



I-49 South Implementation Proposal

1.0 Introduction

In December 2006, the Federal Highway Administration (FHWA) issued a Record of Decision (ROD) for the *Future I-49 South, Wax Lake Outlet to Berwick Environmental Impact Statement (EIS)*, and in January 2008, FHWA issued a ROD for the *Future I-49 South, Raceland to the Westbank Expressway EIS*. The implementation costs of the Selected Alternatives defined in these RODs, including construction and allowances for design, construction management, right-of-way/relocations, wetlands mitigation, and other elements, have exceeded the resources available to the Louisiana Department of Transportation and Development (DOTD). No additional work has been advanced on either Selected Alternative.

As a result, the benefits to the state and the nation of I-49 South have not been realized, traffic has increased in a number of areas, and local residents continue to be required to share US 90 with through traffic. In an effort to relieve these conditions, DOTD initiated the *I-49 Study to Identify Interim Improvements for Safety and Efficiency (Safety and Efficiency Study)* in 2010 for the segments of the corridor identified as Section 3 and Section 4 as shown on **Figure 1**. The design portion of this project was completed in 2012, resulting in two programs for each of the two sections of I-49 South:

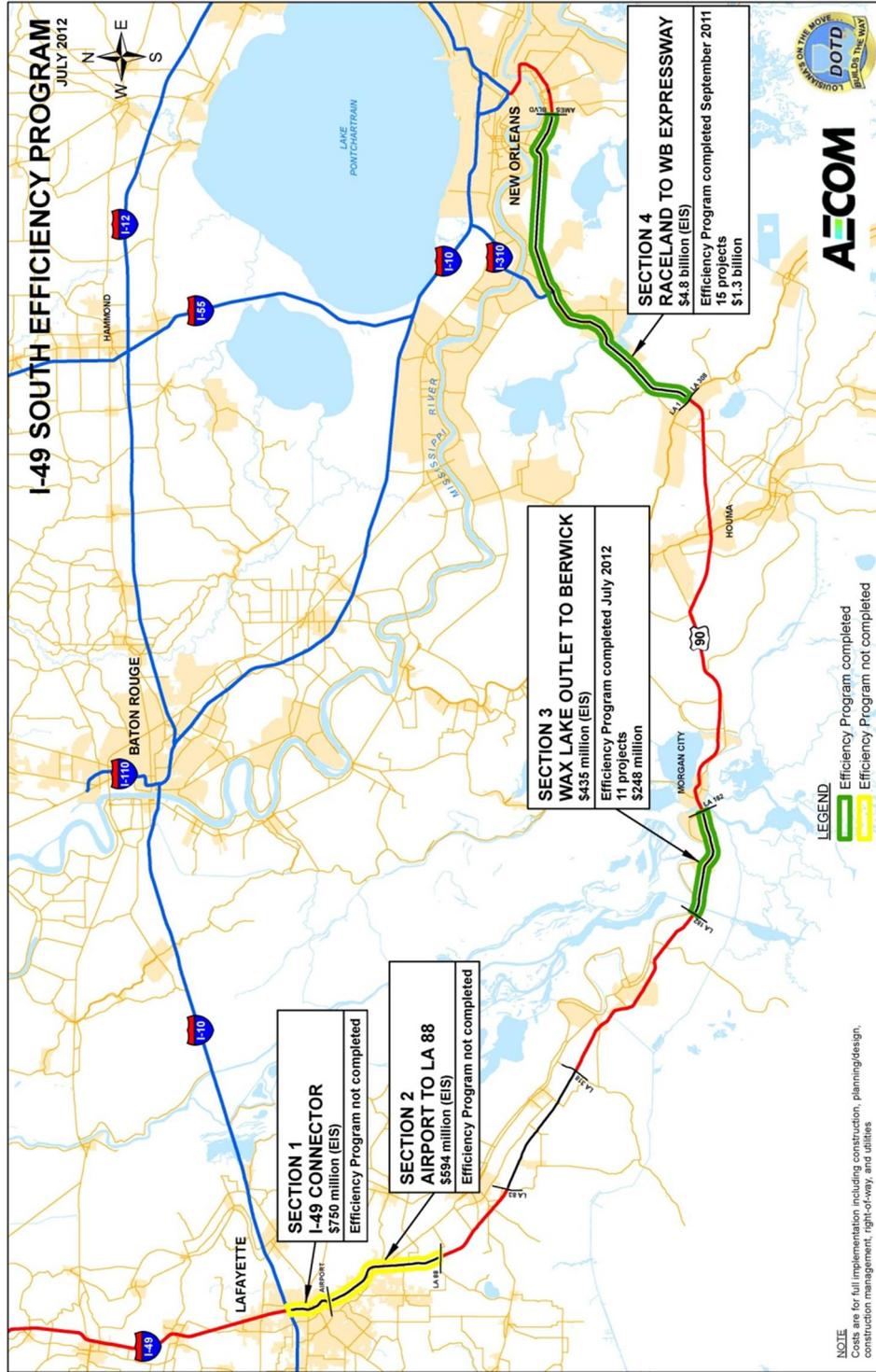
- The **Interim Program** consists of lower cost projects for implementation in the near term that would improve safety and efficiency, including any opportunities to provide near term freeway operations on selected sections or improvements that would support future freeway operations, and
- The **Freeway Program** consists of generally higher cost projects with the ability for phased implementation within funding constraints, to complete I-49 South over time.

This Implementation Proposal summarizes the two Records of Decision and the findings of the Safety and Efficiency plans for each segment, compares them, and describes the manner in which DOTD proposes to proceed into the NEPA process toward implementation of these segments of I-49 South. The proposal is presented in **Section 5.3** and **Appendix H** of this document.



