

CHAPTER V

Comments and Coordination

The Missouri Department of Transportation and the Federal Highway Administration have provided numerous opportunities for coordination of the study with the general public and resource agencies. This chapter summarizes the public involvement and agency coordination programs carried out prior to the release of the Draft and Final First Tier Environmental Impact Statements.

A. Public Involvement

The I-70 First Tier EIS has employed a number of public involvement tools since the inception of the study in January 2000. The public involvement program for the I-70 First Tier EIS was designed with two primary objectives in mind.

- The program should **enhance public awareness and understanding** of the study. This objective has been supported primarily by media attention devoted to the study and by newsletters, public meetings and the web site.
- The program should **offer citizens frequent and accessible opportunities to participate** in a substantive way in the work of the study. This objective has been supported primarily by public meetings, the telephone survey and through comments received via the web site, hot line and post office box.

There have been more than 30,000 direct contacts between the public and the I-70 First Tier EIS. These contacts have ranged from visits to the Web site to substantive and lengthy conversations at public meetings as well as detailed briefings and exchanges with stakeholder groups across the state. These contacts have resulted in more than 2,300 written comments. Media relations efforts have also resulted in coverage which has placed this study in front of a significant portion of the population of the state. Two prominent front-page articles published in the *Kansas City Star* alone had the potential to reach a total audience in excess of 1,000,000 readers based on the newspaper's weekday readership.

The following tools have been employed to support public involvement in the I-70 First Tier EIS.

1. INTERNET: PROJECT WEB SITE AND E-MAIL

A web site and e-mail address are perhaps the most convenient of all avenues for public involvement. Individuals with internet access can visit the web site at their convenience, 24 hours a day, seven days a week.

The I-70 First Tier EIS web site, located at www.i70study.org, went live on February 28, 2000, immediately before the first round of public meetings. As of the publication of the Final First Tier EIS, more than 13,000 individuals have visited the web site in excess of 28,000 times and viewed more than 110,000 pages of information. Visitors spend an average of more than six

minutes on the web site, more than twice the industry standard. Visitors from at least 20 states and 20 foreign countries have accessed the web site.

The web site has been promoted through media relations, via billboards and at public meetings. The web site URL has also been promoted through project team presentations and the newsletter. Significant spikes in traffic occurred on the first day the billboards were erected and when the study has received significant media attention, usually in relation to a public meeting.

2. PUBLIC MEETINGS

Public meetings provide qualitative rather than quantitative data. They draw on a self-selecting population and are not projectable to a larger audience. However, public meetings serve several important purposes.

- Public meetings offer citizens and organizations the opportunity to speak, one-on-one, with engineers, planners and other personnel conducting the study.
- Because public meetings generally attract a motivated audience with a unique and intense interest in the study's subject, they provide the study with an opportunity to become acquainted with individuals and organizations most likely to continue their involvement throughout the process.
- Public meetings offer engineers and planners the opportunity to hear first-hand the concerns of those who might be effected by a project.
- Public meetings typically prompt media coverage, which is necessary for broad awareness of the project. The I-70 First Tier EIS benefited from coverage in both the print and electronic media.

The following table provides attendance figures and location details for each public meeting.

Table V-1: Attendance at I-70 First Tier EIS Public Meetings

Location	Round #1 Date	Round #1 ¹ Attendance	Round #2 Date	Round #2 Attendance	Round #3 ² Date	Round #3 Attendance
Oak Grove	2/28/00	69	5/15/00	33		
Wentzville	2/28/00	43	5/15/00	39	3/21/01	97
Concordia	2/29/00	41	5/16/00	51		
Warrenton	2/29/00	28	5/16/00	40	3/20/01	154
Kingdom City	3/1/00	70	5/17/00	35		
Boonville	3/1/00	37	5/17/00	21		
Jefferson City	3/2/00 ³	35	5/18/00	18		
Columbia	3/2/00	72	5/18/00	86	3/21/01	314
Kansas City			5/22/00	109		
St. Louis			5/22/00	21		
Sedalia			5/22/00	15		
Chillicothe			5/23/00	13		
Macon			5/23/00	21		
Union			5/23/00	1		
TOTALS		395		503		555

¹ Round #1 attendance figures includes both the stakeholder briefings and public meetings.

² Round #3 meetings were scheduled in Warrenton, Wentzville and Columbia to allow communities to review and comment on by-pass alternatives unique to their communities

³ 3/2/00 Jefferson City was a morning legislative briefing only. No public meeting was held.

a. Round #1 Public Meetings

The first round of public meetings took place between February 28 and March 2, 2000. Seven meetings/public official briefings and a legislative briefing took place across Missouri. A total of 395 individuals attended a meeting or legislative briefing.

Promotional Activities

Mailings - 388 invitations were sent to public officials throughout the corridor. Public officials included city council members, county commissioners, emergency services, fire department and law enforcement directors and public works officials. 750 newsletters were distributed throughout the corridor. Newsletters announced meeting times and locations.

Advertising - Quarter page ads were placed in the following newspapers.

<i>Blue Springs Examiner</i>	<i>Boonville Daily News</i>	<i>Columbia Daily Tribune</i>
<i>Concordia Concordian</i>	<i>Fulton Sun-Gazette</i>	<i>Lexington News</i>
<i>Odessa Odessan</i>	<i>St. Charles Marketpower</i>	<i>Warrenton Journal</i>

Media Relations - Media releases were sent through the Missouri Department of Transportation to over 200 media outlets throughout the state.

Media Coverage

Coverage of the meeting was secured in 15 newspapers as well as network television stations in Kansas City, Columbia and St. Louis and radio stations throughout the corridor.

Questionnaires and Comments

Questionnaires were made available at public meetings, and 328 questionnaires were completed.

b. Round #2 Public Meetings

The second round of 14 public meetings took place between May 15 and May 23, 2000. A total of 503 individuals attended meetings.

Promotional Activities

Posters - Posters were distributed to MoDOT public affairs managers with a request that they be distributed in their districts. Posters were distributed by HNTB personnel in the vicinity of the Kansas City meeting and in downtown Kansas City locations.

Mailings - Approximately 900 invitations were sent to citizens throughout the corridor. The entire project mailing list received a meeting notice.

Advertising - Quarter page ads were placed in the following newspapers.

<i>Blue Springs Examiner</i>	<i>Boonville Daily News</i>	<i>Columbia Daily Tribune</i>
<i>Concordia Concordian</i>	<i>Fulton Sun-Gazette</i>	<i>Lexington News</i>
<i>St. Charles Marketpower</i>	<i>Warrenton Journal</i>	<i>Oak Grove Town and Country News</i>
<i>Jefferson City News Tribune</i>	<i>Union Missourian</i>	<i>Macon Chronicle-Herald</i>
<i>Sedalia Democrat</i>	<i>Chillicothe Constitution-Tribune</i>	

Media Relations - Media releases were sent through MoDOT to statewide media outlets. Extensive coverage was secured in both print and electronic media throughout the corridor. Samples of newspaper coverage are attached.

E-mail - Notices were sent to all individuals on the I-70 Improvement Study electronic mailing list (approximately 155 individuals at the time).

Billboards - A total of 14 billboards were rented for use by the study. Nine of those boards, mostly on the east side of the state, were produced in late April. The remaining five billboards were posted May 23rd.

Web Site - From its February 28 inception to the public meeting on May 15th, the I-70 web site experienced more than 3,500 user sessions. Over 400 visits occurred immediately after the first billboards were erected. 2,129 of those visits occurred in the month of May. Meeting details were posted on the web site.

Questionnaires and Comments

Questionnaires were made available at public meetings. A total of 282 questionnaires were completed at public meetings, and 33 additional surveys were received through the mail.

c. Round #3 Public Meetings

A third round of public meetings took place on March 20th and 21st. Round #3 meetings were scheduled in Warrenton, Wentzville and Columbia to allow residents in those communities and surrounding areas to review and comment on by-pass alternatives under consideration. A total of 565 individuals attended one of the three meetings.

Promotional Activities

Posters - Posters were distributed to MoDOT public affairs managers with a request that they be distributed in their districts.

Mailings - Approximately 7,000 postcard invitations were sent to citizens in the Columbia area and the corridor between Wentzville and Warrenton. The entire project mailing list received a meeting notice. General delivery addresses were also purchased by the study team to supplement the mailing list.

Advertising - Quarter page ads were placed in the following newspapers.

