	589 0.6%	60,898 2.0%
Other Race	0 0.0%	0 00.0%	0 0.0%	0 0.0%	0 0.0%	35 0.1%	201 0.2%	2,300 0.1%
Two or More Races	1 3.1%	2 1.5%	5 20.0%	4 4.4%	0 0.0%	1,023 1.6%	1,670 1.8%	48,004 1.6%
Hispanic or Latino (of any race)	3 9.4%	9 6.9%	4 16.0%	6 6.6%	19 55.9%	5,277 8.5%	6,407 6.9%	163,110 5.3%
Total Minority Population	5 15.6%	24 18.3%	10 40.0%	13 14.3%	19 55.9%	8,165 13.1%	10,166 10.9%	375,472 12.2%
125% of COC						16.4%	13.6%	15.2%
Potential Minority EJ Impact	Yes	Yes	Yes	Yes	Yes			
Total Property Acquisitions	2	0	5	1	0			

Source: 2010-2014 ACS Demographic and Housing Five Year Estimates

Limited English Proficiency

Block Groups 2, 3 and 4 of Tract 304.01, located north of West Broadway and I-480, contain the most minorities in the study area, ranging from 15.1% to 38.1% Hispanic or Latino populations. Limited English Proficiency (LEP) was also reviewed for the study area and refers to anyone above the age of five who reported speaking English “less than very well”, as classified by the U.S. Census Bureau. LEP in these block groups are as follows: Tract 304.01, BG 2 – 0%, Tract 304.01, BG 3 – 7.3%, and Tract 304.01, BG 4 – 4.5%. South of West Broadway and I-480, Tract 304.02 BG 2 contains 0% LEP and Tract 304.02 BG 3 contains only 1.7 % LEP.

Table 5-2 presents the low-income populations (poverty status of individuals) by census block group within the study area in comparison to Council Bluffs, Pottawattamie County, and the State of Iowa (COCs). Three of the six census block groups contain higher poverty levels than the County or State, ranging from 16.6% to 44.6%, according to the 2010-2014 ACS data. These block groups are southeast and northwest of the West Broadway/I-480 interchange, as well as northeast of the Avenue G and N 35th Street intersection, which contains the highest percentage (44.6%).

Table 5-2: Low-income Populations (Poverty Status)

	Census Block Groups within Project Study Area						Community of Comparison (COC)		
	Tract 304.01 BG 2	Tract 304.01 BG 3	Tract 304.01 BG 4	Tract 304.02 BG 2	Tract 304.02 BG 3	Tract 303 BG 4	Council Bluffs	Pott. County	State of Iowa
Total Population	1254	1067	624	696	1505	868	62309	90,805	2,978,240
Persons in Poverty Status	198	177	278	97	430	0	10,156	11,985	373,867
Percent of Persons in Poverty Status	15.8%	16.6%	44.6%	13.9%	28.6%	0.00%	16.3%	13.2%	12.6%
125% of COC							20.4%	16.5%	15.8%
Potential Poverty EJ Impact		Yes	Yes		Yes				
Total Property Acquisitions	9	3	0	6	24	0			

Source: 2010-2014 ACS Poverty Status in the Last 12 Months – Five Year Estimates

The websites of the Municipal Housing Agency of Council Bluffs, PublicHousing.com, and LowIncomeHousing.us, provided lists of housing options that are designated as low-income or affordable housing (Housing Choice Voucher known as Section 8, public housing owned by the state, and privately owned subsidized housing). The Section 8 program is the federal government's program for assisting the elderly, disabled and low income families or individuals in providing decent, safe, and sanitary housing. A review of the housing lists indicated that there are three low-income, multi-family housing complexes in the study area, all of which are Section 8 housing, as follows: Maple Park Apartments (2nd Avenue and S 36th St.), Featherstone Apartments and Townhouses (N 35th St. and Avenue I), and Northgate Apartments (N 31st St. and Avenue L). The locations of the low-income housing are shown on **Exhibit 5-1.1**.

No Build Alternative impacts: No adverse impacts to environmental justice populations would occur under the No Build Alternative, because there would be no construction and no displacements of environmental justice populations. The current configuration of the interstate, with no direct connection to West Broadway, does not provide optimum access for environmental justice populations to jobs and employment opportunities along the West Broadway corridor. However, access to West Broadway is still available via other non-direct routes. This condition may be considered an impact that would be minor but not significant, and it would not provide benefits to environmental justice populations.

Proposed Alternative impacts: The Iowa DOT threshold for a potential environmental justice impact is an area having a minority population greater than 25 percent of the total population, or greater than 125% of the minority population of the COC. For potential environmental justice impacts to low-income populations, the study area must have a low-income population percentage greater than 125 percent of the comparison community's low-income percentage. A comparison of the census block groups and blocks in the Project study area and the COCs revealed the presence of minority populations, as well as low-income populations within the thresholds stated above, and as indicated in **Tables 5-1a, 5-1b, and 5-2.**

Minority Populations

In the Project area southeast of the West Broadway/I-480 interchange, 20 residential properties would be displaced by total acquisition in the Proposed Alternative. Three census blocks in this area contain percentages of minorities greater than 125% of the COCs, and some would have residential displacements by total acquisition as follows:

- Tract 304.02, BG 3, B 3002 – 2 displacements – 15.6% total minorities
- Tract 304.02, BG 2, B 2009 – No displacements – 18.3% total minorities
- Tract 304.02, BG 2, B 2002 – 5 displacements – 40.0% total minorities

In the Project area northeast of the West Broadway/I-480 interchange, 9 residential properties would be displaced by total acquisition in the Proposed Alternative. The following census block in this area contains percentages of minorities greater than 125% of the COCs, although there would be no residential displacements:

- Tract 304.01, BG 2, B 2022 – No (0) displacements – 55.9% total minorities

In the Project area northwest of the West Broadway/I-480 interchange, 3 residential properties would be displaced by total acquisition in the Proposed Alternative. The following census block in this area contains percentages of minorities greater than 125% of the COCs, and would have only one residential displacement:

- Tract 304.01, BG 3, B 3010 – 1 displacement – 14.3% total minorities

In the Project area southwest of the West Broadway/I-480 interchange, 10 residential properties would be displaced by total acquisition in the Proposed Alternative; however, none of the census blocks in this area contain percentages of minorities greater than 125% of the COCs.

Low-income Populations

Three of the census block groups in the Project study area contain low-income population percentages greater than the COCs, as shown in **Table 5-2**. The locations of these block groups and the number of residential properties that would be displaced by total acquisition in the Proposed Alternative are summarized as follows:

- Tract 304.01, BG 2 – 3 displacements – 16.6% low-income – Located northwest of the West Broadway/I-480 interchange
- Tract 304.01, BG 4 – No (0) displacements – 44.6% low-income – Located in the northeast portion, just east of the 35th Street/I-29 partial interchange
- Tract 304.02, BG 3 – 24 displacements (10 on the west side of I-29, and 14 on the east side of I-29) – 28.6% low-income – Located south of the West Broadway/I-480 interchange, between West Broadway/I-480 and 6th Avenue – On the west side of I-29, two apartment buildings would be impacted: one with six units and one with four units.

None of the low-income housing complexes would be impacted by the Proposed Alternative.

Environmental Justice Impacts

For an impact to be considered an *environmental justice* impact, the affected minority or low-income population must bear a disproportionate share of the Project's negative effects, as compared to the general population. Based on the impacts discussed above, some impacts may be borne by minority and low-income residents; however, those impacts would not be disproportionately high and adverse, based on the minority and low-income percentages in the areas being impacted, as compared to the general population being impacted.

When the Proposed project is completed, noise impacts would occur to minority and low-income populations, as well as the general population residing along the Project corridor; however, the change in noise levels (from existing to future noise) is expected to be relatively low (an increase of 3 decibels or less) as discussed in **Section 5.4.1**. It is expected that there would be a temporary increase in noise at the residential neighborhoods along the detour routes/frontage roads during reconstruction of I-29. However, after construction is complete, the noise levels would decrease from those generated during construction. The Project would result in minimal changes in noise levels over time, from the start of construction through completion of the Project, and thus the noise impacts on environmental justice populations would be minor but not significant. Those same noise impacts would be experienced by the general population also and would not be disproportionate.

The overall Project would provide positive and beneficial impacts to minority and low-income populations through increased job opportunities on roadway construction crews, improved mobility and access to jobs and community facilities as a result of direct access to the West Broadway commercial facilities, improved accessibility and safety, improved bicycle-pedestrian facilities, and an improved transportation system for public transportation facilities.

A public information meeting was conducted on March 24, 2016, to discuss the two concepts for the I-29/I-480/West Broadway Interchange reconstruction in the Segment 4 Project area, as well as 2016 construction projects in the CBIS area. Leading up to the public meeting, messaging and public notification about the event was coordinated with local and regional

media outlets to inform people about the Project. News stories were published in the newspapers (print and online), broadcast on the radio, and through TV news broadcasts, as well as efforts to engage the public and stakeholders on social media. In addition, direct mail invitation letters were distributed to business owners, organizations, landowners and school representatives identified in the Project corridor. Of the 250 people that attended the public meeting, 74 responded concerning ethnicity, with 97% indicating white, 2% indicating black and 1% indicating some other race. Two people whose properties have the potential of being acquired, indicated that they were elderly and had mobility issues that would require special assistance. More details regarding the public meeting are provided in **Section 7.3**

The highest percentages of Limited English Proficiency in the study area are located north of West Broadway and I-480 in Tract 304.01, BG 3 with 7.3%, and Tract 304.01, BG 4 with 4.5%. Block Groups 2, 3 and 4 of Tract 304.01, located north of West Broadway and I-480, contain the most Hispanic or Latino populations in the study area, ranging from 15.1% to 38.1%. Future public outreach will include notices in Hispanic newspapers, mailings and fliers printed in Spanish, and language interpreters at public meetings. In addition, the Iowa DOT's CBIS Improvements Project website can be viewed in Spanish, as well as several other languages.

As mitigation for displacement, the Iowa DOT offers a relocation assistance program to property owners or tenants that are displaced by a state highway project, including relocation assistance advisory services and payment for moving expenses. Iowa Code 316, the "Relocation Assistance Law", establishes a uniform policy for the fair and equitable treatment of displaced persons that serves to minimize the hardships of relocation. Relocations would be conducted in conformance with the Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended by the Surface Transportation Assistance Act of 1987 and 49 Code of Federal Regulations, Part 24, effective April 1989. Relocation assistance would be made available to all affected persons without discrimination. Special assistance in finding suitable and/or ADA accessible housing will be provided to any person with special disability needs or special low-income needs.

Because of the relocation assistance being provided, the Project would not result in disproportionately high and adverse impacts to the minority and low-income populations in comparison to the general population, and therefore would comply with Executive Order 12898.

5.1.5 Economic

The Tier 1 EIS described the economic characteristics of the CBIS study area, indicating that the Council Bluffs/Omaha metropolitan area is a regional service and trade center, as most goods and services in the area are provided by businesses located in these two cities and along the interstate system. Thus, ease of movement throughout the entire region is critical to economic success, as efficient travel flow throughout the region results in time savings, and subsequently, financial savings. Of the five major employers (greater than 1,000 employees) that were listed in the CBIS study area, only one, the Ameristar Casino is located adjacent to the Segment 4 Project area. The Segment 4 Project area consists of mostly residential properties, and only about 10 small to medium businesses characterized as restaurants, hotels, gas/convenience stores, auto repair facilities, and storage units.

No-Build Alternative Impacts: Reconfiguration of the I-29/I-480 interchange and associated ramps would not be implemented with the No-Build Alternative, thereby, not improving safety or major access and ease of movement along the interstate system. As a result, new businesses may not be attracted to the area because of difficult and inefficient travel routes that can increase the cost of product delivery. The No-Build Alternative could result in decreases in adjacent property values because of poor access to and from the interstate system and commercial traffic having to use neighborhood streets. Under the No Build Alternative, the conditions stated above would not improve which could be considered a significant impact on the economics of the area.

Proposed Alternative Impacts: The Proposed Alternative would displace 42 residential properties through acquisition of the entire parcel and the residential structure on the parcel. Two additional residential properties to be acquired are currently vacant and do not contain a structure. Only one commercial property would be fully acquired, although it is currently vacant. As a result of the residential and commercial acquisitions, property tax revenue would be lost when these properties are taken out of the tax base. According to the most recent (2015) real estate property tax information on the Pottawattamie County Assessor's website, the displaced properties would account for a tax revenue reduction of approximately \$126,430. This amount would equate to an approximate reduction of 0.6 percent of the City of Council Bluffs' total property tax revenue for Fiscal Year 2016. Consequently, the reduction in property taxes, because of displacements, would not be substantial and therefore not considered significant.

There would also be a minor tax base reduction as a result of partial property acquisition that would require minor amounts of land area of several parcels adjacent to the existing right of way, thereby reducing the land value and associated taxes of the affected parcels. However, the land area reductions and corresponding tax base reduction would not be substantial and therefore not considered significant.

During construction of the Proposed Alternative, short-term economic impacts to businesses may occur because of increased traffic congestion from temporary lane reductions/closures or increases in travel times because of detour routes. Access to some businesses could be temporarily restricted or rerouted; however, some traffic lanes would remain open and access to businesses would be modified, through temporary detours and provision of adjacent access locations. The impact of roadway construction on local business patronage can vary, depending on individual customers' preferences in regard to shopping at businesses near construction sites. These decisions are typically based on whether or not alternate locations and/or products are available. These short-term impacts may be considered minor but not significant on the income of the few businesses located along the Project corridor. In the long-term, these businesses would benefit from improved access and decreased travel times to and from the businesses. Therefore, the overall impact would be considered not significant.

Short-term economic benefits would be derived from construction of the Proposed Alternative through an increase in construction-related employment and increased economic activity from those employees patronizing local businesses and service establishments along the Project corridor.

Long-term economic benefits would include the potential for increased economic activity because of safer access, improved access to businesses, improved traffic circulation with fewer

delays at intersections, improved public transportation facilities, and improved bicycle-pedestrian facilities. The Proposed Alternative may also help to revitalize development in some areas (along W Broadway, for example), in accordance with the future land use plans; all of which in turn would provide additional employment opportunities and tax revenue. For these reasons, the proposed project is anticipated to provide benefits to economic development of the Council Bluffs/Omaha metropolitan area.

5.1.6 Joint Development

Joint development of proposed roadway right of way into a shared, multifunction facility would provide alternative uses of public land in addition to the service of a basic transportation route. The purpose of joint development is to restore or enhance the affected environment's social, economic, environmental, or visual values.

The *Council Bluffs Recreation Trails Master Plan*, updated in January 2015, includes the Mid-City Trail, part of which was recently completed in the Project study area. The part of the trail that would be constructed along with the new I-29/I-480 interchange, would connect Tom Hanafan River's Edge Park, the Iowa Riverfront Trail, and Bob Kerrey Pedestrian Bridge to 35th Street via Dodge Riverside Drive and 2nd Avenue, with future phases connecting eastward to 16th Street along City-owned right of way between West Broadway and 2nd Avenue. The City of Council Bluffs also intends to provide a trail connection along West Broadway to connect the River's Edge development eastward to the Mid-City Trail.

The *Trails Master Plan* also includes a branch of the Iowa Riverfront Trail located on the north side of Harrah's Boulevard, from a connection with the Iowa Riverfront Trail to the west side of I-29 where it terminates.

The Iowa DOT is funding a large majority of the cost, with the remainder coming from the City's capital improvements program. As such, Iowa DOT will be in charge of the construction bidding process and subsequent timeline, although coordination with the City would take place throughout the planning, design, and construction processes.

No-Build Alternative Impacts: Under the No-Build Alternative, there would be no roadway construction and therefore, no opportunities for the public to be provided the benefits of a joint development project. Although the benefits would not be realized, it would not be considered a significant impact because bicycle-pedestrian facilities currently exist in portions of the Project corridor.

Proposed Alternative Impacts: Coordination between Iowa DOT and the City would be imperative during design and construction. Portions of the Mid-City Trail in the vicinity of 40th Street, Dodge Riverside Drive, and 2nd Avenue, as well as the branch of the Iowa Riverfront Trail along Harrah's Boulevard, would be temporarily disrupted with short and medium-term closures while those roadways are realigned or reconstructed, or while other construction activities require temporary closures of the trails for safety purposes. With the relocation of the existing 41st Street interchange to 40th Street, it is likely that the Mid-City Trail would be relocated to also cross under at I-480 at 40th Street to maintain its connection to the Iowa Riverfront Trail. In addition, the reconstructed section of the Iowa Riverfront Trail along Harrah's Boulevard would connect to the new trail that would be constructed through the I-29/9th Avenue interchange, then north on the east side of I-29 along the frontage road, as part

of the Segment 4 Project. Impacts of temporary trail closures would be minimized by providing trail detour routes until construction is completed.

The City’s planned trail connection between the River’s Edge Park development and the Mid-City Trail adjacent to West Broadway would be constructed as part of the CBIS Segment 4 Project. Future design phases of the Project would involve coordination with the City to integrate and accommodate the planned trail connection. For the reasons discussed above, the proposed Project is anticipated to provide benefits to bicyclists and pedestrians in the vicinity of the Project area.

5.1.7 Parklands and Recreational Areas

The U.S. Department of Transportation (USDOT) refers to publicly-owned land from parks, recreation areas, and wildlife and waterfowl refuges, or land from historic sites that are listed or potentially eligible for listing on the Nation Register of Historic Places, as “Section 4(f) properties” because they have special status under the provisions of Section 4(f) of the USDOT Act of 1966 (49 USC Part 303 and 23 CFR Part 774). Section 4(f) states that the Administration may not approve the use of a Section 4(f) property unless a determination is made that 1) there is no prudent and feasible avoidance alternative to the use of the property and 2) the action includes all possible planning to minimize harm to the property; or if the use of the property, including any measures to minimize harm (avoidance, minimization, mitigation, or enhancement measures) will have a *de minimis* impact on the Section 4(f) property.

Within the Project study area, there are four resources designated as parks or recreational areas, including two publicly owned parks and two golf courses (one publicly owned, one privately owned).

Potentially eligible Section 4(f) properties were identified based on parcel data collected for the City of Council Bluffs, review of the City of Council Bluffs Parks and Recreation system and Land Use Policy Plan, and discussions with City of Council Bluffs staff. The parks and recreational areas are shown on **Exhibit 5-2** and are described below. Recreational trails can also be eligible Section 4(f) resources and are discussed in **Section 5.1.8**.

With the exception of Westwood Golf Course, the resources discussed in this section have been determined to be Section 4(f) resources. Westwood Golf Course is privately owned, and therefore has been determined by FHWA to be a resource that is not eligible for the protections afforded under Section 4(f).

Westwood Park - Westwood Park is located at 1200 South 35th Street, on the southern border of the Segment 4 study area, immediately east of I-29, with the Union Pacific Railroad corridor immediately south. The park is owned and operated by the City of Council Bluffs and is a Section 4(f) property. Access to Westwood Park is from South 35th Street and a short segment of 12th Avenue, which terminates at the park’s parking lot. There is capacity for approximately 25 automobiles in the parking lot. This seven-acre park contains multiple amenities, including one baseball/softball diamond, one soccer field, a picnic shelter, a playground, an on-site trail system, and restrooms.

Westwood Golf Course - Westwood Golf Course is located at 1 Harrah’s Boulevard, on the southern border of the Segment 4 study area, immediately west of I-29 and south of Harrah’s

Boulevard (which turns into 9th Avenue at the I-29 interchange). Privately owned and operated by Harvey's Iowa Management Company and leased by the Dodge Riverside Golf Club (Course), Westwood Golf Course is a 16.5-acre, 9-hole, par three course open to the public, although it is not applicable to Section 4(f). A small clubhouse on this property provides refreshments, light snacks, and restrooms for golf course users.

Dodge Riverside Golf Course – This golf course property is located at 421 Harrah's Boulevard, immediately west of I-29 and south of I-480. The entire property is called the Dodge Riverside Golf Club on the City's Department of Parks, Recreation, and Public Property website. However, the discussions in this document will refer to the golf course facility adjacent to the proposed Project as the Dodge Riverside Golf "Course", unless referring to the owner or officials of the property. Access to this 138-acre facility is provided at the 9th Avenue interchange, where Harrah's Boulevard terminates. This Section 4(f) property is open to the public and is owned and operated by the City of Council Bluffs, offering year-round use as weather conditions allow. Dodge Riverside Golf Course is an 18-hole course with an on-site clubhouse that includes a pro shop and a full-service restaurant and bar.

Tom Hanafan River's Edge Park – Tom Hanafan River's Edge Park is a Section 4(f) property and is located at the foot of the Bob Kerrey Pedestrian Bridge in Council Bluffs, on the north side of I-480, between the river and the Iowa Riverfront Trail on the levee. The recently developed park consists of an open lawn area, concert seating area, festival grounds, and parking areas. Access is currently provided along Rivers Edge Service Road via Harrah's Boulevard and 9th Avenue.

No-Build Alternative impacts: The No-Build Alternative would not involve construction or right of way acquisition, and would not impact existing parks and recreational areas, or the City's ability to implement future planned improvements or new facilities.

Proposed Alternative impacts: The implementation of the Preferred Alternative would avoid impacts to the Tom Hanafan River's Edge Park, as it is located at the western edge of the Project study area. The park will remain open during construction and access would be maintained along Rivers Edge Service Road via Harrah's Boulevard and 9th Avenue. The Preferred Alternative would result in temporary construction and permanent right of way impacts to the Westwood Golf Course, Westwood Park, and the Dodge Riverside Golf Course. Potential Section 4(f) impact details are displayed on **Exhibits 5-3** and **5-4**, and potential individual impacts to parks and recreation area resources are discussed below.

Westwood Golf Course – The easternmost edge of this 16.5-acre golf course, owned by Harvey's Iowa Management Company, would be permanently impacted as a result of 1.34 acres of property acquisition for highway right of way. The impacts would include the relocation of a tee box, fairway, and green in the northeast corner of the course to maintain the continuity of the nine holes on the course. In addition, temporary construction impacts would occur to the tee, fairway, and green of a hole in the southeast portion of the property. Any areas temporarily disturbed by Project activities would be restored to pre-construction conditions, and as such the temporary impacts would not be considered significant. The relocation of the tee box, fairway, and green; and compensation for their impacts would be coordinated with the golf course owner, and would be in line with the Iowa DOT and FHWA guidelines and processes for right of way acquisitions as stated in **Section 5.1.9. Right of Way**. For these reasons, the permanent impacts to the Westwood Golf Course would be considered minor but not significant.

Westwood Park – The westernmost edge of this 7-acre park owned by the City of Council Bluffs would be impacted by the proposed Project due to grade raises and widening of I-29. As shown in **Exhibit 5-3**, approximately 0.48 acre would be permanently acquired as right of way. This part of Westwood Park is immediately adjacent to the existing I-29 right of way and is not used for designated park activities, nor does it contain built amenities for park users. Based on the Project footprint and location relative to Westwood Park’s activities, construction of the proposed Project is not anticipated to interfere with the functions and uses of Westwood Park. On December 23, 2016, the FHWA determined that the use of Westwood Park would be a *de minimis* impact, as the Project does not adversely affect the activities, features and attributes of the property. The City, as the official with jurisdiction over the property, has been informed of the intent to make the *de minimis* finding (see letter dated January 12, 2017 in **Appendix C-1**) and will need to provide concurrence once the public comment period on the EA has ended. For these reasons, the impacts to Westwood Park would be considered minor but not significant.

Dodge Riverside Golf Course – The proposed Project would involve a westward realignment of the Dodge Riverside Drive frontage road, which would result in permanent impacts to 2.52 acres of the eastern edge of the Dodge Riverside Golf Course, approximately where the 14th hole is currently located, as shown in **Exhibit 5-4**. The impacts would include a strip of approximately 1.91 acres of the property acquired for right of way, and 0.61 acre as a temporary easement. The land acquisition would require the removal of the current 14th hole tee boxes, but the remainder of the hole angles to the southwest, away from the current property line and would not be directly affected. Based on current design and estimated construction limits, the proposed Project would also encroach on the green for hole #13, and on the tee area, green, and fairway for hole #14. To mitigate for impacts, coordination with the City would take place to redesign holes #13 and #14 with the intent to maintain #13 as a par 4 and #14 as a par 5. To minimize impacts and maintain the amenities of the golf course, a temporary green for hole #13 will be constructed to maintain a reasonable 18-hole course design during reconstruction of the 13th green. Some trees that are outside the fairway may need to be removed or relocated as part of the Project, as well as replacement of a chain-link fence marking the golf course property line. Heavy equipment in the vicinity and related construction activities may create temporary conflicts for golfers and maintenance workers. Additionally, grounds may be temporarily disturbed for a short period during construction and restored to playing conditions as part of the Project. On November 29, 2016, the FHWA determined that the use of the golf course property would be a *de minimis* impact, as it does not adversely affect the activities, features and attributes of the property, with consideration of minimization and mitigation/enhancement measures that would be included as part of the Project. The City, as the official with jurisdiction over the property, has been informed of the intent to make the *de minimis* finding (see letter dated January 12, 2017 in **Appendix C-1**) and will need to provide concurrence once the public comment period on the EA has ended. For the reasons stated above, the impacts to the Dodge Riverside Golf Course would be considered minor but not significant.

Further coordination with the City of Council Bluffs and Dodge Riverside Golf Club would be necessary, during final design, to determine refinements and details of the mitigation plans.

5.1.8 Bicycle and Pedestrian Facilities

Publicly-owned recreation trails can also be considered Section 4(f) resources. The trails within the study area, and their Section 4(f) applicability, are described below and are shown on **Exhibit 5-2**.

Iowa Riverfront Trail and Branch along Harrah’s Boulevard - The Iowa Riverfront Trail, a 7-mile trail runs from the Western Historic Trails Center in northern Council Bluffs, along the Missouri River, to south of Interstate 80 in southern Council Bluffs. In the Project study area, the trail is located on the Missouri River levee, which forms the western boundary of the study area. The trail connects to the Bob Kerrey Pedestrian Bridge over the Missouri River, which connects the City of Council Bluffs, Iowa to the City of Omaha, Nebraska. The *Council Bluffs Recreation Trails Master Plan*, updated in January 2015, includes a branch of the Iowa Riverfront Trail that travels along the north side of Harrah’s Boulevard (within the street right of way) and south side of the Dodge Riverside Golf Course, from a connection with the Iowa Riverfront Trail to the west side of I-29 where it terminates. This section of the trail receives substantial pedestrian usage, as it provides the only means for pedestrians to visit the Harrah’s Casino complex. An existing sidewalk on the north side of 9th Avenue provides the means of traveling under the I-29 bridge and through the 9th Avenue interchange.

Mid-City Trail and Future Broadway Trail – The *Recreation Trails Master Plan* includes the Mid-City Trail, part of which was recently completed in the Project study area. The part of the trail that would be constructed along with the new I-29/I-480 interchange would connect Tom Hanafan River’s Edge Park, the Iowa Riverfront Trail, and Bob Kerrey Pedestrian Bridge to 35th Street via Dodge Riverside Drive and 2nd Avenue, with future phases connecting eastward to 16th Street along City-owned right of way between West Broadway and 2nd Avenue. The City of Council Bluffs also intends to provide a future trail connection (Broadway Trail) along West Broadway to connect the River’s Edge development eastward to the Mid-City Trail.

Other pedestrian facilities in the Project study area include non-contiguous sidewalks in residential and commercial areas. Pedestrian sidewalk connections across I-29 occur at 9th Avenue, 2nd Avenue, and Avenue G. There is one existing pedestrian connection across I-480 at S. 40th Street.

No Build Alternative impacts: Under the No Build Alternative, there would be no construction and it would not impact existing bicycle or pedestrian facilities or the City’s ability to implement future planned improvements or new facilities.

Proposed Alternative impacts: The Proposed Alternative would have no temporary or permanent impacts to the Iowa Riverfront Trail paralleling the Missouri River, because no construction would take place in that area. Only temporary construction impacts are expected to affect the Mid-City Trail, which is a Section 4(f) resource. During construction, portions of the Mid-City Trail in the vicinity of 40th Street, Dodge Riverside Drive, and 2nd Avenue would be temporarily disrupted with short and medium-term closures for safety purposes, while those roadways are realigned or reconstructed. During temporary closures, a detour route would be provided for the trail to maintain operations. The City has identified several potential detour routes for the temporary closures (see **Exhibit 5-2**), and details would be finalized as design progresses. The Iowa DOT has determined, and FHWA has concurred, that the effects to the Mid-City Trail would be temporary, and there would be no use of the Section 4(f) resource. The

City of Council Bluffs, as the official with jurisdiction, has concurred with the temporary occupancy exception determination and no use of the Section 4(f) resource, in a letter dated December 22, 2016 (see **Appendix C-1**). With the relocation of the existing 41st Street interchange to 40th Street, it is likely that the Mid-City Trail would be relocated to also cross under at I-480 at 40th Street to maintain its connection to the Iowa Riverfront Trail. For these reasons, the temporary impacts to the Mid-City Trail would not be considered significant.