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Figure 1 I-49 South Corridor



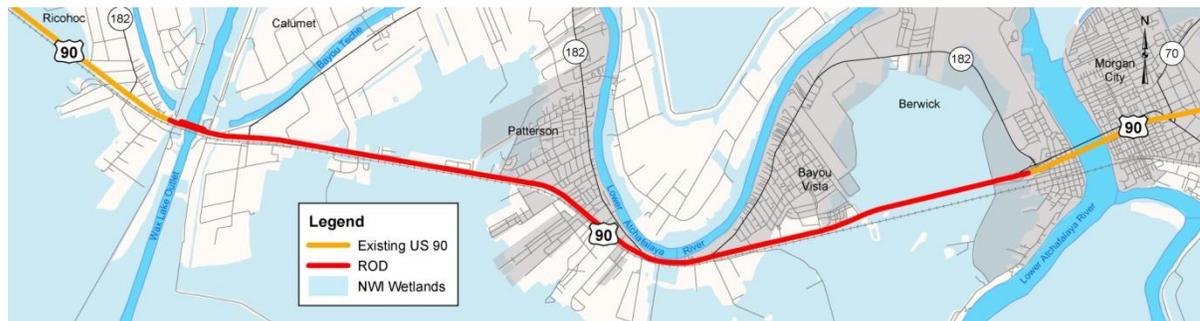


2.0 The Records of Decision

2.1 Wax Lake Outlet to Berwick (Section 3)

The Selected Alternative extends along US 90 in St. Mary Parish for 9.3 miles from Wax Lake Outlet to the approach to the bridge over the Atchafalaya River in the Town of Berwick. It also includes the upgrade of a section of LA 182 with a new crossing of Wax Lake Outlet for a distance of 1.1 miles. The project limits, as shown on **Figure 2**, were to connect the segment of I-49 to the west from LA 88 in Iberia Parish to Wax Lake Outlet, which was in several phases of implementation from planning to construction at the time that the EIS was conducted, and the completed segment to the east from the Atchafalaya River crossing in Berwick to the LA 1 interchange in Raceland.

Figure 2 Wax Lake Outlet to Berwick Project Limits



Purpose and Need

The development of I-49 is a multi-state effort to provide a continuous interstate highway between New Orleans, the central United States, and central Canada. I-49 South would connect the interchange of I-10 and I-49 in Lafayette, LA with the interchange of I-10 and I-49 in downtown New Orleans. This project would upgrade US 90 to a 4-lane control of access highway with ramps to frontage roads providing access to grade separated major connecting roads and to local destinations. This roadway section would separate through traffic from slower moving local traffic. To the extent possible, the project would be constructed within the existing US 90 right-of-way.

The projects needs were defined as follows:

- System Linkage – Upgrading US 90 to an interstate would be compatible with national, regional, and local plans to increase capacity and to improve safety and efficiency during normal operation and during coastal evacuation events.
- Economic Development - Upgrading US 90 to an interstate would enhance the Louisiana economy by improving access to and mobility through the corridor between Lafayette and New Orleans. This corridor contains more navigable water miles than any region its size in the United States, 15 water ports, nine airports, and 36 percent of the state’s population; it is one of the top 10 industrial corridors in the United States in terms of employment per capita and is the most important industrial corridor in the state based on labor and capital investment; and its unique Acadian heritage and natural resources are a base for tourism.
- Evacuation Planning – Southern Louisiana is vulnerable to hurricanes. Due to the topography of the Atchafalaya Basin there are relatively few northbound routes.
- Transportation System Benefits – The EIS found that the driving age population of Louisiana had increased four percent between 1993 and 1996 while Vehicle Miles Traveled (VMT increased 11



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percent and roadway mileage grew by two percent during the same period. The traffic analysis indicated that ADT in 2000 ranged from 18,358 to 26,021 and projected the No Build condition in 2030 to range from 29,005 to 43,120. 2011 ADT presented on the DOTD website ranges from 16,810 to 31,641.

Description of Selected Alternative

The Selected Alternative provided interchanges at Red Cypress Road, Tiffany Street/Lipari Street, Southeast Boulevard, and at Thorguson Drive/Berwick South Road. There was to be a two-way frontage road on the north from LA 182 Access Road East to Red Cypress Road and on the south from LA 182 Access Road East to the easternmost driveway of the gas plants where the road would transition to a one-way eastbound entrance ramp to satisfy the egress requirements of the plants. From Red Cypress Road to Southeast Boulevard there would be a one-way frontage road system that would terminate in ramps connecting to the mainline at the eastern end of Bayou Vista. These roadways both would be on the northern side of the mainline in the Idlewild area where the LA 182 alignment that is parallel to US 90 in this vicinity would be utilized. There would be no frontage roads east of Bayou Vista. In addition to the interchange areas, the mainline would be elevated at LA 182 Access Road East and for approximately 1.9 miles eastward from the Tiffany Street/Lipari Street interchange. A shared use trail would be constructed in accordance with the Americans with Disabilities Act (ADA) connecting Main Street (LA 182) in the City of Patterson with the Kemper Williams Park contingent upon a local sponsor committing to satisfy any responsibilities required by the Burlington Northern Santa Fe Railroad including the maintenance of warning devices.

A two-way frontage road on the north side between Bayou Vista and Thorguson Drive was considered at the request of the Town of Berwick that sought to develop the vacant land along US 90 and by the Louisiana Office of Emergency Preparedness that sought additional capacity during evacuation events. A frontage road was not included because the vacant land is potential wetlands with habitat value for various species including the Louisiana black bear. In consideration of adding capacity, a third lane was included between the Southeast Boulevard and Thorguson Drive/Berwick South Road interchanges.

Right-of-Way Requirements

The Selected Alternative would require 5.84 acres of additional right-of-way. There would be no residential or business relocations, but some properties would be affected by control of access at ramp terminals.

