

## I-40 Corridor Study, Arizona to Albuquerque, Milepost 0 to 150, Control Number 6101580 Public Meeting #2 Comments and Responses

Thank you for your interest in the I-40 Corridor Study from Arizona to Albuquerque. You are receiving this message because you provided written comments on the I-40 Corridor Study as part of our public meeting that was held on April 25, 2023 and the public comment period that was provided through May 24, 2023. The New Mexico Department of Transportation (NMDOT) received 8 emailed comments as part of the comment period, in addition to 15 comments received at the April 25, 2023 public meeting and the comments received through a comment form. The comments that were emailed and made at the April 25, 2023 public meeting and NMDOT’s responses are provided below. A summary of the information provided from the public comment form is provided in the I-40 public meeting #2 summary located on the study website at [i40nmstudy.com](http://i40nmstudy.com). If you have questions or would like additional information, please contact Stephanie Miller at 505.445.5464 or [I40study@parametrix.com](mailto:I40study@parametrix.com). NMDOT will host another public meeting to discuss progress on I-40 Corridor Study in Fall of 2023. Thank you for your interest and participation in this project.

### Exhibit 1. Emailed Comments and Responses

#	Theme	Comment	Response
1	Traffic Volumes	Are there figures on the increase/decrease in vehicles that has occurred on I-40 over the last 3 or 4 years, and, if so, was that divided to show the increase/decrease for large trucks vs other vehicles including passenger cars?	Information on the specific increase/decrease in vehicles that has occurred over the last 3 or 4 years is limited. The long-term trend (10+ years) shows that annual growth rates on this section of I-40 have ranged from a low of 1.1 % to a high of 2.8%. More recent data has suggested higher growth rates for the last 3 or 4 years, but that data is skewed by the COVID-19 pandemic. Most roadways nationally saw a decrease in traffic volumes in 2020 and then an increase afterward. Interestingly, freight traffic has appeared to have maintained strong growth despite the pandemic. Port of entry data in Gallup shows a truck traffic increase of about 6% a year between 2017 and 2022. The study team is considering these factors as part of determining expected growth in the future.

#	Theme	Comment	Response
2	Alternatives	<p>I would like to thank you for the extensive research and presentation of information that you have completed in the initial phases of the study.</p> <p>I live in Gallup but have driven I-40 between Gallup and Albuquerque literally hundreds of times over the years dating back to the 1960's, sometimes as much as 5 - 6 times a week. I think some of those attending the meeting this evening, did not understand the scope of this study, but were trying to include lots of other issues into the meeting.</p> <p>Since the beginning of Covid, traffic volume has definitely increased - both passenger cars and trucks. The truck traffic has increased due to supply chain issues and there have been 'new' truck drivers. As car drivers, we like to blame the truckers for everything, but there are many very good truck drivers and probably a proportional number of bad car drivers. As airlines have decreased the number of flights/seats available, car traffic also increased. This past winter has seen an unusual level of weather-related problems, just as I've seen in Wyoming, Idaho, and in areas of the Pacific Northwest.</p> <p>As the number of law enforcement officers have decreased over the past few years and the assignment of the remaining number of officers to other duties - due primarily to Covid - I have also noticed an increase in traffic violations. When I see a law enforcement presence along I-40, the traffic violations decrease just as they increase when there is no presence, but I understand that isn't really within the scope of the study.</p> <p>As I watched/read the recommendations that are suggested to go forward, I saw many good ideas. Two that really stood out for me were the wider lanes AND shoulders to allow two lanes of traffic to continue through construction zones and around many accidents. I-40 just can't be shut down to one lane for any length of time without major issues, so the ability to keep 2 lanes is a great idea. The other is to focus, through design and technology, on getting the interstate open as quickly as possible, rather than utilizing side roads whenever possible.</p> <p>All in all, an excellent presentation and I especially appreciated the courtesy and professionalism that both the NMDOT and Parametrix staff members utilized in responding to questions.</p>	<p>Thank you for sharing your experiences driving on I-40 and your support of concepts to widen shoulders on I-40, maintain 2-lanes of traffic.</p>

