



DAVID L. CORLISS
INTERIM CITY MANAGER

City of Lawrence KANSAS

City Offices
Box 708 66044-0708
TDD 785-832-3205

6 East 6th
785-832-3000
FAX 785-832-3405

www.lawrenceks.org

CITY COMMISSION

MAYOR
MIKE AMYX

COMMISSIONERS
SUE HACK
DAVID M. SCHAUNER
MIKE RUNDLE
DENNIS "BOOG" HIGHBERGER

May 17, 2006

Mr. Wendall L. Meyer
Assistant Division Administrator
Federal Highway Administration
Kansas Division Office
6111 SW 29th Street, Suite 100
Topeka, Kansas 66614

Re: Project 10-23 K-8392-01
South Lawrence Trafficway
Douglas County, Kansas
City of Lawrence, Kansas Comments on proposed FHWA adoption of Final
Environmental Impact Statement

Dear Mr. Meyer:

The City of Lawrence, Kansas provides the following comments on the proposed Federal Highway Administration (FHWA) adoption of the Final Environmental Impact Statement (FEIS) for Project 10-23 K-8392-01 the South Lawrence Trafficway (SLT) in Douglas County, Kansas. The City strongly believes that neither the interests nor desires of the community are genuinely served by the existing FEIS. As the primary beneficiary of the proposed improvement, the City objects in the strongest terms to the FEIS.

The FEIS fails to reflect a number of conditions which have changed since the adoption of the FEIS in 2003. Further, the FEIS fails to appropriately weigh the significant negative cultural, environmental, social impacts of the selected alignment along 32nd Street.

The continuing flaw in the FEIS is the failure to fully appreciate the detrimental impact the 32nd Street alignment will have on Haskell Indian Nations University (HINU) and the existing wetlands. Constructing a four-lane limited access trafficway between the HINU campus and the wetlands severely damages the connection between HINU and the wetlands – essentially placing an impenetrable barrier between the HINU family of students, faculty and friends and this wonderful natural area. While the 32nd Street alignment proposal continues wetlands mitigation, it is only required because of the unnecessary impact of the project on the wetlands. The Lawrence community considers



the wetlands a local natural treasure – a unique natural area that federal environmental review laws were designed to protect through rigorous analysis of alternatives to ensure that unnecessary harm would be avoided.

The Kansas Turnpike Authority (KTA) has recently announced plans to construct an interchange on Interstate 70 in Leavenworth County, near Tonganoxie, Kansas. This KTA interchange will impact the proposed SLT alignment in a number of ways. The KTA interchange will allow I-70 drivers seeking access to Douglas and Johnson County (or Douglas and Johnson county drivers seeking access to I-70) an additional route to utilize rather than the three interchanges currently serving the Lawrence area. The impact of this new KTA interchange on the proposed alignments and the preferred alignment of the eastern leg of the SLT is not appropriately reviewed and weighed in the FEIS. . Additional study is needed to determine how this interchange will impact the need and location of the eastern leg of the SLT given that one of the goals of the SLT is to connect I-70 traffic with K-10 – something that the Tonganoxie interchange will assist in accomplishing.

Further, the FEIS fails to include the recent development proposals moving forward on the former 9,000 acre Sunflower facility in far western Johnson County. This new development is further changing the transportation landscape of the area – consideration of a new Johnson County arterial street which will connect with Douglas County 1000 Road is underway. These changes should be reflected in additional study before adoption of the FEIS.

The FEIS did not adequately consider how an eastern link between K-10 and I-70 might serve the needs the SLT is intended to address. There has been sparse consideration of the option of a more southerly route along existing right-of-way (for example 1100 Road or 1000 Road), then linking to E 1900 Road and then to K-10.

The FEIS fails to adequately address the changing conditions for development, land use, and traffic in the area south of the Wakarusa. In 2003 the City of Lawrence adopted a Master Plan for the City's Wastewater and Water Utility. The Master Plan calls for a construction of new wastewater treatment facility to be located along the Wakarusa River to provide additional treatment capacity for the Lawrence community. The City is proceeding with the property acquisition and design phases of the facility to ensure the operation of the new facility by 2011. The initial construction will allow the community to grow to a population of 150,000, including substantial urban density development south of the Wakarusa. One of the keys to urban density growth is adequate sewerage facilities. The FEIS fails to account for this new facility and the planned urban density development which will occur within the City of Lawrence's urban growth boundaries as established by amendments to the City's and County's comprehensive plan, *Horizon 2020*. Statements in the FEIS concerning the area south of the Wakarusa River should

Wendell L. Meyer
May 17, 2006
Page 2 of 3

be reviewed and appropriately amended to reflect the consequences of urban density development that will be eventually associated with the new wastewater treatment facility.

The Lawrence City Commission believes that a more current and rigorous review of the conditions facing the Lawrence and Douglas County community should be conducted before proceeding with adoption of an FEIS.

This comment letter was adopted by the Lawrence City Commission on May 16, 2006.

Sincerely,

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

Mike Amyx
Mayor