Environmental Effects, Minimization and Mitigation

The EIS defined the following measures to minimize and mitigate the identified environmental effects:

- Application of the DOTD noise policy determined that noise barriers are warranted in three locations.
- Wherever possible swale drainage would be used to filter contaminants and slow the rate of erosion.
- The wetland analysis delineated 18.7 acres of which DOTD recommends that 6.58 are jurisdictional. No determination was made by United States Army Corps of Engineers (USACE). Impacts would be mitigated as determined through the Section 404 permit process.
- A bald eagle nest was identified adjacent to the project area. Consultation would be initiated with the United States Fish and Wildlife Service (USFWS) if the project encroaches within 3,000 feet of the nest.



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- Formal Section 7 consultation with the USFWS was completed regarding the Louisiana black bear.¹
- To minimize potential cumulative impacts to the Louisiana black bear, the DOTD will consider the non-discretionary Conservation Recommendations of the Biological Opinion dated October 19, 2004.
- Cut and fill operations will be minimized and Best management Practices (BMP) will be used to prevent erosion;
- During design, consideration will be given to limiting the addition of new impervious surfaces, the preservation of stream buffers and sensitive areas, limiting the disturbance of soil and vegetation, and maintaining the infiltration capacity of the area.
- A Phase I Environmental Assessment Report identified two sites for further review.
- It was agreed that landscape material would be installed where feasible in accordance with DOTD standards contingent upon a local entity assuming responsibility for maintenance.
- It was identified that there are two archaeological sites in the vicinity of the project. If the project encroaches on these in one case additional investigation must be undertaken and in the other case data recovery must be undertaken.
- Properties impacted by control of access will be compensated in accordance with DOTD procedures.
- Construction plans and specifications will include requirements regarding maintenance of traffic, air quality, noise, utility conflicts, and stormwater. Provision will be made for work to stop pending consultation with the State Historic Preservation Officer (SHPO) if cultural remains are found during construction. If hazardous waste contamination is uncovered, DOTD Manual No. 48 Underground Storage Tank and Contaminated Site Policy and Procedure will be implemented.
- Any closures of navigable waterways would be coordinated with the United States Coast Guard (USCG) and disclosed in the permit process with the USCG and the USACE.
- Potential community disruption was addressed as follows:
 - The LA 182 crossing of Wax Lake Outlet removes agricultural equipment and vehicles from the interstate;
 - The provision of an entrance ramp from the gas plants maintains existing opportunities for emergency egress;
 - Increasing the clearance under the elevated mainline at LA 182 Access Road East to 18 feet allows farm equipment to pass beneath;
 - The elevation of the mainline through Patterson allows for continued north /south connection of existing roadways and shifting the mainline to the south in Idlewild buffers adjacent residential properties; and
 - Adding a third lane between the Southeast Boulevard and Thorguson Drive Berwick South Road allows travel between Bayou Vista and Berwick without requiring that local traffic enter the through lanes of the interstate.

Cost Estimate and Implementation Schedule

The Selected Alternative was divided into 12 Build Sections scheduled to begin with design of Section 1 in 2009 and ending with completion of the construction of Section 12 in 2015. The same work plus the Ricohoc Interchange that has been added to the project limits has been estimated to cost \$463 million in 2012 dollars.

¹ Biological Opinion, October 19, 2004. See copy of Section 4.11.3 Mitigation Measures, Threatened and Endangered Species of the Final EIS in **Appendix A** of this document.



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The projects needs were defined as follows:

- System Linkage – Construction of an interstate highway would be compatible with national, regional, and local plans to increase capacity and to improve safety and efficiency during normal operation and during coastal evacuation events.
- Evacuation Planning – Southern Louisiana is vulnerable to hurricanes. Only a freeway with its characteristic control of access can be modified efficiently to provide a contraflow system that doubles the capacity of the roadway during an evacuation event.
- Transportation System Improvements – The EIS found that the driving age population of Louisiana had increased four percent between 1993 and 1996 while Vehicle Miles Traveled (VMT) increased 11 percent and roadway mileage grew by two percent during the same period. The traffic analysis indicated that ADT in 2002 ranged from a low of 21,706 between Boutte and Avondale to a high of 65,553 along the Westbank Expressway and projected the No Build condition in 2030 to range from 27,168 to 81,180 in the same locations. 2011 ADT presented on the DOTD website for these approximate locations indicate 26,774 and 68,323 respectively.
- Highway Safety – I-49 would provide the safety benefits of a freeway, which provide the greatest levels of efficiency, safety, and reliability in the movement of people and goods of any roadway classification.
- Economic Development - Upgrading US 90 to an interstate would enhance the Louisiana economy by improving access to and mobility through the corridor between Lafayette and New Orleans. This corridor contains more navigable water miles than any region its size in the United States. This segment of I-49 would provide access to seven ports including the Port of South Louisiana, which ranked first in tonnage in 2004 of all ports in the United States, and the Port of New Orleans ranked seventh in tonnage in 2004. One out of every eight jobs in Louisiana is related to the port industry, which grew six percent between 1997 and 1999. It also would improve access to the Louis Armstrong International Airport and facilitate tourist travel attracted to the rich and unique culture of south Louisiana.

Description of Selected Alternative

The Selected Alternative would complete the existing partial interchange at LA 308 and provide full interchanges at LA 182 and US 90 at the western end of the developed area of Des Allemands in Lafourche Parish; LA 635, I-310, and Willowdale Boulevard in St. Charles Parish; and Dexter Drive/Butler Drive/Avondale Garden Road, Lapalco Boulevard, US 90/US 90 Business (Huey P. Long Bridge), Segnette Boulevard, Victory Drive, and Ames Boulevard in Jefferson Parish. I-49 would be a four-lane highway from Raceland to the US 90/US 90 Business interchange and would be a six-lane facility east of the interchange. In most areas, US 90 would provide local access. A two-way frontage road would be constructed between the elevated lanes of I-49 between Davis Pond and Live Oak Boulevard. It would transition to a four-lane one-way frontage road system in Avondale and to a six-lane one-way system at Segnette Boulevard in order to connect with the existing one-way frontage roads along the Westbank Expressway. In conjunction with the US 90/US 90 Business interchange, US 90 would be reconstructed across the railroad right-of-way to connect with the improvements being constructed in conjunction with the widening of the Huey P. Long Bridge. The entire mainline portion of I-49 and a substantial portion of the extension to I-310 would be elevated.

