

APPENDIX G
Douglas County Administrator
Coordination



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G. Craig Weinaug
County Administrator

October 10, 2007

J. Michael Bowen, P.E.
Division Engineer, KS Division
Federal Highway Administration
6111 SW 29th Street, Suite 100
Topeka, KS 66614-4271

RE: letter addressed to Craig Weinaug dated August 27, 2007

Dear Mr. Bowen:

Thank you for the opportunity to provide current information to assist FHWA and KDOT in the completion of the Section 4(f) evaluation of the South Lawrence Trafficway project in Douglas County. We acknowledge and appreciate your concern that information used to complete the 4(f) evaluation be as complete and current as possible. The six questions posed in your letter of August 27th pertain to "the evaluation of indirect and cumulative impacts attributed to induced development caused by each of the alternatives". Prior to formulating responses to these questions, county staff was asked to do additional research into the recommendations of adopted planning documents and the status of planning documents and studies that are in the process of being finalized. This research was used to provide the framework for our responses. Staying in format with how the questions were originally submitted, our responses are presented after each of the six questions that were posed to the County.

1. What type of growth is planned within the next 20 years south of 31st Street, between US 59 and E 1600 Road? What factors are being used to make this determination?

Two adopted comprehensive plans exist for the area south of 31st Street and south of the Wakarusa River – Horizon 2020¹ (H2020) and Transportation 2025² (T2025). Neither comprehensive plan anticipated significant transportation improvements or a wastewater treatment plant south of the Wakarusa River.

¹ Horizon 2020 is the Lawrence/Douglas County jointly adopted comprehensive land use plan. The plan applies to all unincorporated areas of the county and to land use planning in the city of Lawrence

² Transportation 2025 is the adopted Lawrence/Douglas County MPO's adopted comprehensive transportation plan.

Specific land use development recommendations are not made in H2020 for the unincorporated area (except Service Area 1); floodplain along the Wakarusa River; or, the area to the south of the river. Land use recommendations within the city limits – south of 31st street – are primarily for a continuation of the existing development patterns to the north of the roadway; extension is shown of the commercial corridor along S. Iowa/US 59 with transitional uses of office and/or medium density residential to the west of Louisiana Street and office/industrial uses to the east of Haskell Avenue. The Baker Wetlands are shown in all adopted plans as green space or open space as is the floodplain along the Wakarusa River and its tributaries.

T2025 is currently being revised and updated as the comprehensive transportation plan for 2030 (T2030). According to staff and minutes of the T2030 meetings, the proposed land use plan and population projections for T2030 took into consideration the development of a new wastewater treatment plant south of the Wakarusa River and the recommended 32B SLT alignment. The growth rate used in the population projections was based on historical growth trends and may or may not reflect the 2007 estimated growth figures that were recently released for Douglas County and Lawrence by the US Census Bureau. Projected land uses are not shown for the entire Urban Growth Area (UGA) south of the River. Specific land use projections appear to extend current urban development patterns along the transportation corridors for three major north-south streets that serve Lawrence (US 59, Louisiana, and Haskell Avenue). Along these transportation corridors, projected land uses in the proposed T2030 plan do not extend the full depth of the UGA to N 950 Road. [T2025's land use plan shows the majority of land uses south of the Wakarusa River as open space or low density residential with commercial nodes at the intersections of major roads.]

The major land use type shown on the future transportation/land use maps (adopted and proposed) is for some form of residential development – predominately low density residential. Based on some Traditional Neighborhood Development³ (TND) designs proposed as part of the SmartCode⁴ exercise conducted by Placemakers consultant group in 2006, TND developments are proposed along Louisiana Street and along Kasold Drive (extended south). These concept plans have been incorporated into the proposed T2030 land use map. There is no documentation or evidence that these land use and population projections took into consideration the cumulative impacts of development of a new wastewater treatment plant; eastern SLT connection; US 59 realignment/improvements; and, new rural development regulations on land use development patterns or the pace of development south of the Wakarusa River. Regardless of the lack of current planning documents to include this confluence of events, those involved in the development of these future planning

³ Traditional Neighborhood Development is a comprehensive planning system that includes a variety of housing types and land uses in a defined area.