The City's planned trail connection between the River's Edge Park development and the Mid-City Trail adjacent to West Broadway would be constructed as part of the CBIS Segment 4 Project. Future design phases of the Project would integrate and accommodate the planned trail connection.

The Proposed Alternative is expected to affect the branch of the Iowa Riverfront Trail (a Section 4(f) resource) that travels on the north side of Harrah's Boulevard and the south side of the Dodge Riverside Golf Course. This trail section would be temporarily closed while work is being done at the 9th Avenue interchange. The proposed construction would also include replacement of the existing trail and extending the trail through the 9th Avenue interchange and then north on the east side of I-29 along the frontage road. The temporary impacts on the section of the Iowa Riverfront Trail along Harrah's Boulevard and 9th Avenue would be similar to those of the Mid-City Trail. Iowa DOT has determined, and FHWA has concurred, that the effects to the Iowa Riverfront Trail along Harrah's Boulevard would be temporary and there would be no use of the Section 4(f) resource. The City of Council Bluffs, as the official with jurisdiction, has concurred with the temporary occupancy exception determination and no use of the Section 4(f) resource, in a letter dated February 9, 2017 (see **Appendix C-1**). During temporary closures, a detour route would be provided for the trail to maintain operations. The City has identified several potential detour routes for the temporary closures (see **Exhibit 5-2**), and details would be finalized as design progresses. For these reasons, the impacts to the Harrah's Boulevard Branch of the Iowa Riverfront Trail would not be considered significant.

During construction, other portions of the local street sidewalk network may be temporarily disrupted with short and mid-term closures. Detours would be provided as necessary and closures would be clearly signed and posted. Exact closures and durations would be determined during later Project design phases. For these reasons, impacts to local street sidewalks would not be considered significant.

5.1.9 Right of Way

Much of the proposed Project would be constructed within existing Iowa DOT right of way that was acquired when the I-29 and I-480 interchange was originally constructed in the 1960s. Acquisition of up to approximately 15.7 additional acres of right of way would be required in order to accommodate the proposed interchange design. **Exhibit 5-5** displays the areas of anticipated right of way acquisitions.

No Build Alternative impacts: The No Build Alternative would not involve new construction and thus would not require acquisition of right of way. Therefore, there would be no impacts to right of way.

Proposed Alternative impacts: Portions of approximately 64 properties may be acquired (partially or fully) for right of way needs, totaling approximately 15.7 acres. Of these

properties, 4 are commercial (2.0 acres), 4 are portions of public City or County-owned property (3.3 acres), one is semi-public (0.02 acre of a church), and 55 are residential (10.4 acres). The residential properties are generally located in the vicinity of proposed frontage road construction along I-29, both north and south of West Broadway. Of the 55 residential properties affected, one is an apartment building with six units, one is an apartment building with four units, and two other properties are duplexes. One property is open space of a multi-family complex, while the remaining 50 residential properties are single-family. **Table 5-3** displays a summary of anticipated property acquisitions. The acreage amounts of property acquisition are approximate and are rounded to the nearest tenth (0.1) of an acre. As design progresses through right of way plans, impacts would be minimized or adjusted to the extent practicable and quantified at that time. Exact property acquisition impacts would be offset as described below.

Table 5-3: Anticipated Property Acquisitions

Property Address	Current Use	Acres to be Acquired	Partial or Full Acquisition
1 HARRAHS BLVD	Commercial (Golf Course)	1.3	Partial
1010 S 36TH ST	Residential	0.1	Partial
1200 S 35TH ST	Public (Park)	0.5	Partial
320 S 37TH ST	Residential	0.2	Full
3601 11TH AVE	Residential	0.4	Partial
3617 4TH AVE	Residential	0.1	Full
3615 9TH AVE	Commercial	0.6	Full
3620 2ND AVE	Residential	0.1	Full
3620 8TH AVE	Residential	0.2	Full
3621 4TH AVE	Residential	0.1	Full
3622 2ND AVE	Residential	0.1	Full
3624 9TH AVE	Commercial	< 0.1*	Partial
3626 7TH AVE	Residential	0.2	Full
3630 7TH AVE	Residential	0.2	Full
3631 6TH AVE	Residential	0.2	Full
3632 AVE G	Commercial	< 0.1*	Partial
3633 3RD AVE	Residential	0.1	Full
3633 5TH AVE	Residential	0.2	Full
3634 4TH AVE	Residential	0.2	Full
3635 2ND AVE	Residential	0.1	Full
3635 6TH AVE	Residential	0.1	Full
3636 5TH AVE	Residential	0.3	Full
3636 AVE G	Residential	0.2	Full
3637 3RD AVE	Residential	0.3	Full
3637 5TH AVE	Residential	0.2	Full
3638 4TH AVE	Residential	0.1	Full
3638 6TH AVE	Residential	0.3	Full

Property Address	Current Use	Acres to be Acquired	Partial or Full Acquisition
3639 6TH AVE	Residential	0.1	Full
3642 3RD AVE	Residential	0.2	Full
3650 AVE G	Residential	0.2	Full
3657 AVE B	Residential	0.1	Full
3657 AVE G	Semi-public	< 0.1*	Partial
3662 AVE A	Residential	0.1	Full
3703 4TH AVE	Residential	0.1	Full
3709 4TH AVE	Residential	0.1	Full
3711 2ND AVE	Residential	< 0.1*	Partial
3712 4TH AVE	Residential	0.2	Full
3715 3RD AVE	Residential	0.3	Full
3716 2ND AVE	Residential	0.1	Full
3720 2ND AVE	Residential	0.1	Full
3720 3RD AVE	Residential	0.6	Full
3724 2ND AVE	Residential	0.1	Full
3728 2ND AVE	Residential	0.1	Full
3732 2ND AVE	Residential	< 0.1*	Partial
416 BENSON ST	Residential	0.1	Full
421 HARRAHS BLVD	Public (Golf Course)	1.9	Partial
501 BENSON ST	Residential	0.1	Full
505 BENSON ST	Residential	0.1	Full
521 N 37TH ST	Residential	0.2	Full
525 N 37TH ST	Residential	0.3	Full
718 N 36TH ST	Residential	1.0	Full
718 N 36TH ST	Residential	0.1	Partial
800 N 35TH ST	Residential	0.1	Partial
810 N 36TH ST	Residential	0.1	Partial
810 N 36TH ST	Residential	0.2	Partial
819 N 37TH ST	Residential	0.2	Full
205 N 37TH St	Residential	0.3	Full
109 N 37TH St	Residential	0.1	Full
825 N 37TH ST	Residential	0.2	Full
No Address - South of Ave A and N 37TH ST	Residential	0.1	Partial
20 S 41ST ST	Residential	0.9	Partial
No Address - S38TH ST & DODGE RIVERSIDE DR	Public (vacant)	0.2	Partial
No Address - North of 2ND AVE along I-29 N	Public	0.7	Partial
No Address - SOUTH AVE A along Ramp	Residential	< 0.1*	Partial
APPROXIMATE TOTAL ACRES		15.7	

*Acquisition amount is minimal and could not be rounded to 0.1 acre.

Property owners will be compensated for exact property acquisitions and relocations, in conformance with the Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended by the Surface Transportation Assistance Act of 1987 and 49 Code of Federal Regulations, Part 24, effective April 1989. Relocation assistance will be made available to all persons to be relocated without discrimination. For these reasons, property acquisitions for rights of way would be considered minor but not significant.

5.1.10 Relocation Potential

The Project study area contains approximately 480 single and multi-family residences within or in the vicinity of the Project study area. Approximately 10 commercial businesses are also located along West Broadway, 9th Avenue, 2nd Avenue, and Avenue G.

No Build Alternative impacts: The No Build Alternative would not require any relocations because there would be no new construction and no right of way acquisition of businesses or residences.

Proposed Alternative impacts: As shown in **Table 5-3**, the Proposed Alternative would require the acquisition of right of way from 55 residential properties, 42 of which would likely be total property acquisitions requiring relocation, while two other total acquisitions are residential properties that are vacant with no structures. Of the 4 commercial properties affected by right of way acquisition, only one commercial displacement (currently vacant) is expected under the Proposed Alternative.

Proposed Alternative mitigation: A review of the Zillow real estate website (on May 2, 2017) for the neighborhoods in the project area (between 35th Street and the levee), indicated that there were only a few listings of residential properties on the market, as well as some shown as “potential listings” (pre-foreclosure properties). The approximate values of displaced residential properties, in comparison to the real estate listings are summarized as follows:

- Southeast of I-29/W Broadway – 20 displacements with property values of \$38,600 to \$213,200. No “for sale” listings, but 6 “potential” listings ranging from \$58,000 to \$102,000.
- Southwest of I-29/W Broadway – 10 displacements with property values of \$44,100 to \$821,300. No “for sale” listings, and only one “potential” listing but no price.
- Northeast of I-29/W Broadway – 9 displacements with property values of \$68,500 to \$205,300. Two (2) “for sale” listings ranging from \$115,000 to \$158,000, and 6 “potential” listings ranging from \$219,000 to \$384,000.
- Northwest of I-29/W Broadway – 3 displacements with property values of \$51,700 to \$79,200. No “for sale” listings, but one “potential” listing for \$114,000.

Based on these results, it appears that only a few displaced residences may be able to relocate within the same general neighborhood, at this point in time. However, most of the property owners would most likely have to relocate to other neighborhoods. Expanding the real estate market search farther to the east, in the neighborhoods between 35th Street and 25th Street, and between I-29 and the UPRR tracks, resulted in listings of 21 residential properties “for sale” ranging from \$15,000 to \$150,000, and 48 “potential” listings ranging from \$62,000 to

\$367,000. Therefore, there is a potential for most displaced property owners to relocate within 1 to 1.5 miles of their current location.

All right of way impacts and relocations will be conducted in conformance with the Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended by the Surface Transportation Assistance Act of 1987 and 49 Code of Federal Regulations, Part 24, effective April 1989. Relocation assistance will be made available to all affected persons without discrimination. For these reasons, the relocations required for proposed project construction would be considered minor but not significant.

5.1.11 Construction and Emergency Routes

I-29, I-480 and West Broadway are vital transportation corridors within the Council Bluffs and greater Omaha region. They provide connections to several area hospitals including; the University of Nebraska Medical Center and the Veterans Administration Medical Center in Omaha, and the CHI Health Mercy Hospital and Methodist Jennie Edmundson Hospital in Council Bluffs. Fire and police stations are located to the east of the Project study area, however, none are located within or immediately adjacent to the Project study area. All fire, police, and ambulance services utilize I-29, I-480 and West Broadway for emergency access, as well as other expedient routes.

No Build Alternative impacts: The No Build Alternative would not result in impacts to emergency routes, because no construction involving streets or highways would take place.

Proposed Alternative impacts: Construction of the Proposed Alternative would not result in the permanent severing of access to any existing streets or properties. Construction activities would require the temporary closure of local streets and interstate access, as well as temporary partial interstate lane closures to accommodate construction efforts, but would be minimized by leaving some lanes open to the extent possible. The frontage system in the Proposed Alternative provides the opportunity to detour I-29 through traffic to other interstate routes to reconstruct I-29 between 9th Avenue and Avenue G, and provide access to the local roadway network. The frontage road system would provide access between local streets to I-480, and to I-29 south of 9th Avenue and north of Avenue G. Detouring I-29 to other interstate routes would require the Iowa DOT to notify State and Local governments impacted, the general public, and the trucking industry. The exact location, timing and duration of road closures have not been finalized at this time. If road closures are necessary, a traffic management plan would be developed and implemented during the construction phase of the Project. Access to properties and to the interstate would be maintained by staged construction, temporary access roads, or other appropriate means. Appropriate notification and detours would be posted before any closures occur. If temporary detour routes are necessary, they could include I-80 into and out of Omaha, S 24th Street to S 35th Street and S 16th Street (Council Bluffs), Nebraska Avenue to S 35th Street (Council Bluffs), and N 25th Street to Avenue G and West Broadway (Council Bluffs). Coordination with emergency responders will be required prior to and during construction. This coordination will include notification of when closures will occur, as well as identification of detours during that time. For these reasons, the temporary closures would not result in significant impacts to emergency response facilities.

Depending on the future location of community emergency response facilities, emergency response times to this portion of Council Bluffs could effectively be reduced with the

construction of the Proposed Alternative. Enhanced local system connections with West Broadway would provide additional access points to area neighborhoods. New direct Interstate access from I-29 to West Broadway would allow emergency vehicles improved freeway access, allowing them to utilize a high-speed facility instead of slower moving arterial roadways. Under the proposed project, benefits to the emergency response facilities would be realized.

5.1.12 Transportation

I-29 is a four-lane divided freeway with a posted speed limit of 55 miles per hour within the study area. Based on 2012 traffic volumes, it serves between 18,800 and 38,900 vehicles per day with higher volumes south of I-480. Interstate 480 is a four-lane divided interstate highway connecting the city of Omaha, Nebraska with Council Bluffs, Iowa. The portion of I-480 within the study area serves approximately 48,400 vehicles per day. I-480 transitions into West Broadway, the primary commercial corridor in Council Bluffs.

Current access to I-29 within the Project study area is from full interchanges at 9th Avenue and N. 25th Street, and partial interchanges at Avenue G and N. 35th Street. Direct access from I-29 to West Broadway is not currently provided. This access is provided via the local road network connections (two-lane neighborhood streets) to the 9th Avenue, Avenue G, and N. 35th Street interchanges. Access from I-480 to the local road network is also provided through the interchange at 41st Street and through I-480's transition to West Broadway.

Transit Service

Fixed route transit service is provided within the Project study area by the Transit Authority of the City of Omaha (Metro). Metro bus service in Council Bluffs operates along West Broadway and I-480 connecting Council Bluffs to the bus transit network in Omaha. Two main routes service the area, the Yellow and Blue routes. The Yellow Route services the southern portions of Council Bluffs and the Blue Route services the northeast portions of Council Bluffs. The City of Council Bluffs operates Special Transit Service (STS) paratransit service that provides curb-to-curb service for individuals unable to use Metro's fixed route service because of a disability. The service is available to all eligible residents within the city limits of Council Bluffs.

Rail Network

Freight rail service in the vicinity of the Project area is provided by the Union Pacific Rail Road (UPRR). The UPRR operates a rail yard in central Council Bluffs which connects to Omaha via tracks located to the south of the Project study area.

Aviation

The Omaha Airport Authority operates Eppley Airfield approximately 1.5 miles to the north of the Project study area in Omaha, Nebraska. Eppley Airfield is a regional commercial air passenger and freight facility served by 18 carriers with approximately 75 daily departures. It provides nonstop services to more than 20 major cities and in 2015 served more than 4.2 million passengers. Eppley Airfield handles more than 120 million pounds of cargo annually.

The Council Bluffs Municipal Airport lies in the eastern part of Council Bluffs approximately 7.5 miles from the Project study area. The Council Bluffs Municipal Airport is a public-use, general aviation airport, serving corporate and charter aircraft, and also offers flight instruction.

No Build Alternative impacts: The No Build Alternative would not include reconfiguration of the I-29/I-480 interchange nor a direct connection with West Broadway from I-29, and would not include roadway geometry improvements. Thus, significant adverse impacts to transportation would be likely to occur, as a result of increased congestion and travel times, decreased safety, and decreased level of service. In addition, the existing travel patterns along access routes to the West Broadway commercial corridor would remain, as large commercial vehicles would continue to navigate through residential neighborhoods, mostly on two-lane streets, resulting in increased noise, vibration, and vehicle emissions in those neighborhoods. For these reasons, impacts to transportation from the No Build Alternative would be considered significant.

Proposed Alternative impacts: The Proposed Alternative would improve access and the flow of traffic in the Project study area to and from I-29 and I-480. However, some changes in traffic patterns would occur. New flyover ramps would be constructed, connecting I-480 and I-29. The existing interchange at Avenue G would be reconfigured to provide direct access to and from I-29, and the partial interchange at N. 35th Street would be removed. The existing partial interchange at I-480 and 41st Street will be relocated one block east to 40th Street. This new configuration would provide direct access from West Broadway to and from I-480.

To alleviate the problem of large commercial vehicles driving through residential neighborhoods to access the West Broadway commercial corridor, the Proposed Alternative would provide access from I-29 to West Broadway via one-way frontage roads between split diamond interchanges at 9th Avenue and Avenue G, resulting in beneficial changes in traffic patterns, although still providing connections to local neighborhood streets. These frontage roads would be built first, to function as detour routes while the mainline of I-29 is closed off for reconstruction. South of 2nd Avenue (just south of West Broadway), these frontage roads would replace Service Rd B and S 37th Street, which run parallel and adjacent to existing I-29. The proposed frontage road on the east side of I-29 would be constructed in the approximate same location as existing Service Rd B, portions of which would be relocated to the east to provide reconnections between the local side streets. The proposed frontage road on the west side of I-29 would be constructed in the approximate same location as existing S 37th Street with connections to the local side streets. The proposed frontage roads north of West Broadway would also provide connections to the local side streets. In addition, select local system connections to the frontage roads would provide interstate access to and from the adjacent neighborhoods. Just south of Avenue G, cul-de-sacs would be constructed on N 37th Street and Benson Street. Widening improvements and addition of traffic signals on West Broadway would occur at the interchange with I-29 and the intersections with the frontage roads.

In the short term, the change in traffic patterns discussed above would result in initial duress to commuters during construction, as drivers adjust to detours and new routes. Because these changes in traffic patterns would only be temporary, the adverse impacts would not be considered significant. In the long term, the completion of the Proposed Alternative would result in better overall access, less congestion, and decreased travel times. With construction of the proposed Project, benefits to the transportation system would be realized.

Impacts to aviation at Eppley Airfield are not expected, as it lies outside of the Project study area. However, analysis with the Federal Aviation Administrations (FAA) Notice Critical Tool indicated that the Project will require a formal Federal Regulation Title 14 Part 77 filing. Filing

will occur in later design phases as design plans progress to where exact elevations are known, but no later than 45 days prior to the start of construction. Impacts to the Council Bluffs Municipal Airport are not expected, given its distance from the Project study area, and a formal Part 77 filing is not required for this airport.

5.2 Cultural Impacts

5.2.1 Historical Sites or Districts

Section 106 of the National Historic Preservation Act of 1966 (16 USC 470f) requires federal agencies to determine whether their actions have adverse impacts on historic properties (any historic structure, archaeological site, or other property listed on or eligible for listing on the National Register of Historic Places (NRHP)) and to take steps to avoid these resources, minimize impacts, or mitigate unavoidable impacts.

A search of the database of the National Register of Historic Places (NRHP) was conducted to determine if any properties listed in the NRHP are within or near the study area. The results indicated that no NRHP-listed properties were identified in the Project study area.

The field work for an Intensive Architectural/Historical Survey and Evaluation was conducted on November 19-24 and 27, 2015, with some follow-up in January 2016. The survey and evaluation resulted in the recording of 486 architectural properties. Of the 486 properties, 294 are of historic age (i.e., pre- 1965) and 192 are modern (post-1965). Of the 294 historic-age properties, 284 are single-family dwellings, two are duplexes, two are commercial, one is a public utility building, and one is a former school. The modern properties consist of 140 single-family dwellings, 21 duplexes, 16 apartment buildings, eight commercial buildings, three public buildings/structures, and four churches.

The evaluation of these properties in the context of the historical and modern development of the current Project area resulted in a recommendation of NRHP eligibility for only one property, the former Myers Elementary School (currently home to the Prospect Park Baptist Church). As an NRHP-eligible site, this property is considered a Section 4(f) property.

Former Myers Elementary School / Prospect Park Baptist Church – The former Myers Elementary School building is located at the southeast corner of Avenue G and 37th Street, approximately 200 feet east of the current I-29 northbound bridge over Avenue G. Built in 1957, the building originally served as Myers Elementary School until it was closed in 1986. Since that time, it has been used for multiple purposes, most recently as a day care center for the Prospect Park Baptist Church. The building itself has changed little since its days as an elementary school, both inside and out. This school structure is recommended as eligible for the NRHP under Criterion C for its architectural significance as a Contemporary/Mid-Century Modern design and using the central hall “finger plan” for midcentury school design and for its historical significance as a post-World War II “baby boom” elementary school that was also linked historically to the construction of Interstate 29 in this area.

The Iowa DOT coordinated with the Iowa State Historic Preservation Office (SHPO), which concurred with Iowa DOT’s determination of eligibility on July 21, 2016.

No Build Alternative impacts: No impacts to historic properties are expected from the No Build Alternative, because there would be no construction.

Proposed Alternative impacts: Construction of the Proposed Alternative would require the acquisition of approximately 0.02 acres of the northwest corner of the NRHP-eligible Myers Elementary School property for the reconfiguration of the I-29 northbound frontage road and Avenue G intersection. The acquisition occurs approximately 30 feet from the building which would not be altered or otherwise affected. Access to the property along North 37th Street will be closed and relocated to Avenue G, requiring the relocation of basketball courts and a segment of the playground to another location on the property. The Iowa DOT has determined that the minor impact would result in a “no adverse effect” determination. As part of that determination the Iowa DOT proposed several conditions to avoid impacting the site by requiring a Special Provision (SP) for vibration monitoring. The SP includes:

- A preconstruction survey of the Myers Elementary School to document the present condition and establish a peak particle velocity (PPV) threshold for vibration.
- Sensors are to be installed and tested daily. If 80 percent of the PPV threshold is reached, sensors will alert the contractor and construction engineer.
- If the PPV is reached, a meeting with the contractor and construction engineer will be held to identify alternative construction methods and/or equipment to be used to minimize Project vibration.
- A post construction survey will be performed.

In a letter to the SHPO, dated June 17, 2016 (see **Appendix C-2**), the Iowa DOT stated that only one architectural/historical site (former Myers Elementary School) was determined eligible for the NRHP, and that no archaeological sites within the APE were determined to be eligible for the NRHP. The Iowa DOT also made a determination of “No Adverse Effect” for the Project undertaking. The Iowa SHPO concurred with the Section 106 determination of “No Adverse Effect” on July 21, 2016 (see **Appendix C-2**). Based on the determination of “No Adverse Effect” and the fact that the historic structure will not be altered, Iowa SHPO has been informed of FHWA intent to make a Section 4(f) *de minimis* impact determination for the Myers Elementary School in a letter dated August 10, 2016 (see **Appendix C-2**). For these reasons, the impacts to historical sites would be considered minor but not significant.

5.2.2 Archaeological Sites

A search of the database of the National Register of Historic Places (NRHP) was conducted, as well as a database review of previously recorded and evaluated properties/sites maintained by the Office of the State Archaeologist (OSA). No listed or previously recorded sites were identified in the Project study area.

An intensive Phase I Archaeological Investigation examined a total of 441 acres (179 ha) for archaeological sites. The field investigations were conducted between September and November 2015 and entailed subsurface tests that included the excavation of 67 shovel tests and 206 bucket auger tests. In addition, a geo-archaeological investigation in support of the Phase I investigation was conducted that entailed the extraction and description of 17 mechanical Giddings soil cores. A total of 19 archaeological sites were recorded within the Project’s Area of Potential Effect (APE). These sites consisted of historical sites dating from the late nineteenth to the late twentieth century, although the majority reflect the twentieth

century development of this area of Council Bluffs. None of the sites were determined to have the integrity and/or significance to be recommended for NRHP eligibility and warranted no further archaeological investigation.

No Build Alternative impacts: No impacts to archaeological sites are expected from the No Build Alternative, because there would be no construction.

Proposed Alternative impacts: In a letter to the SHPO, dated June 17, 2016 (see **Appendix B-2**), the Iowa DOT stated that no archaeological sites within the APE were determined to be eligible for the NRHP. The Iowa DOT also made a determination of “No Adverse Effect” for the Project undertaking. The Iowa SHPO concurred with this determination on July 21, 2016 (see **Appendix C-2**). Therefore, there would be no impacts to archaeological sites.

In the event that a previously unevaluated historic property, artifacts, or human remains are discovered during construction, all construction and excavation activities should cease immediately within the area. The area should be secured, the material left in place with no further disturbance, and the Iowa DOT, the Iowa SHPO, or the Iowa Office of the State Archaeologist (OSA), as appropriate, should be contacted immediately.

5.3 Natural Environmental Impacts

5.3.1 Wetlands

Section 404 of the Clean Water Act (33 USC 1251 *et seq.*) establishes a program to regulate the discharge of dredged or fill material into a Waters of the United States, a term which includes rivers, streams, wetlands, mudflats, lakes, oxbows, natural ponds, and impoundments. Activities in Waters of the U. S. regulated under this program include fill for development, water resource projects (dams and levees), infrastructure development (highways and airports), and mining projects. Section 404 requires that before any dredged or fill material can be discharged into a Water of the U. S., a permit must be obtained from the U.S. Army Corps of Engineers that authorizes such a discharge. Prior to the issuance of the permit, the permittee must demonstrate that adverse impacts to wetlands, streams, and other aquatic resources have been avoided and minimized to the extent practicable, and for unavoidable impacts, compensatory mitigation is required to replace the loss of wetland and aquatic resource functions in the watershed.

An investigation of the CBIS Segment 4 Project Study Area was performed on October 13, 2015; November 4, 2015; and November 9, 2015 to identify any Waters of the U.S., including wetlands, that may be impacted by the proposed Project. All potential wetland and stream areas within the Study Area, as well as those wetlands shown on National Wetland Inventory (NWI) maps and those streams and/or drainages shown as blue lines on USGS Quadrangle maps, were investigated. Wetland delineations were conducted using methods outlined in the *1987 Corps of Engineers Manual for Wetland Delineation* and its *Midwest Regional Supplement*. Wetland boundaries were identified in the field and mapped using a Global Positioning System (GPS) as well as available topographic survey information. Jurisdictional stream determinations were made based upon guidance received from the U.S. Army Corps of Engineers and in accordance with *Regulatory Guidance Letter 05-05*.

Field investigations identified 10 wetland areas within the CBIS Segment 4 Project Study Area. The cumulative total acreage of wetlands within the Study Area is approximately 0.75 acre, all of which is emergent wetland. **Table 5-4** provides information related to each of the 10 wetland areas, including type, size and location description. **Exhibit 5-6** shows the wetlands within the Project study area.

Table 5-4: Project Study Area Wetlands

Wetlands ID Number	Wetland Type (Field Verified)	Wetland Size (acres)	Description
1	EM	0.02	Small, emergent wetland located within green space near the southern boundary of Tom Hanafan River's Edge Park (north of I-480).
2	EM	0.07	Small, emergent wetland located within green space near the southern boundary of Tom Hanafan River's Edge Park (north of I-480).
3	EM	0.03	Emergent wetland located along the bottom of the WUS 1 channel (west of the Corps' levee; south of I-480).
4	EM	0.04	Emergent wetland located along the bottom of the WUS 1 channel (east of the Corps' levee, south of I-480; WUS #1 lacks an ordinary high water mark at this location).
5	EM	0.04	Emergent wetland located along the bottom of the WUS 1 channel (southwest quad of the South 40 th St. interchange, south of I-480).
6	EM	0.12	Small, emergent wetland located within the infield of the I-29/I-480 System Interchange.
7	EM	0.07	Small, emergent wetland located within the infield of the I-29/I-480 System Interchange.
8	EM	0.09	Emergent wetland located within the bottom of a shallow, excavated drainage in the infield of the I-29/I-480 System Interchange.
9	EM	0.06	Emergent wetland located within the bottom of a shallow drainage in the infield of the I-29/I-480 System Interchange.
10	EM	0.21	Shallow pond/emergent wetland (man-made) located along the 13 th hole of the Dodge Riverside Golf Course.
Total		0.75	

No Build Alternative impacts: The No Build Alternative would not impact any wetlands in the Project study area, because there would be no new roadway construction, and therefore no fill material placed in wetlands.

Proposed Alternative impacts: Four (4) wetlands would be avoided, while six (6) wetlands encompassing approximately 0.42 acre would be impacted by the construction of the Proposed Alternative, as shown in **Table 5-5**. Impacts would include the filling and channeling of wetlands. A Clean Water Act (CWA) Section 404 Permit would be obtained from the U.S. Army Corp of Engineers (USACE) prior to construction.