Boonville Daily News
St. Charles Marketpower

Columbia Daily Tribune
Warrenton Journal

Fulton Sun-Gazette

Radio airtime was also purchased on stations in Columbia and Warrenton. A total of 120 one-minute radio spots ran in the communities targeted for these meetings.

Media Relations - Media releases were sent through MoDOT to media outlets in the vicinity of the meetings. Media relations efforts garnered extensive coverage of the public meetings and the study in both print and electronic media.

E-mail - Notices were sent to all individuals on the I-70 Improvement Study electronic mailing list (approximately 470 individuals and organizations at the time).

Web Site - Meeting details were posted on the web site.

Questionnaires and Comments

Questionnaires were made available at public meetings. A total of 226 questionnaires were completed at public meetings, and 15 additional surveys were received through the mail.

3. POST OFFICE BOX AND HOT LINE

The post office box and hot line have been promoted through media, on the web site and in study publications and presentations. To date, more than 300 comments, queries or questionnaires have been received at the project post office box or through the toll free hot line.

4. MAILING LISTS

The I-70 First Tier EIS has compiled mailing lists comprising 1,615 individuals and organizations with an interest in I-70. The mailing list continues to build as individuals and organizations contact the study and are added to the mailing list. The study maintains both a regular and an electronic mailing list.

- **Regular Mailing List** – 1,115 individuals and organizations are included on the regular mailing list. This list includes members of the general public as well as stakeholders throughout the state.
- **Electronic Mailing List** - 500 individuals and organizations are included on the electronic mailing list.

5. MEDIA RELATIONS

More than one million Missourians have been exposed to the I-70 First Tier EIS through print and electronic media coverage. This exposure has resulted in a 47 percent level of awareness in the corridor.¹

Media relations efforts on behalf of the I-70 First Tier EIS have been conducted cooperatively between the HNTB team and MoDOT public affairs. To date, media relations efforts have been highly effective, achieving more than 75 print placements as well as extensive television coverage. Based only on print placements achieved to date, more than one million Missourians have been exposed to information on the I-70 First Tier EIS at least once.

Media relations efforts have consisted of the following activities:

- Media releases have been distributed at seven points in the study. Releases were distributed (1) at the project kick-off in January 2000, (2) prior to each of the three rounds of public meetings, (3) when the decision was made to extend the decision-making process for selecting the preliminary preferred strategy in June 2000, (4) when the preliminary preferred strategy was identified in October 2000 and (5) when the Draft First Tier EIS was published and public hearings were scheduled.
- Media packets were provided at public meetings. Packets included 8.5" x 11" reprints of exhibits as well as copies of media releases and fact sheets.

¹ Based on the I-70 First Tier EIS Telephone Survey of 611 corridor residents.

- Study team members participated in editorial meetings and live interviews with numerous media outlets in the corridor.

6. NEWSLETTERS AND UPDATES

Four newsletters have been published and mailed to the project mailing list. More than 5,000 copies of the newsletters have been downloaded from the web site.

Newsletters were published in February 2000, June 2000, October 2000 and August 2001. Two one-page updates in a format similar to the newsletter have also been mailed prior to the last two rounds of public meetings.

7. STAKEHOLDER COORDINATION AND BRIEFINGS

Special briefings have been conducted for the following stakeholder groups.

Table V-2: Stakeholder Group Presentations

Stakeholder Group	Date of Briefing
State of Missouri General Assembly	March 2000
Sierra Club of Missouri	May 2000
Manitou Bluffs Project/Missouri River Communities Network	May 2000
Missouri Coalition for the Environment	May 2000
Boonslick Regional Planning Commission	May 2000
East-West Gateway Coordinating Council	April 2000, July 2001, October 2001
Mid-Missouri Regional Planning Commission	May 2000
Columbia Area Transportation Study Organization	March 2000; March 2001
Warrenton Chamber of Commerce	May 2000; March 2001
Greater Kansas City Chamber of Commerce	May 2000
Wentzville Chamber of Commerce	May 2000; March 2001
St. Louis Regional Commerce and Growth Association	May 2000
St. Louis Board of Aldermen, Transportation Committee	May 2000
Missouri Motor Carriers Association	May 2000
Representatives of Yellow and Consolidated Freightways	June 2000
Mid America Regional Council	July 2000, July 2001
Missouri Highway Users Association	November 2000
American Society of Civil Engineers – Kansas City, Missouri	January 2001
Missouri Highways and Transportation Commission	October 2001
Concordia Board of Aldermen	May 2000, May 2001
City of Warrenton	March 2001
Lake St. Louis Chamber of Commerce	March 2001
I-70 Stakeholders Committee (City of Columbia)	March 2001, July 2001
Village of Innsbrook Trustees	April 2001
City of Wright City	March 2001
City of Wentzville	March 2001
Warren County	March 2001
Rotary Club – Columbia, Missouri	May 2001
City of Oak Grove	May 2001
City of Odessa	May 2001
City of Concordia	May 2001
City of Grain Valley	May 2001

8. SURVEY

A 611-sample survey was conducted to assess corridor-wide public opinion and to evaluate the extent to which the anecdotal information received at public meetings accurately reflected the corridor as a whole. ETC Institute of Kansas City conducted the survey. The survey was conducted during and immediately after the second round of public meetings at a time when the study was receiving extensive media attention. Traffic on the project web site was also high during this period.

a. Sample Population

Six hundred and eleven interviews were conducted for this study.

- 48 percent of those interviewed were males, 52 percent female.
- 30 percent were between 35 and 54 years of age.
- 71 percent of those interviewed typically traveled at least 15 miles one way when traveling on I-70.
- 76 percent of those interviewed had been driving I-70 for at least 10 years.
- The sample represents residents in Boone, Callaway, Cooper, Howard, Jackson, Johnson, Lafayette, Montgomery, Pettis, Saline, St. Charles and Warren counties.

b. Findings

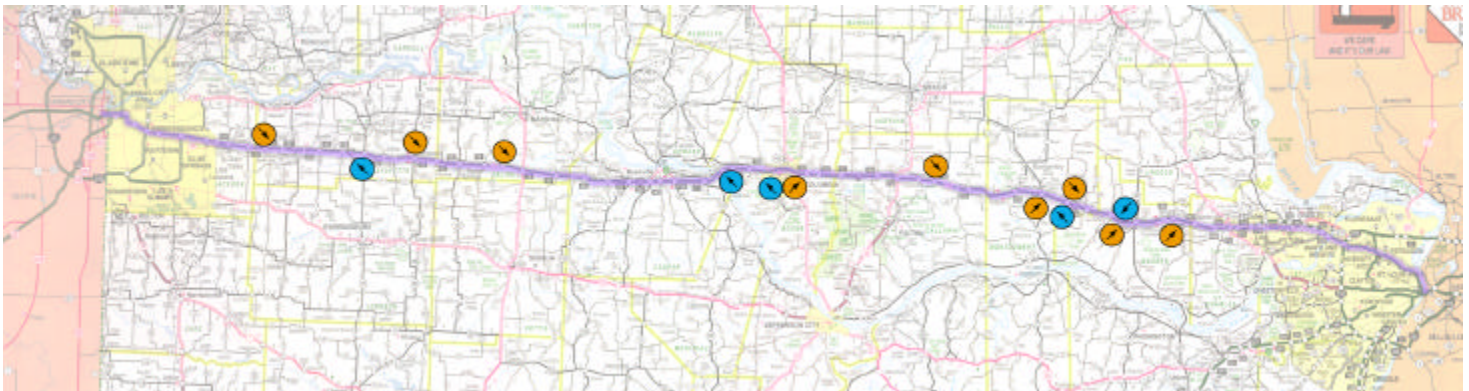
The following are several findings of interest to the I-70 First Tier EIS.

- 47 percent of those surveyed had heard of the "I-70 Improvement Study."
- 85 percent considered widen the existing highway to be a good or great idea. 13 percent considered it "not a good idea."
- 58 percent considered a new parallel interstate to be a good or great idea. 35 percent considered it "not a good idea."
- 49 percent considered high-speed rail to be a good or great idea. 44 percent considered it "not a good idea."
- 34 percent considered a new parallel toll road to be a good or great idea. 61 percent considered it "not a good idea."
- 62 percent of respondents consider congestion to be a major problem. 11 percent feel it is not a problem.
- 60 percent feel truck traffic is a major problem. 13 percent feel it is not a problem.
- 47 percent are "very concerned" about the number of cars on I-70. 57 percent are "very concerned" about the number of trucks on I-70.
- 51 percent are "very concerned" about the speed that vehicles travel on I-70.
- 65 percent of respondents believe minimizing construction-related traffic delays on existing I-70 should be a "very important" factor in selecting a strategy.
- 47 percent believe the strategy should minimize direct impacts to the natural and cultural environment.