Right-of-Way Requirements

Substantial sections of the Selected Alternative are on new right-of-way. A major concern in this regard is the resulting impact to 578.9 acres of wetlands identified in the Wetlands Finding. This may not fully delineate the potential wetland total as the alignment crosses the Paradis Wetland Mitigation Bank, which was in the process of being established at the time that the EIS was conducted.



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Potential relocations include 15 residential properties, 12 businesses, and 11 other uses. In addition, there are pipelines, rail lines, and drainage structures on the Monsanto Property that would be defined in accordance with a study to be performed during final design.

Some properties could be affected by control of access at ramp terminals.

Environmental Effects, Minimization and Mitigation

The EIS defined the following measures to minimize and mitigate the identified environmental effects:

- Relocation would be addressed through the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Relocation Act). If necessary, housing of last resort would be provided to residential displacements.
- Census Tract 628 in Boutte is an Environmental Justice neighborhood. As a mitigation strategy, a family occupying several residences will be relocated as a unit². Other minority families in the right-of-way will be relocated in accordance with the Relocation Act. In successive phases of the project, the sponsors will continue to make special efforts to involve the residents in planning and implementing the project.
- Application of the DOTD noise policy determined that noise barriers are not feasible and reasonable in association with the Selected Alternative.
- At-grade roadways improved or constructed by the project outside urban areas would use swale drainage to filter contaminants and slow the rate of erosion. Areas below the elevated sections of the mainline would not be paved to provide the same benefit.
- The wetland analysis delineated 578.9 acres. Impacts would be mitigated as determined through the Section 404 permit process.
- Floodplain impacts are minimized by the elevated mainline. At-grade roadways would be constructed to an elevation of at least 5.0 feet msl. Culverts will be designed to convey normal drainage and storm flows.
- Bald eagle nests were identified in the project area. Should the project encroach within 660 feet³ of a nest, further consultation with USFWS would be required.
- Cut and fill operations will be minimized and Best Management Practices (BMP) will be used to prevent erosion;
- During design, consideration will be given to limiting the addition of new impervious surfaces, the preservation of stream buffers and sensitive areas, limiting the disturbance of soil and vegetation, and maintaining the infiltration capacity of the area.
- A Phase I Environmental Assessment Report identified 44 sites for further review.
- In addition to typical utility relocation procedures, the special study of the Monsanto property would define the actions, responsible parties, and sequence of relocation.
- The new bridge over Bayou Des Allemands, a designated Scenic Stream, would affect views of the bayou. Mitigation requirements would be determined through the Class B Scenic Streams Permit process.
- The extension of the elevated Westbank Expressway would be constructed to appear identical to the existing completed portion of the highway.
- If previously undocumented cultural material is encountered during construction, work will stop in that area pending consultation with the SHPO. Prior to construction, a delineation and evaluation of Site 16J29 will be completed prior to construction and, if determined eligible, mitigation will be

² See Appendix 6-A to the Final EIS.

³ This distance varies from the 3,000 feet referenced on page 3 due to the removal of the bald eagle from the listed species under the Threatened and Endangered Species Act.



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coordinated with the SHPO, and tests will be made in the vicinity of the Old Mt. Airy Cemetery to determine the sites of any unmarked graves so that appropriate measures can be taken.

- Construction plans and specifications will include requirements regarding maintenance of traffic, air quality, noise, utility conflicts, and stormwater. Provision will be made for work to stop pending consultation with the State Historic Preservation Officer (SHPO) if cultural remains are found during construction. If hazardous waste contamination is uncovered, DOTD Manual No. 48 Underground Storage Tank and Contaminated Site Policy and Procedure will be implemented.
- Any closures of navigable waterways would be coordinated with the United States Coast Guard (USCG) and disclosed in the permit process with the USCG and the USACE.
- To minimize potential cumulative impacts to water quality, mitigation strategies will be reexamined during final design.

Cost Estimate and Implementation Schedule

A Project Management Plan (PMP) was completed for this project in March 2008 in accordance with Section 1904(a) of SAFETEA-LU. The PMP included three implementation scenarios for 15 construction segments: Funds as soon as possible, Accelerated right-of-way acquisition, and one at a time. The Accelerated right-of-way acquisition scenario was identified as the more probable.

The estimate for this work in 2012 dollars is \$4.8 billion not including the wetland mitigation estimate.



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3.0 The Safety and Efficiency Study

As stated in the Introduction, DOTD determined that the estimated costs of the two Selected Alternatives exceeded the resources available and that the US 90 corridor requires operational improvements for safety and efficiency and a program to complete I-49 South that reasonably can be achieved. Therefore, in 2010 the DOTD initiated the *I-49 Study to Identify Interim Improvements for Safety and Efficiency*, which developed, in each segment, an Interim Program and a Freeway Program. The Interim Program identified lower cost projects for implementation in the near term that would improve safety and efficiency, and, in some cases, provide freeway operations or improvements that would support future freeway operations. The Freeway Program identifies projects to complete I-49 South over time with a goal of cost efficiency and the ability for phased implementation within funding constraints.