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3	Freight Lane, Reliability	<p>Our family travels to Albuquerque at least 4 times a month for doctor appointments. We have been delayed four hours at one time because of a traffic accident. We also missed an appointment because of a traffic accident backup that was over an hour. Returning from appointment a semi pulled out in passing lane in front of me and I had to drive off on the shoulder. A lane for semi traffic would be a huge improvement.</p>	<p>Thank you for sharing your concerns on I-40 and your suggestion of adding a third lane that would be dedicated to freight. As part of our initial alternatives analysis, the study team considered adding a third lane that would be dedicated to trucks. The study team found that while there could be some benefits to having a dedicated freight lane, overall traffic volumes and composition do not meet the criteria from the Federal Highway Administration (FHWA) where freight-only lanes are desirable. These criteria include truck volumes that exceed 30%, and peak traffic volumes that exceed 1,800 vehicles per lane-hour, and off-peak volumes exceed 1,200 vehicles per lane hour. The study team found that needs on I-40 would be better met by other concepts, such as widening roadway shoulders or adding a third lane for all travelers. For these reasons, alternatives being advanced for additional analysis include: 1) Enhanced 2-Lane Alternative with added lanes, which would address roadway deficiencies, widen roadway shoulders, improve pavement, and add a lane to I-40 in areas where a third lane is needed to provide capacity or improve safety and 2) A 3-Lane Alternative that would widen I-40 to 3 lanes.</p>
4	Alternate Routes, Freight Lane	<p>In the last year, MANY MORE trucks have been traveling the alternate route from Arizona to Albuquerque via Highway 53 (Zuni/Ramah/El Morro) which is a NM State Scenic Byway. Are these commercial semi-trucks allowed to use this Scenic Byway? Are they trying to avoid the weigh stations? They are having and causing wrecks along this route just like they do on I-40.</p> <p>We drive to Albuquerque every 2 weeks or so on the study portion of I-40 and there is almost always a truck wreck on the highway. Why? We are scared to death of the trucks and often take the alternative Route 66.</p> <p>I think the trucks should have their own lane and stay in it and be prohibited to drive when it is raining or snowing. Too many people are dying because of them. These issues should be addressed, please. Thank you.</p>	<p>Highway 53 is a public state highway that is open for public use by vehicles, including commercial semi-trucks. The Scenic Byway status of NM 53 does not prohibit semi-trucks from using this route.</p> <p>Improving safety on I-40 is a purpose of the I-40 Corridor Study. Safety improvements being considered include widening roadway shoulders, providing longer merge lanes at interchanges, adding lanes in areas where there are steep grades. In addition, the project team is continuing to evaluate an alternative that would add a third lane on this section of I-40. The study team considered the idea of building a freight-only lane as part of our initial alternatives analysis. However, a freight-only lane was not recommended for additional consideration for reasons described in the response to Comment #3 of this table.</p>

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5	Reliability, Safety	<p>This is a comment submitted by Ms. Janice Begay via a phone conversation on 4/12/2023. Janice's comments include:</p> <ul style="list-style-type: none"> <li>• She regularly drives from Gallup to Albuquerque.</li> <li>• She mentioned the new legislation requiring semis to be in the right lane and suggested that she thought this new legislation would be helpful.</li> <li>• Her primary concern is safety and that truck drivers need to be more respectful. She says safety is an issue, particularly in the winter.</li> <li>• I-40 needs to be free of potholes.</li> <li>• A key issue for her and many people who live in Gallup is the need to drive to Albuquerque to receive medical care. There is a shortage of doctors and specialists in Gallup, so people who live in Gallup often have to drive to Albuquerque for medical care. The number of backups on I-40 has increased over time, so it is difficult to predict how long the trip will take, which can cause people to miss critical medical appointments.</li> <li>• I-40 needs to be safe. We didn't used to have a problem with trucks and safety, but this has become an issue.</li> </ul>	<p>Thank you for your comments. Reliability and safety are critical issues that have been identified in this corridor. The alternatives being developed and evaluated are focused on improving roadway safety and reliability by identifying improvements that will minimize delays on I-40 by improving incident management, minimizing lane closures during construction, improving roadway and pavement condition, and improving driver safety.</p>
6	Road Condition	<p>My daughter and I just finished a road trip from Gallup to Kansas City, traveling through Oklahoma, Texas, Kansas, and Missouri in addition to our own New Mexico. I was embarrassed again at the condition of our highways compared to all of those states.</p> <p>Do we simply ask for contractors to build a less durable asphalt? Those states have the same extreme temperature fluctuations that we do, and in some cases even heavier traffic. What is the reason for the poor road surfaces? I have lived in Gallup for over 34 years, and we have to be mindful of potential delays on I-40 due to road accidents, especially if we are facing time pressure such as getting to the Albuquerque airport on time for a flight. How many of these accidents could be prevented by a better road?</p> <p>Thank you for reading my thoughts, and I look forward to any improvements you and your team can deliver.</p>	<p>As part of this study, NMDOT is considering the pavement condition on I-40 and adjacent alternate routes and areas where improvements are needed will be identified.</p>
7	Rest Area	<p>Would like to see at least one more rest area.</p>	<p>Thank you for your comment and interest in an additional rest area.</p>
8	Alternate Routes	<p>My wife and I drive I 40 to Gallup or Grants twice a week. We are frustrated by the lack of frontage roads. Without frontage roads, we can be stuck on the highway for hours with no alternative routes available.</p>	<p>As part of this corridor study, the NMDOT is considering improvements to alternate routes and improvements to incident and construction management to minimize delays on I-40. Improvements being considered for alternate routes include removing clearance constraints for trucks, pavement improvements, and addressing areas where alternate routes are not provided such as continental divide and the area east of Laguna.</p>