The 0.42 acre of wetland impacts, together with the approximate 0.04 acre of stream channel impacts (see **Section 5.3.2**), would be less than ½ acre and within the threshold of a Nationwide Permit. Through coordination with the Regulatory section of the USACE Rock Island District, it was determined that the waters of the U.S. filled by this Project would be applicable to a Department of the Army Nationwide #14 Permit for Linear Transportation Projects, and would be obtained from the USACE prior to construction, in compliance with the Clean Water Act. However, the USACE will not issue a 404 permit until a Section 408 Approval is issued, if required (see **Section 5.3.3**). Because wetland impacts are greater than 1/10th acre, mitigation would be required and would be fulfilled through the purchase of wetland credits from an

approved wetland mitigation bank that has adequate credits at the time of the permit application. Because the wetland impacts are minor and fall within the Nationwide Permit threshold, together with the purchase of wetland mitigation credits, the wetland impacts would be considered not significant.

Table 5-5: Potential Impacts to Wetlands

Wetlands Identification Number	Wetland Size (acres)	Wetland Impacts (acres)
4	0.04	0.04
5	0.04	0.04
6	0.12	0.12
7	0.07	0.07
8	0.09	0.09
9	0.06	0.06
Total	0.75	0.42

5.3.2 Surface Waters and Water Quality

The Project study area is located within the Big Papillion-Mosquito Watershed (USGA Hydrological Unit Code: 10230006). Iowa DNR’s most recent 303(d) list of impaired waters indicates that the Missouri River is not listed (i.e. not in Category 5, impaired and requiring a total maximum daily load (TMDL)) in the Project study area. However, Iowa DNR designates the river as Category 4c, in which the impairment is not caused by a pollutant and a TMDL is not required. The use that is impaired is noted as “aquatic life – game fish”. The 303(d) list of the Nebraska Department of Environmental Quality (NDEQ) lists the Missouri River in the Project study area as impaired by the pathogen *Echerichlia coli* (*E. coli*) and impaired for “primary contact recreation”. A water supply intake exists on the river at mile 619, which is near the east terminus, but upstream of the Project study area.

As noted in the Tier 1 Draft EIS, private groundwater wells in the Omaha/Council Bluffs metropolitan area are typically shallow (less than 100 feet deep) and associated with agricultural and residential uses at properties outside the city limits. The Iowa DNR’s database of registered private wells was accessed to determine the locations of any existing wells. Several well locations in the database were designated as being plugged. However, four active well locations were identified in the Project study area, all of which are within an area of public right of way north of the I-29/35th Street partial interchange, and were used for dewatering purposes. Wells could receive roadway runoff contaminants if not properly cased or if hydraulically connected to the highway drainage system.

During the Fall of 2015 (October 13, November 4, and November 9), field investigations were conducted to identify any Waters of the U.S. that may be impacted by the proposed Project. Field investigations identified one stream/drainage area within the Project study area. The total length of the stream is 365 linear feet. The stream/drainage area is a small, excavated drainage that originates at a culvert outlet in the southwest quadrant of the South 40th Street interchange and flows west to the Missouri River. Portions of the drainage ditch exhibit a discontinuous

ordinary high water mark (OHWM), with an approximate average width of 10 feet. This surface water segment is displayed on **Exhibit 5-6**. The area to the east (upstream) of this drainage ditch contains only wetlands, and there are no other drainage channels with an ordinary high water mark.

No Build Alternative impacts: Under the No-Build Alternative, the improvements would not be constructed and no impacts to surface waters would occur.

Proposed Alternative impacts: The Proposed Alternative would result in fill material being placed in approximately 161 linear feet of the stream/drainageway, equating to approximately 0.04 acre of surface area below the OHWM. In conjunction with proposed wetlands impacts (0.42 acre), a CWA Section 404 Nationwide Permit #14 would be obtained from the USACE for impacts to the stream segment occurring within the limits of construction. As a condition of that permit, it is expected that surface water impact mitigation measures would be required and may include the installation of rock splash basins at the culvert outlets. Because the stream impacts are minor and fall within the Nationwide Permit threshold, together with the mitigation, the stream impacts would be considered not significant.

The private wells on the north side of the I-29/35th Street interchange would be within the impact area of the Project. Any impacted wells will be filled, closed, and capped in compliance with Iowa DNR regulations and requirements to prevent roadway runoff contaminants from reaching groundwater.

The Missouri River would not be directly impacted, nor would the water supply intake, as it is upstream of the Project. Obtaining the required National Pollutant Discharge Elimination System permit and following the Iowa DOT's and the City of Council Bluffs' adopted guidelines known as Best Management Practices (BMPs), which address construction site storm water runoff and post-construction storm water management, would minimize impacts and prevent significant impacts to water quality. BMPs attempt to reduce and control pollutants discharged into the storm sewer systems and surface waters. The following mitigation measures may be followed to further minimize impacts to water resources during construction or operation of the proposed Project:

- Use construction controls to minimize erosion and sedimentation.
- Use pervious surfaces where practicable.
- Control runoff and spoil disposal in order to avoid contamination of ground and surface water.
- Control use of pesticides, herbicides, and fertilizer.
- Use proper sanitation measures during construction activities to avoid E coli entering water resources through overland flows or other means.
- Maintain vegetative buffers to reduce sedimentation and delivery of chemical pollutants to the water body.

5.3.3 Floodplains

The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM), showing the 100-year and 500-year floodplains and the regulatory floodway (Effective Date:

February 4, 2005), were reviewed for the study area. 23 CFR 650 identifies the 100-year (base) flood as the flood having a one percent probability of being equaled or exceeded in any given year. The regulatory “floodway” is the channel of a stream plus any adjacent floodplain areas that must be kept free of encroachment so that the 100-year flood discharge can be conveyed without increasing the base flood elevation more than a predetermined volume. As displayed on **Exhibit 5-7**, the FIRM indicates that the Missouri River 100-year floodplain (Zone AE – base floodplain elevations determined) and a designated regulatory floodway share the same boundary line and are confined to the west (river) side of the Council Bluffs levee, outside the Project area limits. The FIRM also shows the 500-year floodplain covering the entire Project area on the east side of the levee. A note in the 500-year floodplain area on the FIRM states the following: “*This area protected from the 1% annual chance flood by levee, dike or other structure subject to failure during larger floods*”.

During the most recent flood event in 2011, the Missouri River water levels exceeded the 1% annual exceedance probability flood elevation for approximately 90 days. The levees did not fail during this event, but it was determined that levee design safety factors were lower than required levels. After the floodwaters receded, the City received federal emergency financial assistance for efforts to combat floods and to rehabilitate damaged portions of the levee system.

FEMA is currently updating its flood protection mapping for the area and has asked the City of Council Bluffs to certify that the levee system meets current levee accreditation standards. Without recertification, a large portion of the City that is currently shown in the 500-year floodplain (east side of the levee) will be designated as a Special Flood Hazard Area (100-year floodplain). Deficiencies of the levee system were identified at various locations where improvements are needed to meet current design and accreditation standards, which will increase the integrity of the levee system and reduce the risk of flooding. The City of Council Bluffs has recently received financial assistance from the Iowa Flood Mitigation Program for the City’s levee improvements.

The Council Bluffs levee system is maintained and administered by the City of Council Bluffs and regulated by the USACE Omaha District. The City of Council Bluffs’ flood protection system within the Project area is identified by USACE as L627, and includes Council Bluffs Levee Unit I. Council Bluffs Levee Unit II, Section 1 is located immediately south of the Project area. The UPRR Bridge across I-29 is the demarcation between the two levee units (see **Exhibit 5-7**).

No Build Alternative impacts: The No-Build Alternative would not impact the Missouri River floodway and 100-year floodplains in the Project area, because existing conditions would not change, and the floodway and floodplain boundaries would be unaffected. The City of Council Bluffs would continue to operate and maintain the levee system. In the long-term, the No Build Alternative would not be injurious to the public interest and would not impair the usefulness of the Council Bluffs Levee Unit I.

Proposed Alternative impacts:

Floodplains

Although the FEMA floodway/100-year floodplain boundary line appears to be mapped on the land side of the levee, resulting in what appears to be an encroachment from the Proposed

Alternative, the actual boundary is confined to the river side of the levee, which provides protection against the 100-year flood elevation. Therefore, there would be no impacts to the floodway/100-year floodplain from the proposed Project. The Proposed Alternative would be constructed entirely within the current 500-year floodplain of the Missouri River, covering a surface area of 193.2 acres, and would not cause a rise in the 100-year flood surface elevation or have a negative effect on the Missouri River floodplain.

During later design phases, hydraulic modeling and more detailed calculations would be completed using greater bridge, pier and roadway design details to better understand potential fill impacts within the 500-year floodplain, if any. An Iowa DNR floodplain development permit would not likely be required, but the City of Council Bluffs could require a floodplain development permit.

Levees

Drillings/borings, footings, and excavation are not planned within the federally authorized levee project right of way, which includes the drainage district easement that extends 15 feet outward from the toe of the levee, nor in the levee critical area (500 feet landward of Council Bluffs Levee Unit I). Proposed construction, including grading of fill for new and reconfigured pavement, would occur within the 500-foot critical area where I-480 approaches the levee, and in the northern portion of the Project where I-29 parallels the levee (see **Exhibit 5-7**). However, no excavation would occur in the 500-foot critical area, nor the levee right of way. On I-480, project construction activities would terminate at the east end of the existing bridge structure that crosses the levee to tie into existing pavement at the bridge, but would not encroach into the levee right of way. In the northern portion of the project where I-29 parallels the levee, minor grading for roadway embankment fill would occur in a narrow portion of the levee right of way, approximately 375 feet west of the east terminus. Iowa DOT is coordinating with the City of Council Bluffs and USACE, Omaha District concerning Section 408 Approval, and will submit a design package for review and approval.

If the need arises during final design activities to drill borings or otherwise excavate within the federally authorized levee project right of way, the City of Council Bluffs and USACE will be notified and coordinated with to determine potential effects on the levee system and receive approval to conduct such activities.

The physical improvements associated with the Proposed Alternatives would not affect the ability of the Council Bluffs levee system to continue to function as intended. The Project would not result in any increase in flooding in the area protected by the Council Bluffs Levee Unit I levee. The City of Council Bluffs would continue to operate and maintain the levee system. The Proposed Alternative would not be injurious to the public interest and would not impair the usefulness of the Council Bluffs Levee Unit I because the levee integrity, and other components of the flood protection system, would not be adversely affected and there would be no increase in flooding in the area protected by the levee. Similarly, impacts of the Project on other resources would not be injurious to the public interest because the levee system would be protected. Therefore floodplain impacts would be considered not significant.

5.3.4 Wildlife and Habitat

The Project study area primarily supports urban wildlife habitat with planted trees and lawn areas. Riparian zones border the Missouri River, which is outside of the Project study area. Typical urban-adapted wildlife are found within the Project study area, including squirrels, rabbits, raccoons, and various bird species. The Iowa DOT conducted field investigations during the Fall of 2015 to evaluate the study area for existing woodland habitat and threatened and endangered species habitat. Although there are scattered trees along some of the right of way lines and at some of the parks, the only wooded area is at the far northeastern extent of the Project study area. The study area is generally on the east edge of the Central Flyway and bordering on the west edge of the Mississippi Flyway path of migratory birds. The majority of bird species in the U.S. fall under the regulatory protection of the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act, which prohibits the taking, killing, possession, and transportation, (among other actions) of migratory birds or eagles, their eggs, parts, and nests, unless specifically authorized by the U.S. Fish and Wildlife Service.

Through additional field investigations, Iowa DOT also identified wetland areas and a stream in the study area.

No Build Alternative impacts: The No Build Alternative would not impact wildlife and habitat, because no construction, land disturbance, or vegetative clearing would take place.

Proposed Alternative impacts: The Proposed Alternative is expected to result in only minimal alteration of the existing wildlife habitat, as the Project study area is located within an existing developed urban area. Potential impacts to wetlands and a portion of a stream would be minimal, as discussed in **Sections 5.3.1 Wetlands** and **5.3.2 Surface Waters and Water Quality**. Potential impacts to threatened and endangered species are discussed in **Section 5.3.5** and woodland impacts are discussed in **Section 5.3.6**. Some of the scattered trees along the right of way would require removal. The Iowa DOT would implement conservation measures that minimize potential impacts to migratory birds, including clearing of trees outside of the nesting season (generally March 1 to August 31) or conducting nest surveys prior to clearing to avoid injury to eggs or nestlings. Prior to construction, bridges would also be checked for potential nests. Based on the considerations stated above, impacts to wildlife habitats would be minimal and would not be significant.

5.3.5 Threatened and Endangered Species

Early coordination with the Iowa DNR and the U.S. Fish and Wildlife Service (USFWS) was initiated to determine if rare, threatened, or endangered plants and/or animals exist in the Project study area (see **Appendix C-3**). In compliance with Section 7 of the Endangered Species Act of 1973 the Project was evaluated by Iowa DOT to determine the likelihood of impacting threatened and/or endangered species and/or their habitat. A species review was conducted for the Project study area, and the Iowa DOT determined that there is no designated critical habitat nor suitable habitat for threatened or endangered species, other than suitable habitat for the federally threatened northern long-eared bat (*Myotis septentrionalis*).

The northern long-eared bat hibernates in caves and mines and swarms in surrounding wooded areas in autumn. In late spring and summer, the bat forages and roosts in upland

forests. The Iowa DOT determined that there is only one area, which is located within the far northeastern extent of the Project study area, where suitable woodland habitat for the federally listed northern long-eared bat (NLEB) may be present.

No Build Alternative impacts: The No-Build Alternative would not impact any threatened or endangered species within the Project area, because no tree clearing would take place.

Proposed Alternative impacts: No tree clearing in the wooded area in the far northeastern extent of the Project study area is expected with the Proposed Alternative, at this time. The Iowa DOT, under the delegated authority provided by the Federal Highway Administration, determined (on February 1, 2017) that there would be no effect on federally or state listed species, and the Project would not result in the destruction or adverse modification of federally designated critical habitat. Therefore, no impacts to threatened or endangered species would occur. Should tree clearing become necessary to construct the Proposed Alternative in the far northeastern extent of the Project study area, further review by the Iowa DOT and consultation with the USFWS and Iowa DNR would be necessary.

5.3.6 Woodlands

The Iowa DOT defines woodlands to include the following:

- An area of forested land at least two acres in size;
- An area containing a density of at least 200 trees per acre (approximate tree spacing of 15 feet on center); and
- Trees within the area possess a 3-inch diameter at breast height (dbh) or greater.

If the size of a treed area is less than 2 acres, it is not considered a woodland.

Based on field investigations during the Fall of 2015 (October 13, November 4, and November 9) and a desktop review using aerial photography, the Iowa DOT determined that trees meeting the criteria of a woodland are present along the far northeastern extent of the Project study area, as shown on **Figure 5-8**.

No Build Alternative impacts: The No-Build Alternative would not impact a woodland within the Project study area, because no tree clearing in that area would take place.

Proposed Alternative impacts: The Proposed Alternative would not impact woodlands within the Project study area; therefore, no impacts to woodlands would occur. Should tree clearing become necessary to construct the Proposed Alternative in the far northeastern extent of the Project study area, and woodland greater than two acres is impacted, the woodland will be mitigated in accordance with Iowa Code 314.23. Iowa Code 314.23, Environmental Protection, states that woodland removed be replaced by plantings as close as possible to the initial site; or by acquisition of an equal amount of woodland in the general vicinity for public ownership and preservation; or by other mitigation deemed to be comparable to the woodland removed, including, but not limited to, the improvement, development, or preservation of woodland under public ownership.

5.4 Physical Impacts

5.4.1 Noise

A traffic noise analysis was conducted in August of 2015 to examine the existing and future (2040) noise levels and impacts associated with the Project. The traffic noise analysis is documented in the *Council Bluffs Interstate System – Segment 4, Traffic Noise Analysis Technical Memorandum*. The determination of probable noise impact and potential abatement measures complies with Title 23, Code of Federal Regulation (CFR), Part 772, and the Iowa DOT's *Policies and Procedure Manual*, Highway Traffic Noise Analysis and Abatement, PPM 500.07, (Noise Policy).

The FHWA has developed Noise Abatement Criteria (NAC) and procedures to be used in the planning and design of highways. For residential areas (as well as other designated sensitive land uses), the NAC is 67 dB(A) (A-weighted decibels); and for businesses, it is 72 dB(A). The Iowa DOT noise policy defines a noise impact as occurring when levels approach or exceed the NAC or when predicted future noise levels are 10 dB(A) or more above existing levels. Iowa DOT defines “approach” as coming within 1 dB(A) of the NAC, which are 66 dB(A) for residential areas and 71 dB(A) for businesses.

Iowa DOT defines a “receptor” as a discrete or representative location of a noise sensitive area(s) or Common Noise Environment(s) (CNE), primarily a residential exterior that is frequently used by persons. A CNE is a group of similar receptors (e.g. all residences) that are exposed to similar noise sources and levels; traffic volumes, traffic mix, and speed; and topographic features. Receptors and (CNEs) were identified based on characteristics such as land use, topography, and roadway geometrics.

Noise Monitoring and Modeling

Existing noise levels were monitored at 12 locations within the study area. Monitored noise levels ranged from 60 dB(A) to 69 dB(A) depending on location. Data was analyzed using FHWA's Traffic Noise Model, TNM[®]2.5, to predict existing and future (2040) levels of peak hour noise at 47 sensitive CNEs in the Project study area. Based on the TNM modeling, modeled noise levels range from 56 dB(A) to 69 dB(A) under the existing scenario, and 58 dB(A) to 70 dB(A) under the no-build scenario. The traffic noise levels would increase 1 to 2 dB(A) between the two scenarios due to the increase in predicted traffic volumes.

The build scenario traffic noise levels range between 57 dB(A) and 70 dB(A). When comparing the build scenario to the existing scenario, the change in noise levels at CNE receptors would range between a decrease of five (-5) dB(A) to an increase of three (3) dB(A). The changes in noise levels would be due to both an increase in traffic volumes along with a change in the alignment of I-29, I-480, the interchange ramps and the frontage roads. The modeled noise levels and the traffic noise analysis results are presented in **Table 5-6**.

Table 5-6: Noise Impact Summary

Modeled Receptor	Activity Category	NAC (approaching) dB(A)	Existing Noise Level dB(A)	Predicted Noise Level			Impacted (yes/no)
				No Build dB(A)	Build dB(A)	Increase Over Existing	
R-1	B	66	67	68	68	1	Yes
R-2	C	66	65	66	67	2	Yes
R-3	B	66	68	69	69	1	Yes
R-4	B	66	68	69	69	1	Yes
R-5	B	66	59	60	60	1	No
R-6	B	66	67	69	68	1	Yes
R-7	C	66	62	63	62	0	No
R-8	B	66	59	60	59	0	No
R-9	B	66	69	70	70	1	Yes
R-10	B	66	62	63	64	2	No
R-11	B	66	68	69	69	1	Yes
R-12	B	66	68	69	68	0	Yes
R-13	B	66	63	64	63	0	No
R-14	B	66	61	62	62	1	No
R-15	B	66	65	66	67	2	Yes
R-16	B	66	63	64	66	3	Yes
R-17	B	66	66	67	<i>Receptor is relocated in build condition</i>		
R-18	C	66	65	66	63	-2	No
R-19	B	66	63	64	61	-2	No
R-20	B	66	65	66	60	-5	No
R-21	B	66	60	61	58	-2	No
R-22	B	66	64	65	63	-1	No
R-23	B	66	64	66	64	0	No
R-24	B	66	66	68	65	-1	No
R-25	B	66	65	66	65	0	No
R-26*	B	66	63	64	63	0	No
R-28	B	66	61	62	61	0	No
R-29	B	66	63	64	64	1	No
R-30	C	66	56	58	58	2	No
R-31	C	66	64	66	65	1	No
R-32	C	66	66	67	64	-2	No
R-33	B	66	63	65	63	0	No
R-34	B	66	62	64	63	1	No
R-35	B	66	61	63	64	3	No
R-35b	B	66	57	58	60	3	No
R-36	B	66	57	58	58	1	No
R-37	B	66	57	58	57	0	No
R-38	B	66	62	63	63	1	No
R-39	B	66	65	66	61	-4	No
R-40	B	66	65	66	61	-4	No
R-41	B	66	60	61	61	1	No
R-42	B	66	58	59	60	2	No
R-43	B	66	62	63	<i>Receptor is relocated in build condition</i>		
R-44	B	66	61	62	61	0	No
R-45	B	66	65	66	<i>Receptor is relocated in build condition</i>		
R-46	C	66	56	58	57	-1	No
R-47	B	66	57	59	58	-1	No

* R-27 not used in the analysis

No-Build Alternative impacts: Existing noise levels at 10 of the 47 CNE receptors approach, meet, or exceed the NAC of 67 dB(A), and range from 66 dB(A) to 69 dB(A). Under the No-Build Alternative, predicted noise levels at 20 of the 47 CNE receptors would approach, meet, or exceed the NAC of 67 dB(A) as a result of an increase in traffic volumes, and would range from 66 dB(A) to 70 dB(A). Under the No Build Alternative, noise levels would exceed the NAC by a maximum of 3 db(A), which would be a minor impact but not significant, because the highest predicted No Build noise levels are only 2 db(A) higher than the existing noise levels.

Proposed Alternative impacts: Of the 47 sites that were tested as part of the 2040 build model, predicted noise levels at 10 residential locations would approach, meet, or exceed the NAC of 67 dB(A), ranging from 66 dB(A) to 70 dB(A), and therefore are considered impacted. The change from existing noise levels compared to predicted traffic noise levels range from no change (0 dB(A)) to a 3-dB(A) increase. Because 3 db(A) is a low relative amount of change, noise impacts would be considered minor but not significant.

Proposed Alternative mitigation: According to Iowa DOT Noise Policy 500.07, when traffic noise impacts are identified, noise abatement must be considered and evaluated for both feasibility and reasonableness. Construction of noise barriers is the most commonly used noise abatement measure.

Feasibility and Reasonableness

According to Iowa DOT Noise Policy 500.07, feasibility refers to the ability to provide abatement in a given location considering the acoustic (noise reduction) and engineering (constructability) limitations of the site. A noise abatement measure is not feasible unless the measure is predicted to achieve a noise reduction of at least 5 dB(A) for a majority (more than half) of impacted receptors, and it can feasibly be constructed.

In addition, each of the following reasonableness factors must be evaluated in order for noise abatement to be considered reasonable:

- *Benefited Receptor Viewpoints* – Solicit viewpoints at benefited receptor locations regarding noise wall desirability.
- *Noise Abatement Costs* - A reasonable cost per benefited receptor is \$40,000 or less based on 2012 costs.
- *Noise Reduction Design Goal* – A 10 dB(A) noise reduction design goal must be predicted to be achieved by at least one benefited receptor.

A traffic noise wall located along the proposed right of way was evaluated for feasibility and reasonableness of abatement for the impacted receptors. The location of the evaluated noise wall is on the south side of I-29, in the northeast portion of the Project corridor, between N. 26th Street and N. 36th Street. The noise barrier appears to meet feasibility and reasonableness criteria.

Optional Reasonableness Criteria

Iowa DOT Noise Policy 500.07 also considers other optional reasonableness criteria.

Date of Development – The date of development considers the time period of sensitive land use development relative to the construction of the roadway facility, in this case the Interstate. Based on review of historical aerial photographs, the I-29 corridor was constructed between 1960 and 1970. According to Interstate-Guide.com, the section of I-29 from 9th Avenue to Iowa 192 opened in 1968. Development along the corridor similarly occurred between 1960 and 1970, and most likely occurred concurrently with the I-29 construction.

Change Between Existing and Future Build Condition Noise Levels – The change in noise levels considers the potential increase in noise between the existing noise condition and the projected traffic noise level after the proposed Project is completed (in 2040). The smaller the change, the less likely that noise abatement development would be considered to be reasonable. The change in traffic noise levels in this section of the Project corridor ranged from no change (0 dB(A)) to a 3-dB(A) increase. Of the 16 CNE receptors within the noise wall area, 15 of those would experience an increase of less than 3-dB(A) and one would experience an increase of 3-dB(A). The average change is 1 dB(A) and therefore, based on the Iowa DOT policy, would be categorized as “high no”, because of the low relative amount of change, and noise impacts would not be considered significant.

Because the analyzed noise barrier does not meet the optional reasonableness criteria, noise abatement for this Project is unlikely.

In the initial phase of construction, the frontage roads along I-29 would be built first to function as a detour route while the mainline of I-29 is closed off for reconstruction. It is expected that there would be a temporary increase in noise at the residential neighborhoods along the detour route/frontage roads during reconstruction of I-29. However, after construction is complete, the noise would decrease. During construction activities, temporary construction noise can be mitigated with the following:

- Providing notice to the community of construction activities and duration well in advance so that citizens may plan accordingly;
- Controlling the noise emissions at their source;
- Identification of sensitive areas where construction noise should be limited as well as good coordination between the contractor, engineer and property owner; and
- Limiting the work hours to normal working hours which exclude the hours of sleep and Sundays or holidays.

For these reasons, temporary noise generated during the construction of the proposed project would be a minor impact but would not be considered significant.

Noise Contour Information for Local Officials

Noise contours were generated for the undeveloped areas on the north side of I-480, just east of the river. The 66 dB(A) future traffic noise contour is located approximately 40 feet from I-480, and the 71 dB(A) contour is less than 25 feet from the edge of pavement. Construction activities, unrelated to the Proposed Alternative, have recently commenced in this area, and according to the Playland Park Neighborhood Master Plan, this mixed-use development has been planned with an adequate buffer between the highway and the buildings to avoid noise impacts in this area.

5.4.2 Air Quality

Pottawattamie County and subsequently Council Bluffs is a non-attainment area for Lead under the National Ambient Air Quality Standards (NAAQS). Non-attainment was designated effective December 31, 2011. Two sources of lead non-attainment were identified, Griffin Pipe Products and Alter Metal Recycling, both located to the east of the Project study area. The Iowa DNR submitted a State Implementation Plan (SIP) for Lead Non-Attainment on January 30, 2015 to the EPA. This document outlined requirements for lead control measures at both facilities to reduce emissions to acceptable levels.

Requirements outlined in the SIP included haul road sweeping, limits on hours of operation, and the installation of control devices. The most recent monitored lead NAAQS violation occurred during 2012 in the September through November 3-month rolling average.

No Build Alternative impacts: The No Build Alternative is not expected to contribute to lead levels in the study area, since lead has been removed from motor vehicle gasoline. The No Build Alternative would be expected to have minor effects to air quality in the study area, in that traffic congestion would worsen, thereby resulting in more idling vehicles and minor increases of vehicular pollutant emissions. Therefore, impacts to air quality from the No Build Alternative would be minor but not significant.

Proposed Alternative impacts: The Proposed Alternative is not expected to contribute to lead levels within the Project study area, since lead has been removed from motor vehicle gasoline.. The Proposed Alternative would decrease traffic congestion and idling vehicles, thereby reducing vehicular pollutant emissions. In addition, long term air quality related to transportation emissions is expected to be improved by the Proposed Alternative. The Proposed Alternative would improve direct access to many areas within Council Bluffs, which will reduce emissions by reducing vehicle miles traveled within the Project study area. Although the Proposed Alternative would still produce vehicular emissions, impacts to air quality would be minor but not significant.

Short term air quality impacts associated with dust and equipment emissions during construction are to be controlled by standard contract and equipment specifications. As such, short term air quality impacts are not anticipated to be significant.

5.4.3 Energy

The current consumption of energy in the Project corridor includes the energy (in the form of gasoline and diesel fuel) consumed by vehicles for normal operation and maintenance, including fossil fuels, labor, and highway construction materials, would occur during Project construction and as a result of the Project. Reducing congestion and improving travel times and level of service is one of the objectives stated in the Project Purpose and Need section, and the resulting reduction in energy consumption would be a by-product of implementation of the CBIS Segment 4 Project improvements.

No-Build Alternative Impacts: Under the No-Build Alternative, energy consumption would continue, and stop-and-go traffic conditions and congestion would be expected to worsen as more vehicles use the area between now and 2040, on a road system that was originally designed according to 1960s and early 1970s standards. This would result in an increase in long-term

fuel consumption as a larger number of vehicles sit idle. As a result, adverse but not significant energy consumption would occur because traffic would not be able to move through the area smoothly.