9. BILLBOARDS

Fourteen billboards were erected in April and May 2000 to raise awareness of the study and to direct traffic to the web site and hot line. Significant spikes in Internet and hot line traffic occurred immediately after billboards were posted. Ten billboards stood for 30 to 45 days. Three of the billboards have remained up for almost one year. One billboard still stood as this document was published. Figure V-1 indicates the location and orientation of the billboards.

Figure V-1: Placement and Orientation of I-70 First Tier EIS Billboards



B. Summary of Public Input (Prior to Draft First Tier EIS)

1. PUBLIC INPUT PRIOR TO THE IDENTIFICATION OF THE PRELIMINARY PREFERRED STRATEGY

While there was a diversity of opinion in general, two messages may be drawn from pre-selection public input. These messages are discussed in greater detail in the separate report titled "Interim Report on Public Involvement" dated June 9, 2000.

a. Message #1: Concern for Safety

The clearest message conveyed from the earliest stage of the study until today relates to safety. Driving on I-70, whether across the state or from one side of Columbia to the other, elicits strong concerns from travelers. While they offer different solutions, Missourians are uniformly concerned for their safety when traveling on I-70. Much of this concern centers on the perceived volume of freight trucks and the speed at which they drive. There was a common perception expressed that enforcement of speed and weight limits was lax and that if trucks were simply separated from smaller passenger vehicles, many safety concerns would be alleviated.

b. Message #2: Improvement Strategy Preference

When citizens expressed an opinion specifically on an improvement strategy, the preponderance of public input expressed a preference for widening the existing Interstate 70. It is important to note that most of the open-ended comments received, concerned a variety of issues and often did not take a specific stand on an improvement strategy. When forced to express a preference in the context of a questionnaire or telephone survey, respondents expressed a clear preference for widening and reconstructing the existing highway. At the same time, they expressed a higher degree of opposition to building a new parallel facility.

2. PUBLIC INPUT AFTER THE ANNOUNCEMENT OF THE PRELIMINARY PREFERRED STRATEGY

Since the announcement of the preliminary preferred strategy, public input has been quite varied and has not coalesced around any single issue. However, the following messages or issues have surfaced.

a. General Support for the Selected Strategy

While support has not been unanimous, comments submitted via the study web site have been supportive of MoDOT's preliminary decision.

b. Concern for Timeline of Improvements

Many comments have expressed an attitude that can be summarized as “whatever you do, do it now.” There is a general perception on the part of many respondents that indicates a high level of frustration with the condition of the existing road compounded by skepticism that many members of the general public will live to see the improvements. This skepticism expresses itself in a number of ways.

c. Concern for Impacts at Interchanges

A number of communities have expressed concern regarding the impact of applying strict access management guidelines as interchanges are reconstructed. However, this concern is moderated by their position that they would rather experience the impact of a reconstructed interchange than face what they considered the threat of the parallel facility. The communities of Warrenton, Wentzville and Wright City all shared this view when presented with the by-pass alternative. In briefings with elected leaders of these communities, the message was clear: We would rather feel the pain of new interchanges than face the potential loss of traffic due to a by-pass.

d. Concern for Impact of By-pass in the Corridor between Warrenton and Wentzville

One issue that is being addressed by the study at the time this document is being prepared is how to handle the more urbanized areas of the corridor in Columbia and between Warrenton and Wentzville. As described above, the communities of Warrenton, Wright City and Wentzville all expressed a general preference for widening the Interstate on its existing alignment through their communities. This position was based partially on their concern for loss of business due to a by-pass. Many elected leaders and communities planners were also concerned with the impact of the by-pass itself. Several community leaders indicated that they viewed the by-pass as an obstacle to future community development.

It should be noted that, in the corridor between Wentzville and Warrenton, support for widening on the existing alignment was not unanimous nor was it enthusiastic. There is a general perception that improvements of some sort are inevitable and that widening on the existing alignment would be in the best long-term interest of the communities.

e. Concern for Impact of By-pass on Columbia

The issue of whether to widen on the existing alignment or build a by-pass is also present in Columbia. This question was explored in meetings with CATSO, the Columbia I-70 Stakeholders Committee and with members of the public. There was a diversity of opinion on the subject, but several consistent messages emerged.

- Residents living north of Columbia are concerned with the impact of a northern by-pass. Concerns are based on (1) the potential direct impact home and land owners may feel if they lose property to the interstate and (2) the potential secondary impacts of increased development and the introduction of vehicular noise in the area.
- Residents and business owners adjacent to I-70 are concerned about the potential impact of widening on the existing alignment. This concern is based primarily on the assumption that they would lose much or all of their property to the widening.
- Although they have not taken a formal position within the context of the I-70 First Tier EIS, Columbia planners are supportive of a northern by-pass. Stakeholders Committee also recommended a by-pass.

C. Location Public Hearings and Formal Comment Period on Draft First Tier EIS

1. PUBLIC HEARINGS

Seven public hearings were held the week of Aug. 27, 2001. Hearings took place at the locations identified in Table V-3.

Table V-3: Public Hearing Locations and Attendance

Location	Attendance
Aug. 27	
Grain Valley	57
Warrenton	88
Aug. 28	
Concordia	94
Wentzville	45
Aug. 29	
Columbia	126
Aug. 30	
Kingdom City	59
Boonville	47
TOTAL	516

An open house format was used for the public hearings. This format allowed attendees to review project information at their own pace and ask questions of study representatives. Hard copies of the Draft First Tier EIS were available for review. Attendees also had the opportunity to review the Draft First Tier EIS in electronic form.

Attendees were able to submit written comments using questionnaires or verbally to a court reporter.

The only variation in hearing format was in Columbia where attendees were invited to assemble in a separate room to make verbal comments before MoDOT staff and the public. These comments are included in the transcript for the Columbia hearing.

The only variation in the content of the public hearings was related to maps and aerial photographs that were displayed. While all maps and aerials were available at all hearings, only those representing improvements in the vicinity of a specific hearing were displayed on easels.

2. VIRTUAL EIS

The Draft First Tier EIS was made available on the study Web site at www.i70study.org. Visitors to the Web site were able to review the Draft First Tier EIS and submit comments through an online comment form and e-mail. During the months of August and September, there were 6,216 visits to the Web site. Table V-4 summarizes the Virtual EIS activity.

Table V-4: Summary of Virtual EIS Activity

Draft First Tier EIS Chapter	Number of Downloads
Summary	3,188
Chapter 1	3,175
Chapter 2	2,549
Chapter 3	2,346
Chapter 4	521
Chapter 5	313
Chapter 6	320
Chapter 7	329
Chapter 8	259

3. PUBLIC VIEWING LOCATIONS

The Draft First Tier EIS was made available at 42 locations throughout the corridor.

4. SUMMARY OF DRAFT FIRST TIER EIS AND PUBLIC HEARING COMMENTS

A total of 293 comments were received during the comment period for the Draft First Tier EIS. Comments were received in a number of forms, as indicated in Table V-5.

Table V-5: Summary of Comment Forms Received

Source	Number
Written, submitted at hearing	89
Verbal, submitted to court reporter at hearing	28
Written, mailed	35
Written, faxed	1
E-mail to study@i70study.org	72
First Tier EIS Online Comment Form	17
Web Site Online Comment Form ²	51
TOTAL	293

a. General Summary of Public Comments

A majority of the comments submitted during the formal comment period were of a general nature. Common themes heard prior to the release of the Draft First Tier EIS, as discussed in an earlier section of this chapter, were repeated. Comments were received from the general citizenry; from public planning agencies, such as Metropolitan Planning Organizations or Regional Planning Commissions; from business groups; from non-profit environmental advocacy groups; and from various municipalities located within the Study Corridor. Table V-6 presents and categorizes consistent comments and themes received from the public in review of the Draft First Tier EIS.