The scope of the Safety and Efficiency Study included both the conceptual design development of the projects of the Interim and Freeway Programs and the completion of the DOTD Stage 0 Checklists that are integral to the Stage 0 Feasibility Study phase of the DOTD Project Delivery Process. The Safety and Efficiency Study also included a coordination element, which consisted of presentations to the Louisiana Legislators and local elected officials of the affected Parishes and to the representatives of state and federal resource agencies with an interest in the projects as listed below:

- Legislators of affected Parishes, 1:00 PM, May 10, 2013, Room 302AA Executive Classroom, DOTD Headquarters
- St. Charles Parish, 10:00 AM, May 15, 2013, Conference Room 302AA, DOTD District 02
- Jefferson Parish, 2:00 PM, May 30, 2013, Conference Room New Orleans Regional Transportation Center
- Lafourche Parish, 2:00 PM, June 11, 2013, Council Chamber, Mathews Government Complex
- St. Mary Parish, 5:00 PM, June 13, 2013, Patterson Civic Center
- Resource Agency Briefing, 10:00 AM, August 28, 2013, Room 302AA, DOTD Headquarters

In addition, the St. Mary officials held a meeting on July 8, 2013, to which the DOTD and consultant project staffs were invited. No formal notes were prepared at the meeting, but the state legislators present submitted a letter to DOTD listing their concerns and their requests for changes in the concepts that were presented. DOTD subsequently responded and the refinements to the concepts that resulted are shown in this proposal. The notes from these presentations, the correspondence between St. Mary Parish and DOTD, and the follow-up comments from agency representatives are found in **Appendix B**.

The next step in the DOTD Project Delivery Process is Stage 1, which is to undertake the appropriate National Environmental Policy Act (NEPA) analysis. The estimates of probable cost included in the checklists itemize NEPA analysis, design, construction, construction management, right-of-way/relocations, and other elements.

The Stage 0 Checklists and Estimates of Probable Cost for both segments as published in the September 2011 *Report: LA 308 to the Westbank Expressway* and the August 2012 *Report: St. Mary Parish* are found in **Appendix C on the CD found inside the back cover of this document**. As there have been refinements to the Line and Grade concepts in both Sections since the Reports were published, checklists for some projects, as currently proposed, are not included in Appendix C. Also, the estimates of probable cost for Segment 4 found in Appendix C have been escalated in **Tables 3, 4, and 5** and **Appendix H** of this document to present all estimates in 2012 dollars.



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3.1 Wax Lake Outlet to Berwick (Section 3)

Interim Program

The Interim Program includes three projects. Two of the projects, both associated with the LA 182 crossing of Wax Lake Outlet, are substantially the same as the Selected Alternative. The third project implements access management improvements on US 90 and constructs two sections of frontage road on the north side that also are substantially the same as the Selected Alternative. The frontage roads would contribute to the ultimate freeway section. These projects are listed with their estimated cost in **Table 1**; **Appendix D** includes drawings comparing these projects with the Selected Alternative in the ROD and the CADD drawings of the projects.

**Table 1 Interim Program Projects
Wax Lake Outlet to Berwick**

Project		Estimated Cost in 2012 \$ (millions)
I-1	Intersection Improvement at LA 182 Access Road West	\$ 2.9
I-2	LA 182 Crossing of Wax Lake Outlet	\$12.7
I-3	US 90 Access Management Throughout Corridor	\$15.0
Total Estimated Cost		\$30.6

Freeway Program

The Freeway Program includes eight projects listed with their estimated costs in **Table 2**; **Appendix E** includes drawings comparing these projects with the Selected Alternative in the ROD and the CADD drawings of the projects.. Subsequent to the completion of the Safety and Efficiency Study and the Stage 0 checklists, there have been refinements to the projects in response to comments by the St. Mary Parish elected officials. These changes are reflected in the conceptual plans presented on the CD, but not on the checklists. The estimates of probable cost in this document, however, have been updated to reflect these refinements.

**Table 2 Freeway Program Projects
Wax Lake Outlet to Berwick**

Project		Estimated Cost in 2012 \$ (millions)
F-1	Ricohoc Interchange	\$ 27.9
F-2a	South Access Road	\$ 16.2
F-2b	North Frontage Road Calumet	\$ 23.4
F-3	North Frontage Road Patterson	\$ 23.0
F-4	Red Cypress Interchange	\$ 45.8
F-5	Cotten Road Overpass	\$ 35.8
F-6	Southeast Boulevard Interchange	\$ 38.8
F-7	Thorguson/Berwick South Interchange	\$ 31.4
Total Estimated Cost		\$242.3

The project limits of the Safety and Efficiency Study differ from the logical termini of the EIS. At the time that the EIS began, the entire segment of I-49 from LA 88 in Iberia Parish and Wax Lake Outlet was in the process of being converted to a freeway, one interchange at a time. Therefore, the EIS terminated at Wax Lake Outlet. However, the interchange at Ricohoc, immediately to the west of the outlet, has not been completed and is not currently underway. In order to provide a continuous



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freeway with control of access between LA 88 and the LA 1 interchange in Raceland, the Ricohoc interchange area was added to the project limits of the Safety and Efficiency Study.

3.2 Raceland to the Westbank Expressway (Section 4)

Interim Program

The Interim Program includes 18 projects. Eleven of these are access management projects to improve safety and efficiency and do not contribute to the completion of I-49. These are listed with their estimated costs in **Table 3**. The cumulative cost estimate of these projects is \$47.9 million in 2012 dollars.

Of the other 7 projects at a combined estimated cost of \$192.3 million, three provide a total of 13.9 miles of freeway, while four contribute as a first step to the development of a future freeway. These projects are listed with, their estimated costs in 2012 dollars, and their contributions to the completion of I-49 in **Table 4**.

Appendix F includes drawings comparing these projects with the Selected Alternative in the ROD and the CADD drawings of the projects.