Proposed Alternative Impacts: The proposed Project would require an initial increase in the use of fossil fuels to operate the heavy equipment needed to construct the highway improvements, as well as the use of construction materials. Upon completion of the Project, upgraded vehicle mobility through the area, decreased congestion, and increased Interstate to Interstate linkages would be provided, which would in turn help to reduce fuel consumption in the long term. These improvements would result in fuel reductions and provide benefits in energy use. Therefore, the energy consumption of the Project would be minor but would not be considered a significant impact. The proposed Project would also cause temporary traffic delays and congestion during construction, but these delays would be temporary and; therefore, not considered significant.

5.4.4 Contaminated and Regulated Materials Sites

The Iowa DOT conducted a preliminary review for the potential or known presence of regulated materials for the proposed Project on September 9, 2015. This review was intended to identify those properties with potential or known Recognized Environmental Conditions (RECs); and was based on a review of Iowa Department of Natural Resources (DNR), US Environmental Protection Agency (EPA), and County Assessor on-line databases, historic aerial photos, sanborn maps, and Google Earth photography. Properties were also verified through a drive-by review of the study area. The Iowa DNR was also contacted during early coordination and provided a response letter listing some sites of concern (see **Appendix C-3**).

Sixteen (16) properties were identified within and near the study area, with five identified as having potential RECs, and eleven identified as having known RECs, as summarized in **Table 5-7**. **Table 5-7** also indicates the level of risk that the Iowa DOT assigned each site, based on a site’s potential for contamination or environmental releases. Four (4) properties are indicated as having a low risk for contamination, 7 are indicated as moderate risk, and 5 are indicated as high risk. **Exhibit 5-9** shows the location of of each potential or known REC within the study area.

Table 5-7 - Properties with Potential or Known Recognized Environmental Conditions (REC)

Map ID No.	Facility Name	Facility Address	Data Source & Environmental Interest Type*	Notes	RISK
Potential RECs					
RM-1	Dodge Riverside Golf Club	4100 First Ave/ 421 Harrahs Blvd	DNR - UST (1)	UST removed in 2006	Low
RM-2	Former Frito Lay	3919 W Broadway/ 103 S. 38th St	DNR - UST (1); EPA – RCRA - Haz Waste Generator	Currently River Park Apts. UST removed in 1988	Low
RM-3	Speedy Gas & Shop	430 S. 35 th St	DNR – UST (2)	1 UST removed in 2007	Moderate
RM-4	Automart 150	3444 W. Broadway	Auto-related wastes	Auto sales facility since the 1960s	Low

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Map ID No.	Facility Name	Facility Address	Data Source & Environmental Interest Type*	Notes	RISK
RM-5	Former Auto Repair / Edmunson Memorial Hospital	3434 W. Broadway	Auto repair wastes	Currently a parking lot for Jennie Edmunson Health Center West	Low
Known RECs					
RM-6	Nomi Petro Mart	3607 9th Avenue	DNR - UST (3); DNR - LUST	Currently Phillips 66 gas station. DNR designation - "No Action Required" in 2000.	Moderate
RM-7	Sunshine Mini-Mart	3606 9th Avenue	DNR - UST (2); DNR - LUST	Currently vacant building.. USTs removed 2006. DNR designation - "No Action Required" in 2000.	Moderate
RM-8	Speedee Mart 1512	3624 9th Avenue	DNR - UST (7); DNR - LUST	Currently in operation. 3 USTs active. 4 USTs removed 1988. History of free product. DNR designation - "No Action Required" in 2000.	High
RM-9	CB Quick Stop	3500 Avenue A	DNR - UST (5); DNR - LUST	Currently in operation. 2 USTs active. 3 USTs removed 1994. Extensive history of free product. Remediation ongoing.	High
RM-10	Former Benson 66 Service	3500 W. Broadway	DNR - UST (4); DNR - LUST	Former gas station site. USTs removed 1989. Groundwater monitoring.	High
RM-11	Mercantile Bank of Western Iowa	15 S. 35th St/ 3445 W. Broadway	DNR - UST; DNR - LUST	Former gas station site. DNR designation - "No Action Required" in 2003.	Moderate
RM-12	Buck's Inc	3501 W. Broadway	DNR - UST (13); DNR - LUST; EPA - RCRA - Haz Waste Generator	Currently in operation. 12 USTs active. 1 UST removed in 1990. DNR designation - "No Action Required" in 2000.	Moderate
RM-13	G's BP Amoco	3540 W. Broadway	DNR - UST (4); DNR - LUST	Currently in operation. 3 USTs active. 1 UST removed in 1993. DNR designation - "No Action Required" in 2000.	Moderate
RM-14	Former Holiday Station Store #59	3601 W. Broadway	DNR - UST (4); DNR - LUST	Currently vacant lot owned by City. USTs removed 1995. History of free product. DNR designation - "No Action Required" in 2000 & 2014.	High
RM-15	Kwik Shop #527	3632 Avenue G	DNR - UST (2); DNR - LUST; Spills	Gas station currently in operation. History of free product. Remediation ongoing.	High

Map ID No.	Facility Name	Facility Address	Data Source & Environmental Interest Type*	Notes	RISK
RM-16	Westend Service	3778 Avenue G	DNR - UST (5); DNR - LUST	Former gas station. Now auto repair. USTs removed 1997. DNR designation - “No Action Required” in 2010.	Moderate

*UST – Underground Storage Tank; LUST – Leaking Underground Storage Tank

No Build Alternative Impacts: The No Build Alternative would not impact any of the contaminated or regulated materials sites, or result in a potential for encountering contamination, as there would be no construction involved.

Proposed Alternative Impacts: The Proposed Alternative would result in partial impacts to two low risk properties, two moderate risk properties and three high risk properties. **Table 5-8** lists the potentially impacted sites. Sites RM-1 and RM-2 are designated as low risk, and no leaking underground storage tanks (LUSTs) were present. Land disturbance for construction activities on these properties would be on the edges and would be minimal. Based on those conditions, there would be a relatively low risk of contamination from these properties during construction, and impacts would not be considered significant.

The Proposed Alternative would acquire minimal amounts (less than 0.1 acre) of property from the moderate and high risk sites that would be impacted, but would not affect the facilities containing regulated materials. These sites have had LUSTs, although all except RM-15 have been assigned “No Action Required” designations from Iowa DNR.

According to the soil survey data of the Natural Resources Conservation Service, the depth to the water table is approximately six (6) feet throughout much of the corridor, including the areas in the vicinity of sites RM-14 and RM-15, two high risk sites. There is a potential that the LUSTs could have caused some groundwater or soil contamination; however, construction activities near these sites would be minimal (less than 0.1 acre of disturbance at the edge of the property) and would involve fill or shallow excavation at a depth well above the water table at these sites. However, given the history of free product (present as a discrete substance rather than mixed with water or soil) associated with these sites, Iowa DOT will coordinate with Iowa DNR to determine the status of any remediation at these sites (including locations of monitoring wells or recovery wells), and will coordinate with construction contractors before construction to ensure all appropriate precautions are taken to protect construction workers and the public from contamination. For these reasons, any potential encounter with these sites would have minor impacts but would be considered not significant.

The soil survey data indicates that the water table at sites RM-6, RM-7, and RM-8 is near the surface. Sites RM-6 and RM-7 are considered moderate risk sites and have a history of LUSTs; and site RM-8 is designated as high risk with a history of free product and LUSTs. Given these factors, Iowa DOT will coordinate with Iowa DNR to determine the status of any remediation at these sites, and will coordinate with construction contractors before construction to ensure all appropriate precautions are taken to protect construction workers and the public from potential contamination. Construction activities near these sites would be minimal (less than 0.1 acre of disturbance at the edge of the property) and would involve fill or shallow excavation.

Based on the conditions and precautions stated above, any potential encounter with these sites would have minor impacts but would be considered not significant.

Table 5-8: Potentially Impacted Regulated Materials Sites

Map ID No.	Facility Name	Data Source & Environmental Interest Type*	Notes	RISK	Impact / Acquisition
RM-1	Dodge Golf Course	DNR - UST (1)	UST removed in 2006	Low	Partial (minimal)
RM-2	Former Frito Lay	DNR - UST (1); EPA – RCRA - Haz Waste Generator	Currently River Park Apts. UST removed in 1988	Low	Partial (minimal)
RM-6	Nomi Petro Mart	DNR - UST (3); DNR - LUST	Currently Phillips 66 gas station. “No Action Required”	Moderate	Partial (minimal)
RM-7	Sunshine Mini-Mart	DNR - UST (2); DNR - LUST	Currently vacant building. USTs removed 2006. “No Action Required”	Moderate	Partial (minimal)
RM-8	Speedee Mart 1512	DNR - UST (7); DNR - LUST	Currently in operation. 3 USTs active. 4 USTs removed 1988. History of free product. “No Action Required”	High	Partial (minimal)
RM-14	Former Holiday Station Store #59	DNR - UST (4); DNR - LUST	Currently vacant lot owned by City. USTs removed 1995. History of free product. “No Action Required”	High	Partial (minimal)
RM-15	Kwik Shop #527	DNR - UST (2); DNR - LUST; Spills	Gas station currently in operation. History of free product. Remediation ongoing.	High	Partial (minimal)

*UST – Underground Storage Tank; LUST – Leaking Underground Storage Tank

All known and unknown hazardous materials encountered during roadway improvements would be handled per federal, state, and local laws and regulations. Where hazardous material or solid waste is identified in the required right of way, resolution with the property owner would be conducted prior to purchase. If an unknown site is encountered during construction, the Iowa DOT and the Iowa DNR will be contacted and appropriate laws and EPA regulations would be followed to eliminate or minimize any adverse environmental consequences. Standard best management practices would be used for demolition, clearing and grubbing. Buildings that are identified for demolition would be thoroughly inspected for both stored hazardous materials and hazardous materials used in the construction of the building (i.e. asbestos, etc.). For these reasons, any potential encounter with a contaminated site would have minor impacts but would be considered not significant.

5.4.5 Visual

The existing visual character of the study area adjacent to the roadway is predominantly single-family residential and smaller areas of multi-family residential, from Avenue G on the north to 9th Avenue on the south. These areas of sensitive visual receptors have been subject to views of the road since the time it was built. The notable visual resources that provide aesthetic open views from the road include the Dodge Riverside Golf Course, the Westwood Golf Course, Westwood Park, the West Broadway Gateway open area and monument structures, the woodland area in the northeast portion of the corridor, and the Bob Kerrey Pedestrian Bridge (as a background visual element).

No Build Alternative Impacts: The No-Build Alternative would result in increased congestion which can be considered a visual impact. However, most of the residents adjacent to the roadway corridor have been accustomed to living close to the Interstate roadway and experiencing views of the existing traffic on the road; therefore, the impact would be minor but not significant.

Proposed Alternative Impacts: Visual impacts are determined by the degree of “change” in the visual environment as related to the viewers. The construction of the Proposed Alternative would include reconfigured interchange areas with additional paved lanes at, and between those interchanges. At the adjacent residential areas, reconfigured and additional lanes would be located closer to some residences than existing lanes had been, resulting in some residents experiencing views of the road that had previously not existed. However, the proposed roadway configuration would not be a substantial change in the visual environment and views of the road, as most of the residents adjacent to the roadway corridor have been accustomed to living close to the Interstate roadway and experiencing views of the existing road. Therefore, the visual impacts would be considered minor but not significant.

The proposed alternative would not negatively affect the visual character of the notable visual resources in the study area, and the views from the road would not be negatively impacted or changed. Some views from the road may also be enhanced by tree removal adjacent to the golf course and Westwood Park, thereby creating more openings for views to these visual resources. However, the users of the golf course and the park, who currently have sporadic views of the roadway traffic through breaks in the trees, would be exposed to more open views of the roadway with tree removal. The West Broadway Gateway would not be negatively impacted by the Proposed Alternative; however, its construction can provide opportunities for landscape enhancements in the disturbed areas adjacent to the Gateway. For the reasons stated, and because the viewers are accustomed to the views of the existing adjacent roadway, the visual impacts of the Proposed Alternative would be minor but not significant.

Aesthetics and Visual Enhancement

In 2007, an Aesthetics Subcommittee, composed of community members, Iowa DOT and consultants, helped develop a plan to assist in formulating recommendations for aesthetic treatments and enhancements for the interstate corridor that compliments the character of the existing natural environment and incorporates locale-specific details. The resulting Aesthetics Master Plan incorporates local culture, public art, landscape and other planning initiatives, to create a signature community Gateway, as well as a cohesive corridor that is attractive and easy to navigate. The primary elements of interest in the Aesthetics Master Plan are bridges, landscape design, and public spaces/community gateways. Other features to be considered are lighting, retaining walls, sound walls, system interchanges, signage and sign structures, stand alone public art pieces, barriers and fencing.

The Aesthetics Master Plan also references other plans that incorporate aesthetics and visual enhancements in the Project corridor, as follows:

West Broadway Corridor Redevelopment Plan – One of the specific locations for aesthetic enhancements identified in the Aesthetics Master Plan is the I-480 entrance at West Broadway. The *West Broadway Corridor Redevelopment Plan* specifies distinctive and

attractive gateway features along this entry to the City. A feature that has already been implemented and has become a recognized icon for the City is the Broadway Gateway, located just east of the I-480/I-29 interchange. The lighting, monuments and landscaping were created to depict the bluffs and prairie of the City's surroundings.

The *Council Bluffs Public Art Master Plan* calls for public art to be located at city gateways, along major transportation corridors, commercial destinations and other locations along the interstate, in accordance with the style, genre and policy recommendations outlined in the Public Art Master Plan.

City of Council Bluffs Trail Plan – The reconstruction of the interstate and the development of trails presents opportunities for aesthetic enhancements to improve the interaction between the two modes of transportation. The Mid-City Trail, which is currently under construction in the Project study area, would be constructed along with the new I-29/I-480 interchange, as it travels through the interchange to connect with the Iowa Riverfront Trail.

5.4.6 Utilities

The Project study area contains multiple energy and communication utilities. Known utility providers with infrastructure located within the study area include:

- Black Hills Energy - natural gas distribution lines;
- CenturyLink - communications and data cables;
- Windstream - fiber optic cables;
- Cox Communications - communications and data cables;
- City of Council Bluffs - water and sanitary sewer lines;
- Iowa Communications Network (ICN) – fiber optic cables;
- MidAmerican Energy – electrical power distribution lines; and
- Sprint – fiber optic cables.

No Build Alternative impacts: No impacts to utilities would occur under the No Build alternative because there would be no construction.

Proposed Alternative impacts: It is expected that construction of the Proposed Alternative would have impacts on underground and above ground utilities within the Project area. The extent and exact nature of those impacts would be determined during the design phase of the Project. It is anticipated that utilities within the Project area would be relocated in the same vicinity of their current location, to offset impacts and to accommodate the construction of the Proposed Alternative. Coordination with public and private utility companies would take place during design and construction to ensure utility service is uninterrupted or only minimally disrupted during construction. For these reasons, impacts on utilities would be minor but not significant.

5.5 Cumulative Impacts

A cumulative impact is defined 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” (40 CFR 1508.7). Cumulative impacts include the direct and indirect impacts of a project together with impacts from reasonably foreseeable future actions of others. For a project to be reasonably foreseeable, it must have advanced far enough in the planning process that its implementation is likely.

The Tier 1 Draft EIS evaluated the CBIS Improvements Project’s (Segments 1 to 5) cumulative effects on land use, water quality, wetlands, and threatened and endangered species. The cumulative impact analysis in this document updates the Tier 1 analysis to reflect changes in the range of past, present, and planned/future projects contributing to cumulative effects.

Past Actions

The following projects have previously been implemented and have resulted in past impacts to social and environmental resources in areas near the vicinity of the Segment 4 Project area:

- CBIS Segment 1 I-80 improvements, from just east of the I-80/I-480/U.S. 75 interchange in Omaha to just east of the Missouri River bridge in Council Bluffs, including replacement of the existing bridge with a new four-lane bridge.
- Addition of a third lane to eastbound I-80/I-29, between the West and East system interchanges.
- The CBIS Segment 2 project included construction of additional lanes to provide a dual divided freeway through the I-80/I-29 overlap section (between the West and East System interchanges). The 24th Street interchange was reconstructed.
- The completed portion of the CBIS Segment 3 project included elimination of several railroad alignments and development of new consolidated tracks.
- Widening of approximately 4.5 miles of U.S. 275 to four lanes in Council Bluffs between the Missouri River Bridge and I-29.
- The Metro Crossing Shopping Center project, an 85-acre development with 500,000 square feet of retail space at the northwest quadrant of the I-29/U.S. 275 interchange.
- Widening of 24th Street in Council Bluffs between I-80/I-29 and U.S. 275 to four lanes.
- Bob Kerrey Pedestrian Bridge over the Missouri River, connecting Omaha and Council Bluffs.
- Council Bend restoration project by USACE – Development of a chute, backwaters, wetlands, and shallow river habitat, located along the east bank of the Missouri River in Council Bluffs, from approximately 0.5 mile upstream of the I-480 bridge to the Chicago, Central, and Pacific Railroad bridge.
- Tom Hanafan River’s Edge Park, located at the foot of the Bob Kerrey Pedestrian Bridge in Council Bluffs, and consisting of an open lawn area, concert seating area, festival grounds, and a riverfront trail.
- River Edge Service Road and adjacent shared-use path, between Tom Hanafan River’s Edge Park and Harrah’s Casino complex.
- Riverfront Place in Omaha, located at the foot of the Bob Kerrey Pedestrian Bridge, and consisting of 78 residential units in two towers, 27 town homes, commercial space, and a public plaza.

Present Actions

The following projects are under construction, or have just been completed, and have resulted in impacts to social and environmental resources in areas near the vicinity of the Segment 4 Project area:

- CBIS Segment 2 improvements are under construction (continuing through 2021), including reconstruction of the I-29/I-80 west system interchange and improvements to the I-29 and I-80 mainline.
- CBIS Segment 3, currently under construction, includes geometric and capacity improvements to the I-29 and I-80 mainline and the I-80/I-29 East System interchange, the South Expressway interchange, the U.S. 275 interchange, and the Madison Avenue interchange.
- An interim project to improve access to the mixed use development currently under construction on the former Playland Park site and the current River’s Edge development north of the I-480 interchange, by extending Benson Street from Avenue D to Avenue B.
- On the site of a former amusement park in Council Bluffs, located east of River’s Edge Park and south of an existing residential neighborhood, the Playland Park Neighborhood development will include office buildings and mid-rise condominium towers that will contain community space, retail uses, and townhouses. Parking will be provided on-street, in surface parking lots behind buildings, and in parking structures.

Planned and Potential Future Actions

The City of Council Bluffs Planning and Zoning Department is responsible for the coordination of all long-range and current planning efforts for the City. The Department adopted the *Bluffs Tomorrow 2030 Comprehensive Plan* in September 2014, which serves as a guide for future neighborhood, commercial, and industrial development, as well as investment in transportation and utilities. A brief summary of key planned or future projects within or near the Study Area follows:

- CBIS Segment 2 improvements are planned (continuing through 2021) to include reconstruction of the Nebraska Avenue interchange and the UPRR overpass, which will be rebuilt from the existing five tracks to three tracks to improve local yard operations. Iowa DOT is providing funds for UPRR to store trains within their nearby yard rather than on the bridge.
- Segment 5 of the overall CBIS Improvements Project will include I-80 improvements from the Madison Avenue interchange to north of the U.S. 6/Kanesville Boulevard interchange.
- Widening of U.S. 6 in Iowa between I-80 and the Westfair Amphitheatre to four lanes.
- Addition of a 15-acre water park (with another 8 acres reserved for future expansion) is tentatively planned to be constructed west of the Mid-America Center in Council Bluffs.
- West Broadway Corridor Plan – The corridor is being planned to transition from a mixture of retail and light industrial uses to a more dense, walkable mixed-use corridor

that will include the redevelopment of obsolete commercial properties, the addition of multi-family housing and residential units that appeal to a broader market segment, pedestrian amenities, a new regional multi-use recreational trail along the 1st Avenue corridor, and the potential for public transportation linking this corridor to the downtowns of Council Bluffs and Omaha.

- Mid-City Area Wide Plan (Avenue B to 5th Avenue, and S 14th Street to S 10th Street) – The City of Council Bluffs received a U.S. Environmental Protection Agency (EPA) Brownfields Area Wide Planning Grant to prepare a revitalization plan for Mid-City, which includes site assessment, cleanup and reuse planning, as well as overall neighborhood revitalization. The *Preferred Redevelopment Plan* includes the following types of proposed redevelopment: sports-related commercial development; a workforce training center campus; neighborhood improvements and the preservation of historic homes as single-family dwellings; a mixed-use neighborhood focused on gardens, parks, food and sustainable living; open space and a public recreation area celebrating Indian Creek; commercial development: and a public market place.
- The City's *Bluffs Tomorrow 2030 Comprehensive Plan* includes the subarea plan for the area in the vicinity of the I-80/Highway 6 interchange (in Segment 5) and Iowa Western Community College. The area is currently undeveloped agricultural land. Planned land uses include commercial, research/technology campus, office, industrial, and logistics.
- The Council Bluffs Riverfront Master Plan identifies a potential 17-acre housing project with duplex type buildings near Avenue G and Benson Street west of I-29.

Proposed Alternative impacts: Cumulative impacts to resources in the Project study area may result from roadway development, as well as residential, commercial, and park/recreational development. Although it is uncertain how much actual future development would be indirectly attributed to the construction of the proposed Segment 4 roadway improvements, the Project could provide the catalyst for implementation of planned development such as the West Broadway Corridor and the Playland Park Neighborhood, as identified in the City's comprehensive plan, as well as other development independent of the Segment 4 Project.

Land Use – Much of the proposed Segment 4 Project would be constructed within existing Iowa DOT right of way. Acquisition of up to approximately 16 additional acres of right of way will be required in order to accommodate the proposed improvements. Four (4) of these properties are commercial (one of which would be a total acquisition); 56 are residential, 42 of which would be total acquisitions requiring relocation, with two other total acquisitions of vacant residential property. In addition, approximately 2.4 acres of Section 4(f) park/recreational property would require acquisition for proposed improvements to Westwood Park and the Dodge Riverside Golf Course. In addition, 0.48 acre of the privately-owned Westwood Golf Course would be acquired for the Segment 4 Project. Land use impacts that have already been estimated in the other CBIS Improvements Project areas include 3 residential displacements and 1.16 acres of Section 4(f) park/recreational property in Segment 1; 2 residential displacements but no Section 4(f) park/recreational impacts in Segment 2; and 61 residential displacements, 12 business displacements and no Section 4(f) park/recreational acquisition impacts in Segment 3 (Segment 5 has not yet gone through the Tier 2 environmental analysis process).

The Segment 4 Project and the reasonably foreseeable transportation projects listed above would not create major disruptions in long established neighborhoods or to existing

transportation routes, as the changes would be to the existing highway and transportation systems with well established adjacent land uses. In addition, the City's future land use policies that control changes in land use are well established through the City's comprehensive plan and corresponding subarea plans. The reasonably foreseeable projects listed above, that are outside the transportation rights of way, are also subject to these future land use plans and policies which guide future development. Therefore, it is anticipated that the Segment 4 Project and the reasonably foreseeable projects would generally conform to future land use adjacent to the Interstate system and would not result in significant cumulative impacts. The City, through its adopted planning process and comprehensive land use plans, has identified and positioned the Project study area for guided future development.

Bicycle and Pedestrian Facilities – During interchange construction, the Segment 4 Project would result in temporary occupancy impacts to the Mid-City Trail and the trail along Harrah's Boulevard (branch of Iowa Riverfront Trail), both of which are Section 4(f) resources. During construction of Segments 1, 2 and 3, temporary occupancy impacts would also occur to the following Section 4(f) trail facilities: Segment 1 would affect the Back-to-the-River Trail (a component of the Omaha Riverfront Trail) and the Iowa Riverfront Trail; Segment 2 would affect the Indian Creek Trail; and Segment 3 would affect the unnamed trail connector that passes under the U.S. 275 bridge. All of these trails would be temporarily occupied by providing trail detours, which maintain the continuity of the existing trail system. However, there would be no long-term impacts on trails, and the trails affected during construction would be replaced or relocated. Therefore, trail impacts would be minor but not significant.

Transportation – The Segment 4 Project would improve access and the flow of traffic at the I-480/I-29 system interchange and provide direct access at West Broadway to and from I-480. The existing interchange at Avenue G would be reconfigured to provide direct access to and from I-29, and the partial interchange at N. 35th Street would be removed. The existing partial interchange at I-480 and 41st Street will be relocated one block east to 40th Street. Segment 1 improvements include two 5-lane bridges over the Missouri River and addition of auxiliary lanes on I-80. Segment 2 improvements would include interstate lane additions, the 24th Street interchange bridge replacement to expand its capacity, reconstruction of the I-29/I-80 system interchange, and reconstruction of the Nebraska Avenue interchange and the UPRR overpass, which would be rebuilt from the existing five tracks to three tracks to improve local yard operations. Segment 3 improvements include geometric and capacity improvements to the I-29 and I-80 mainline and the I-80/I-29 East System interchange, the South Expressway interchange, the U.S. 275 interchange, and the Madison Avenue interchange. Segment 3 improvements also include railroad corridor consolidation by constructing new track and taking several miles of existing track out of service, as well as eliminating 16 at-grade rail crossings and creating three others. thereby improving the efficiency of rail operations and reducing roadway / railroad conflicts and delays.

In the short term, there would be some duress on commuters during construction, as drivers adjust to detours and new routes; however, the completion of the CBIS improvements would result in better overall access, improved safety, less congestion, and decreased travel times for all users of the system. Therefore, impacts to transportation would be minor in the short term but not significant, and would be beneficial in the long term.

Water Quality – The Segment 4 Project study area is currently drained via roadside drainage swales that eventually flow to the Missouri River. Future development in the Project area has the potential to impact water quality both on a temporary basis during construction activities and on a permanent basis. The addition of impervious surfaces, which would likely occur from proposed developments, would increase the amount and speed of storm water runoff as well as introduce new sources of pollutants that, if transported via streams or drainage swales to the Missouri River, could degrade water quality. Sedimentation resulting from exposed soil, the use of pesticides and fertilizers, pollutant-laden runoff from parking lots, and increased runoff from additional impervious surfaces could result. The Iowa DOT and the City of Council Bluffs have adopted guidelines known as Best Management Practices (BMPs) that address construction site storm water runoff and post-construction storm water management. BMPs attempt to reduce and control pollutants discharged into the storm sewer systems and surface waters. The water quality impacts of new construction or conversions of undeveloped land to other uses could be mitigated by including vegetated buffer zones to filter pollutants around creeks and drainage ways. Therefore, impacts to water quality would be minor but not significant.

Wetlands - The Tier 1 cumulative impacts analysis stated that less than 3 percent (60 acres) of the 2400 acres of NWI wetlands in the Council Bluffs area could be affected by the CBIS Improvements Project. However, the actual right of way required for the Tier 2 projects would be much less than the potential impact area defined in the Tier 1 study area. The Segment 4 Project would impact only 6 small wetlands encompassing approximately 0.42 acres. Wetland impacts that have already been quantified in the other CBIS Improvements Project areas include 1.6 acres in Segment 1, 10.4 acres in Segment 2, and 18.26 acres in Segment 3 (Segment 5 has not yet gone through the Tier 2 environmental analysis process). Although the cumulative effect of wetland losses associated with the CBIS Improvements, in conjunction with other projects in the vicinity, are relatively minimal, they result in habitat loss and diminished nutrient retention. However, these impacts would be minimized as a result of resource agency requirements for wetland permits and wetland mitigation in the form of on- or off-site wetland creation, restoration, or enhancement, or from the purchase of certified wetland mitigation bank credits. For these reasons, wetland impacts would be considered minor but not significant.

Threatened and Endangered Species – There are large acreages of riparian habitat along the Missouri River and riverfront areas. The Tier 2 Environmental Assessment for Segment 1 (which included a Missouri River bridge crossing) and the Categorical Exclusion for Segment 2 indicated that some area projects adjacent to the river, such as the Council Bend restoration project, are designed to improve or preserve habitat along the river. At that time, the northern long-eared bat (NLEB) was not listed as threatened, and tree clearing was to occur from October to January to avoid the roosting and foraging season for the listed Indiana bat, and to avoid the nesting period for migratory birds. As a result of coordination with resource agencies, as well as the minimization and mitigation measures to be implemented for each project, adverse cumulative impacts on species of the Missouri River and adjacent wooded land are not anticipated to occur. For these reasons, impacts to listed bat species would be considered minor but not significant.