² The Web site allowed users to submit comments through an online comment form attached to chapters of the Draft First Tier EIS or through a general online comment form at http://www.i70study.org/2d_comments.htm

Table V-6: Summary of Consistent General Comments

General Public Comment
1. Concern for Kingdom City interchange.
2. General concern regarding the safety of traveling on I-70.
3. Desire for stricter enforcement of speed limit.
4. Concern for crossover accidents.
5. Concerns related to volume and operation of trucks on I-70.
6. Concepts to be considered further in Columbia Area.
7. Concepts to be considered further in Warrenton/Wright City/Wentzville
8. Alternative Modes of Transportation, TSM/TDM
9. Toll Road
10. Access Management/Interchange Design
11. Sequence of improvements/Statewide priorities

The following general comments indicate concerns that were shared frequently by individuals and public agencies who contacted the study through various means. These issues and concerns are not the product of a scientific survey and do not necessarily reflect the issues and concerns of a wider audience. The following generalized comment categories were identified to represent the comments received as a whole. All comments received were reviewed and considered as part of this First Tier EIS.

- **Concern for the Kingdom City interchange** – A number of individuals, businesses and organizations expressed concerns for the impact of the Kingdom City interchange as presented in the Draft First Tier EIS. Specifically, concerns were expressed that eliminating access to Kingdom City at Highway 54 would have a severe impact on the success of businesses built around the interchange and, consequently, the vitality of the town itself.

Response: All interchange layouts presented in the Draft First Tier EIS are conceptual only and are subject to revision and considerable greater depth of study in the second tier studies. The second tier study will include extensive public involvement and MoDOT will actively seek the input of business owners, residents and other interested parties as interchange designs are refined.

- **General Concern Regarding the Safety of Traveling on I-70** – Consistent with public input throughout this study, many individuals expressed concern for their safety when driving on I-70. While many related those concerns directly to the volume and operation of trucks, many expressed safety as a general concern related to the overall volume and speed of traffic on the highway and the condition of the pavement.

Response: Safety is a prime concern, as indicated by its inclusion in the Purpose and Need Statement for the I-70 First Tier EIS. This concern for taking safety issues into consideration will be carried forward into the subsequent second tier studies. While most accidents are the result of driver behavior, MoDOT is working to make I-70 safer by:

- Including a 124-median in the reconstructed and rebuilt I-70
- Increasing the inside and outside shoulder width to 12-feet
- By implementing an access management plan at interchanges that ensures the safest, smoothest flow of traffic onto and off of the interstate.

- **Desire for Stricter Enforcement of Speed Limit** – Consistent with public input throughout this study, many individuals expressed the perception that enforcement of the speed limit was lax. Each comment associated increased enforcement of the speed limit with improved safety on the highway.

Response: While this issue is clearly beyond the scope of this study, it raises an important issue. A majority of accidents are the result of driver behavior and speed is frequently a contributing factor. While the Missouri Highway Patrol enforces the speed limit and other laws to the fullest extent of their capabilities, Missouri drivers are most in control of the speed of vehicles on the highway.

- **Concern for Crossover Accidents** – Many of those submitting comments expressed a desire for the immediate introduction of median barriers of some sort to prevent future crossover accidents. Cable and “Jersey” barriers were considered effective safety measures that could be introduced immediately.

Response: While the safety improvements recommended by the I-70 First Tier EIS are long-term in nature, MoDOT will continue to assess certain short-term measures to enhance the safety and efficiency of the highway. One of those recommended measures could be median barriers in certain areas. Between 1996 and 2001 MoDOT spent more than \$7 million on these types of measures. MoDOT introduces cross over prevention measures in coordination with district offices in locations where the benefits of these measures outweigh the disadvantages. In some instances where median space is adequate to allow for safe recovery and median barriers would be likely to deflect cars back into traffic and cause more serious accidents, median barriers and guards are not introduced.

- **Concerns Related to Volume and Operation of Trucks on I-70** – Truck traffic has been a consistent concern throughout the course of this study. The following specific concerns have been expressed and were repeated during the formal comment period for the Draft First Tier EIS:
 - Volume of truck traffic contributes to unsafe driving conditions.
 - Excessive speed of trucks contributes to unsafe driving conditions.
 - Weight and speed of trucks contributes to poor pavement conditions.
 - Limit trucks to the outside two lanes.
 - Lower the speed and weight limits for trucks and improve enforcement.

Response: MoDOT is committed to enforcing truck operations on all of its highways in accordance with the authority it has been granted for this purpose. This study has indicated the option of limiting trucks to the outside two lanes as part of the I-70 improvements. MoDOT will continue to investigate the merits of this option and the necessary legislative authority.

- **Concepts to be Considered Further in Columbia Area** – The City of Columbia, the Columbia Area Transportation Study Organization, Boone County, and the business community of Columbia requested that the Far North Conceptual Corridor be retained for more detailed review and study as part of the second tier study for the Columbia Area, to be conducted as an EIS.

Response: The traffic analysis conducted in the First Tier EIS determined that the Far North Conceptual Corridor would not attract through traffic due to out-of-direction travel issues. The Far North Conceptual Corridor is too far north to provide travel timesavings for traffic passing through Columbia. Consequently, this concept would not solve the traffic-related problems along existing I-70. This conclusion suggests that it would not be prudent or necessary to consider this concept further. However, due to land use issues, the local community leaders have requested more detailed discussion and review of the land use issues related to the two relocation concepts. Regardless of shifts or changes in land use, the Far North Conceptual Corridor will not attract traffic unless more drastic measures are considered for calming traffic or further reducing speeds along existing I-70. MoDOT will continue to discuss and consider the Far North Conceptual Corridor as part of the second tier study for SIU No. 4.

- **Concepts to Be Considered Further in Warrenton/Wright City/Wentzville** – A number of comments addressed the question of bypass corridors and widening in the Warrenton/Wright City/Wentzville area. A majority of comments expressed support for widening through this area on the existing alignment. Bypasses were generally viewed as barriers to growth in communities in the area. Concerns were also expressed regarding residential impacts and impacts to the natural environment and farmland.

Response: A second tier EIS will consider the impacts of all three-bypass corridors and the widening of I-70 in the Warrenton/Wright City/Wentzville area. This EIS will consider in detail impacts to the environment, communities and traffic operations and will include substantial public involvement.

- **Alternative Modes of Transportation, Intelligent Transportation Systems** – A number of comments urged serious consideration of alternative modes of transportation (for both passengers and freight) as well as introduction of ITS strategies. Many comments suggested these measures as complements to the selected strategy.

Response: The First Tier EIS evaluated the ability of alternative modes of transportation and Intelligent Transportation Systems to meet the needs of the I-70 corridor. While it was determined that these strategies alone would not meet the needs of the corridor, they were identified as potential complements to the preferred strategy.

- **Toll Road** – A number of comments expressed support for tolling all or a portion of the interstate. Most of this support was qualified in some way. Many comments suggested tolling for trucks only or for those traveling in designated express lanes.

Response: The First Tier EIS determined that constructing a separate toll road was not financially feasible as a stand-alone strategy because it would not be self-supporting. However, this does not preclude MoDOT from future considerations of toll road applications along the existing I-70. Implementation of a toll road would require legislative action because MoDOT does not currently have the statutory authority to operate toll roads.

- **Access Management/Interchange Design** – A number of comments were received regarding access management standards (restricted access to businesses) and interchange design (environmental impacts and displacements of larger interchanges).

Response: The interchange concepts presented in the First Tier EIS are conceptual in nature and subject to revision. These interchange concepts will be subjected to more

detailed analysis and public input during the second tier studies. While MoDOT seeks to implement its access management standards to the greatest extent possible, it understands that it must take into consideration impacts to businesses, residences and other factors at existing interchanges (i.e., context sensitive solutions).

- **Sequence of Improvements/Statewide Priorities** – Three organizations raised questions related to how the state proposes to prioritize the various sections of independent utility. Questions were also raised regarding how this project fit into MoDOT's statewide list of priorities.

Response: MoDOT is committed to implementing I-70 improvements in a prudent and responsible sequence and in the context of its statewide transportation priorities. Construction will be conducted in a manner consistent with the Purpose and Need as existing and projected conditions within the corridor continue to worsen or materialize. The timing of construction will depend on the availability of funding, the respective priorities within the corridor, and other commitments and needs within the state.

b. Substantive Public Comments

Of the 293 public comments, nine were considered substantive in nature. Table V-7 categorizes these substantive comments. General responses are provided in the following section.