**Table 3 Interim Program Access Management Projects
Raceland to the Westbank Expressway**

Project		Estimated Cost in 2012 \$ (millions)
I-3	Des Allemands West Access Management	\$ 8.8
I-4a	LA 632 Intersection Improvements	\$ 8.1
I-4b	Des Allemands East Access Management	\$ 1.1
I-5	Des Allemands – Paradis Access Management	\$ 2.2
I-6	Paradis Access Management	\$10.4
I-7	Paradis – Mosella Access Management	\$ 1.2
I-9	Boutte Access Management	\$ 5.3
I-11a	Jamie Blvd. Intersection Improvements	\$ 2.7
I-13a	WB Expressway Lane Addition – Ames Blvd. to Westwood Dr.	\$ 2.2
I-13b	EB Expressway Lane Addition – Westwood Dr. to Ames Blvd	\$ 1.8
I-13c	Westbank Expressway Signal System Improvements	\$ 4.1
Total Estimated Cost		\$47.9



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**Table 4 Interim Program Projects that Contribute to the Completion of I-49
Raceland to the Westbank Expressway**

Project		Contribution to I-49	Estimated Cost in 2012 \$ (millions)
I-1	LA 308 Flyover	Completes the missing movements in the LA 308 interchange and completes 2.18 miles of mainline I-49	\$ 14.5
I-2	LA 182 Closure/Freeway Upgrade	Completes 5.49 miles of mainline I-49	\$ 14.0
I-8	I-310 Interchange Improvements	Provides EB to NB ramp of future US 90/I-49/I-310 interchange	\$ 23.6
I-10	Boutte – Avondale Freeway Upgrade	Completes 5.87 miles of mainline I-49	\$ 42.5
I-11b	Avondale East Median Widening	Realigns 1.42 miles of US 90 to serve as future frontage road	\$ 16.5
I-11c	Avondale West Median Widening	Realigns 1.70 miles of US 90 to serve as future frontage road	\$ 30.9
I-12	Huey P. Long Interchange Upgrade	Provides directional ramps at US 90/US 90 Business interchange and realigns 1.99 miles of US 90 to serve as future frontage road	\$ 50.3
Total Estimated Cost			\$192.3

Freeway Program

The Freeway Program includes eight projects, which when combined with the 7 projects from the Interim Program that contribute to the completion of I-49, would fully complete I-49 from the LA 1 interchange in Raceland to Ames Boulevard. The implementation cost of the Freeway Program is \$1,120.7 million in 2012 dollars. The total rounded cost of freeway implementation is \$1.3 billion, including the Interim projects that contribute to the completion and the Freeway projects. The Freeway projects and their probable costs in 2011 dollars are listed in **Table 5; Appendix G** includes drawings comparing these projects with the Selected Alternative in the ROD and the CADD drawings of the projects.

**Table 5 Freeway Program Projects
Raceland to the Westbank Expressway**

Project		Probable Cost in 2012 \$ (millions)
F-1	Des Allemands West New Freeway	\$ 57.4
F-2	Bayou Des Allemands Bridge Improvements	\$ 11.0
F-3	Des Allemands East New Freeway Bypass	\$ 79.0
F-4	Des Allemands – Paradis Freeway Upgrade	\$ 5.4
F-5	Paradis New Freeway Bypass	\$ 123.1
F-5a	Paradis/Boutte New Freeway Bypass	\$ 314.5
F-5b	Avondale Freeway	\$ 162.8
F-6	Westbank Expressway – Huey P. Long Interchange to Ames Blvd	\$ 367.5
Total Estimated Cost		\$1,120.7



4.0 Comparison of the Programs

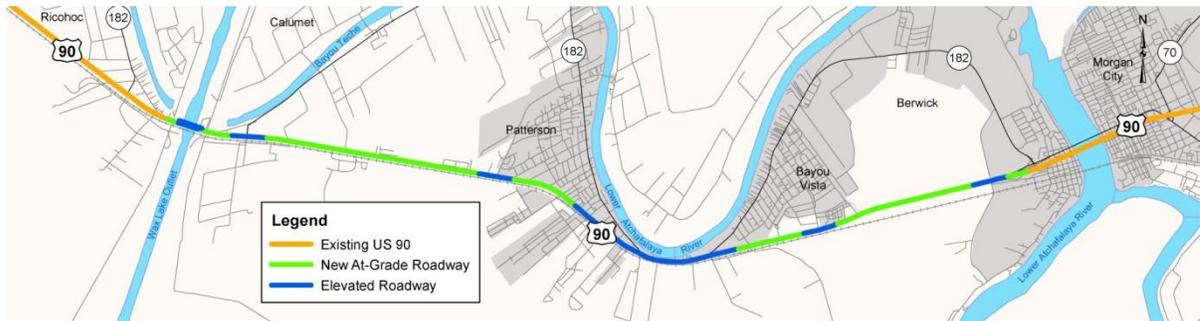
The most significant differences between the Selected Alternatives in the RODs and the projects in the Safety and Efficiency Study are their probable costs and overall design concepts.

Wax Lake Outlet to Berwick

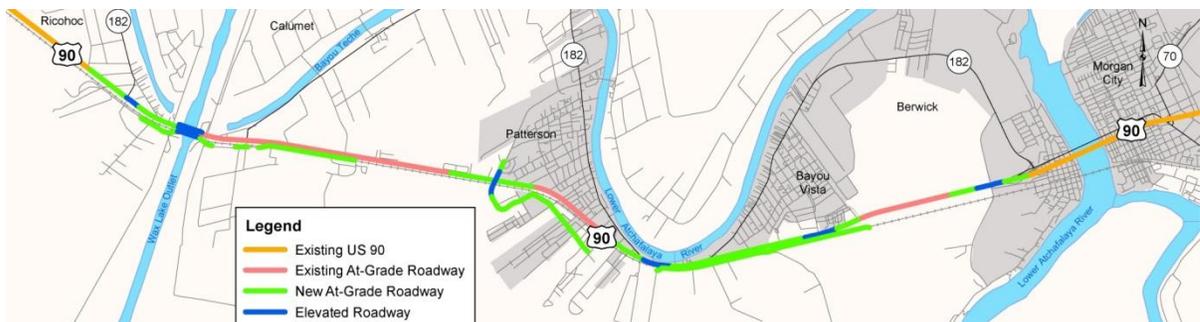
The estimated cost of the Selected Alternative plus the Ricohoc Interchange, escalated to 2012 dollars, would be \$463 million while the estimated cost of the Safety and Efficiency Study concept is \$257.3 million, including the Ricohoc Interchange and the access management portion of I-3.