Direct construction impacts on listed river species were not considered significant with incorporation of avoidance, minimization, and mitigation measures, to avoid harming the

listed pallid sturgeon, lake sturgeon, and sturgeon chub. These measures included control of erosion from construction activities, and utilizing measures to minimize impacts on Missouri River water quality, such as vegetated drainage swales to trap sediment and reduce runoff from pavement. Based on the implementation of these measures to avoid harm to the listed species, a determination was made that construction of the Segment 1 project may affect, but is not likely to adversely affect, the pallid sturgeon, lake sturgeon, and sturgeon chub.

Loss of habitat through fragmentation caused by urban development and agricultural practices is a factor in the overall decrease of threatened and endangered populations, and has made most of the CBIS study area inhospitable to threatened or endangered species that may occur in the vicinity. In Segments 2 and 3, the eastern massassauga rattlesnake was the only listed species identified as having potential habitat, although it was determined that it would not be adversely affected. Therefore, impacts to this species would be considered not significant.

In the CBIS Segment 4 Project area, suitable wooded roosting habitat for the listed northern long-eared bat is present only in the northeast extent of the Project area and would not be impacted. Therefore, there would be no effect on the bat species.

Minimization and mitigation measures that would be implemented to preserve habitat would not result in cumulative adverse impacts on threatened and endangered species as a result of the CBIS Improvements Projects and other projects in the area. Therefore, impacts to threatened and endangered species would be considered not significant.

Mitigation: Where possible, the CBIS improvements Projects and other reasonably foreseeable future projects have been planned to avoid resource impacts, or to minimize impacts by reducing project footprints. Coordination will continue to take place with local, state, and federal agencies to ensure that the Segment 4 Project and reasonably foreseeable area developments strive to minimize impacts. Although mitigation measures would be proposed for individual projects, no mitigation is proposed specifically for cumulative impacts.

5.6 Streamlined Resource Summary

The resources not discussed in the body of the EA are located in the Streamlined Resource Summary, **Appendix A**. The summary includes information about the resources, the method used to evaluate them, and when the evaluation was completed. **Table 5-9** summarizes the impacts of the Proposed Alternative to the resources discussed in the sections above.

Table 5-9: Summary of Proposed Alternative Impacts

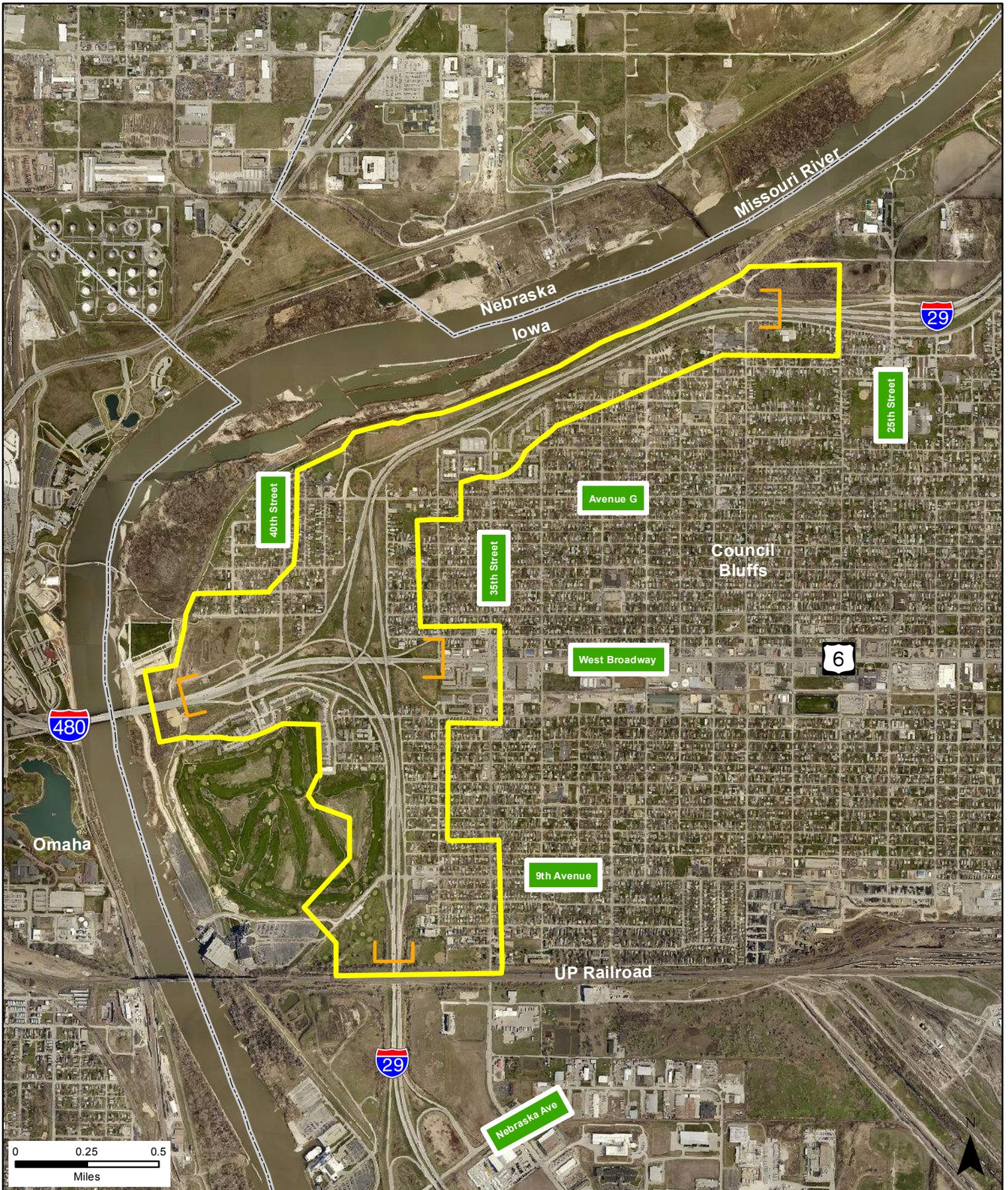
Issue	No Build Alternative	Proposed Alternative
Approximate Length (mi)	2.5	2.5
Land Use	No impacts	Minor but not significant impacts to residential, park/recreation, public, semi-public, and commercial land use

CBIS Improvements Project – Tier 2, Segment 4 Environmental Assessment

Issue	No Build Alternative	Proposed Alternative
Community Cohesion	Potentially significant impacts	Improvement of access to neighborhoods and services. Temporary construction impacts or permanent property acquisitions to Prospect Park Baptist Church, Dodge Riverside Golf Course, Westwood Golf Course, and Westwood Park. Minor but not significant impacts, and beneficial impacts.
Churches (ac)	0	0.02 – Minor but not significant impacts.
Environmental Justice	Minor but not significant impacts.	Potential Minority and Low Income EJ Impacts. Not considered to be disproportionately high and adverse compared to general population. Minor but not significant impacts.
Economic	Significant impacts.	Displacement of 42 residential properties and one commercial property, through full acquisition. Accounts for a \$126,430 tax revenue reduction per year. Minor but not significant impacts.
Joint Development	No impacts	Realignment of Mid-City Trail. Beneficial impacts.
Parklands and Recreation Areas (Section 4(f) Properties as noted) (ac)	0 No impacts	1.34 acres of non-4(f) Westwood Golf Course to be acquired. 2.39 acres of Section 4(f) property (Dodge Riverside Golf Course and Westwood Park) to be acquired. Minor but not significant impacts.
Bicycle and Pedestrian Facilities	No impacts to existing facilities	Temporary impacts during construction. Mid-City Trail (Section 4(f)) to be relocated as part of construction. Branch of Iowa Riverfront Trail along Harrah’s Blvd (Section 4(f)) to be reconstructed. No significant impacts.
Right of Way Acquisition (ac)	0 – No impacts	15.7 - Minor but not significant impacts.
Relocation Potential (Residential total acquisitions)	0 – No impacts	42 - Minor but not significant impacts.
Construction and Emergency Routes	No impacts	Temporary closures of local streets and partial interstate lane closures. No significant impacts. Beneficial impacts.

CBIS Improvements Project – Tier 2, Segment 4 Environmental Assessment

Issue	No Build Alternative	Proposed Alternative
Transportation	No impacts	Improved access to neighborhood and traffic flow. Beneficial impacts.
Historical Sites or Districts (Section 4(f) Properties)	0 No impacts	0.02 acres of total ROW acquisition for the Project. No Adverse Effect. Minor but not significant impacts.
Archeological Sites	No sites identified	No sites identified
Wetland Impacts (ac)	0 No impacts	0.42 - Minor but not significant impacts.
Surface Water Impacts (Streams/Drainages) (ft) / (ac)	0 No impacts	161 / 0.04 - Minor but not significant impacts.
100-year Floodplain (ac)	0 No impacts	0 – No impacts
500-year Floodplain (ac)	0 No impacts	193.2 – Impacts not significant
Wildlife and Habitat	No impacts	Minor but not significant impacts.
Threatened and Endangered Species	No Effect	No Effect
Woodlands	No impacts	No impacts
Noise Impacts (Number of Receptors)	20 - Minor but not significant impacts.	10 - Minor but not significant impacts.
Air Quality	Minor but not significant impacts.	Minor but not significant impacts.
Energy	Adverse but not significant impacts.	Minor but not significant impacts. Beneficial impacts.
Hazardous Materials	0 No impacts	Partial impacts to: 2 – low risk properties; 2 - moderate risk properties; 3 - high risk properties. Minor but not significant impacts.
Visual	Minor but not significant impacts.	Minor but not significant impacts.
Utilities	No impacts	Impacts to underground and above ground utilities. Anticipated relocation will be necessary. Minor but not significant impacts.



**CBIS Segment 4 Tier 2
Environmental Assessment**

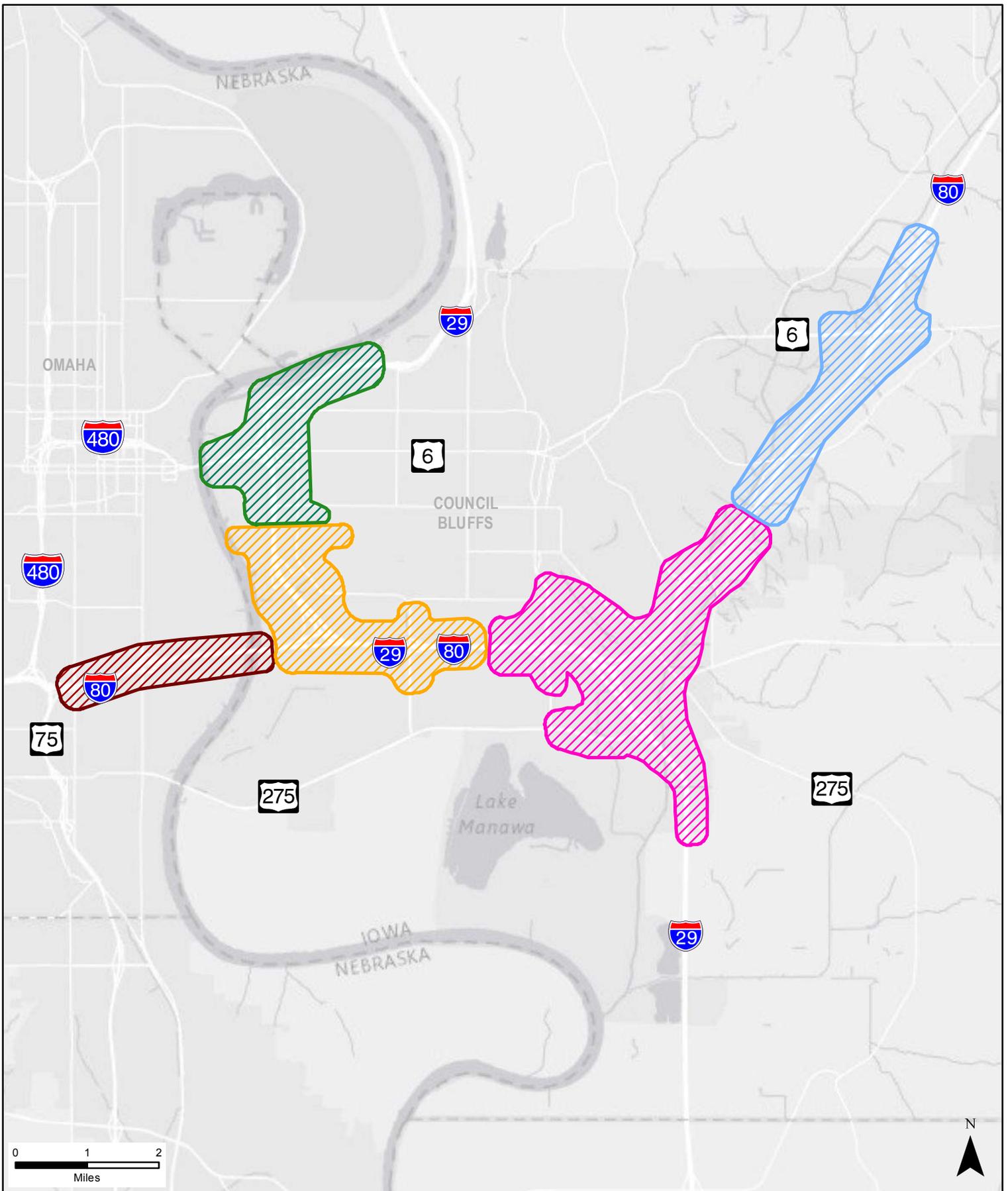
Project Study Area
Council Bluffs Interstate System Improvements Project
Council Bluffs, IA

Date
February 2017

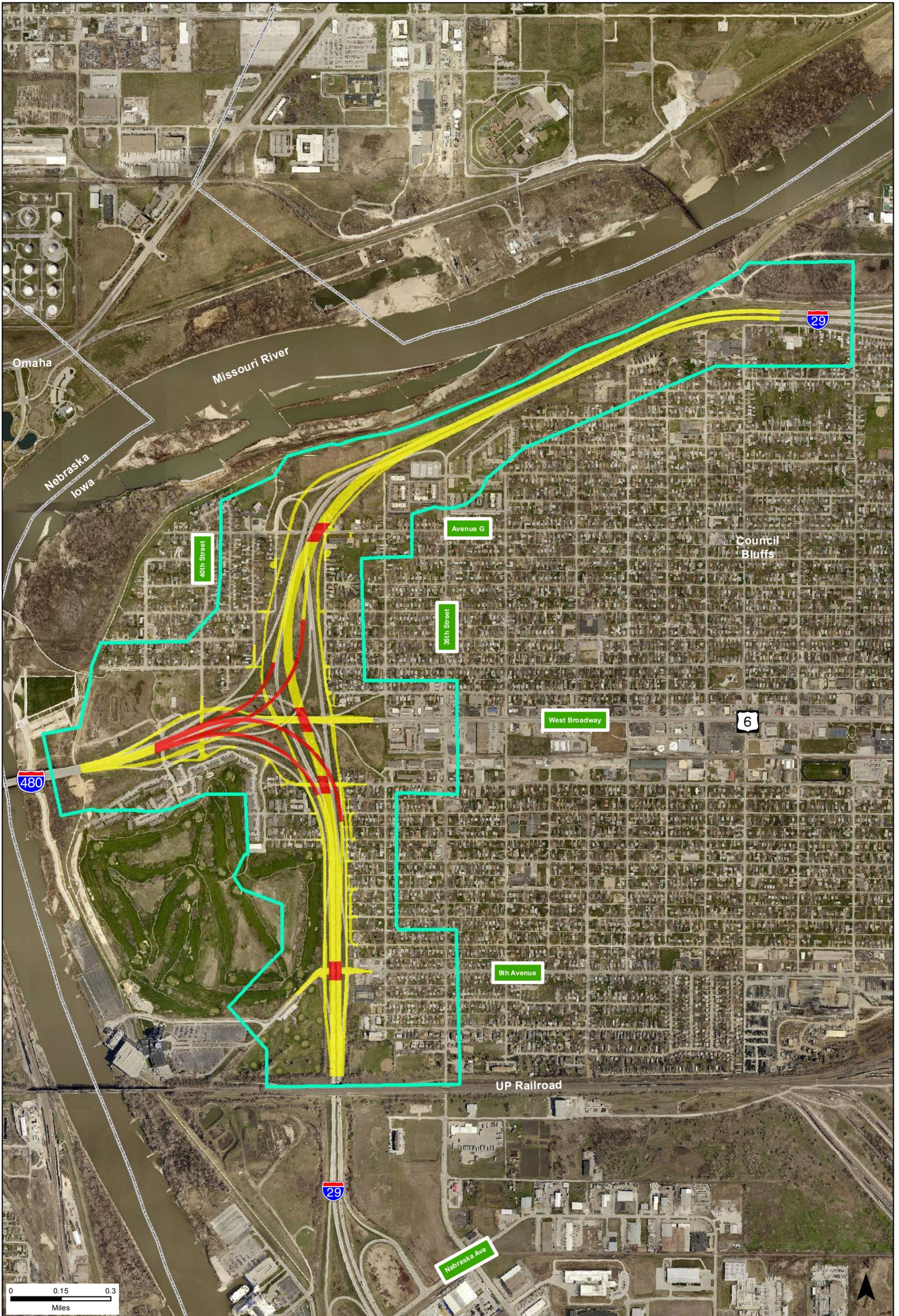
Exhibit
1-1



-  Project Termini
-  Study Area



	 Segment 1	 Segment 4	CBIS Segment 4 Tier 2 Environmental Assessment Tier 2 Segments Council Bluffs Interstate System Improvements Project Council Bluffs, IA	Date February 2017
	 Segment 2	 Segment 5		Exhibit 2-1



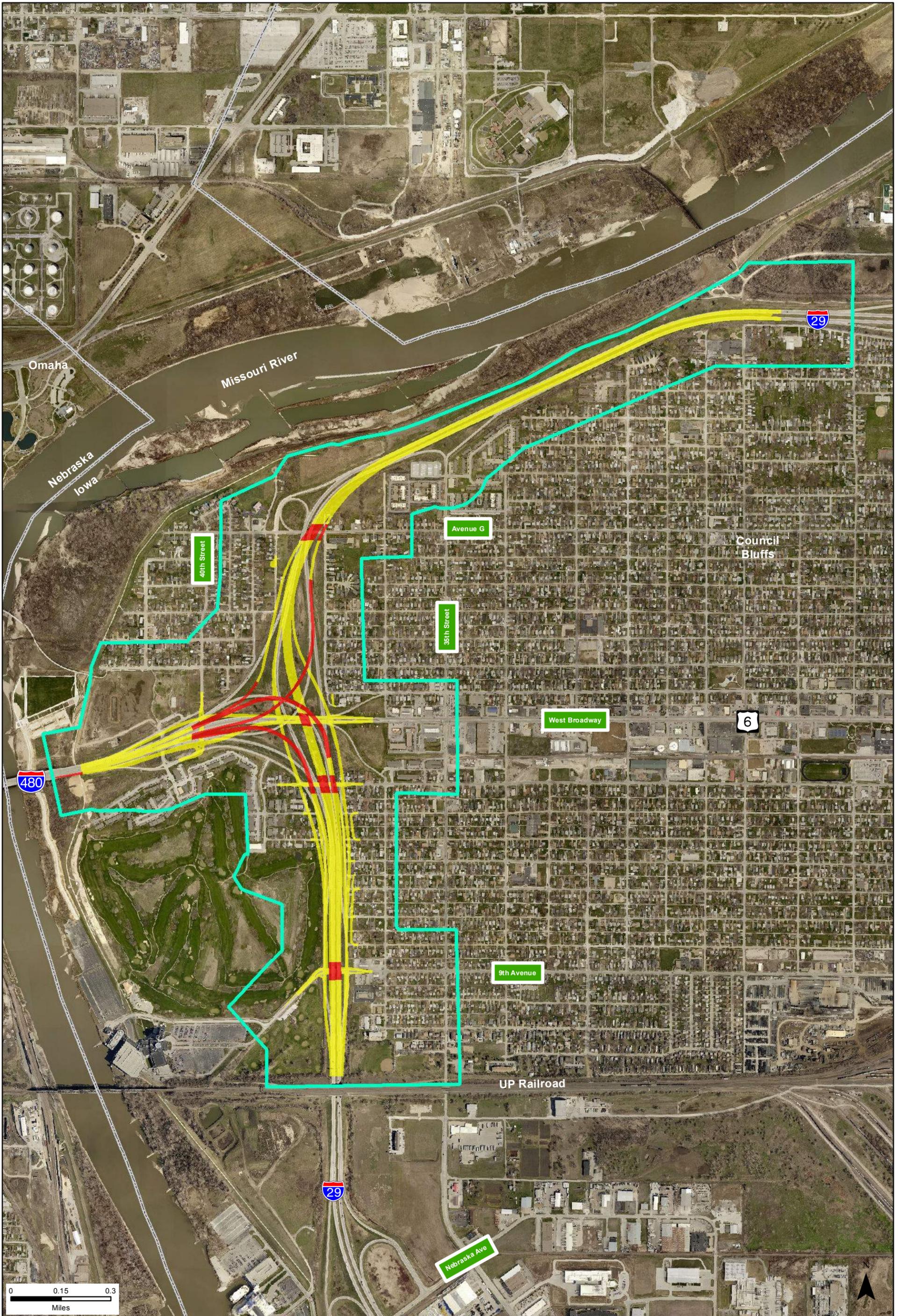
- Proposed Bridge
- Study Area
- Proposed Pavement

**CBIS Segment 4 Tier 2
Environmental Assessment**

Alternative 1
Council Bluffs Interstate System Improvements Project
Council Bluffs, IA

Date
February 2017

Exhibit
4-1



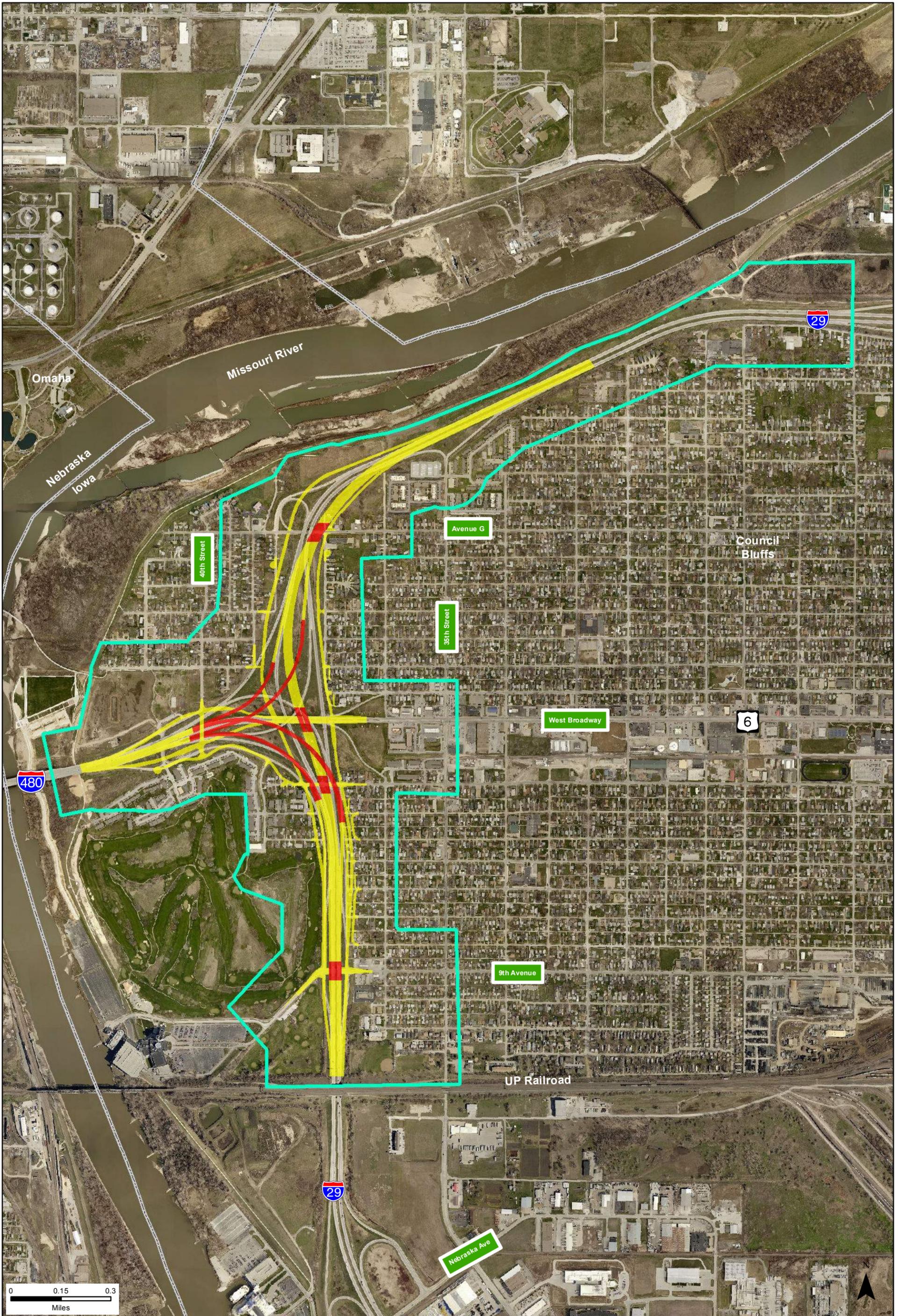
- Proposed Bridge
- Study Area
- Proposed Pavement

**CBIS Segment 4 Tier 2
Environmental Assessment**

Alternative 2
Council Bluffs Interstate System Improvements Project
Council Bluffs, IA

Date
February 2017

Exhibit
4-2



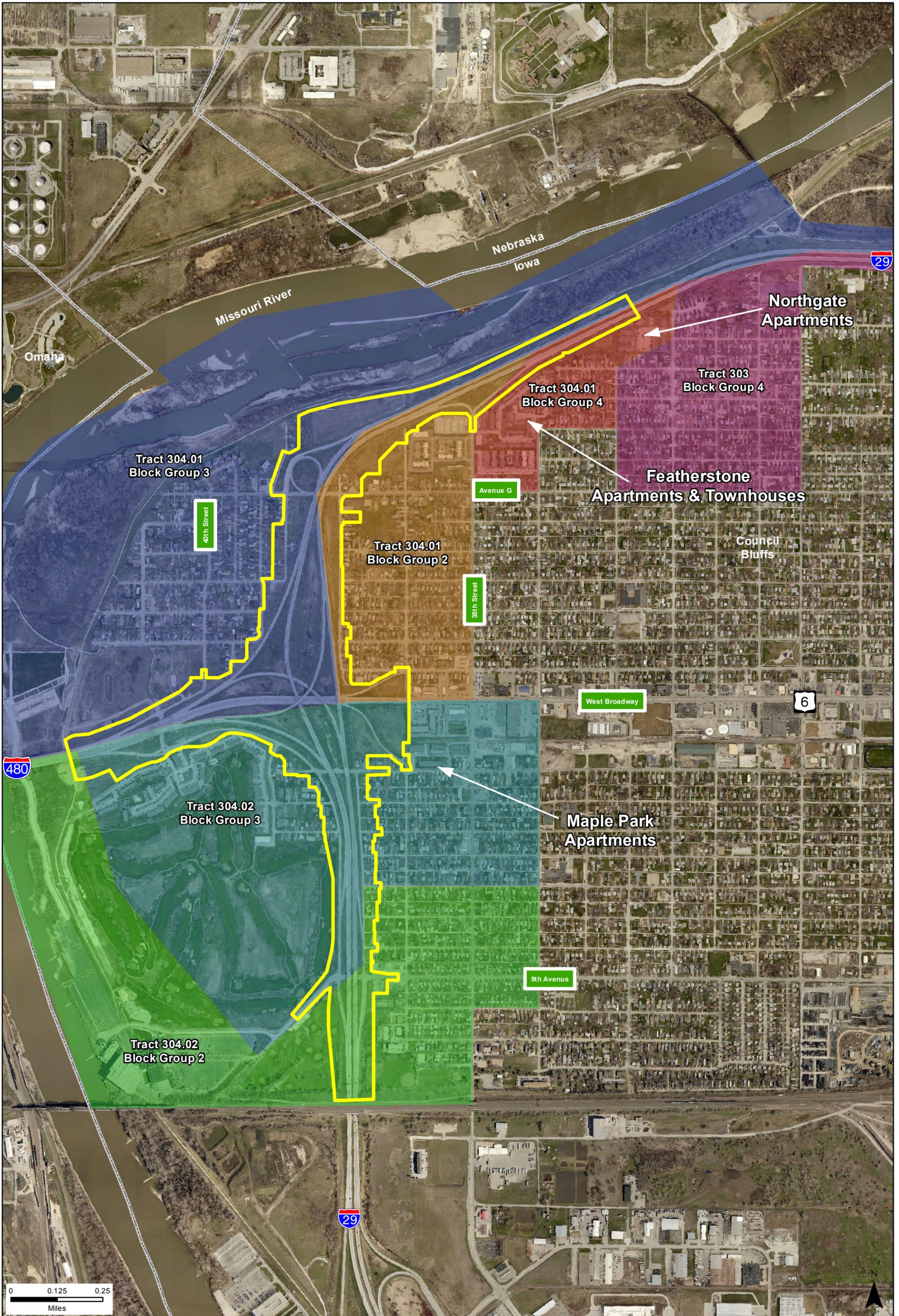
- Proposed Bridge; brgConcrete
- Proposed Pavement
- Study Area