## Exhibit 2. Public Meeting Comments and Responses

#	Theme	Comment	Response
1	Coolidge Construction	<p>What about the corridor at Coolidge, is anyone looking at the construction in this area to see what has been happening over the last year? I live in Thoreau. Sometimes it takes 1.5 to 2 hours to travel 10 miles eastbound from Jamestown toward Albuquerque. There have been so many accidents and potholes, driving in the westbound lanes is like a washboard. Construction was supposed to be done, but it doesn't look like people are working on it. Also, in your presentation you stated that there had been 9 closures, we've had more than 2 dozen closures over the past year. At Fort Wingate you said there was 1 closure last year, that's not true, there have been at least 4 or 5. The NMDOT has huge piles of sand along the roadway in this area on both sides of the road. There are a lot of things happening between Gallup and Thoreau that you are not talking about.</p>	<p>I can understand the frustration of the travelling public. Part of the reason for this study is to look at improvements and practices that can help avoid some of the difficulties that are currently being experienced at Coolidge and elsewhere. Regarding the closures, I agree that there have been more than 9 closures on I-40. The information we presented documented 9 closures that occurred over a specific 2-month timeframe last summer (2022) and does not include closures that occurred in 2023 or other time periods. The NMDOT is aware of other closures that have occurred on I-40 and they are working hard to manage the situation with the resources they have. Part of what we are looking at in this corridor study is how to maintain 2-lanes of traffic during construction so we can avoid 1-lane closures like the one at Coolidge.</p> <p>As for the flood area/location with the piles of sand. There are two projects in the early design phase to improve the flooding conditions. The design phase takes about a year, and it will take two to three years to construct the improvements.</p> <p>NMDOT is aware of the conditions on I-40 and are doing everything we can to make sure that the traveling public is safe and able to get through the Coolidge area during construction. Two overnight closures were done earlier this year to completely overlay pavement in the Coolidge area to fix potholes and pavement conditions and there have not been any closures since that work was done. Some of the work that has been done more recently on the Coolidge project has been temperature sensitive and has had to occur when weather conditions would allow to make sure that quality work occurs and to adhere to the standards and specifications that we have. NMDOT is expecting the construction at Coolidge to be completed by the end of the year and then the eastbound lanes will be open and construction will shift to the westbound lanes. If you have additional comments or questions, please reach out to us.</p>

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2	Construction Phasing, Potholes	Would it be possible to start rehabilitation from the Arizona state line, and also start at the end of the road from Grants and meet in the middle? Road construction from Albuquerque to Grants is going great, continue with the pace, and hopefully communities can be patient. I can't believe it has gone this far; third world countries have better road conditions. Potholes that cause accidents and make it hard to navigate safely to your destination, it's worse at nighttime. This puts a black eye on NMDOT transportation department.	Regarding phasing of improvements, starting from the Arizona state line is one possibility. To date, we have not looked at how projects will be phased, but we will be looking at this and the best ways to implement projects in a timely matter. There are portions of that 150 miles of the study area that have been recently constructed and other areas under construction, so that will be taken into consideration. The improvements projects that will be recommended as part of this study will take many years to fund and implement. As part of next steps, we will be looking at identifying improvements and prioritizing those improvements based on the condition of I-40, safety, and where improvements could address the biggest needs.
3	Roundabouts	Is this study considering roundabouts as a solution to interchange congestion in Gallup? For example, at US 491?	We are primarily looking at congestion and merging and diverging of traffic from the I-40 mainline and the interchanges. We are aware that NMDOT has several projects and studies underway that are focused on looking at I-40 intersections and cross-streets. Roundabouts may be considered at those locations once traffic is on and off of I-40.
4	Safety	In 9 days, it will be a year since my son was killed at mile marker 137. He was killed in a single vehicle rollover accident. He was 35 and died with a 19-year-old friend. They were heading home from a job in Gallup late one night. I know now that this stretch of highway is known and they refuse to do anything about people driving over the sides. Is this being considered and what is planned for the specific section of I-40 from maybe mile marker 130 to 145? Too many people are being injured and are dying there and it's preventable. Things like lights, a cable, or concrete barrier may have helped. What is intended on this specific stretch of I-40?	I am very sorry for your loss and appreciate your comment and question. Aside from looking at crashes and traffic volumes, we are looking at the roadway sections and are doing a detailed analysis of slopes and recovery areas along I-40 and the landscape of the roadway to see if it is traversable and recoverable. This analysis will help us to make recommendations of provisions to keep drivers on the roadway, which could include barriers.
5	Public Outreach	Thank you for having this meeting. We have been working with your group for months and our invite list is over 30 to 40 people for this meeting. My question is, in Phase B will you be participating in community type in-person meetings? We have had virtual meetings, but it would be important to our communities to meet in-person. Is that going to be available and can you coordinate with Laguna Public Works?	Thank you for your question. We have a formal plan with the NMDOT for this study on how we reach out to communities. That plan includes meetings like this one where we have virtual meetings, since it's difficult to have in-person meetings in every community. We have been holding individual meetings with other stakeholders, including tribes. If it would benefit a tribal community to have an in-person meeting then please contact us and we can work out sending staff to attend an in-person make a presentation. We are scheduling meetings with the tribes in May and June of this year and we will contact you after this meeting to discuss setting up an in-person meeting.