Table V-7: Substantive Public Comments

Substantive Public Comments	
1.	Take into consideration an unusual hybrid of oak tree known as the Concordia Oak.
2.	Southern bypass corridor in the Warrenton/Wright City/Wentzville area potentially impact Native American campsites and burial grounds.
3.	I-70 is a major obstacle for pedestrians, bikers and people in wheelchairs.
4.	On behalf of Central Missouri Diabetic Children's Camp, far north bypass around Columbia could impact camp and nearby cave that is home to gray bats.
5.	Village of Innsbrook is not mentioned in Volume 1 of the Draft First Tier EIS.
6.	South access road in Warrenton should avoid Dyer Park.
7.	New location of Highway 54 threatens "the cultural site used by pioneers for "Camp Meetings and Revivals" and the Simcoe Reunion and continues to remove evidence of the earliest pioneer road and of Native American use of the land."
8.	Near north bypass of Warrenton/Wright City/Wentzville potentially impacts cemetery and 1920/30s-school house/church.
9.	Location of bridge over Missouri River and relocation of Route BB and Exit 115 could impact adjacent caves and sinkholes, Indiana Gray Bat habitat and water quality.

The purpose of a first tier EIS is to address a broad question or issue to enable an efficient, phased approach to a transportation decision-making process. Because of its "high level" purpose, a first tier EIS does not conduct the level of detailed analysis many would expect from a traditional EIS. Thus, many of the substantive issues raised here will be addressed in subsequent second tier studies.

- **Hybrid Oak Tree** – Take into consideration an unusual hybrid of oak tree known as the Concordia Oak, located approximately one mile west of the city limits of Concordia, Missouri.

Response: The location of the Concordia Oak grove will be taken into account in the second tier project documentation. Appropriate consideration will be given to this resource and actions could include avoidance, minimization or mitigation.

- **Native American Campsites** – Southern bypass corridor in the Warrenton/Wright City/Wentzville Area would potentially impact Native American campsites and burial grounds.

Response: This comment has been noted and will be explored in greater detail in the second tier study. Cultural resources will be identified and evaluated further as this bypass corridor is analyzed in greater detail.

- **Pedestrian and Bicycle Access** – I-70 is a major obstacle for pedestrians, bikers and people in wheelchairs who desire to cross the corridor.

Response: Pedestrian, bicycle and wheelchair access across the I-70 corridor will be given consideration in the second tier studies.

- **Central Missouri Diabetic Children's Camp** – The far north bypass around Columbia could impact this camp and nearby Holton Cave that is home to gray bats.

Response: The Draft First Tier EIS notes the location of the gray bat habitat. The potential impacts of the bypass concept on this site and the camp itself will be considered in greater detail in the Second Tier EIS for the Columbia Area.

- **Village of Innsbrook** – The Village of Innsbrook was recognized in the constraint mapping for the Draft First Tier EIS, but was not listed as a community located within the Study Corridor that could be potentially impacted.

Response: The Village of Innsbrook is identified in Appendix G, Relocation Corridor Options, Jonesburg to Lake Saint Louis, maps 1 and 2. The text in Chapter III, Affected Environment, has been changed to add the Village of Innsbrook to the list of municipalities in Warren County.

- **Dyer Park** – South access road in Warrenton should avoid Dyer Park.

Response: The location of Dyer Park is noted in Appendix G, Widening Improvements to Existing Corridor, Warrenton to Lake Saint Louis, map 4 of 24, and in other sections of the Draft First Tier EIS. Interchange layouts are presented in conceptual form only and are subject to adjustment and refinement in the second tier study. Alignment of frontage and access roads as well will be analyzed in further detail, and, if necessary, adjusted in the second tier study.

- **Response:** Interchange layouts are presented in the Draft First Tier EIS in conceptual form only and are subject to adjustment and refinement in the second tier study. Cultural and environmental resources and impacts such as those referenced here will be evaluated in greater detail in the second tier study.

- **Schoolhouse** – Near north bypass of Warrenton/Wright City/Wentzville potentially impacts cemetery and 1920/30s-school house/church.

Response: The location of the schoolhouse is noted in Appendix G, Relocation Corridor Options, Jonesburg to Lake St. Louis, map 1 of 2, and in other sections of the Draft First Tier EIS. Resources such as these will be evaluated further as this bypass corridor is analyzed in greater detail in the second tier study.

- **Impacts of Missouri River Crossing and Relocation of Route BB** – Location of bridge of Missouri River and relocation of Route BB and Exit 115 could impact adjacent caves and sink hole, Indiana Gray Bat habitat and water quality.

Response: The Draft First Tier EIS notes the challenges of building a new bridge in the vicinity of the Overton Bottoms and Manitou Bluffs. While that document indicates that a northern expansion is least likely to have significant impacts to cave structures and endangered species habitat, these issues will be studied in greater detail in the second tier study. The second tier study will also evaluate such factors as impacts to water and air quality as well as historical and cultural resources.

D. Agency Coordination

Resource agency coordination has been ongoing throughout this First Tier EIS. The environmental scoping process, to identify issues and concerns which would affect the definition and evaluation of the improvement strategies and resulting alternative corridor options, has been performed since the beginning of the study in January, 2000. In addition to the formal scoping meeting, the scoping process has continued with periodic study team progress meetings during which resource agency personnel attended and participated. They played a key role in the collaborative decision-making process for this study.

1. ENVIRONMENTAL SCOPING MEETING

On February 23, 2000, an environmental scoping meeting was held in the Federal Highway Administration Division Office conference room, located in Jefferson City. Prior to the meeting, special invitations were sent to the appropriate resource agencies. Accompanying the invitation was a packet of information about the project, the first tier approach, draft purpose and need statement and a project map. A notice of intent to perform the study and announcing the scoping process for the study was published in the federal register in advance of the meeting. Those agencies invited to attend the scoping meeting are listed below. All meeting attendees were provided minutes of the meeting.

- **Federal Agencies**

Federal Highway Administration
Environmental Protection Agency
Federal Emergency Management Administration
U.S. Army Corps of Engineers
U.S. Fish and Wildlife Service
U.S. Coast Guard

- **State Agencies**

Missouri Department of Natural Resources
Missouri Department of Conservation
Missouri State Emergency Management Administration

At the scoping meeting, an overview of the study was presented, including a presentation of the approach to the project.

General Discussion

The purpose and need framework was discussed which included: roadway capacity; traffic safety; design features; system preservation; efficient movement of goods; and access to recreational facilities. Also, the environmental analysis methodology was identified for the anticipated social, economic and environmental features within the project corridor.

The environmental review concurrence points were listed and discussed. These included: purpose and need, strategies carried forward, preferred strategy, Draft EIS, selected strategy with alternative corridor options and the Final EIS.

The opportunity of joint development by way of this project was highlighted. The KATY Trail and the Missouri River crossing area were discussed as prime locations for possible joint development activity.

2. STUDY TEAM PROGRESS MEETINGS

Periodic study team progress meetings were held during which resource agency personnel attended and participated. They were part of the collaborative decision-making process for this study. The participating agencies included MDNR, MDC, USCOE, USFWS, USEPA and the FHWA. To date, nine study team progress meetings have been held, including the Scoping Meeting. The dates and subject matter of those meetings follow:

- a. February 23, 2000 -- Scoping Meeting (Study introduction; draft Purpose and Need; Concurrence Points; Joint Development; and Feasibility Study.)
- b. March 15, 2000 -- (Phase I Evaluation Matrix; Public Involvement Review; Environmental Data Collection Activities; and Traffic and Economic Studies Information).
- c. April 18, 2000 -- (Chapter I, Purpose and Need; Affected Environment Overview; and Public Involvement update).
- d. June 21, 2000 -- (Review findings of Public Involvement Efforts).
- e. October 25, 2000 -- (MoDOT Commission Meeting and Stakeholder Coordination review; Sections of Independent Utility; and Project Schedule).
- f. January 16, 2001 -- (Preferred Widening Strategy; upcoming agency meetings, Overton Bottoms, and Mineola Hill; Methodology for Evaluation of Alternatives; and Stakeholder and Public Meetings for Columbia and the Wentzville to Warrenton).
- g. April 17, 2001 -- (Agency and Public Meetings update; Widening Strategy Review; Evaluation of Widening Strategy; Preliminary Draft First Tier EIS).
- h. July 17, 2001 -- (Status of Draft First Tier EIS and SIU plan).