**CBIS Segment 4 Tier 2
Environmental Assessment**

Proposed Alternative
Council Bluffs Interstate System Improvements Project
Council Bluffs, IA

Date
February 2017

Exhibit
4-3



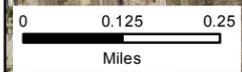
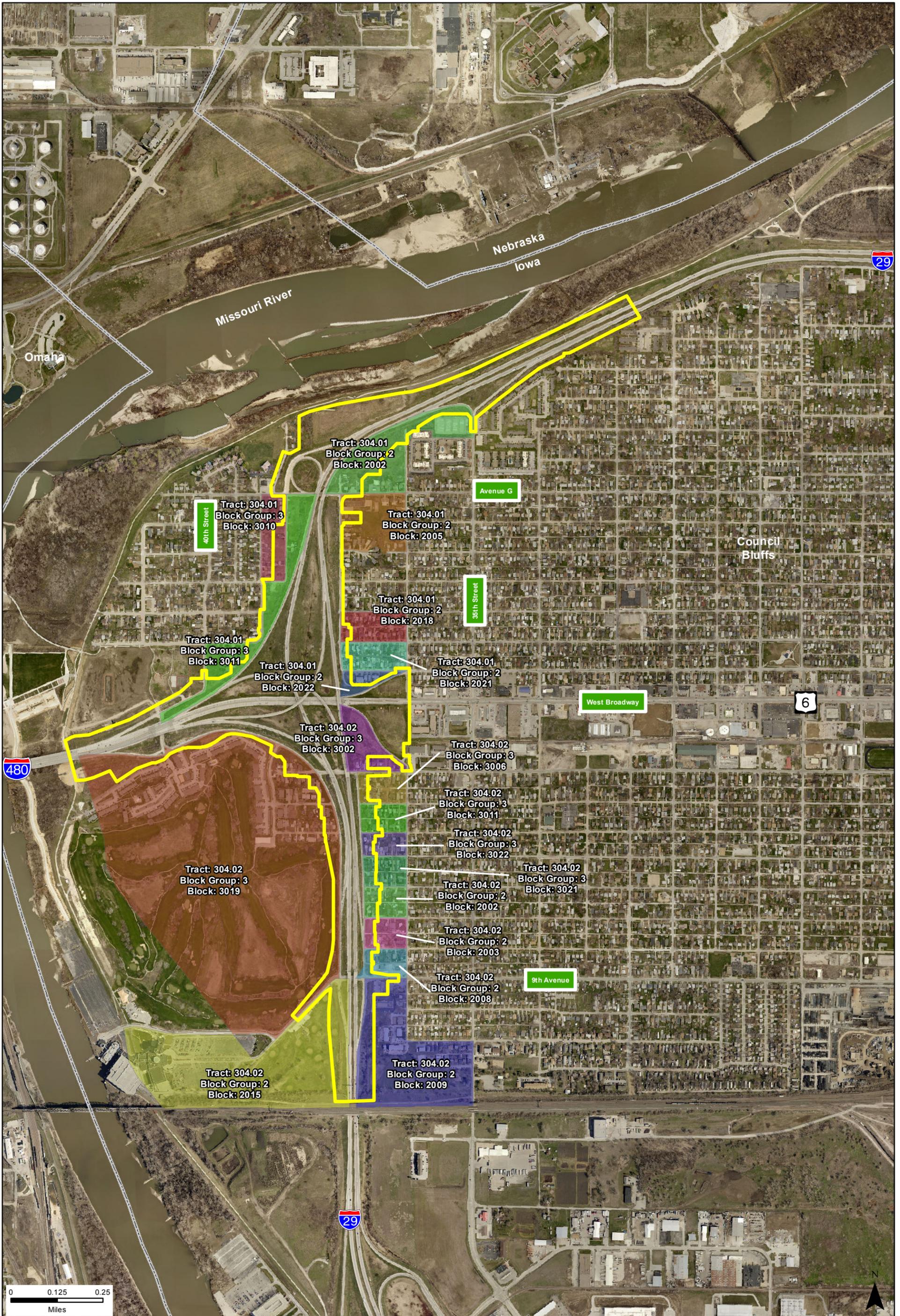
 NEPA Limits
Alt 1 Construction Limits
25ft Buffer

**CBIS Segment 4 Tier 2
Environmental Assessment**

EJ - Census Block Groups
Council Bluffs Interstate System Improvements Project
Council Bluffs, IA

Date
June 2017

Exhibit
5-1.1



Alt 1 Construction Limits
25ft Buffer

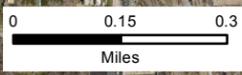
* Only Blocks with property acquisition are shown

CBIS Segment 4 Tier 2
Environmental Assessment

EJ - Census Blocks
Council Bluffs Interstate System Improvements Project
Council Bluffs, IA

Date
June 2017

Exhibit
5-1.2



- ◆ Existing Trail System
- Existing Mid-City Trail
- Trails Constructed as Part of Project
- Proposed Future Trails
- North Detour Route
- South Detour Route
- Study Area
- Section 4(f) Property

**CBIS Segment 4 Tier 2
Environmental Assessment**

Parks, Recreation and Trails
Council Bluffs Interstate System Improvements Project
Council Bluffs, IA

Date
February 2017

Exhibit
5-2



Total Impacts
0.7 Acres

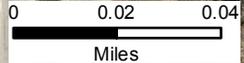
Right of Way
Aquisition
0.48 Acres

Westwood Park

S 36th St

11th Ave

S 35th St



N



-  Proposed Right of Way
-  NEPA Boundary
-  Park Impacts
-  Right of Way To Be Aquired
-  Park

CBIS Segment 4 Tier 2 - EA
Park and Recreational Section 4(f) Impacts
Westwood Park
 Council Bluffs Interstate System Improvements Project
 Council Bluffs, IA

Date
June 2017

Exhibit
5-3

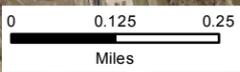
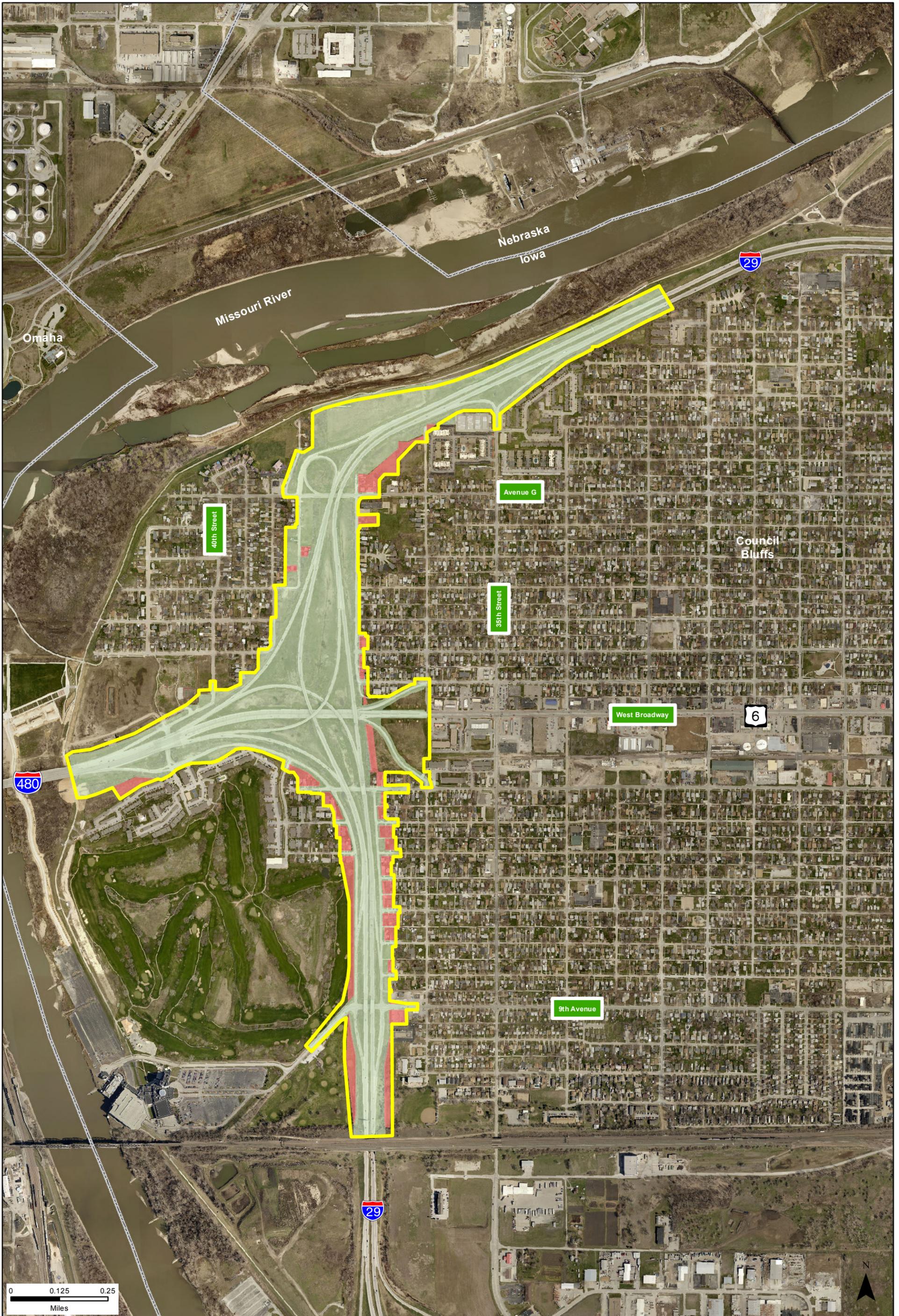


-  Mitigation Area
-  Proposed Right of Way
-  Park Impacts
-  Right of Way To Be Acquired
-  Park

CBIS Segment 4 Tier 2 - EA
Park and Recreational Section 4(f) Impacts
Dodge Riverside Golf Course
 Council Bluffs Interstate System Improvements Project
 Council Bluffs, IA

Date
June 2017

Exhibit
5-4



- NEPA Boundary
- Right of Way To Be Acquired
- Existing Right of Way

**CBIS Segment 4 Tier 2
Environmental Assessment**
Anticipated Right of Way Acquisitions
Council Bluffs Interstate System Improvements Project
Council Bluffs, IA

Date
June 2017

Exhibit
5-5

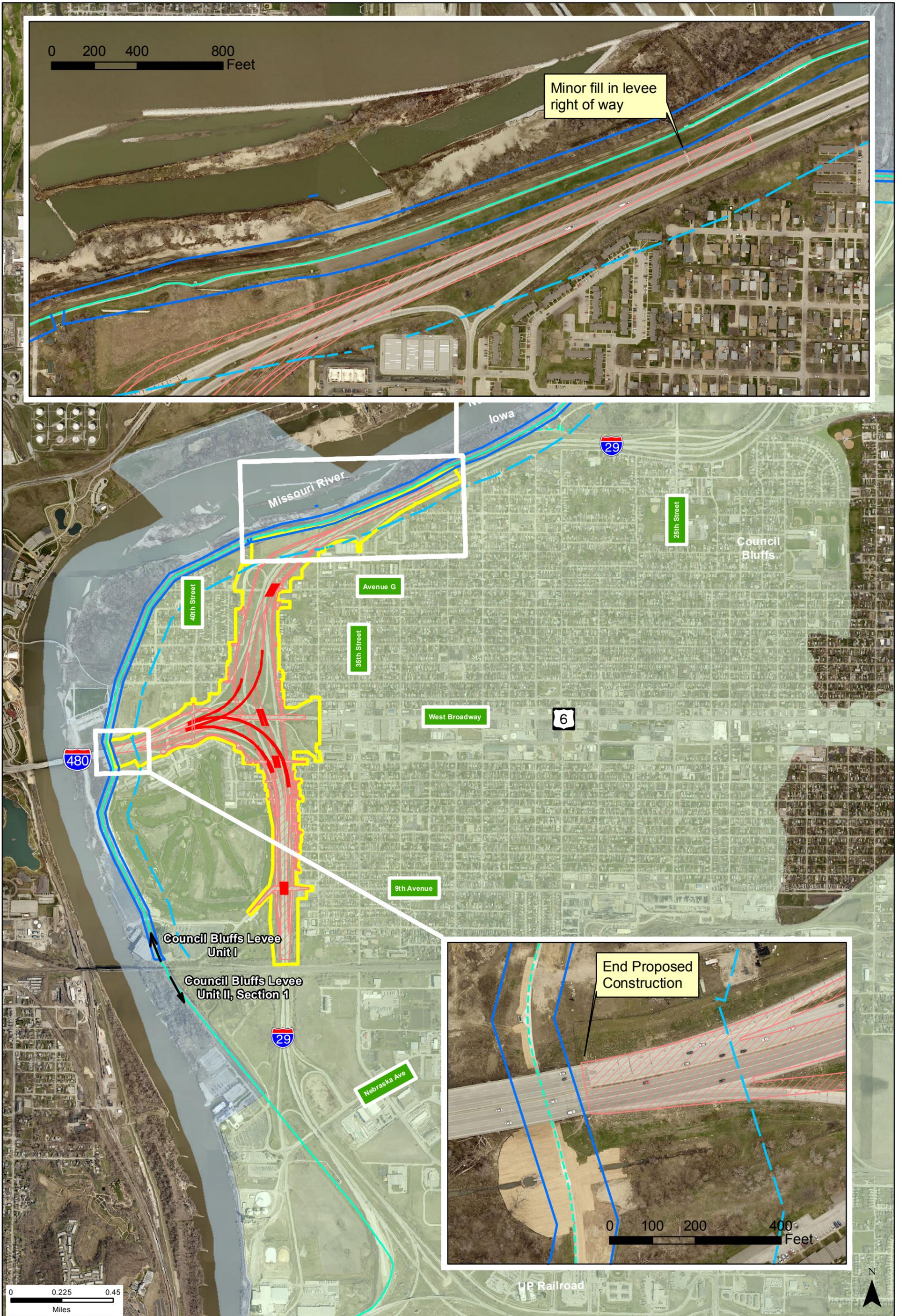


- ▭ NEPA Boundary
- ▭ Wetlands
- ▭ Streams/Drainages

CBIS Segment 4 Tier 2
Environmental Assessment
Wetlands and Streams/Drainages
 Council Bluffs Interstate System Improvements Project
 Council Bluffs, IA

Date
 February 2017

Exhibit
 5-6



0 200 400 800 Feet

Minor fill in levee right of way

Missouri River

40th Street

Avenue G

35th Street

West Broadway

28th Street

Council Bluffs

29

6

480

Council Bluffs Levee Unit I

Council Bluffs Levee Unit II, Section 1

9th Avenue

Nebraska Ave

End Proposed Construction

0 100 200 400 Feet

0 0.225 0.45 Miles



- Levee L627 Centerline
- Levee L627 ROW
- 500-ft Critical Area
- NEPA Boundary
- Proposed Pavement
- Proposed Bridge
- 100 Year Floodplain
- 500 Year Floodplain

CBIS Segment 4 Tier 2 Environmental Assessment

Floodplains and Levees
Council Bluffs Interstate System Improvements Project
Council Bluffs, IA

Date
June 2017

Exhibit
5-7



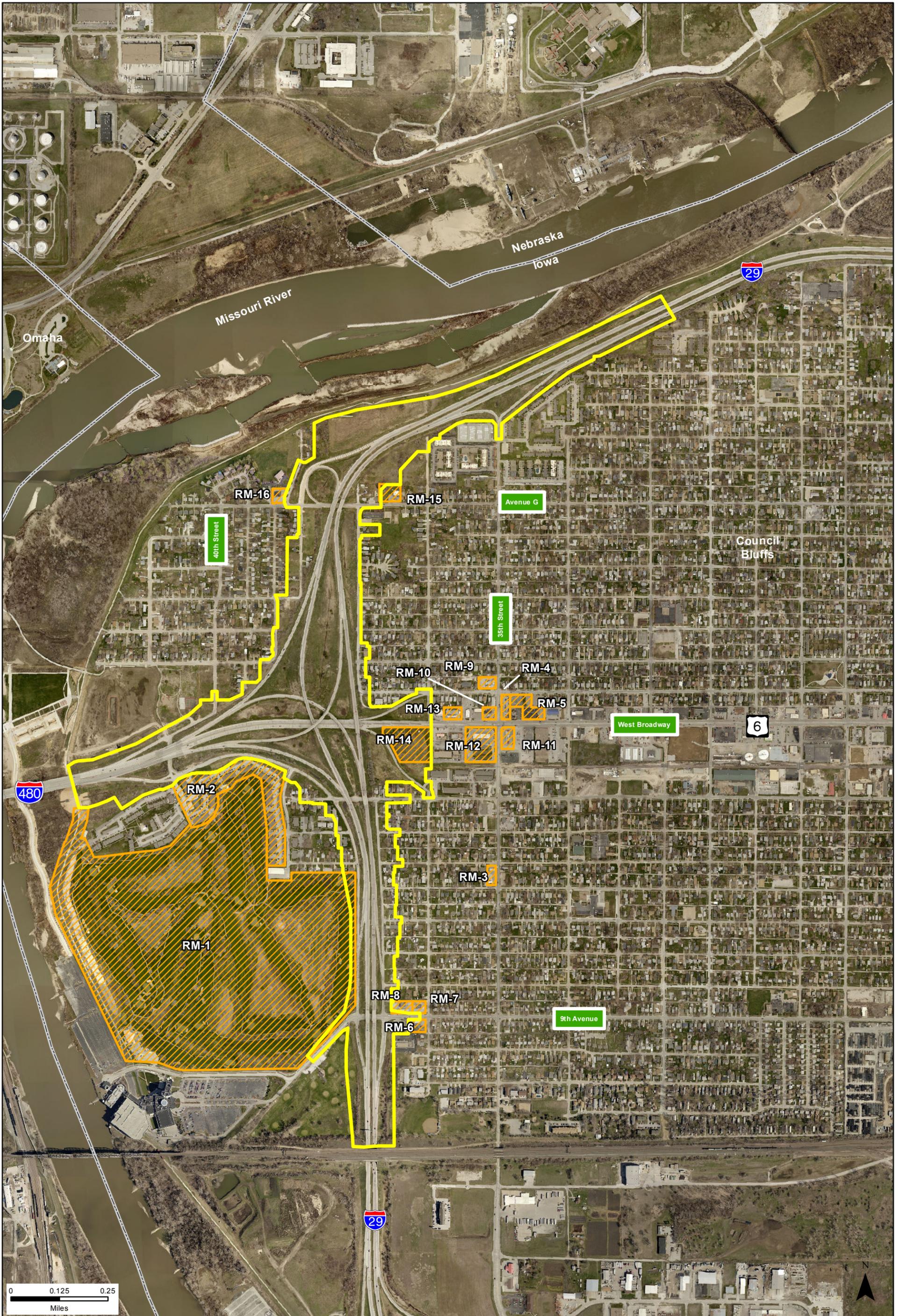
 NEPA Boundary
 Woodlands

**CBIS Segment 4 Tier 2
 Environmental Assessment
 Woodlands**

Council Bluffs Interstate System Improvements Project
 Council Bluffs, IA

Date
 February 2017

Exhibit
 5-8



-  NEPA Boundary
-  Contaminated and Regulated Materials Sites

**CBIS Segment 4 Tier 2
Environmental Assessment**

Contaminated and Regulated Materials Sites
Council Bluffs Interstate System Improvements Project
Council Bluffs, IA

Date
June 2017

Exhibit
5-9

6.0 Disposition

This Streamlined EA concludes that the proposed Project is necessary for safe and efficient travel within the Project corridor and that the proposed Project meets the purpose and need. The Project will have no significant adverse social, economic, or environmental impacts of a level that would warrant an environmental impact statement. Alternative selection will occur following completion of the public review period and public hearing. Unless significant impacts are identified as a result of public review or at the public hearing, a Finding of No Significant Impact (FONSI) will be prepared for this proposed action.

The CBIS Segment 4, Tier 2 EA is being distributed to the following agencies and organizations. Individuals receiving the EA are not listed for privacy reasons.

- 6.1 Federal Agencies
- 6.2 State Agencies
- 6.3 Local/Regional Units of Government
- 6.4 Locations Where this Document Is Available for Public Review
- 6.5 Potential Permits Required for the Project
- 6.6 Statewide Transportation Improvement Program and Transportation Improvement Program Status

7.0 Comments and Coordination

7.1 Agency and Tribal Coordination

Appropriate federal, state, and local agencies were contacted by letter in February 2016 as part of the early coordination process. The letter asked each agency to respond with any comments regarding the CBIS Improvements Project, Tier 2 Segment 4 EA Project. The Iowa DOT also requested the US Army Corps of Engineers (USACE) Omaha District to act as a Cooperating Agency in regard to the EA document for the Project. The USACE accepted the request in a letter dated March 1, 2016 (see **Appendix C-3**). The list of all agencies contacted are shown below in **Table 7-1** (with their response date noted as applicable) and can be viewed in **Appendix C-3**.

Table 7-1: Agency Early Coordination

Agency Type	Agency	Date of Response
Federal	Federal Aviation Administration	March 4, 2016
Federal	Federal Emergency Management Agency	-
Federal	Federal Railroad Administration	-
Federal	Federal Transit Administration	-
Federal	U.S. Army Corps of Engineers	February 26, 2016 March 1, 2016
Federal	U.S. Coast Guard	March 2, 2016
Federal	U.S. Dept. of Agriculture	-
Federal	Natural Resource Conservation Service	March 14, 2016

Agency Type	Agency	Date of Response
Federal	U.S. Dept. of Housing and Urban Development	-
Federal	U.S. Dept. of Interior	-
Federal	U.S. Environmental Protection Agency	March 18, 2016
Federal	U.S. Fish and Wildlife Service	March 1, 2016
Federal	Federal Highway Administration	-
State	IA Department of Natural Resources	February 24, 2016 March 1, 2016 March 3, 2016 March 18, 2016
State	IA Department of Agriculture and Land Stewardship	February 22, 2016
State	IA State Historic Preservation Office	-
State	IA State Hazard Mitigation Team	March 3, 2016
Local	Metropolitan Area Planning Agency (MAPA)	March 8, 2016
Local	Pottawattamie County Board of Supervisors	-
Local	Pottawattamie County Engineers Office	-
Local	Council Bluffs Mayor's Office	-
Local	Council Bluffs Parks and Recreation	-
Local	Council Bluffs City Engineer	-
Local	Council Bluffs Area Chamber of Commerce	-
Local	City of Omaha, Nebraska	-
Local	Douglas County, Nebraska	-
Local	Metro Area Transit	-
Private	Union Pacific Railroad	February 26, 2016

Coordination with the following Native American Tribes was conducted via letters on March 1, 2016 (see **Appendix C-4** for example letter), although no responses have been received:

- Flandreau Santee Sioux
- Iowa Tribe of Kansas and Nebraska
- Iowa Tribe of Oklahoma
- Omaha Tribe of Nebraska
- Otoe-Missouria Tribe
- Pawnee Nation of Oklahoma
- Peoria Tribe of Indians of Oklahoma
- Ponca Tribe of Nebraska
- Prairie Band Potawatomi Nation
- Prairie Island Indian Community
- Sac and Fox Nation of Oklahoma
- Sac and Fox Tribe of the Mississippi in Iowa
- Santee Sioux Nation
- Sisseton - Wahpeton Oyate
- Spirit Lake Tribe
- Three Affiliated Tribes - Mandan, Hidatsa & Arikara
- Upper Sioux Community

- Yankton Sioux Tribe

7.2 NEPA Process

The environmental documentation process, to consider impacts resulting from construction of the Proposed Alternative was formally initiated in June of 2015. Coordination with the following agencies has been ongoing prior to, and since this time:

- Iowa Department of Natural Resources
- Iowa State Historic Preservation Office (SHPO)
- U.S. Army Corps of Engineers
- U.S. Environmental Protection Agency
- U.S. Fish and Wildlife Service

7.3 Public Involvement

As part of the ongoing NEPA process, a public information meeting was conducted in order to discuss the two concepts for the I-29/I-480/West Broadway Interchange reconstruction in the Segment 4 Project area, as well as 2016 construction projects in the CBIS area. The public information meeting was held on Thursday, March 24, 2016 at the Council Bluffs Interstate System Improvement Program Office. . An Elected Officials briefing, which was attended by 25 people, preceded a public open house meeting from 5:00 to 7:00 p.m., which was attended by approximately 225 people.

A variety of informational materials were developed to educate attendees about the interstate reconstruction program, including a series of information boards, a preconstruction meeting handout/fact sheet, and a PowerPoint presentation. Meeting attendees had the opportunity to learn about the Project process, provide input and ask questions directly to Iowa DOT representatives, and to provide written comments via a comment form.

In addition, an online meeting was developed and launched on March 24, 2016. The online meeting contained all of the information that was available to attendees of the public meeting. The online meeting will remain accessible throughout the duration of the CBIS Improvements Project.

Leading up to the public meeting, messaging and public notification about the event was coordinated with local and regional media outlets to inform people about the Project. News stories were published in the newspapers (print and online), broadcast on the radio, and through TV news broadcasts. Efforts to engage the public and stakeholders on social media were successful leading up to and following the public meeting, including Facebook, Twitter, and social media advertisements. In addition, direct mail invitation letters were distributed to business owners, organizations, landowners and school representatives identified in the Project corridor. Email invitations were sent to those identified through stakeholder research, those who had expressed early interest in the program, and those that signed up for program email alerts through the program website.

Several written comments received during the public meeting period, pertaining to Segment 4, suggested incorporation of a wall/retaining wall for noise reduction and safety. Another

comment was a concern that eliminating access (with Alternative 2) at the I-29/Avenue G interchange and closing N 35th Street access to and from the interstate in that area of town would have significant negative impacts on the church located on Benson Street.

Oral comments that were expressed during the public meeting dealt with lane striping that was hard to see or was in the wrong location, roadway lights that are not on when they should be or some that are on constantly and do not turn off, and incorrect labels on maps or exhibit boards. Some attendees wanted to see the main thoroughfare of Rivers Edge Park connected to the frontage road instead of funneling traffic through the residential area. Several comments regarding right of way acquisition were also received, pertaining to inquiries about whether or not their residence would be acquired or partially impacted. Some residents had questions about relocation needs regarding disability or elderly accessible requirements, some requested early acquisition, and some stated that they were not ready to move yet.