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6	Alternate Routes	Have alternative routes (traffic) been measured while they are in use during closures? I am concerned about the impact those diversions will have on these roads such as Santa Fe Ave/Rt. 66 in Grants. These diversions cause great stress on our main drive and hinder our local economy.	<p>Alternate routes that parallel I-40 are not designed to carry I-40 volumes or speeds. We are considering how we maintain or quickly establish traffic flow on I-40 after an incident. The goal is to minimize disruption and impacts to alternate routes and the communities they travel through when they are used. We are continuing to look at this and can hopefully develop recommendations to mitigate your concerns.</p> <p>Part of the idea of widening shoulders and proposing crossovers is to provide options to keep more traffic off of alternate routes and on I-40. We are not doing traffic counts on alternate routes when incidents occur because we know these routes do not have the capacity to carry I-40 volumes and speeds, because the routes were not designed to be an interstate highway. What we are looking at is how do we keep things moving on I-40 and get it open to traffic as quickly as possible when there is a crash or other incident. The other challenge is even if we do have a nearby alternate route, how do we get I-40 traffic to that route? It requires state police/traffic control to direct I-40 traffic to these alternate routes and there are pinch points, such as stop signs, traffic lights etc. that impede getting traffic to/from I-40 and those alternate routes. Our focus is on how we keep traffic moving on I-40.</p>
7	General	Good presentation, you are doing your homework. Thanks.	Thank you.
8	Holiday Traffic, ITS	I appreciate the opportunity to provide input. Thank you for the great work you are doing. I recently had a terrifying experience driving on I-40 about a week before Thanksgiving between Laguna and Albuquerque. There was an extraordinary volume of traffic and a high percentage of heavy trucks. The trucks were following too closely and speeding. Is heavy holiday traffic being considered? Could ITS be utilized to help in this situation?	There are normal, typical day-to-day traffic operations and there are other isolated events, such as holidays where traffic may increase. NMDOT is trying to look at best practices in the corridor to improve consistency with the level of operations. Improved ITS could help to improve travel for isolated events such as holidays to help people better plan trips and to minimize driver frustration which can lead to aggressive driving behavior such as driving too close or speeding.

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9	Alternate Routes	Will the project address frontage road improvements and safety enhancements which provide visitor access to rest areas specifically at MP102?	We are looking at deficiencies on frontage roads/alternate routes, such as ramps and interchanges that provide access to alternate routes. In particular we are looking at interchanges where traffic would get on and off of I-40 to access frontage roads. Interchanges are areas where we see more conflicts and crashes due to the merging and weaving movements getting on and off of the freeway. We're looking at all of the interchanges (access points) on I-40, which includes the interchange at MP 102.
10	Alternate Routes	As a Laguna Tribal member, you say the roads through the Pueblo aren't for interstate traffic, but the semis and others do go on 66 when the interstate is backed up due to road construction or accident. The traffic doesn't follow the speed limit and it's scary because our houses are right there by the road and especially when buses are dropping kids off. How are you going to keep us safe from the interstate traffic? Also, the semis have messed up our roundabout at the 114 exit when they are trying to use the Route 66 frontage road.	<p>The goal is to keep the majority of traffic on I-40 and not have I-40 traffic using the alternate routes. Heavy trucks and other vehicles are not prohibited to use the frontage roads and alternate routes. We have identified this as a concern as part of the study and we are looking at policies and other things we can do to mitigate impacts.</p> <p>During the construction project on I-40 in Laguna, the NMDOT had issues with trucks and vehicles using the frontage roads and speeding and not driving safely. The NMDOT partnered with Laguna Police Department and State Police to try and help enforce the laws and speed limits on the frontage roads during the Laguna reconstruction. For future projects we will look at partnering with local law enforcement to keep communication open and focus on how to keep the roads safe.</p>