The mainline of the Selected Alternative described in the ROD (See Section 2.1 of this document.) has long sections of elevated roadway and the at-grade sections, although primarily within the existing US 90 right-of-way, are realigned from the existing travel lanes. Essentially it is a new roadway within the existing right-of-way. The Safety and Efficiency Study concept reduces the amount of elevated structure and uses the existing travel lanes of US 90 to the maximum extent possible as shown in Figure 4.

Figure 4 Comparison of Elevated, Existing At-Grade, and New At-Grade Roadway Wax Lake Outlet to Berwick (Section 3)



Selected Alternative in ROD



Safety and Efficiency Study



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Raceland to the Westbank Expressway

The estimated cost of the Selected Alternative, escalated to 2012 dollars would be \$4.8 billion while the estimated cost of the Safety and Efficiency Study concept is \$1.3 billion for the projects that contribute to or complete I-49.

The Selected Alternative mainline described in the ROD (See Section 2.2 of this document.) is entirely elevated and is primarily on a new right-of-way for the 23.4 miles (64 percent of the length) from Raceland to Davis Pond. The Safety and Efficiency Study concept reduces the amount of elevated structure and uses the existing travel lanes of US 90 to the maximum extent possible as shown in **Figures 5 and 6**.

Figure 5 Comparison of Elevated, Existing At-Grade, and New At-Grade Roadway Raceland to I-310 (Section 4)



Selected Alternative in ROD



Safety and Efficiency Study

Figure 6 Comparison of Elevated, Existing At-Grade, and New At-Grade Roadway I-310 to the Westbank Expressway (Section 4)



Selected Alternative in ROD



Safety and Efficiency Study



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5.0 Implementation Proposal

Based on the foreseeable reduction in total costs and the possibility to construct the highway in operable segments over time, which would not be plausible given the largely elevated sections of the Selected Alternatives, DOTD proposes to advance the concepts developed in the Safety and Efficiency Study to Stage 1 NEPA Analysis of their Project Delivery Program.

The Stage 1 work would be divided into two large groups of projects:

1. Categorical Exclusions (CE) or Environmental Assessments (EA) for the Interim Program projects that provide only access management improvements along existing US 90, and
2. Supplemental Environmental Impact Statements (SEIS) for the Freeway Program projects and the Interim Program projects that contribute to the completion of I-49 with the exception of I-8 - I-310 Interchange Improvements, which is scheduled to be the subject of an EA to be conducted by the New Orleans Regional Planning Commission (RPC).

A matrix showing these proposed NEPA classes of action by project is found in **Appendix H**. The following references the applicable NEPA provisions and other steps that must be taken relative to the projects and NEPA process in Section 3 and in Section 4.

5.1 Categorical Exclusions/Environmental Assessments

For the first group, the DOTD proposes to prepare CEs for all projects, which meet the criteria for CEs established in 23 CFR 771.117(d)¹ as all projects meet the definitions in items 1, 2, and 7 of that provision. DOTD recognizes that the documentation must be in accordance with *FHWA Memorandum - Categorical Exclusion (CE) Documentation and Approval*, March 30, 1989. *Wax Lake Outlet to Berwick*

In this section, only the access management elements of Project I-3 would be eligible for a CE as the other elements of that project and the other Interim projects all contribute to the completion of I-49.

Raceland to the Westbank Expressway

If a project cannot qualify for a CE, an EA would be undertaken. The projects that are most likely to require EAs are those that require additional right-of-way, which include I-3 Des Allemands West Access Management in Lafourche Parish and I-4a Des Allemands East Access Management in St. Charles Parish. Although in different Parishes, these projects are separated only by the bridge across Bayou Des Allemands. If EAs are required, it would be reasonable to combine the two projects into a single document.

The CEs also could be combined to some extent. For examples, I-4a, if it does not require an EA, could be combined with I-4b and I-5 that are adjacent to each other and to I-4a. I-6 and I-7 could be combined as they are adjacent, separated from I-5 by a major intersection. I-13a, I-13b, and I-13c could be combined.

¹ 23 CFR 771.117(d)¹ Additional actions which meet the criteria for a CE in the CEQ regulations (40 CFR 1508.4) and paragraph (a) of this section may be designated as CEs only after the FHWA approval. The applicant shall submit documentation which demonstrates that the specific conditions or criteria for these CEs are satisfied and that significant environmental effects will not result. Examples of such actions include but are not limited to: (1) Modernization of a highway by resurfacing, restoration, rehabilitation, reconstruction, adding shoulders, or adding auxiliary lanes (e.g., parking, weaving, turning, climbing); (2) Highway Safety or traffic operations improvement projects including the installation of ramp metering control devices and lighting; and (7) Approvals for changes in access control.



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5.2 Supplemental Environmental Impact Statements

DOTD recognizes that the projects that contribute to the completion of I-49 will require SEISs in accordance with CEQ Regulations Section 1502.9(c)(1)(i)².

Wax Lake Outlet to Berwick (Section 3)

The limits of this segment would need to be redefined to include the Ricohoc interchange on the west side of Wax Lake Outlet. This would change the title to Ricohoc to Berwick.

The cooperating agencies would continue to include the USACE, New Orleans District and USFWS. Consideration should be given to inviting the USCG to be a cooperating agency as the LA 182 crossing will be included in the project. This bridge was not recognized as an element of the project at its initiation in 2000.

New Traffic data must be collected and analyzed as the data used in the EIS dates from 2000.