APPENDIX A

STREAMLINED RESOURCE SUMMARY

SOCIOECONOMIC IMPACTS Section:

Land Use	
Evaluation:	Resource is discussed in Section 5 of the Resource Analysis
Method of Evaluation:	Review of City of Council Bluffs and City of Omaha parcel data and land use data, field visits to confirm property uses.
Completed by and Date:	Consultant, 6/15/2015
Community Cohesion	
Evaluation:	Resource is discussed in Section 5 of the Resource Analysis
Method of Evaluation:	Discussions with public at public meetings and discussion with City Staff
Completed by and Date:	Consultant, 6/15/2016
Churches and Schools	
Evaluation:	Resource is discussed in Section 5 of the Resource Analysis
Method of Evaluation:	Field Review/Field Study
Completed by and Date:	Consultant, 6/15/2016
Environmental Justice	
Evaluation:	Resource is discussed in Section 5 of the Resource Analysis
Method of Evaluation:	Review of US Census Bureau American Community Survey 5 Year Summary 2010-2014.
Completed by and Date:	Consultant, 6/15/2016
Economic	
Evaluation:	Resource is discussed in Section 5 of the Resource Analysis
Method of Evaluation:	Field review for existing businesses, discussion with DOT Staff and business/property owners at public meetings.
Completed by and Date:	Consultant, 6/15/2016
Joint Development	
Evaluation:	Resource is discussed in Section 5 of the Resource Analysis
Method of Evaluation:	Discussions with DOT and City Staff regarding future projects in the study area.
Completed by and Date:	Consultant, 6/15/2016
Parklands and Recreational Areas	
Evaluation:	Resource is discussed in Section 5 of the Resource Analysis
Method of Evaluation:	Field Review/Field Study
Completed by and Date:	Consultant, 6/15/2016
Bicycle and Pedestrian Facilities	
Evaluation:	Resource is discussed in Section 5 of the Resource Analysis
Method of Evaluation:	Field Review/Field Study and discussions with DOT and City Staff.
Completed by and Date:	Consultant, 6/15/2016
Right of Way	
Evaluation:	Resource is discussed in Section 5 of the Resource Analysis
Method of Evaluation:	Comparison of preliminary design files and GIS parcel database.
Completed by and Date:	Consultant, 6/15/2016
Relocation Potential	

Evaluation:	Resource is discussed in Section 5 of the Resource Analysis
Method of Evaluation:	Field Review/Field Study and discussions with DOT and City Staff.
Completed by and Date:	Consultant, 6/15/2016
Construction and Emergency Routes	
Evaluation:	Resource is discussed in Section 5 of the Resource Analysis
Method of Evaluation:	Field Review/Field Study and discussions with DOT and City Staff.
Completed by and Date:	Consultant, 6/15/2016
Transportation	
Evaluation:	Resource is discussed in Section 5 of the Resource Analysis
Method of Evaluation:	Field Review/Field Study and discussions with DOT and City Staff.
Completed by and Date:	Consultant, 6/15/2016

CULTURAL IMPACTS Section:

Historic Sites or Districts	
Evaluation:	Resource is discussed in Section 5 of the Resource Analysis
Method of Evaluation:	Report
Completed by and Date:	Sub consultant, 2/15/2016
Archaeological Sites	
Evaluation:	Resource is discussed in Section 5 of the Resource Analysis
Method of Evaluation:	Report
Completed by and Date:	Sub consultant, 2/15/2016
Cemeteries	
Evaluation:	Resource is not in the study area
Method of Evaluation:	Field Review/Field Study
Completed by and Date:	Consultant, 6/15/2016

NATURAL ENVIRONMENT IMPACTS Section:

Wetlands	
Evaluation:	Resource is discussed in Section 5 of the Resource Analysis
Method of Evaluation:	Field Survey and wetland delineation conducted in October and November 2015.
Completed by and Date:	Iowa DOT and Consultant, 6/15/2016
Surface Waters and Water Quality	
Evaluation:	Resource is discussed in Section 5 of the Resource Analysis
Method of Evaluation:	Field Survey and stream identification conducted in October and November 2015.
Completed by and Date:	Iowa DOT and Consultant, 6/15/2016

Wild and Scenic Rivers	
Evaluation:	Resource is not in the study area.
Method of Evaluation:	Database
Completed by and Date:	Consultant, 6/15/2016
Floodplains	
Evaluation:	Resource is discussed in Section 5 of the Resource Analysis
Method of Evaluation:	Review of FEMA floodplain mapping.
Completed by and Date:	Consultant, 6/15/2016
Wildlife and Habitat	
Evaluation:	Resource is discussed in Section 5 of the Resource Analysis
Method of Evaluation:	Field Review/Field Study
Completed by and Date:	Consultant, 6/15/2016
Threatened and Endangered Species	
Evaluation:	Resource is discussed in Section 5 of the Resource Analysis
Method of Evaluation:	Field Review/Field Study
Completed by and Date:	Consultant, 11/19/2015
Woodlands	
Evaluation:	Resource is discussed in Section 5 of the Resource Analysis
Method of Evaluation:	Field Review/Field Study
Completed by and Date:	Consultant, 6/15/2016
Farmlands	
Evaluation:	Resource not in the study area.
Method of Evaluation:	Field Review/Field Study
Completed by and Date:	Consultant, 6/15/2016

Physical IMPACTS Section:

Noise	
Evaluation:	Resource is discussed in Section 5 of the Resource Analysis
Method of Evaluation:	Report
Completed by and Date:	Subconsultant, 12/27/2016
Air Quality	
Evaluation:	Resource is discussed in Section 5 of the Resource Analysis
Method of Evaluation:	Field Review/Field Study as well as literature review of EPA EnviroMapper
Completed by and Date:	Consultant., 6/15/2016
MSATs	
Evaluation:	<p>This Project will not result in any meaningful changes in traffic volumes, vehicle mix, location of the existing facility, or any other factor that would cause an increase in emissions impacts relative to the no-build alternative. As such, FHWA has determined that this Project will generate minimal air quality impacts for Clean Air Act criteria pollutants and has not been linked with any special MSAT concerns. Consequently, this effort is exempt from analysis for MSATs.</p> <p>Moreover, EPA regulations for vehicle engines and fuels will cause overall MSATs to decline significantly over the next 20 years. Even after accounting for a 64 percent increase in VMT, FHWA predicts MSATs will decline in the range of 57 percent to 87 percent, from 2000 to 2020, based on regulations now in effect. This will both reduce the background level of MSATs as well as the possibility of even minor MSAT emissions from this Project.</p>
Method of Evaluation:	FHWA Interim Guidance on Air Toxic Analysis in NEPA Documents, February 3, 2006
Completed by and Date:	IA DOT NEPA Manager, 6/15/2016
Energy	
Evaluation:	Resource is discussed in Section 5 of the Resource Analysis
Method of Evaluation:	Other
Completed by and Date:	Consultant, 6/15/2016
Contaminated and Regulated Materials Sites	
Evaluation:	Resource is discussed in Section 5 of the Resource Analysis
Method of Evaluation:	Review of Iowa DNR, US EPA and County Assessor online databases, historic aerial photos, Sanborn maps and Google Earth.
Completed by and Date:	Client and Consultant, 9/9/2015
Visual	
Evaluation:	Resource is discussed in Section 5 of the Resource Analysis
Method of Evaluation:	Field Review/Field Study
Completed by and Date:	Consultant, 6/15/2016
Utilities	
Evaluation:	Resource is discussed in Section 5 of the Resource Analysis
Method of Evaluation:	Field Review/Field Study
Completed by and Date:	Consultant, 6/15/2016

APPENDIX B

MINORITY POPULATIONS DATA

APPENDIX B

Minority Populations in Census Blocks Affected by Property Acquisition

	Tract 304.01 BG 2 B 2005		Tract 304.02 BG 3 B 3006		Tract 304.02 BG 3 B 3011		Tract 304.02 BG 2 B 2015		Tract 304.02 BG 3 B 3002		Tract 304.01 BG 2 B 2018		Tract 304.02 BG 3 B 3022		Tract 304.02 BG 2 B 2009		Tract 304.01 BG 3 B 2021		Tract 304.02 BG 2 B 2002		Tract 304.01 BG 3 B 3011		Tract 304.02 BG 2 B 2008		Tract 304.01 BG 3 B 3010		Tract 304.01 BG 2 B 2022		Tract 304.02 BG 3 B 3021		Tract 304.02 BG 3 B 3019		Tract 304.02 BG 2 B 2003		Tract 304.01 BG 2 B 2002		Council Bluffs		Pottawattamie County		State of Iowa				
	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total
Total Population	68	100%	48	100%	39	100%	0	0%	32	100%	79	100%	32	100%	131	100%	84	100%	25	100%	37	100%	7	100%	91	100%	34	100%	34	100%	650	100%	26	100%	84	100%	62230	100%	93153	100%	3078116	100%			
White	64	94.1%	46	95.8%	34	87%	0	0.0%	27	84.4%	72	91.1%	29	90.6%	107	81.7%	76	90.5%	15	60.0%	33	89.2%	7	100.0%	78	85.7%	15	44.1%	32	94.1%	565	86.9%	25	96.2%	73	86.9%	54065	86.9%	82987	89.1%	2702644	87.8%			
Black/African American	1	1.5%	1	2.1%	0	0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	7	5.3%	0	0.0%	0	0.0%	0	0.0%	2	2.2%	0	0.0%	0	0.0%	17	2.6%	0	0.0%	1	1.2%	1110	1.8%	1016	1.1%	93293	3.0%					
American Indian, Eskimo, Aleut	0	0.0%	0	0.0%	0	0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	2	1.5%	0	0.0%	0	0.0%	1	2.7%	0	0.0%	1	1.1%	0	0.0%	3	0.5%	0	0.0%	0	0.0%	257	0.4%	283	0.3%	7867	0.3%					
Asian, Native Hawaiian, or Pacific Islander	0	0.0%	0	0.0%	0	0%	0	0.0%	1	3.1%	0	0.0%	0	0.0%	4	3.1%	0	0.0%	1	4.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	24	3.7%	0	0.0%	0	0.0%	463	0.7%	589	0.6%	60898	2.0%					
Other Race	0	0.0%	0	0.0%	0	0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	35	0.1%	201	0.2%	2300	0.1%					
Two or More Races	0	0.0%	1	2.1%	0	0%	0	0.0%	1	3.1%	0	0.0%	0	0.0%	2	1.5%	2	2.4%	5	20.0%	0	0.0%	0	0.0%	4	4.4%	0	0.0%	13	2.0%	0	0.0%	3	3.6%	1023	1.6%	1670	1.8%	48004	1.6%					
Hispanic or Latino (of any race)	3	4.4%	0	0.0%	5	13%	0	0.0%	3	9.4%	7	8.9%	3	9.4%	9	6.9%	6	7.1%	4	16.0%	3	8.1%	0	0.0%	6	6.6%	19	55.9%	2	5.9%	28	4.3%	1	3.8%	7	8.3%	5277	8.5%	6407	6.9%	163110	5.3%			
Total Minority Population	4	5.9%	2	4.2%	5	12.8%	0	0.0%	5	15.6%	7	8.9%	3	9.4%	24	18.3%	8	9.5%	10	40.0%	4	10.8%	0	0.0%	13	14.3%	19	55.9%	2	5.9%	85	13.1%	1	3.8%	11	13.1%	8165	13.1%	10166	10.9%	375472	12.2%			
125% of COC																																													
Potential Minority EJ Impact									Yes						Yes				Yes				Yes		Yes																				
Total Property Acquisitions	2		2		4		0		2		1		3		0		3		5		2		0		1		0		3		10		1		3										

Blocks are only those affected by property acquisitions.

APPENDIX C-1

SECTION 4(F) COORDINATION

Office of Location and Environment

800 Lincoln Way | Ames, Iowa 50010

Phone: 515.239.1035 | Email: jacob.woodcock@dot.iowa.gov

Ref. IM-029-3(166)54--13-78

Primary System

Pottawattamie County

R&C: _____

August 10, 2016

Ms. Sara Andre
Mr. Doug Jones
State Historic Preservation Office
600 East Locust
Des Moines, Iowa 50319

RE: Determination of *de minimus* impact for Proposed Segment 4 of the Council Bluffs Interstate System, City of Council Bluffs, Pottawattamie County

Dear Sara and Doug:

The Iowa DOT previously consulted with your office on the above referenced undertaking resulting in a finding of no adverse effect with conditions on July 22, 2016. Based on that concurrence, it is FHWA's intent to make a *de minimus* impact finding given the project will not adversely affect or impair the features and attributes that contribute to the National Register of Historic Places eligibility of the Myers Elementary School (78-02621).

If you have any questions, please contact me at (515) 239-1035 or jacob.woodcock@dot.iowa.gov.

Sincerely,



Jacob W. Woodcock
Office of Location and Environment



PARKS, RECREATION AND PUBLIC PROPERTY
(712) 328-4650

December 22, 2016

Jorge Zamora
Iowa Department of Transportation
Office of Location and Environment
800 Lincoln Way
Ames, IA 50010

RE: IMN-029-3(166)54-13-78

Dear Mr. Zamora:

The City of Council Bluffs has been contacted by the Iowa DOT Office of Location and Environment regarding the CBIS Segment 4 Improvement Project in Council Bluffs, Iowa. The City of Council Bluffs understands that there is a need for this improvement and that the proposed interstate improvement project will have a temporary affect on the Section 4(f) Properties.

The City of Council Bluffs has been notified that as part of the project, the Mid City Trail will be temporarily closed while work is being done along the I-29/I-480 mainline and system interchange. A temporary detour route, as illustrated in the attachment labeled CBIS Segment 4 Tier 2, Environmental Assessment, Trails and Trail Detours, will be utilized to reroute bicycle and pedestrian traffic that would normally use this trail. Additionally, as part of the CBIS Segment 4 Improvement Project, portions of the Mid City Trail and other connecting trails/walkways will be reconstructed/constructed, as a DOT project expense, as illustrated in attachments labeled CBIS Segment 4, Project IM-029-3(166)54--3-78, Proposed Pedestrian Access and CBIS Segment 4, Project IM-029-3(166)54--3-78, Proposed Pedestrian Widths.

It is agreed however, for the Future Shared Used Paths illustrated in the Proposed Pedestrian Access attachment, IDOT shall provide design and grading only. The trail surface shall be a non-IDOT expense.

After our discussions, it is further understood that the closure of the Mid City Trail will meet the following criteria:

1. Duration (of the occupancy) is to be temporary, i.e., less than the time needed for construction of the project, and there will be no change in ownership of the land;



2. Scope of the work is minor, i.e., both the nature and the magnitude of the changes to the 4(f) resource are minimal;
3. There are no anticipated permanent adverse physical impacts, nor will there be interference with the activities or purpose of the resource, on either a temporary or permanent basis;
4. The land being used will be fully restored, i.e., the resource must be returned to a condition which is at least as good as that which existed prior to the project.

This letter documents the agreement of the appropriate local officials having jurisdiction over the resources regarding the above conditions.

If you wish to contact me concerning this letter, please call me at (712) 328-4650.

Sincerely,

A handwritten signature in black ink, appearing to read "L. N. Foster". The signature is written in a cursive, flowing style.

Larry N. Foster, Director
Parks, Recreation and Public Property

January 12, 2017

Larry Foster
Director, Parks and Recreation
City of Council Bluffs
209 Pearl St. Suite 103
Council Bluffs, IA 51503

RE: Notice of Intent to make a De Minimis Impact Finding – Dodge Riverside Golf Club and Westwood Park
CBIS Segment # 4
IM-029-3(166)54--13-78

Dear Mr. Foster:

The Iowa Department of Transportation (Iowa DOT) in coordination with the Iowa Division FHWA, is notifying the City of Council Bluffs Parks and Recreation Department of its intent to make a *de minimis* impact finding according to 23 CFR 774, also commonly referred to as Section 4(f) of the DOT Act of 1966.

The Administration may not approve the use, as defined in §774.17, of Section 4(f) property unless a determination is made that:

There is no feasible and prudent avoidance alternative, as defined in §774.17, to the use of land from the property; and

The action includes all possible planning, as defined in §774.17, to minimize harm to the property resulting from such use; or

The Administration determines that the use of the property, including any measure(s) to minimize harm (such as any avoidance, minimization, mitigation, or enhancement measures) committed to by the applicant, will have a de minimis impact, as defined in §774.17, on the property.

The Iowa DOT will be coordinating with the City of Council Bluffs concerning the use of the Dodge Riverside Golf Club and Westwood Park in Segment 4 of the Council Bluffs Interstate System (CBIS) Project. CBIS Segment 4 improvements include geometric, safety, and capacity improvements along I-29 that will require the acquisition of property from the Dodge Riverside Golf Club and Westwood Park, both of which are located immediately adjacent to the project impact area. The use of property from Dodge Riverside Golf Club and Westwood Park will include all measures to minimize harm to the affected activities, features, or attributes that qualify them for Section 4(f) protection. Efforts to minimize and mitigate impacts at the Dodge Riverside Golf Course will include the redesign and relocation of holes #13 and #14 with the intent to maintain hole #13 as a par 4 and hole #14 as a par 5. Additionally, to maintain the amenities of the golf course, a temporary green for hole #13 will be constructed in order to maintain a reasonable 18 hole golf course during reconstruction of the golf course. The attached figure shows the existing alignment of I-29 and where the proposed project will impact the Dodge Riverside Golf Course and Westwood Park.

The public will be given the opportunity to review and comment on the Environmental Assessment (EA) and the intent to make a *de minimis* impact finding. The EA will discuss the effects of the I-29 improvements project on the protected activities, features, or attributes of Dodge Riverside Golf Club and Westwood Park.

As the official having jurisdiction over the Section 4(f) resource, following the public review and comment period we will ask you to concur in writing that the CBIS Segment 4 improvement project will not adversely affect the activities, features, or attributes that make the properties eligible for Section 4(f) protection.

Please contact me at 515-239-1251 or jorge.zamora@iowadot.us if you have any questions or concerns.

Sincerely,



Jorge Zamora
Office of Location and Environment/NEPA Section

JLZ:sm

cc: Charlie Purcell – IA DOT-Project Delivery Bureau
Tammy Nicholson, IA DOT - OLE
Brad Hofer, IA DOT - OLE
Wes Mayberry, IA DOT - OLE
Scott Schram – IA DOT- District 4
James Muetzel – IA DOT District 4
Jeff Krist – City of Council Bluffs
Matt Cox – City of Council Bluffs
Greg Reeder – City of Council Bluffs
Mike LaPietra - FHWA
Joe Jurasic - FHWA



PARKS, RECREATION AND PUBLIC PROPERTY
(712) 328-4650

February 9, 2017

Jorge Zamora
Iowa Department of Transportation
Office of Location and Environment
800 Lincoln Way
Ames, IA 50010

RE: IMN-029-3(166)54-13-78

Dear Mr. Zamora:

The City of Council Bluffs has been contacted by the Iowa DOT Office of Location and Environment regarding the CBIS Segment 4 Improvement Project in Council Bluffs, Iowa. The City of Council Bluffs understands that there is a need for this improvement and that the proposed interstate improvement project will have a temporary affect on the Section 4(f) Properties.

The City of Council Bluffs has been notified that as part of the project, a portion of the Iowa Riverfront Trail that runs along the north side of Harrah's Boulevard and South of the Dodge Riverside Golf Course will be temporarily closed while work is being done along the I-29/I-480 mainline and system interchange. This trail section will be impacted during the time work is underway at the 9th Avenue interchange. The proposed construction will also include replacing of the existing trail and extending the trail to the east side of I-29 and back north along the east side of I-29. As we discussed, this section of the trail receives significant pedestrian usage as it provides the only means for pedestrian to visit the Harrahs Complex. I understand efforts will be made to minimize impacts and address safety related concerns associated with these pedestrians and other trail users during construction. The attached display illustrates the proposed detour alignment during construction in accordance with the HGM recommendations, as well as the new proposed trail alignment to be constructed as part of this project.

I also understand that the closure of the Iowa Riverfront Trail, Harrah's Boulevard, south of the Dodge Riverside Golf Course section will meet the following criteria:

1. Duration (of the occupancy) is to be temporary, i.e., less than the time needed for construction of the project, and there will be no change in ownership of the land;



2. Scope of the work is minor, i.e., both the nature and the magnitude of the changes to the 4(f) resource are minimal;
3. There are no anticipated permanent adverse physical impacts, nor will there be interference with the activities or purpose of the resource, on either a temporary or permanent basis;
4. The land being used will be fully restored, i.e., the resource must be returned to a condition, which is at least as good as that which existed prior to the project.

This letter documents the agreement of the appropriate local officials having jurisdiction over the resources regarding the above conditions.

If you wish to contact me concerning this letter, please call me at (712) 328-4650.

Sincerely,

A handwritten signature in black ink, appearing to read "L. N. Foster", written over a light blue horizontal line.

Larry N. Foster, Director
Parks, Recreation and Public Property

APPENDIX C-2

CULTURAL RESOURCES (SECTION 106) COORDINATION



www.iowadot.gov

Office of Location and Environment

800 Lincoln Way | Ames, Iowa 50010

Phone: 515.239.1035 | Email: jacob.woodcock@dot.iowa.gov

Ref. IM-029-3(166)54--13-78

Primary System

Pottawattamie County

R&C: 020378055

June 17, 2016

Ms. Sara Andre
Mr. Doug Jones
State Historic Preservation Office
600 East Locust
Des Moines, Iowa 50319

RECEIVED

JUN 17 2016

by SHPO

RE: Phase I Archaeological Investigation and Intensive Architectural/Historical Survey and Evaluation for Proposed Segment 4 of the Council Bluffs Interstate System, City of Council Bluffs, Pottawattamie County; **No Adverse Effect**

Dear Sara and Doug:

Enclosed for your review and comment is supporting documentation for the proposed Segment 4 of the Council Bluffs Interstate System, City of Council Bluffs, Pottawattamie County. The proposed project will involve improvements to portions of the existing I-29 and I-80 interstate system in Council Bluffs. The Area of Potential Effect (APE) encompasses the I-29/I-480 interchange at West Broadway in the northwest section of the interstate system in the city. The Phase I archaeological and architectural/historical surveys were carried out by Tallgrass Historians L.C. of Iowa City.

The archaeological investigation consisted of three stages: preliminary documentary research, field survey and analysis. The investigation identified 19 historic period archaeological sites 13PW353-13PW371. These sites primarily represented residential sites, though several were school related, railroad related, railroad/interstate-related and two associated with the former Dodge Park Pumping Station. The investigation noted that due to the many prior impacts to all of these sites, it was determined that the overall site deposits lack sufficient archaeological integrity and all recommended as not eligible as a result. The Iowa DOT agrees with this recommendation and finds 13PW353-13PW371 not eligible for the National Register of Historic Places.

The architectural/historical survey part of the investigation covered the same area as the Phase I investigation. These efforts resulted in the recording of 486 architectural properties, of these properties, 294 are of historic age. The evaluation of the pre 1966 historic age properties in the context of the historical and modern development of the current project area resulted in the recommendation

of National Register of Historic Places eligibility of only one property. This property is the former Myers Elementary School built in 1957 at the southeast corner of Avenue of G and 37th Street. The site is now home to the Prospect Park Baptist Church. The building is recommended eligible under Criterion C for its architectural significance as a Contemporary/Mid-Century design and using the central hall "finger plan" for mid-century school design and for its historical significance as a post-World War II "baby boom generation" elementary school that was linked historically to the construction of Interstate 29 in this area. The Iowa DOT agrees with this recommendation and finds the Myers Elementary School (78-02621) eligible for the National Register of Historic Places.

Currently, there are plans at the former Myers Elementary School for minor ROW acquisition (.02 acres), removal and relocation of access and the reconfiguration of basketball courts and a segment of the current playground (see attached figure). The ROW acquisition and reconfigurations will not impact the building itself and will not alter the architectural details that make the site eligible for the National Register of Historic Places. Historic aerial photographs from the 1970s, 1980s and 1990s of the site reveal multiple alterations to the parking layout and landscaping. The Iowa DOT has taken efforts to avoid impacting the site and will require a Special Provision (SP) for vibration monitoring. The SP will require:

- A preconstruction survey of the Myers Elementary School will be completed that will document the present condition. The preconstruction survey will also establish a peak particle velocity (PPV) threshold for vibration.
- Sensors will be installed and tested daily. If 80 percent of the PPV threshold is reached sensors will alert the contractor and in turn the construction engineer.
- If the PPV is reached, a meeting with the contractor and the construction engineer will identify alternative construction methods and/or equipment to be used to minimize project vibration.
- A post construction survey will be performed.

With the above stated conditions in place, we now request your concurrence with our determination of **No Adverse Effect** for this undertaking. If you concur, please sign below, and add comments you may have and return this letter to our office. As with any Iowa Department of Transportation project, should any new important archaeological, historical, or architectural materials be encountered during construction, project activities shall cease and the Office of Location and Environment shall be contacted immediately.

If you have any questions, please contact me at (515) 239-1035 or jacob.woodcock@dot.iowa.gov.

Sincerely,



Jacob W. Woodcock
Office of Location and Environment

JWW: enclosures

Cc: Wes Mayberry –Transportation Engineer
Scott Schram– District 4 Engineer
DeeAnn Newell – NEPA Team Lead

Concur:  _____ Date: 7/21/2016
SHPO Historian

Comments:

Concur:  _____ Date: 7/21/2016
SHPO Archaeologist

Comments:

Office of Location and Environment

800 Lincoln Way | Ames, Iowa 50010

Phone: 515.239.1035 | Email: jacob.woodcock@dot.iowa.gov

Ref. IM-029-3(166)54--13-78

Primary System

Pottawattamie County

R&C: _____

August 10, 2016

Ms. Sara Andre
Mr. Doug Jones
State Historic Preservation Office
600 East Locust
Des Moines, Iowa 50319

RE: Determination of *de minimus* impact for Proposed Segment 4 of the Council Bluffs Interstate System, City of Council Bluffs, Pottawattamie County

Dear Sara and Doug:

The Iowa DOT previously consulted with your office on the above referenced undertaking resulting in a finding of no adverse effect with conditions on July 22, 2016. Based on that concurrence, it is FHWA's intent to make a *de minimus* impact finding given the project will not adversely affect or impair the features and attributes that contribute to the National Register of Historic Places eligibility of the Myers Elementary School (78-02621).

If you have any questions, please contact me at (515) 239-1035 or jacob.woodcock@dot.iowa.gov.

Sincerely,



Jacob W. Woodcock
Office of Location and Environment

APPENDIX C-3

AGENCY COORDINATION



February 22, 2016

Mr. Jorge Zamora
Office of Location & Environment
Iowa Department of Transportation
800 Lincoln Way
Ames, IA 50010

RE: Council Bluffs Interstate System Improvement Project Segment 4 – Pottawattamie County – Environmental Assessment

Dear Mr. Zamora:

The Iowa Department of Agriculture and Land Stewardship - Division of Soil Conservation and Water Quality (IDALS – DSCWQ) appreciates the opportunity to provide input regarding the proposed Council Bluffs Interstate Improvement Project Segment 4 in Pottawattamie County and respectively submits the following item for comment below.

IDALS-DSCWQ greatest concern is controlling soil erosion. Erosion often occurs at significant levels during construction activities when large unvegetative areas are exposed and unprotected. Any soil erosion that does occur during construction shall be promptly mitigated with procedures outlined in a written erosion control plan to address this concern.

If you have any questions, we ask that you contact the West Pottawattamie County Soil and Water Conservation District office located in Council Bluffs.

**Dale DuVal, District Conservationist, West Pottawattamie County USDA Service Center
Natural Resources Conservation Service
305 McKenzie Avenue, Suite 1
Council Bluffs, Iowa 51503
(712) 328-2489**

All personnel in the Soil and Water Conservation District offices are well informed and stand ready to assist and advise you with problems that can arise from an undertaking of the size and scope that you have outlined in your letter.

Thank you for the opportunity to provide this information.

Sincerely,

A handwritten signature in black ink, appearing to read "James Gillespie".

James Gillespie, Director
IDALS/Division of Soil Conservation and Water Quality

Cc: West Pottawattamie SWCD



STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR
KIM REYNOLDS, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
CHUCK GIPP, DIRECTOR

February 24, 2016

Jorge Zamora
Iowa Dept. of Transportation
Office of Location & Environment
800 Lincoln Way
Ames, IA 50010

RE: Council Bluffs Interstate System Improvement Project
Segment 4 – IM-029-3(166)54—13-78

Dear Mr. Zamora:

This letter is in response to your request for information on potential impacts associated with the Council Bluff Interstate System Improvement Project, Segment 4, Environmental Assessment (EA) preparation in the city limits of Council Bluffs, Pottawattamie County, Iowa and how the project relates to State and Federal recreational grant programs and projects. After review of the State and Federal projects awarded to the City of Council Bluffs, two projects have the potential for further review as your study for the Interstate system improvement proceeds.

The first project is a State Resource Enhancement and Protection Fund grant #02-R4-LT, awarded to the city for the Iowa Riverfront Trail. This trail runs along the river levee from N. 25th Street, south along the levee to Nebraska Avenue and I-29. The city is responsible for maintaining the trail and keeping it open for public use. The Department would like to be included in any discussions on changes that might be made to the trail.

The second project is a Federal Land and Water Conservation Fund grant #19-00939, Playland Park. This park is located along the river levee at Avenue B and N. 41st Street. The Federal program requires the entire park remain in outdoor recreation, in perpetuity. If the park is affected by the results of your EA, it will need to be determined if a 6(f)3 Conversion will take place. If a conversion is necessary, the DOT will need to coordinate with the City and our Department to mitigate with new park land.

The early coordination of this process is very helpful to our office and the National Park Service, as we both are responsible for ensuring our program projects remain in outdoor recreation, and conversions are kept to a minimum.

Please keep our office informed as to any potential changes as a result of the feasibility study. If you have any questions, please contact me at 515-725-8213.