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11	Alternate Routes	<p>Thank you for providing this information. The Navajo Nation has been working with NMDOT on the options to help relieve flooding in the Fort Wingate area. In addition, we have seen the challenges and impacts of traffic on alternate routes when I-40 traffic is at a standstill. Trucks will get off of I-40 at NM 566 (near Church Rock) and will travel north to get on BIA route N11 and N49 to Smith Lake. They will then travel south on NM 371 to Thoreau to get back onto I-40. We have heard concerns about heavy truck traffic on these routes when I-40 is shut down. We have also had challenges in the Tohajiilee area and heard that people will get off of I-40 and head westbound on BIA Route 57 in the and will get back on I-40. I know you have said that this study will hopefully address keeping traffic on I-40 and making improvements and enhancements, but the reality is that this won't happen overnight. It will take well over 10 years. Prioritization will be critical for many of the tribes. We will be pushing for enhancements to come first to keep traffic on the interstate and not use our local roads. I'm looking forward to the prioritization portion of the study. Safety and moving traffic is a challenge on I-40. I drive this section regularly and heavy truck traffic and narrow shoulders are an issue. I don't think I've ever seen a highway where there are so many guard rail end sections hit. I attribute this to a lack of shoulders and the road is windy, which adds to the challenges. I look forward to future presentations.</p>	<p>Thank you, we appreciate your comments. We will continue to work on the issues. Any time we get comments where people can share their experiences it helps to bolster our data and what we are looking at from an analytical perspective. This helps our technical evaluation and will inform our recommendations, phasing, and priorities.</p>

#	Theme	Comment	Response
12	Alternate Routes	<p>There are concerns about the underpass between mile marker 89 to the mile marker 96 on Acoma lands. When accidents occur on I-40, traffic uses this alternate route and trucks get stuck crossing through the box culvert under I-40. These routes are not designed for the heavy truck traffic. There is a similar issue from mile marker 114 to 126 where there are no frontage roads, the only place you can go is to use NM 6. When there are issues on I-40 and traffic uses the alternate routes, damage occurs to these alternate routes. Questions I get from constituents are who compensates for damages to these roads, especially on tribal lands?</p>	<p>For the area that you mention near mile marker 89, NMDOT is actively working to remove this constraint. The NMDOT is working on plans with the Acoma to create a new roadway that will bypass the low clearance area. The Acoma have indicated that they would prefer the new road to be a state road. The details are being worked out, but NMDOT is fine with it becoming a state route.</p> <p>Regarding damage done to frontage roads, the NMDOT does not have a policy to compensate for damage caused by the semis and other traffic. Most of the frontage roads/alternate routes are state highways that NMDOT repairs as they can get to it. The NMDOT cannot speak to what occurs on local or tribal routes. As to the issue of damage to alternate routes when traffic re-directs itself to these routes when there is an incident on I-40. One of the challenges that NMDOT has is that we can't control or restrict drivers from using these routes, since they are publicly funded with state and federal funds. In most cases drivers direct themselves to these routes. We can advise traffic and try to post information ahead of time but we cannot restrict traffic from using these routes unless there are specific height and weight limits.</p>
13	Nighttime	<p>What is being considered for nighttime use on this project?</p>	<p>Different issues arise during nighttime use, including overnight semi parking on the roadway, proper signing and lighting, and visibility. ITS is one solution considered for informing truckers where stops can be had.</p>
14	General	<p>Wonderful presentation, thank you.</p>	<p>Thank you</p>
15	Transit	<p>Why is the Railrunner not considered in this model, there is more population than you think on this side of the state and it should not be considered a money issue but a quality-of-life issue. In northern New Mexico they have the same populations we do and it is widely used by them, build it and they will use it.</p>	<p>In our initial alternatives analysis, we looked at commuter rail and commuter bus service and found it would not address the majority of the needs we have on I-40 related to safety and operations. Even if we did run trains, it would not pull enough vehicles off of I-40 to create a noticeable reduction of traffic. Commuter rail or bus improvements are not precluded by this study and could be considered as a solution or project outside of this study for reasons like quality of life.</p>