⁴ SmartCode is a model design and development code released by Duany Plater-Zyberk and company in 2003 and is the only unified transect-based code available for all scales of planning.

documents agree that the cumulative impacts of all these events in the short horizon time of 5-10 years is significant and worthy of study.

Future commercial development locations are shown as nodes in Horizon 2020. For the portion of the Urban Growth Area south of 31st Street, the commercial chapter in H2020 proposes the addition of five new commercial nodes by 2020. Three of these commercial nodes are categorized as neighborhood centers, one is described as an automotive commercial center, and one is shown as a major commercial center (CC400)⁵. Of these five commercial nodes, only one is anticipated to occur east of US 59 and that is a neighborhood center at the intersection of Douglas County Route 1055 (Haskell Avenue) and N 1100 Road. Policies in H2020 would support the upgrading of this proposed commercial node to a major commercial center should the Alternative Alignment create an interchange at Douglas County Route 1055 (Haskell Avenue). The only major commercial center currently anticipated in Horizon 2020 is a CC400 center at the intersection of US 59 and Douglas County Route 458 (N 1000 Road). A regional commercial center is not anticipated in Horizon 2020 to occur within the planning period (2020). These commercial locations and types of development were based on no significant transportation improvements occurring to east-west roads south of the Wakarusa River. The impact of a new interchange, fully accessible to development (if it is outside the floodplain), has not been considered in these land use planning documents. The impact of a southern alignment of the SLT, such as the 42A Alternative Alignment would cause the assumptions, locations, and number of major commercial centers to be reconsidered based on development pressures that would be associated with the creation of a major intersection in an area where all four corner of the intersection could be developed. The modeling work currently being done by KDOT for T2030 to project future traffic volumes along the transportation network around Lawrence has relied on the 32B Preferred Alignment, being developed north of the Wakarusa River.

Studies and plans that are not adopted but are in some stage of development that include the areas adjacent to or south of 31st Street are the: Southern Development Plan, the Southeast Area Plan, Transportation 2030, a master plan for development of the area around the Wakarusa Treatment Plant, an update to the Parks & Recreation Master Plan, and on-going studies of the extension of 31st street to the east of Haskell Avenue.

2. What effect does the proposed wastewater treatment plan have on the current growth plans for the area south of 31st Street, between US 59 and E 1600 Road?

Prior to the approval of a wastewater treatment plant south of the Wakarusa River, urban densities of development were not planned to occur except for commercial

⁵ CC400 is one of two types of community commercial centers identified in Horizon 2020. It can contain up to 400,000 gross square feet and takes its primary access from an arterial or collector street.

nodes at some major road intersections. The initial phase of the treatment plant south of the Wakarusa River is designed to provide relief to development pressures on the west side of Lawrence (and west of the SLT/K10), where existing neighborhoods are underserved or new development is limited by existing sanitary sewers capacities. Future phases of the Wakarusa Treatment Plant would open up the area south of the Wakarusa River to urban development densities. The only planning done to-date within the watershed area that the treatment plant will serve south of the river is in T2030's land use plan, and this only extends to N 950 Road. T2030's land use plan indicates the potential for development of urban residential densities could occur in portions of 9 square miles (by the end of the planning period, 2030) in the sections that are directly south of the floodplain. Urban development is projected to cover approximately 5,000 to 5,700 acres, excluding floodplain areas. Urban growth densities south of the Wakarusa River can be expected to accelerate when the new treatment facility is expanded or when another major improvement, such as the 42A alignment, are completed.

3. How would an SLT alternative that has an alignment south of the Wakarusa River (42nd Street Alignment) and access to Haskell Avenue affect the current and future plans for the type of growth that is expected south of 31st Street?