Sincerely,

Kathleen Moench

Kathleen Moench
Budget & Finance Bureau



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
CORPS OF ENGINEERS, ROCK ISLAND DISTRICT
PO BOX 2004 CLOCK TOWER BUILDING
ROCK ISLAND, ILLINOIS 61204-2004

February 26, 2016

RECEIVED

MAR 3 2016

Office of Location & Environment

Operations Division

SUBJECT: CEMVR-OD-P-2016-252

Mr. Jorge Zamora
Iowa Department of Transportation
800 Lincoln Way
Ames, Iowa 50010

Dear Mr. Zamora:

Our office reviewed your letter dated February 17, 2016 concerning the proposed Council Bluffs Interstate System Improvement Project Segment 4, in Pottawattamie County, Iowa.

It appears your project will impact waters of the United States (including wetlands), and will require a Department of the Army (DA) Section 404 permit. Additional information will be required before we can determine the need for, and what form of Section 404 authorization will be needed to cover your project. Please submit a complete application for DA authorization as early as possible. Your complete application must include a wetland delineation covering your project's area of Potential Effect and a discussion of all impacts to the nation's waters.

Because this project will occur within the Omaha District's Civil Works Boundary, I have sent them a copy of this letter. When the Omaha District responds to your inquiry they may also reference this letter. Should you have any questions, please contact me by letter, or telephone at 309/794-5859.

Sincerely,

Albert J. Frohlich
Project Manager
Regulatory Branch

Copies Furnished:

Ms. Jennifer Gitt
US Army Corps of Engineers – Omaha District
1616 Capitol Avenue
Omaha, Nebraska 68102

Zamora, Jorge [DOT]

From: Kyle D. Nodgaard <kdnodgaa@up.com>
Sent: Friday, February 26, 2016 12:24 PM
To: Zamora, Jorge [DOT]
Subject: Council Bluffs Interstate System Improvement Project - Segment 4

Jorge,

Per our phone conversation, UP is not impacted by segment 4 of this project and has no comments.

Thank you,

Kyle Nodgaard
Manager - Industry and Public Projects
Union Pacific Railroad
Omaha, NE
kdnodgaa@up.com
402-544-2029 (Office)
402-271-5656 (Fax)

**

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**

Phone Record

Date: 2/26/16

Name: Kyle Nodgaard
Manager- Industry and Public Relations
Union Pacific Railroad
Omaha, NE
kdnodgaa@up.com
402-544-2029

Agency: UPRR

Comments:

Received call from Kyle Nodgaard at UPRR. He indicated that the UPRR would not be affected by Segment 4 project. He also noted that the railroad line further north is owned by Canadian National. It is the railroad with the swing bridge. He forwarded the packet to Harlan Ariens at the Canadian National RR.

Zamora, Jorge [DOT]

From: Conroy, Colleen [DNR]
Sent: Tuesday, March 01, 2016 2:45 PM
To: Zamora, Jorge [DOT]
Cc: Sipe, Stacey [DNR]; DNR Sov Land and Env Review
Subject: SL 12675 IM-029-3(166)54-13-78 Environmental Review for Natural Resources

Council Bluffs Interstate Improvements
Pottawattamie County

Thank you for inviting Department comment on the impact of this project. The Department has searched for records of rare species and significant natural communities in the project area and found no site-specific records that would be impacted by this project. However, these records and data are not the result of thorough field surveys. If listed species or rare communities are found during the planning or construction phases, additional studies and/or mitigation may be required.

This letter is a record of review for protected species, rare natural communities, state lands and waters in the project area, including review by personnel representing state parks, preserves, recreation areas, fisheries and wildlife but does not include comment from the Environmental Services Division of this Department. This letter does not constitute a permit. Other permits may be required from the Department or other state or federal agencies before work begins on this project.

Please reference the following DNR Environmental Review/Sovereign Land Program tracking number assigned to this project in all future correspondence related to this project: 12675.

If you have questions about this letter or require further information, please contact me at (515) 725-8464.

Environmental Review requests can be submitted electronically to: SLER@dnr.iowa.gov.

SETH MOORE Sovereign Lands & Environmental Review Coordinator



Iowa Department of Natural Resources
515.725-8464 | F 515.725-8201 | Seth.Moore@dnr.iowa.gov
Wallace Building | 502 E 9th St | Des Moines IA 50319

WWW.IOWADNR.GOV   

Leading Iowans in Caring for Our Natural Resources.



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
CORPS OF ENGINEERS, OMAHA DISTRICT
1616 CAPITOL AVENUE
OMAHA NE 68102-4901

March 1, 2016

Planning, Programs, and Project Management Division

Mr. Jorge Zamora
IowaDOT
Office of Location & Environment
800 Lincoln Way
Ames, Iowa 50010

Dear Mr. Zamora:

Thank you for your letter dated February 17, 2016 (received February 22, 2016) regarding the environmental review of the proposed improvements to the Council Bluffs Interstate System. It is understood that the proposed improvements to Segment 4 of the interstate system along I-29 from the Union Pacific Railroad Bridge over I-29 northward to the 25th Street interchange and to I-480 from the east abutment of the Missouri River Bridge to I-29, including the I-29/I480 interchange ramps and connection to West Broadway in Council Bluffs, Pottawattamie County, Iowa.

As discussed at the February 29, 2016, meeting, the proposed project requires review under Section 14 of the Rivers and Harbors Act of 1899 as codified in 33 USC 408 (Section 408) to ensure that any alteration, occupation, or use of a United State Army Corps of Engineers civil works project would not be injurious to the public interest or impair the usefulness of the civil works project. For your information and use, we have enclosed Engineer Circular 1165-2-216, *Policy and Procedural Guidance for Processing Requests to Alter U.S. Army Corps of Engineers Civil Works Projects Pursuant to 33 USC 408* to assist you during this effort. At the February 29, 2016 meeting, we also discussed that the Corps of Engineers Omaha District would act as a Cooperating Agency with respect to the Environmental Assessment (EA) being prepared for this project, and we look forward to that effort. To assist with the initiation of the EA, we offer the following comments for your consideration:

Your plans should be coordinated with the state water quality office that has jurisdiction within the area where the project is located to ensure compliance with federal and state water quality standards and regulations mandated by the Clean Water Act and administered by the U.S. Environmental Protection Agency. Please coordinate with the Iowa Department of Natural Resources concerning state water quality programs.

If you have not already done so, it is recommended you consult with the U.S. Fish and Wildlife Service and the Iowa Department of Natural Resources regarding fish and wildlife resources. In addition, the Iowa State Historic Preservation Office should be contacted for information and recommendations on potential cultural resources in the project area.

Since the proposed project does not appear to be located within Corps owned or operated lands, your plans should be submitted to the local floodplain administrator for

review and approval prior to construction. It should be ensured that the proposed project is in compliance with the floodplain management criteria of Pottawattamie County and the State of Iowa. In addition, please coordinate with the following floodplain management office:

Iowa Department of Natural Resources
Wallace State Office Bldg
Attention: Mr. Bill Cappuccio
502 9th Street
Des Moines, Iowa 50319
Telephone: 515.281.8942
Fax: 515.281.8895
Email: bill.cappuccino@iowa.gov

Any proposed placement of dredged or fill material into waters of the United States (including jurisdictional wetlands) requires Department of the Army authorization under Section 404 of the Clean Water Act. You can visit the Omaha District's Regulatory website for permit applications and related information. Please review the information on the provided website (<http://www.nwo.usace.army.mil/Missions/RegulatoryProgram.aspx>) to determine if this project requires a 404 permit. For a detailed review of the permit requirements, preliminary and final project plans should be sent to:

U.S. Army Corps of Engineers
Wehrspann Regulatory Office
Attention: Mr. John Moeschen, CENWO-OD-R-NE
8901 South 154th Street
Omaha, Nebraska 68138-3621

If you have any questions, please contact Mr. Matthew D. Vandenberg of my staff at (402) 995-2694 or matthew.d.vandenberg@usace.army.mil and reference PD# 6832 in the subject line.

Sincerely,



Eric A. Laux
Chief, Environmental Resources and Missouri River
Recovery Program Plan Formulation Section

Enclose:



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Rock Island Field Office
1511 47th Avenue
Moline, Illinois 61265
Phone: (309) 757-5800 Fax: (309) 757-5807

IN REPLY REFER
TO:

FWS/RIFO

March 1, 2016

Mr. Jorge Zamora
NEPA Document Manager
Office of Location and Environment
800 Lincoln Way
Ames, Iowa 50010

Dear Mr. Zamora:

Thank you for contacting us regarding your project. This responds to your letter dated January 17, 2016, requesting our comments on Segment 4 of the Council Bluffs Interstate Improvements (CBIS) project. It is our understanding that the Federal Highway Administration, in cooperation with the Iowa Department of Transportation, is preparing an Environmental Assessment. We have the following comments.

With respect to any species, listed or proposed to be listed, which may be present in the area of the proposed action, we refer you to the Section 7(a)(2) Technical Assistance webpage found at: <http://www.fws.gov/midwest/endangered/section7/s7process/>. By following the instructions, you can determine what your action area is, whether listed species may be found within the action area, and if the project may affect listed species.

The Service removed bald eagles from protection under the Endangered Species Act on August 8, 2007. However, they remain protected under the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act of 1940 (Eagle Act). The Eagle Act prohibits take which is defined as, "pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, destroy, molest, or disturb" (50 CFR 22.3). Disturb is defined in regulations as, "to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, 1) injury to an eagle, 2) decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or 3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior." The National Bald Eagle Management Guidelines (Guidelines) offer guidance on how to minimize disturbance to bald eagles and increase the likelihood that actions near bald eagle nests are consistent with the Eagle Act and the Migratory Bird Treaty Act. We encourage adherence to these Guidelines.

It is unlawful to take or disturb eagles without first obtaining a permit for non-purposeful take of eagles. However, no permit would be available unless an applicant has first taken all practicable steps to avoid take of eagles. Information about eagle permits can be found online at the following link: <http://www.fws.gov/midwest/MidwestBird/eaglepermits/>

There may be wetlands within and adjacent to the project area. The Corps of Engineers is the Federal agency responsible for wetland determinations, and we recommend that you contact them for assistance in delineating the wetland types and acreage within the project boundary. Priority consideration should be given to avoid impacts to these wetland areas. Any future activities in the study area that would alter these wetlands may require a Section 404 permit. Unavoidable impacts will require a mitigation plan to compensate for any losses of wetland functions and values. The U.S. Army Corps of Engineers, Clock Tower Building, P.O. Box 2004, Rock Island, Illinois, 61201, should be contacted for information about the permit process.

These comments provide technical assistance only and do not constitute the report of the Secretary of the Interior on the project within the meaning of Section 2(b) of the Fish and Wildlife Coordination Act, do not fulfill the requirements under Section 7 of the Endangered Species Act, nor do they represent the review comments of the U.S. Department of the Interior on any forthcoming environmental statement. If you have questions, please contact Heidi Woeber of my staff at 309-757-5800, extension 209.

Sincerely,


Kraig McPeck
Field Supervisor

cc: IADNR (Schwake, Moore)
IADOT (Solberg)
USEPA (Summerlin)

U.S. Department of
Homeland Security

United States
Coast Guard



Commander
Eighth Coast Guard District

1222 Spruce Street, Room 2.102D
St. Louis, MO 63103-2832
Staff Symbol: dwb
Phone: (314) 269-2434
Fax: (314) 269-2379
Email: allan.o.monterroza@uscg.mil
www.uscg.mil/d8/westernriversbridges

RECEIVED
MAR 9 2016
Office of Location & Environment

16591.6
March 2, 2016

Mr. Jorge Zamora
NEPA Document Manager
Iowa Department of Transportation
800 Lincoln Way
Ames, IA 50010

Subj: COUNCIL BLUFFS INTERSTATE SYSTEM IMPROVEMENT PROJECT -
SEGMENT 4 - IM-029-3(166)54--13-78

Dear Mr. Zamora:

We have reviewed the information in your letter dated February 17, 2016 and determined that this project does not include a bridge crossing over water. Therefore the Coast Guard has no interest in the project.

If there are any questions, please contact Mr. Allan Monterroza at the above listed number. We appreciate the opportunity to comment on the project.

Sincerely,

A handwritten signature in blue ink, appearing to read "Eric A. Washburn".

ERIC A. WASHBURN
Bridge Administrator, Western Rivers
By direction of the District Commander



STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR
KIM REYNOLDS, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
CHUCK GIPP, DIRECTOR

RECEIVED

MAR 8 2016

Office of Location & Environment

March 3, 2016

MR JORGE ZAMORA
IOWA DEPARTMENT OF TRANSPORTATION
800 LINCOLN WAY
AMES IA 50010

RE: Council Bluffs Interstate System Improvement - Segment 4 (Tier 2), Pottawattamie County
Early Coordination for Preparation of Environmental Assessment
Iowa DOT Project No.: IM-029-3(166)54-13-78

Dear Mr. Zamora:

This letter is in response to the February 17, 2016 letter concerning the Council Bluffs Interstate System Improvement Segment 4 (Tier 2) project. Thank you for inviting our comments.

As you are aware, waters of the United States (includes wetlands) should not be disturbed if a less environmentally damaging alternative exists. Unavoidable adverse impacts should be minimized to the extent practicable. Any remaining adverse impacts should be mitigated through restoration, enhancement, creation and/or preservation activities. Information regarding the requirements for mitigation is described in the Federal Register (Volume 73, No. 70) dated April 10, 2008, under "Compensatory Mitigation for Losses of Aquatic Resources; Final Rule".

Any proposed placement of dredged or fill material into waters of the United States (including jurisdictional wetlands) requires Department of the Army authorization under Section 404 of the Clean Water Act. Based on the information you provided, a Section 404 permit may be required for this project. A completed application packet should be submitted to the Rock Island District Corps of Engineers as well as 2 copies to the Iowa Department of Natural Resources for processing as soon as possible. The application form can be obtained at: <http://www.iowadnr.gov/InsideDNR/RegulatoryLand/FloodPlainManagement/FloodPlainDevPermits.aspx> or at <http://www.mvr.usace.army.mil/Missions/Regulatory/Permits.aspx>

We would ask that Best Management Practices be used to control erosion and protect water quality near the projects. You are encouraged to conduct your construction activities during a period of low flow. You are required to seed all disturbed areas with native grasses and to implement appropriate erosion control measures to insure that sediments are not introduced into waters of the United States during construction of the projects. Clearing of vegetation, including trees located in or immediately adjacent to waters of the state, should be limited to that which is absolutely necessary for construction of the projects.

If you have any questions, please call me at (515) 725-8399.

Sincerely,

Christine Schwake
Environmental Specialist

Zamora, Jorge [DOT]

From: Harper, Dennis [HSEMD]
Sent: Thursday, March 03, 2016 8:45 AM
To: Zamora, Jorge [DOT]
Subject: NEPA Compliancy Response - Segment 4 Council Bluffs

Jorge:

Based on your letter and attached information dated February 17, 2016, I am hoping this email suffices.

We have reviewed the content of the package sent under your signature. Staff have researched any currently obligated and/or proposed federal undertakings from our records. Given the area identified we have absolutely nothing to report and nothing to base additional comments on.

If you need anything else please don't hesitate to email.

Sincerely

Dennis J. Harper

State Hazard Mitigation Officer (SHMO)

Hazard Mitigation Bureau Chief

Recovery Division

Iowa Homeland Security and Emergency Management Department (HSEMD)

Desk Phone - 515-725-9348

Cell Phone - 515-829-1877

Zamora, Jorge [DOT]

From: scott.tener@faa.gov
Sent: Friday, March 4, 2016 8:47 AM
To: Zamora, Jorge [DOT]
Subject: EA for Segment 4 of the Council Bluffs Interstate Improvements Project

We have received your letter dated February 17, 2016 regarding the subject project. We generally do not provide comments from an environmental perspective.

Airspace Considerations

The project may require formal notice and review for airspace considerations under Federal Aviation Regulation (FAR) Part 77, Objects Affecting Navigable Airspace. To determine if you need to file with FAA, go to <http://oeaaa.faa.gov> and click on the "Notice Criteria Tool" found at the left-hand side of the page.

Several items may need to be checked such as any roads, objects, and temporary construction equipment (e.g. cranes) that exceed the notice criteria.

Multiple locations will need to be checked because of the length of the route. We recommend checking the route at 1 mile intervals and at increases in elevation (e.g. natural rise, bridges & overpasses).

If after using the tool, you determine that filing with FAA is required, we recommend a 120-day notification to accommodate the review process and issue our determination letter. Proposals may be filed at <http://oeaaa.faa.gov>.

More information on this process may be found at: <http://www.faa.gov/airports/central/engineering/part77/>

Please let me know if you have any questions,

Scott Tener, P.E.
Environmental Specialist

FAA Central Region Airports Division
901 Locust St., Room 364
Kansas City, Missouri 64106-2325
T 816.329.2639 | F 816.329.2611
<http://www.faa.gov/airports/central/>

March 8, 2016

Mr. Jorge Zamora
NEPA Document Manger
800 Lincoln Way
Ames, IA 50010

Dear Mr. Zamora:

I am writing on behalf of the Metropolitan Area Planning Agency (MAPA), which serves as the Metropolitan Planning Organization for the Greater Omaha-Council Bluffs region. MAPA strongly supports the Council Bluffs Interstate (CBIS) improvement project. CBIS is currently one of the most important projects within the region.

Through the Long-Range Transportation Plan, MAPA has assisted with the regional modeling for CBIS's first development, Segment 4 - Tier 2, which links the conjunction of Interstate 29 (I-29), Interstate 480 (I-480), and West Broadway (US-6). This conjunction is one of the key links in the region's transportation network and links the downtown areas of the City of Council Bluffs and City of Omaha. The project will provide the residents and businesses within Council Bluffs with improved access to services (such as education, hospitals, jobs, retail, and entertainment). This project is also a key element in the region's movement of freight, as the City of Council Bluffs has two major intermodal freight facilities within four miles of the I-29 / I-480 conjunction.

Additionally, the project will link West Broadway, which the City of Council Bluffs and the Regional Transit Vision have identified as a future high capacity transit corridor linking to the Bus Transit Rapid (BRT) line along Dodge Street presently being implemented by the City of Omaha and Metro Transit. Through the BRT, a key transit corridor will be created from West Roads Mall in the City of Omaha to the downtown area in the City of Council Bluffs. The transit corridor has a population of 97,792 and employment of 139,109; representing both a transportation backbone and economic backbone of the region.

In conclusion, MAPA supports CBIS (including the Segment 4 - Tier 2 project) as it will provide vital linkages within the local and regional transportation networks now and into the future in order to maintain the transportation system while improving the assess, mobility, and economic vitality of the Omaha-Council Bluffs metropolitan region.

Sincerely,



Greg Youell
Executive Director



March 14, 2016

Mr. Jorge Zamos
Iowa Department of Transportation
800 Lincoln Way
Ames, IA 50010

SUBJECT: Segment 4 of the Council Bluffs Interstate Improvements (CBIS)

Dear Mr. Zamos:

In response to your inquiry dated February 17, 2016, the following resources of concern to the Iowa Natural Resources Conservation Service (NRCS) include:

- Conservation Practices and Non-Waters of the United States on Private Land. Should this undertaking involve work or structures placed outside of property solely under your control, you would need to consult with all applicable landowners for the purpose of coordinating the proposed work outside of areas that may compromise the respective landowner's USDA program eligibility (e.g., conservation practices on highly erodible lands, and any wetlands, especially wetlands considered non-waters of the US).
- Existing NRCS Conservation Easements. Please refer to <http://gdwweb1.ftw.nrcs.usda.gov/> to see if your undertaking will affect an NRCS easement. Should an easement be affected, you may contact Sindra Jensen ((515) 323-2480) at the Iowa NRCS State Office for further information.
- Prime Farmland. (**The Farmland Protection Policy Act does not apply here because the land is prior converted by urban development.**)

** Please be advised, the Iowa NRCS discourages actions that would cause a reduction in stream length or adversely affect wetlands.*

Please note that federally-protected species, state-protected species, historic properties and/or waters of the United States may be affected by this proposed project. These are important resources of concern and this office strongly advises you to consult with the following offices for more information:

Federally - Protected Species

U.S. Fish and Wildlife Service
Rock Island Illinois Field Office
1511 – 47th Avenue
Moline, Illinois 61265
Phone: 309/757-5800
Fax: 309/757-5807

Natural Resources Conservation Service
210 Walnut Street, Room 693
Des Moines, IA 50309-2180
Voice (515) 284-4370 – FAX (855) 261-3544
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State - Protected Species

Iowa Department of Natural Resources
Environmental Review for Natural Resources
Conservation and Recreation Division
502 East 9th Street
Des Moines, Iowa 50319-0034
Phone: 515/281-8967

Cultural Resources and Historic Properties

State Historical Society of Iowa
State Historic Preservation Office
600 East Locust Street
Des Moines, Iowa 50319-0290
Phone: 515/281-8743

Waters of the United States

U.S. Army Corps of Engineers
Regulatory Branch
Clock Tower Building
Post Office Box 2004
Rock Island, Illinois 61204-2004
Phone: 309/794-5057

Thank you for your inquiry with the Iowa NRCS regarding your project proposal. It is our sincere expectation that the information provided is helpful to you. Should you require any further assistance please contact James Cronin, State Biologist, at (515) 323-2221.

Sincerely,



Grover DePriest
State Resource Conservationist



STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR
KIM REYNOLDS, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
CHUCK GIPP, DIRECTOR

March 18, 2016

Sent by email attachment

Jorge Zamora
Iowa DOT
800 Lincoln Way
Ames, IA 50010

Dear Jorge:

On February 22, 2016, the Iowa Department of Natural Resources (DNR) Field Office Atlantic received a letter requesting comments on a draft Environmental Assessment (EA) of the proposed Council Bluffs Interstate System Improvement Project Segment 4 IM-029-3(166)54—13-78. Please find below and attached comments.

IDOT should be aware these facilities exist, and that during part of their ROW construction activities they may encounter petroleum contamination, monitoring wells or recovery wells used for site monitoring and remediation. If IDOT activities encroach onto these properties and MWs are destroyed, they will need to be replaced if critical to the ongoing remediation efforts. DOT representatives should contact DNR Elaine Douskey Elaine.Douskey@dnr.iowa.gov or (515) 725-8311 about their plans that may specifically affect these properties.

8LTE37, KWIK SHOP #527, 3632 AVENUE G - high risk; remediation is ongoing
8LTI97, CB QUICK STOP, 3500 AVENUE A - high risk; remediation is ongoing
7LTH83, BENSON 66 SERVICE, 3500 WEST BROADWAY - high risk; groundwater monitoring
9LTG44, FORMER CENTRAL STATES TRUCKING, 3201 W BROADWAY - not classified

The Iowa Department of Natural Resources (DNR) is the regulatory authority for the air quality programs described below. These programs may or may not apply to the proposed project. For questions, please contact Christine Paulson by e-mail at Christine.Paulson@dnr.iowa.gov or by phone at 515-725-9510.

- **Construction Permitting Requirements**

DNR issues construction permits for new and modified sources of air pollutants. If the project includes any new air emission units, including portable equipment such as cement batch plants, asphalt plants, or limestone crushing plants, the project may be subject to these construction permitting requirements. Please visit our website at www.iowadnr.gov/airconstructionpermits for more information or contact our permit hotline at 1-877-AIR-IOWA. You may also wish to review the rules for permitting contained in 567

Iowa Administrative Code (IAC) Chapter 22 (455B). The IAC is available on-line at <https://www.legis.iowa.gov/law/administrativeRules/agencies>.

- **Asbestos**

Building renovations, demolitions and training fires are potentially subject to the asbestos release prevention efforts under the National Emission Standards for Hazardous Air Pollutants (NESHAP) for asbestos [40 Code of Federal Regulations (CFR) Part 61, Subpart M]. The DNR has been delegated the authority to administer and enforce this program.

The asbestos NESHAP rules apply **before** renovation or demolition begin, and often require a thorough inspection and lab analysis of suspect asbestos containing material, notification to the DNR and, in some cases, proper removal and disposal. For more information, please visit our website at www.iowadnr.gov/asbestos. You may also contact the DNR Asbestos NESHAP Coordinator, Tom Wuehr, by email at Tom.Wuehr@dnr.iowa.gov or by phone at 515-725-9576.

- **Open Burning**

The DNR regulates open burning. “Open burning” is the burning of combustible materials where the products of combustion are emitted into the open air without passing through a chimney or stack. In general, open burning is prohibited, except for the specific exemptions listed in the state open burning rules. The open burning requirements are contained in 567 IAC rule 23.2(455B). In addition, there are a number of definitions in 567 Chapter 20 that are applicable to open burning. The IAC is available on-line at <https://www.legis.iowa.gov/law/administrativeRules/agencies> .

- **Fugitive Dust**

The DNR administers regulations that pertain to fugitive dust. In general, owners or operators must take reasonable precautions to prevent fugitive dust from becoming airborne and crossing the property line. These regulations, which may be applicable to this project, are contained in 567 IAC paragraph 23.3(2)“c”, and can be found at the website indicated above.

- **Opacity**

The DNR administers regulations that pertain to opacity (visible emissions). In general, visible emissions in excess of 40 percent opacity are not allowed unless specifically exempted under rule. The rules for opacity, which may pertain to this project, are under paragraph 567 IAC 23.3(2)“d”, and are available on-line at the link indicated above.

Sincerely,

Jerah Sheets
Environmental Services Division

Zamora, Jorge [DOT]

From: Summerlin, Joe <summerlin.joe@epa.gov>
Sent: Friday, March 18, 2016 11:38 AM
To: Zamora, Jorge [DOT]
Cc: Moses, Althea
Subject: Segment 4 of the Council Bluffs Interstate Improvements (CBIS)

Jorge:

I won't insult you with the boilerplate language this time. Your letter stated that you will be looking at the standard things in your document (air quality, EJ, Wetlands, etc.). So let's skip the formalities and get down to the nitty gritty.

- 1) Understand this could fall under FAST 41. Might want to look into that.
- 2) Recommend contacting Althea Moses to help coordinate any EJ concerns at (913) 551-7649 or at moses.althea@epa.gov. She and her staff are fantastic and can provide good "counseling" about the community's needs or help provide outreach to make sure 4(f) and NHPA concerns are addressed.
- 3) I see the railroad is just south of the study area. Consider coordination with FRA to ensure project won't interfere with Chicago to Omaha High Speed Rail plans.
- 4) Consider stormwater runoff and designs that will slow the flow of sheeting effects as water makes it way to the Missouri River. Also, consider stormwater effects on properties on both sides of the river.
- 5) Recommend developing a good Purpose and Need section that can easily be read and tells the story of why Council Bluffs needs this improvement.
- 6) Develop good alternatives (not just a build/no build) and evaluate them or explain why they have been discarded.
- 7) Recommend designing to discourage development on the east bank of the Missouri River.
- 8) Work with Corps on levee impacts.
- 9) Contact IDNR to make sure there are no Brownfields or CERCLA sites that will be impacted during construction.

Hope this helps!

If you have any questions or concerns please contact me at (913) 551-7029 or at Summerlin.joe@epa.gov.

Sincerely,

Joe Summerlin
NEPA Reviewer
EPA, Region 7
11201 Renner Blvd.
Lenexa, KS 66219
(913) 551-7029

APPENDIX C-4

TRIBAL COORDINATION

Office of Location & Environment

800 Lincoln Way, Ames, IA 50010

Phone: 515-239-1097 | Email: matt.donovan@dot.iowa.gov

March 1, 2016

Ref. IM-029-3(166)54--13-78

Primary System

Pottawattamie County

Ms. Sara Childers, THPO
Upper Sioux Community
P.O. Box 147
Granite Falls, MN 56241

Re: Council Bluffs Interstate System Improvement Project, Segment 4

Dear Ms. Childers:

We consider the above referenced project a federal undertaking.

Enclosed for your review and comment is the project description and map of the project limits for the above federally funded project. As a part of early coordination, we are soliciting comments from your tribe regarding the proposed project as it relates to your tribes area of expertise. The comments and material you supply will be used to determine if the proposed improvements may have impacts that warrant further consideration and are consistent with future long-term development plans within the study corridor. Your comments will be incorporated into the environmental planning process and Environmental Assessment document as appropriate.

The enclosed information should help you understand the nature of the project and help you determine the location of the proposed roadway improvement. To remain on schedule a response would be appreciated within 30 days of receipt of this letter. Please feel free to call me at (515) 239-1097. If you wish to contact a representative of the U.S. government, call Mr. Michael LaPietra, Federal Highway Administration, Iowa Division, at (515) 233-7302.

If you have any questions, please contact me at (515) 239-1097 or matt.donovan@dot.iowa.gov.

Sincerely,



Matthew J.F. Donovan, RPA

Office of Location and Environment

MJFD

Enclosures

cc: Mike LaPietra – Federal Highway Administration