- i. October 3, 2001 – (Review of Draft First Tier EIS comments).

Written comments have been received from the resource agencies concerning various sections of the Preliminary Draft First Tier EIS. Copies of these comments are included in Appendix H, located in Volume II.

3. SPECIAL MEETINGS

a. Environmental Groups Briefing

A meeting was held May 1, 2000, in Jefferson City to present and discuss the I-70 First Tier EIS approach and process with invited environmental groups representatives. It was an opportunity to update the groups about the projects' progress, hear their concerns and to inform them of how they could remain involved in the development of the project. The overall project approach and schedule was discussed along with the environmental analysis that was underway. The environmental groups represented at the meeting included: Sierra Club; Missouri Coalition for the Environment, Missouri Rivers Communities Network and the Missouri Department of Conservation.

b. Overton Bottoms Resource Agency Meeting

On February 22, 2001, a meeting was convened near Rocheport to facilitate a roundtable discussion about the I-70 project and other agency activities that are planned or ongoing within the project area. The participating resource agencies offered their thoughts about the I-70 project, discussed their specific agency activities within the Overton Bottoms area, and as a group, brainstormed the joint development possibilities that could possibly take place within the area. Ideas such as a visitors center, getting people back to the river, connection to the KATY Trail, bicycle and pedestrian access on the new bridge, combination rest area with visitor's center, wetland creation, interpretive kiosks of the area, upcoming Lewis and Clark celebration and connection, habitat mitigation, rest area best management practices, joint agency funding mechanisms and the availability of transportation enhancement funding were discussed. A more detailed discussion of this meeting is described in Chapter IV, Joint Development section. Agencies in attendance at this meeting included: USCOE, USFWS, FHWA, MDC, Missouri Rivers Communities Network; Overton Wooldridge Levee District, University of Missouri and MoDOT.

c. Mineola Hill Resource Agency Meeting

On February 28, 2001, a meeting was held at the Missouri Department of Natural Resources in Jefferson City, to discuss and listen to the thoughts and concerns about the Mineola Hill area. The meeting began with a historical view of the area that included the construction of US 40 in 1953, the construction of I-70 in 1965 and the environmental features in the area of Graham Cave State Park, Graham Farmstead and the Graham/Picnic/Slave rock, located in the median of existing I-70. There is no outdoor advertising in this area of the Loutre River valley. That is primarily because the landowners do not want it. This is one of the more natural scenic areas that I-70 crosses in Missouri. The Graham Cave State Park has been there since the late 1950's and there are no plans for expansion. Other concerns discussed included: special significance of "Slave" rock and its avoidance, design mitigation options through this area, cost to avoid this area, highway noise and its impact to the camping area of the park, reconstruction of the rest areas and the possible use of a low-frequency transmitter to describe the features of the area to the traveling public and the use of local architecture in the rest areas. A more detailed discussion of this meeting is located in Chapter IV, Joint Development section. Agencies in attendance at this meeting included: MDNR, MDC, FHWA and MoDOT.

d. Missouri Department of Conservation Meeting

On April 12, 2001, a presentation of the I-70 project was made to the quarterly meeting of MDC field personnel in the Rocheport City Hall. This presentation included an I-70 project overview that discussed the purpose and need, range of strategies, first tier environmental analysis approach and the current status of the project. There was a question and answer session that included questions about existing wildlife and highway conflicts, possible mitigation for wildlife crossings along the I-70 corridor and possible larger-in-scope concerns by the MDC for the entire 199-mile (320.3 km) length of the project. This highway project presents a unique opportunity for comprehensive, whole-corridor joint development among the resource agencies and the Missouri Department of Transportation.

4. DRAFT FIRST TIER EIS AGENCY COMMENTS

On August 10, 2001, the FHWA and MoDOT, in cooperation with the U.S. Army Corps of Engineers and the U.S. Coast Guard, issued the Draft First Tier EIS for 199 miles (320.3 km) of I-70 in Missouri. In accordance with the National Environmental Policy Act and Clean Water Act, comments offered by public agencies, the general public, or other interested parties need to be adequately addressed by the Final First Tier EIS. The following section presents the agency review comments received for the Draft First Tier EIS. The 45-day minimum comment period on the Draft First Tier EIS ended on September 25, 2001.

Comments on the Draft First Tier EIS were received from the following agencies and are included in the following section:

- ✓ Missouri Department of Conservation – September 26, 2001
- ✓ Missouri Department of Natural Resources – September 25, 2001
- ✓ U.S. Environmental Protection Agency – September 24, 2001
- ✓ U.S. Army Corps of Engineers – September 20, 2001
- ✓ U.S. Coast Guard – October 19, 2001
- ✓ Federal Transit Administration – October 4, 2001
- ✓ U.S. Department of the Interior – October 24, 2001

Each of the agency letters received have been reproduced and have had comment codes (bold numbers and letters) added in the margins. Immediately following the comment letters are the corresponding responses with applicable references to the relevant sections of the First Tier EIS.



MISSOURI DEPARTMENT OF CONSERVATION

Headquarters

2901 West Truman Boulevard, P.O. Box 180, Jefferson City, Missouri 65102-0180
Telephone: 573/751-4115 ▲ Missouri Relay Center: 1-800-735-2966 (TDD)

JERRY M. CONLEY, Director

September 26, 2001



Mr. Kevin Keith
Chief Engineer
Missouri Department of Transportation
P.O. Box 270
Jefferson City, MO 65102

Dear Mr. Keith:

RE: Route I-70 Corridor, Draft First Tier Environmental Impact Statement, Review

Reviews of volumes one and two of the Preliminary Draft First Tier Environmental Impact Statement (EIS) for this project were conducted by Mr. Joseph Bachant; his comments were provided to you in a letter dated May 24, 2001. These comments are still valid, but most seem to have been adequately addressed in the Draft First Tier Environmental Impact Statement that you approved on July 30, 2001.

1A

I appreciated the opportunity to participate in the agency coordination meeting held at the Federal Highway Administration, Missouri Division Office, on July 19, 2001. It was apparent from the presentations and discussions revolving around the development of sections of independent utility that a great deal of thought and deliberation went into identifying these sections. We concur with the limits of the proposed sections of independent utility and agree that they appear to be of sufficient length to address environmental matters on a broad scope. The Department is encouraged by the commitments made in the Draft First Tier EIS regarding floodplain evaluations, mitigation initiatives, and joint development opportunities within environmentally sensitive areas (e.g., Overton Bottoms, Mineola Hill, Lamine River, etc.). Please include the Department in any Second Tier studies and all subsequent planning for facility developments within sections of independent utility, particularly where evaluations and assessments of potential environmental impacts are required.

Thank you for the opportunity to review and comment.

Sincerely,

GENE GARDNER
POLICY COORDINATOR

GG:dcl

c: Mr. Don Neumann

COMMISSION

STEPHEN C. BRADFORD
Cape Girardeau

ANITA B. GORMAN
Kansas City

CYNTHIA METCALFE
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STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCESBibb Holden, Governor • Stephen H. Mahford, Director
OFFICE OF THE DIRECTOR
P.O. Box 176 Jefferson City, MO 65102-0176

SEP 25 2001



Mr. Don Neumann
Programs Coordinator
Federal Highway Administration
209 Adams Street
Jefferson City, Missouri 65102

Mr. Kevin Keith
Chief Engineer
Missouri Department of Transportation
P.O. Box 270
Jefferson City, Missouri 65102

Re: Draft First Tier Environmental Impact Statement, Interstate 70 Corridor, Kansas
City to St. Louis, Missouri

Dear Messrs. Neumann and Keith:

The Missouri Department of Natural Resources has completed its review of the Draft First Tier Environmental Impact Statement, Interstate 70 Corridor, Kansas City to St. Louis, Missouri, published by the Federal Highway Administration and the Missouri Department of Transportation for the proposed improvements to the 199 mile long corridor. As this is the first tiered environmental impact statement produced by MoDOT and FHWA, we would like to commend both agencies for using the tiered approach in evaluating the options available for the cross-state corridor.