The 42A or Alternative Alignment south of the Wakarusa River will create a major intersection at Douglas County 1055 [Haskell Avenue]. Based on goals and policies in the commercial chapter (Chapter 6) of Horizon 2020, this intersection of a principal Arterial with a Freeway could provide a new or alternative location for the next regional commercial node. Currently, only a CC400 commercial node is proposed south of the Wakarusa River and it is proposed to be located approximately two miles to the west at US 59 and Douglas County Route 458 (N 1000 Road).

Commercial nodes are attractions for other types of land uses, including residential uses, and the likely result of a commercial node at Haskell Avenue would be a more mixed and dense urban population than the low density residential proposed on the T2030 land use map.

4. How would an SLT alternative that has an alignment north of the Wakarusa River (32nd Street Alignment) and access at Haskell Avenue affect the current and future plans for the type of growth that is expected south of 31st Street?

The Wakarusa River and its wide floodplain provide a significant natural barrier to the expansion of urban densities to the south of the River. Although the Wakarusa Treatment Plant will promote some urban densities of development south of the river, the major type of land use (as shown on both the adopted and proposed comprehensive transportation plans) is low density residential development.

The realignment of Haskell Avenue and the creation of a major interchange along Haskell could influence existing businesses that are relocated due to that intersection improvement to locate immediate to the south of the river and floodplain, particularly as the location of the treatment plant east of Haskell Avenue would be a deterrent to the development of residential neighborhoods east of Haskell Avenue and north of N 1100 Road.

5. How would a "No Build" SLT alternative affect the current and future plans for the type of growth that is expected south of 31st Street?

The "no build" alternative leaves the existing roadway network (and existing K10) to handle the increased traffic. The immediate and long-term impacts on this decision would have more immediate impacts on the timing and development of an improved and extended 31st Street east of Haskell Avenue – and on possible improvements to N 1100 Road or N 1000 Road – then on urban development south of 31st Street and/or the Wakarusa River. If the "no build" alternative were selected the area south and west of Louisiana and 31st Streets purchased for the Preferred Alignment, and formerly proposed for multiple family development, would likely be purchased by a developer interested in proposing a similar density or intensity of land use.

6. Discuss the land use planning along 31st Street, Haskell Avenue and Louisiana Street, adjacent to the Haskell Agricultural Farm Property, and how likely it is to change if either or none of the SLT alternatives is constructed.

The planning along 31st Street is based on it being a Principal Arterial in the city of Lawrence street network. Land uses proposed along this classification of road are similar throughout Lawrence. The rural character south of 31st Street, primarily influenced by the Baker Wetlands would continue for that portion of the corridor that lies between Louisiana Street and Haskell Avenue. Development west and northwest of Louisiana Street would likely be residential with significant areas retained for drainage easements along FEMA floodplains. The industrial and non-residential nature of land uses to the east of Haskell Avenue would not be likely to change, although over time some redevelopment of existing or similar types of uses would probably occur.

The improvement and extension of 31 Street from Haskell Avenue to O'Connell Road is in the 2008 Capital Improvements Plan for Lawrence. If neither alternative is selected and "no build" becomes the default selection, it is likely that the city and county commissions will turn to implementing the recommendations in the 2003 31st Street Corridor Study, which looked at 31st Street from Iowa to Douglas County Route 1057.

Discussion of the specific impacts of either the Preferred Alignment (32B) or the Alternative Alignment (42A) has already been addressed in the responses to questions 5 and 4, respectively.

The information provided in these responses is similar to the information that was available to FHWA and KDOT since beginning the Section 4(f) study, although several chapter updates have occurred to Horizon 2020 since 2004. The new influences on development south of 31st Street and south of the Wakarusa River come from the convergence of events that have occurred since 2004 – approval of a new wastewater treatment plant south of the Wakarusa River; approval and (on-going) construction of a realignment of US 59 Highway from Franklin County through Douglas County to N 1100 Road; adoption of more stringent rural development regulations within the UGA of Lawrence, and new development patterns proposed by the parallel Smart Code currently under consideration for adoption by the Lawrence City Commission.

If these responses need additional discussion, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Craig Weinaug". The signature is fluid and cursive, with a long horizontal stroke at the end.

G. Craig Weinaug
County Administrator