The proposed changes in the design concept will include, but not necessarily be limited to, the following potential new or changed effects:

- The extent and locations of noise barriers that are reasonable and feasible;
- Impacts to wetlands;
- Impacts related to hazardous materials sites;
- Impacts to habitat, especially as the forested areas south of US 90 in St. Mary Parish have been identified as critical habitat for the Louisiana black bear. This will be an issue largely as a result of the southern frontage roads that are proposed outside the existing right-of-way. Although these roads do not disturb forested areas substantially, they could have the cumulative effect of making all land south of US 90 more accessible for future development. This concern must be weighed against the advantages of connecting the developed areas of the City of Patterson on the south to those on the north to improve emergency service delivery and of eliminating six existing grade crossings; and
- Community concerns that were resolved under the Selected Alternative, but which potentially are not resolved under the Safety and Efficiency Study concept. These include:
 - Bicycle and pedestrian access to Kemper Williams Park.
 - The provision of an entrance ramp from the gas plants that maintains existing opportunities for egress;
 - Increasing the vertical clearance under the elevated mainline to 18 feet to allow farm equipment to pass beneath. This would be needed at the Ricohoc interchange or elsewhere in the vicinity of Wax Lake Outlet;
 - The elevation of the mainline through Patterson to allow for continued north /south connection of existing roadways and the distance of the mainline in Idlewild from adjacent residential properties; and
 - The third lane between the Southeast Boulevard and Thorguson Drive Berwick South Road allowing travel between Bayou Vista and Berwick without requiring that local traffic enter the through lanes of the interstate.

Issues raised by local officials in St. Mary Parish regarding the Safety and Efficiency concept that must be addressed in the SEIS include:

- The preference for locating an interchange on the east side of Wax Lake Outlet rather than on the west in Ricohoc,
- The provision of a frontage road connecting Bayou Vista and Berwick, and
- Implementation of access management improvements to US 90 as soon as possible.

² CEQ Regulations Section 1502.9(c)

Agencies:

1. Shall prepare supplements to either draft or final environmental impact statements if:

- (i) The agency makes substantial changes in the proposed action that are relevant to environmental concerns;



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The first of these is a new issue that would be addressed based on the extension of the project limits to include the Ricohoc interchange.

The second of these was examined in depth during the EIS and was carried into the Draft EIS to give the opportunity for comment. The arguments raised in favor were the need for local traffic to make this trip without having to enter the mainline lanes of the interstate and the provision of additional capacity during an evacuation event. These were addressed by the addition of a third lane in each direction in this section.

The third issue would be addressed by completing a CE for the access management elements of Interim project I-3. The frontage roads elements would be included in the SEIS.

The principal issue that will not change is the need to accommodate the crossings of Louisiana black bears. The installation of grade separated large animal crossings must be weighed against the requirement of reduced speeds along at-grade sections of the roadway.

Raceland to the Westbank Expressway (Section 4)

The limits of this segment would not need to be redefined. It must be noted however, that two other NEPA documents will control portions of the project. These include:

- The EA currently be conducted for the extension of Willowdale Boulevard from US 90 to River Road (LA 18); and
- The EA that is programmed to be conducted for what is identified and described in the Safety and Efficiency Study as Project I-8 - I-310 Interchange Improvements.

The cooperating agencies would continue to include the USACE, New Orleans District, USFWS and the USCG.

New Traffic data must be collected and analyzed as the data used in the EIS dates from 2001.

The proposed changes in the design concept will include, but not necessarily be limited to, the following potential new or changed effects:

- The need to acquire access rights to the property abutting the US 90 right-of-way in two locations:
 - East of Bayou Lafourche for a distance on both sides of the roadway of approximately 7.67 miles and
 - In the generally undeveloped area near the St. Charles / Jefferson Parish Line on the north side for a distance of approximately 3.79 miles and on the south side for a distance of approximately 2.65 miles;
- The abandonment of LA 182 between US 90 and LA 307 and the routing of LA 307 along the LA 182 alignment from their intersection to LA 308;
- Mitigation requirements for required right-of-way through portions of the Paradis Wetland Mitigation Bank and through wetland areas not crossed by the Selected Alternative;

Other potential changes in the scope of the SEIS would result from the following:

- If it is determined that the relocation of the BNSF Railroad should be studied as an alternative to Freeway Project F-5a, the scope of the utility relocation study on the Monsanto property would be revised.
- If it is determined that portions of the Westbank Expressway should be proposed as an at-grade roadway, additional traffic impact, noise, and visual analyses would be needed in conjunction with substantial community outreach activities; and
- If the Safety and Efficiency Study concept is adopted in the Mosella/Boutte areas, it would eliminate direct impacts on the Environmental Justice neighborhoods on the north side of US 90 in St. Charles Parish.

Issues raised by local officials in Lafourche, St. Charles, and Jefferson Parishes regarding the Safety and Efficiency concept that must be addressed in the SEIS include:

- The local effect of purchasing access rights to the commercial property near the intersection of US 90 and LA 182;



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- An interest in developing a frontage road along US 90 and on the north side of I-49 to maintain a local connection between Paradis and Des Allemands; and
- Concern that the at-grade section proposed through Avondale would not have a detrimental effect on the future development of the land south of US 90.

The first of these will be addressed during the public outreach process in accordance with the Relocation Act.

The second will be explored as a design refinement during the SEIS.

The third issue will require coordination between the DOTD and the Jefferson Parish Planning Department.

5.3 Summary of Proposal

1. In conclusion, as discussed above and summarized in **Appendix H**, DOTD requests that FHWA: Make the determination that the NEPA requirements for the Interim Projects that do not contribute to the completion of I-49 may be accomplished through CEs with the possible exception of the Interim Projects I-3 and I-4a for Raceland to the Westbank Expressway pending the initiation of the CE process for those projects pursuant to 23 CFR 771.117(d) and *FHWA Memorandum - Categorical Exclusion (CE) Documentation and Approval*, March 30, 1989³;
2. Make the determination that an SEIS with redefined limits from Ricohoc to Berwick is the appropriate action for the Wax Lake Outlet to Berwick segment; and
3. Make the determination that an SEIS is the appropriate action for the Raceland to Westbank Expressway segment.

³ Note that on September 19, 2013, FHWA issues a Notice of Proposed Rulemaking relative to 23 CFR 771 that could eliminate the possible exception.