The department commented on portions of the draft document in letters dated May 10, 2000 and July 17, 2000. We appreciate that a number of the concerns raised in these letters were addressed in the most recent version, but would again raise some of these same concerns. As stated in our previous letter, and as evidenced by Table II-33 and elsewhere in the document, the environmental impact of widening I-70 is much less than the anticipated impacts resulting from construction of a parallel facility. The "widening with by-pass strategy" also had the highest Benefit/Cost Ratio. We commend both agencies for selecting a widening strategy as the preferred alternative, rather than a parallel route, and anticipate a Final First Tier document that carries this strategy forward.



Page 2

We appreciate being provided the opportunity to comment on this proposed interstate project. Additional comments are attached. We ask that this letter and the attachment, as well as our letters of May 10, 2000 and July 17, 2000 be published as part of the Final First Tier Environmental Impact Statement, in order to better formalize the public review and comment process. Please contact Ms. Jane Beetem of this office if you have any questions about our comments. Ms. Beetem can be reached at (573) 522-2401.

Thank you for your responsiveness.

Sincerely,

DEPARTMENT OF NATURAL RESOURCES



Stephen Mahfood
Director

SM:tlj

Attachments: As stated.

ADDITIONAL COMMENTS OF THE
MISSOURI DEPARTMENT OF NATURAL RESOURCES
SEPTEMBER 24, 2001

ENVIRONMENTAL EVALUATION FOR
DRAFT FIRST TIER ENVIRONMENTAL IMPACT STATEMENT
INTERSTATE 70 CORRIDOR
KANSAS CITY TO ST. LOUIS, MISSOURI

Proposed Alternatives

- 2A The department has concerns regarding the Recommended Preferred Strategy, which would support urban and suburban expansions into rural areas. For example, the features of a modern I-70 (as shown on page 9 and elsewhere) include continuous frontage roads on both sides, providing ready access to undeveloped land. This development leads to the consumption of prime farmland for other uses, while at the same time feeding the cycle of sprawl and urban decay. This issue should be explored in the first tier environmental impact statement, as a secondary impact of expanding the interstate. As indicated in Table II-2, with three lanes for traffic each way, even an injury accident would leave one lane open, so the mandatory use of outer roads for incident management purposes should be reconsidered.
- 2B One way to partially address the issue would be to limit outer road construction to areas that are presently served by local government infrastructure (water supply, wastewater treatment, local road capacity, etc.) so that the local governments are not victimized by the public's expectations of extensions of local services.
- 2C It is the philosophy of the Clean Water Act to first avoid impacts to waters of the U.S., then minimize necessary impacts, and as a last resort, mitigate for their effects. It is stated on II-19 (and elsewhere) that "six lanes are needed to adequately serve future traffic" even in rural areas. As borne out by Tables I-1 and I-2, Exhibit I-4, etc., the use of I-70 is not consistent throughout the corridor, and thus the need for lane expansion is not consistent throughout the corridor. Options should be explored that would add capacity only to the areas where lane expansion is needed most, thus avoiding impacts to water and other resources by minimizing stream crossings and other disruptions.
- 2D The need for an eventual six to eight lanes in rural areas should be explained. On page II-50, the document states that eight lanes would be needed from Concordia westward into Kansas City, based on an anticipated 57,000 vehicles per day in Concordia. Exhibit I-4 indicates that 62,000 vehicles per day are anticipated on I-70 near Boonville, yet the Boonville area is not mentioned as needing 8 lanes in 2030. This apparent contradiction should be clarified. If the need for additional rural lanes is based on projected further outward movement of people from the largest urban areas, the final document should reference

newly available census data, to see if the newer data correlates with the document's predictions for population growth in these areas.

2E

The use of tolls on a widened I-70 was not discussed in the document, as tolls were only discussed relative to the parallel interstate option. Even though the use of tolls may require legislative action, this option should be considered in the first tier of study. New technology allows electronic collection of tolls, to minimize disruption of traffic. In light of the budget situation for all of state government, both now and in the foreseeable future, it seems prudent that every option available to raise income or reduce project cost (without compromising quality) should be explored. By not widening I-70 in rural areas until traffic demands are greater and not actually constructing new outer roads along the entire corridor, cost savings could be realized and environmental impacts reduced. (Right of way may still be acquired, but construction costs could be deferred.)

2F

Individual and commercial travelers use I-70 because it is, at present, the fastest way to get to their destinations. Page II-60 notes that a 10% increase in travel is expected with a Widen I-70 Strategy, "due to a reorientation of travel destinations created by the enhanced mobility." The corresponding impact of this reorientation on plans to upgrade existing parallel routes (specifically Highways 50 & 36) should be explained. The impact that upgrading of these routes is expected to have on I-70 traffic volumes should also be addressed.

Alternate Modes of Transportation

2G

A concern raised in a previous letter regarded the need for alternate transportation modes as tools to relieve the already heavy traffic on I-70, specifically the use of rail transportation. Looking at Exhibit I-4, I-70 Traffic Volumes, it is apparent that the greatest potential for growth in I-70 travel is around the outer edges of the urban areas. Thus, it seems that a discussion of eventual expansion of Metrolink into western St. Louis and St. Charles County would have merit. This could build on plans currently being developed to expand Metrolink westward to the Chesterfield airport. The recommendations made in this First Tier Environmental Impact Statement may not be fully accomplished for many years, and so consideration of light rail as one tool to minimize congestion on I-70 in the St. Louis and Kansas City areas should be considered.

2H

As our population ages, alternative modes of transportation will become increasingly desirable. The "baby boomers" are expected to be active well into their later years, long after they are no longer able to drive themselves. This means that current demand for alternative transportation may be very different than such demand by the time rebuilding of I-70 is completed, and should be considered in the first tier study.

The document did describe, and even illustrated (Page II-81, Figures II-12 and II-13) the possibility of future rail service in the corridor. However, the 40 foot wide Future Transportation Improvement Corridor would only be reserved in the rural

- 2I areas of the project. The document should provide guidance as to how this reserved corridor in the rural areas may be connected to the urban areas. The benefit of reserving the corridor in rural areas, should there be no potential for urban connectivity, should be explained. The document should clarify if eight lanes in rural areas would still be needed in the future for vehicular traffic if rail service were added to the corridor. Issues such as bridge heights required to make rail service possible on I-70 have been raised in discussions with MoDOT. Similar issues, such as access, transfer points, and connectivity to other transportation options need to be addressed. Since rail transportation could be a corridor-wide issue, these types of issues should be addressed, at least preliminarily, in the first tier environmental document, so that subsequent studies would plan to develop the corridor in a similar fashion.
- 2J The analysis of movement of freight by various modes of transportation on page I-32 does not indicate if rail companies were contacted as part of the discussion. It would be helpful to know if the existing rail lines that closely parallel I-70 are near capacity, if this has limited the amount of freight moved by rail, and if the companies believe additional rail lines could be utilized for movement of freight. Also, the analysis focused on shipments into, out of and within Missouri, but not through the state. Additional rail lines or other improvements might assist in moving freight through the state quickly, thus relieving I-70 of some truck traffic.
- 2K Other modes of transportation, such as bicycle and pedestrian crossings, should be considered in subsequent studies. Access across I-70 should be incorporated as bridges crossing the interstate are rebuilt, as this access is difficult and costly to add later.
- 2L Safety
Vehicle speed on I-70 is another concern of anyone who drives the route. Yet the only discussion of speed in the document relates to a proposed increase in speed on a parallel interstate. Numerous references in the document point to the increase in posted speed limits in 1996 (from 65 mph to 70 mph for cars and 60 mph to 70 mph for trucks) as a likely factor in the documented increase in the number and severity of accidents on I-70. Yet, there is no discussion of the possibility of reducing the speed limit on I-70 to calm traffic and increase safety. The issue of speed on a widened I-70 should be addressed in the document.
- 2M A search of the department's records on responses to environmental spills on interstates revealed that I-70 has more spills reported than any other interstate in Missouri, and that the number of spills on I-70 are increasing. While a variety of chemical spills were documented, the majority involved diesel fuel released as a result of an accident involving a truck or debris puncturing a fuel tank. Such releases may ultimately find their way into Missouri's water systems, making a reduction in the number of truck involved accidents on I-70 an important environmental consideration. Department staff indicated that many such accidents occur on steep hills, and so speed is likely a contributing factor.

- 2N Demographic data projecting the 2030 elderly population in Missouri was requested in our May 10, 2000 letter. The FTEIS should address how the proposed improvements to I-70 would enhance safety for all users, even elderly drivers.

