
March 20, 2020

Timothy Marshall, Division Administrator
Federal Highway Administration, Iowa Division
105 6th Street
Ames, Iowa 50010

Subject:

Buy America Waiver Request for "I-74 Bridge Recreational Trail Letdown Structure"
Project Number: IM-074-1(255)5-13-82

Dear Mr. Marshall:

The City of Bettendorf, Iowa is seeking a waiver of the Buy America requirements for the traction elevator components and guide rails for an elevator structure to be constructed in the vicinity to the U.S. 67 southbound (Grant St.) on-ramp to the proposed westbound I-74 Bridge, just east of Leach Park in Bettendorf, Iowa. The elevator structure is part of the overall \$1.2 billion I-74 project which includes reconstruction of the Mississippi River Bridge, five interchanges, and replacement and widening of mainline pavement. A waiver from the Federal Highway Administration (FHWA) regarding Buy America Federal Statute 23 CFR 635.410 is needed because there are no known elevator manufacturers in the USA that produce elevators containing 100% domestic steel or iron components.

Project Description:

The project includes construction of an ADA accessible pedestrian bridge and letdown structure approximately twenty-seven (27) feet wide by twenty-five (25) feet deep which includes two (2) six (6') foot by ten (10') foot elevators. The overall height of the letdown structure will be approximately sixty-seven (67') feet. A steel bridge connection included in the project will provide the access from the proposed I-74 bridge to the letdown structure itself. A location map is provided, attached as Exhibit A and Conceptual view, Exhibit B.

The elevator letdown structure will provide a key link from the proposed Interstate 74 Mississippi River Bridge crossing, to both the Illinois and Iowa riverside trail network. The elevator was presented to the public at various meetings and is part of the environmental document.

Project Cost:

The I-74 project reconstructs a 5.4-mile corridor from Avenue of the Cities in Moline, Illinois to Middle Road in Bettendorf, Iowa (see attached Exhibit C, Corridor location map). The overall project cost is approximately \$1,200,000,000 (\$1.2 billion), which includes reconstruction of the Mississippi River Bridge, five interchanges, and the replacement and widening of mainline pavement. The corridor improvement is broken out into twenty-two (22) separate contracts, which includes contract 255, the Pedestrian Bridge and letdown Structure Elevator.

The total estimated cost of contract 255 is \$2,242,852.68 (2020 dollars) with \$427,500 as the cost of the elevator component. Refer to Exhibit D for the Contract 255 Cost Estimate. All other

contracts associated with this project are expected to be fully compliant with Buy America requirements.

The cost comparison of contract 255 is as follows:

- Elevator cost is 19% of the total cost for contract 255
- Elevator cost is 0.03% of the total \$1.2 billion I-74 project cost

Funding:

Contract 255 is 100 % funded by the City of Bettendorf, Iowa, with no federal funding. The contract is administered by the Iowa Department of Transportation due to coordination needs with the overall I-74 Bridge project. The letdown structure was included in the National Environmental Policy Act (NEPA) document and approval process. By virtue of being included within the scope of NEPA determination for the overall bridge project, the letdown structure is required to meet Buy America requirements.

Waiver Request Items:

Elevator components and elevator guide rails

Cost of Elevator System Waiver Items:

\$427,500 is the cost estimated by Kone for two Monospace 500 model elevators with glass rear walls. This cost includes 34% domestic components and does not include the cost for a general contractor to construct the hoist way. Refer to Exhibit E for the Kone Monospace model 500 components Country of Origin.

Foreign Steel Country of Origin:

Austria, China, and Mexico (see attached Country of origin document, Exhibit E)

Reasons for Waiver Request, Justification:

The I-74 bridge pedestrian path ultimately starts/ends on the Bettendorf side at State/Grant Street (US Route 67). This intersection is a very busy intersection which also has on/off ramps for the I-74 mainline. From the intersection to the trail a live at-grade railroad track must be crossed. By designing the letdown structure into the project, it takes the access to the pedestrian bridge and scenic overlook closer to the Mississippi River and away from the busy intersection traffic and alleviates pedestrians and bicycles crossing the railroad tracks. This letdown structure will alleviate pedestrian, bicycle, and handicapped safety issues. The Letdown structure will provide a direct connection to the urban park under the bridge and the existing Mississippi River Trail (MRT) which runs along the Mississippi River. The letdown structure allows safer access to the MRT and the American Discovery Trails in Illinois and Iowa.

The I-74 bridge project was designed utilizing ADA Standards to accommodate all users of the facility. On the Bettendorf, Iowa, side the letdown structure was chosen as the safest alternative to provide direct access from the bridge to the local park and trail network. Without the letdown structure, pedestrians and cyclists would be forced to take the Mississippi River Bridge crossing down to U.S. 67 and then attempt to connect to the riverfront trails via local

streets including crossing of an active railroad line. This area is heavily traveled with commercial and industrial vehicles creating an undesirable safety concern.

In an effort to comply with Buy America requirements and maximize the domestic content on this project, the project team has contacted eleven (11) elevator manufacturers across the country and none of them were able to produce the traction type elevator that would meet the Buy America requirements and satisfy the needs of the project. Information obtained from the elevator firms indicated the elevator machine, guide rails, and other miscellaneous steel and iron components are produced mostly or in part out of the country. The main component that is not produced domestically are the elevator guide rails. American Elevator Company stated the guide rail component of the elevator has not been produced in the USA for 25 years. Refer to the attached manufacturer correspondence, Exhibit F.

The project team has worked for over six months to analyze alternatives. An alternate rack and pinion elevator design option was considered which would meet Buy America requirements. This type of elevator is not preferred by the city of Bettendorf for the following reasons:

- The rack and pinion system is intended for freight elevators and would not satisfy the needs of the project to provide transportation for pedestrians, bicycles, and handicapped individuals;
- Rack and pinion is the more expensive option;
- Wider and deeper elevator pit;
- Requires a more extensive support for pedestrian walkway from the bridge;
- Requires a larger footprint;
- The traction type matches the elevator type concept shown at the public hearings which had public acceptance. Changing to a rack and pinion (freight) elevator design would not fit the public perception and aesthetic qualities expected; and
- The rack and pinion elevator is noisier and provides a much less smooth ride than a traction elevator.

The traction type using domestic components except guide rails was also evaluated but is not preferred because of higher cost, wider hoist way, larger elevator controllers, greater overhead clearance, larger building footprint, and uncertainty of obtaining maintenance components. Refer to Exhibit G for a summary of letdown structure alternatives.

The other alternatives allowed under Buy America Federal Statute 23 CFR 635.410, minimal use threshold and alternate bidding, were explored and found not feasible. The City of Bettendorf believes in order to complete this project, a waiver needs to be granted. There are no viable options for obtaining and constructing the elevator component of the project using 100% American made and produced steel and iron. The ramification of not providing an elevator system could potentially result in safety issues for pedestrians, bicyclists, and those with physical disabilities to the recreational river trail network in Bettendorf and adjacent cities.

Your consideration of the City of Bettendorf Buy American waiver request is greatly appreciated. If you have any questions or concerns, please contact Danielle Alvarez, I-74 Project Manager, Iowa DOT District 6 at 563-823-4373.

Sincerely,

Jim Schnoebelen
District 6 Engineer
Iowa Department of Transportation
5455 Kirkwood Blvd. SW
Cedar Rapids, Iowa, 52404

cc: Micah Loesch, Andy Wilson, FHWA
Jim Schnoebelen, Danielle Alvarez, Iowa DOT

Brent Morlok, Bettendorf City Engineer
George Ryan, Wood.plc