Joint Development Opportunities

- 2O The DFTEIS discusses possible corridor enhancements and joint development opportunities such as recreational trails or linear parks. We would encourage MoDOT to pursue such creative options outside the Overton Bottoms and Mineola Hill areas that were the focus of the DFTEIS. Roadside rest areas can incorporate wetland and floodplain mitigation features and natural upland scenic zones and walks. Trails created below the bridges can be connected to existing or enhanced natural scenic areas, providing an opportunity for relief from highway travel, plus environmental education benefits.

- 2P Purchase of scenic easements to prevent billboards and unsightly development should also be considered along with the right-of-way purchases. Particularly in the pristine areas, such as Mineola Hill, Overton Bottoms and the Lamine River, scenic easements would be advisable. These easements could be written to prohibit not only billboards, but cellular towers and other future development as well.

Parks, Recreation Areas, Public Lands

- 2Q MoDOT has effectively incorporated the Department's previous comments and concerns regarding the Mineola Hill and Overton Bottoms areas, as they are discussed at length throughout the document.

- 2R In Chapter IV, page IV-28, the discussion notes that the KATY Trail State Park would be impacted west of Boonville, as the trail passes over I-70 in this location. The existing bridge would have to be replaced by a longer bridge to span the proposed widened interstate. Such changes will need discussion in subsequent studies.

- 2S On page III-20, Rock Bridge Memorial State Park is still listed as a city park and not as a State Park. On page III-21, Finger Lakes State Park and Confederate Memorial State Historic Site again are not mentioned in the document. They are within the 5-6 mile radius of the study area. Both park and historic site have utilized Land and Water Conservation Fund (LWCF) monies.

- 2T Finger Lakes State Park and the Missouri Department of Conservation's Rocky Fork Conservation Area are within the area shown as comprising the Columbia Area Far North Corridor, however neither are addressed in this section. Further information and discussion is needed in future I-70 studies so that proposed improvements will not impact the parklands.

Water Quality

- 2U It is expected that measures designed to protect water quality, as outlined in the Memorandum of Understanding signed by both MoDOT and DNR on July 11, 2001, will be implemented by MoDOT as design and construction of Interstate 70 proceeds.

- 2V Bridging of all streams, both perennial and ephemeral, should completely span the 100-year flood plain and valley floor to prohibit constriction of the waterway during high water periods. Bridging the flood plain allows water to move freely, rather than backing up outside the flood plain. Construction of highways on embankment fills in natural wetlands. This damage can be avoided if the entire flood plain is bridged. Also, wildlife can move freely under bridges. If culverts are used, large animals will have to attempt to cross the interstate, creating a safety hazard. It should be noted that all streams do have 100-year flood plains even though they may not be previously mapped or calculated by a sanctioned agency.

- 2W Wetland mitigation sites will abound along the areas of lower elevation in the corridor. As the project moves into more detailed studies, we encourage MoDOT to seek out opportunities to enhance or construct wetlands. Signals such as the presence of hydric soils or changes in slope or elevation indicate areas with potential for wetland rejuvenation or creation.

- 2X Hydrologic Changes A specific hydrology issue in the I-70 corridor relates to the Missouri River crossing at Overton Bottoms, and the lessons learned during the Flood of 1993. According to the department's records, on July 29, 1993 the Missouri River crested near Boonville, Missouri, discharging a measured flow of 717,000 cubic feet per second. Due to flood induced closings of other highways, Interstate 70 served during this time as a major evacuation and supply route. This vital transportation link was nearly lost as water came within inches of overtopping the road. The potential loss of I-70 was due in large part to the constriction of flood waters by construction of the highway on earthen fill in the Missouri River floodplain, rather than on piers. The use of piers in construction would have allowed the flood waters more room to flow outside the normal river channel. Improvements to I-70 must improve the safety of the interstate by building the interstate and bridges at least 2 feet above the highest flood on record.

- 2Y In general, the increase in the impermeable area caused by the addition of roadway and interchanges will affect the hydrology of the area. This effect will be to diminish the groundwater recharge in the area, in turn diminishing the base flow. The most severe affects will be realized in times of drought, when groundwater discharge is the only input into stream systems. Accordingly, there will likely be an increase in the peak flow, due to:

- 1) increases in impermeable surface;
- 2) reduction of channel length by culvert pipes;

- 3) reduction of interception of precipitation through continuous mowing / maintenance of grass along right-of-ways;
- 4) increases in velocity due to reduced roughness within culvert pipes / riprap areas; and
- 5) shunting of runoff directly into streams through engineered ditches.

It is the department's experience that alterations to flow from culverts can have simple or cumulative effects to upstream and downstream areas. If a stream system realizes increased peak flows for the reasons stated above, nearby in-stream structures may begin to fail. For instance,

- downstream road crossings or culverts that were designed to handle historic peak flows may now not have enough hydraulic capacity, and may begin to cause localized flooding to roads and / or residences;
- increased velocities may incise channels upstream of the highway crossing, sending headcuts upstream which may cause bank instability from the resultant steeper side slopes. This may jeopardize any structures or roads near upstream banks;
- increased velocity and power from peak flows will increase erosive forces on the outside banks of meanders. This may cause these banks to erode quicker, changing the course of the stream system.

The manipulation of stream crossings without taking these concerns into account would result in increased costs to nearby landowners as well as local public works agencies. This may also cause streams to violate the general water criteria, specifically 10 CSR 20-7.031 (3) C, "Waters shall be free from substances in sufficient amounts to cause unsightly color or turbidity..." and G, "Waters shall be free from physical, chemical or hydrologic changes that would impair the natural biological community."

These hydrologic changes should be assessed in future environmental studies, and stormwater management facilities should be included to eliminate any hydrologic changes from pre-construction conditions.

22

Impact Minimization Bridges are preferable over culverts because they minimize impacts to aquatic resources. Bridges reduce the amount of stream channelization, are less likely to become clogged with debris, and allow for natural substrate and vegetation to remain in place. In general, culverts should be designed so that they do not change the low-flow characteristics of the streams. Culvert designs that allow the original substrate to remain intact are preferable (e.g., using arches instead of boxes). Efforts should be made to use bio-engineered structures when constructing stream crossings, such as incorporating native plant material into bank stabilization areas. This way, the connectedness of the continuous riparian corridor is maintained, and water quality is improved through shading, interception of run-off, etc. Grade controls may be necessary to control any headcuts/channel incision that may occur from this project.

2AA

Mitigation Costs Any wetlands impacted by this project will need to be mitigated in conformance with the attached "State of Missouri Aquatic Resources Mitigation Guidelines." Similarly, any sections of stream lost to channelization need to be mitigated in at least a 1:1 ratio. The costs of mitigating the streams and wetlands should be included when calculating total project costs and determining preferred alternatives, as mitigation is required for all large projects impacting wetlands and streams. To get estimates for stream mitigation costs, the Missouri Stream Stewardship Trust Fund or local stream mitigation bank should be consulted. To receive cost estimates for wetland mitigation, local wetland mitigation banks should be consulted. The mitigation should begin concurrent with the conversion of the wetlands. The mitigation sites should be close to the wetlands impacted.

2BB

Cultural Resources

As stated in this document, federal legislation in 1990 designated I-70 as part of the Dwight D. Eisenhower System of Interstate and Defense Highways, and in 1994, the American Society of Civil Engineers named this system as one of the "Seven Wonders of the United States". We believe that discussions should be undertaken to develop a Programmatic Agreement (PA), in order to reach agreement on the identification, evaluation, protection and, as necessary, mitigation of historic properties with the Area of Potential Effect (APE) of this project.

2CC

More information will be needed to review eligibility of specific historic resources for the National Register of Historic Places as subsequent levels of study proceed. This information will enable the department to make more specific statements as to eligibility and possible affect. We would appreciate an opportunity to review the findings of the historic preservation consultants, who collectively spent several weeks conducting research in our Cultural Resources Inventory.

2DD

Hazardous Waste

Page III-61 refers to an "SPL – State Priority List – MDNR Superfund Section." No such list exists. The Superfund Section does maintain a database of state "Superfund" sites. These sites range from active sites undergoing characterization or remediation to closed sites where no further action is planned. The Superfund Section identified one site in Jackson County, the Lake City Army Ammunition Plant in Independence, which is on the National Priorities List (NPL). The NPL lists the sites with the highest priority for further investigation under the federal Superfund program.

2EE

Six Superfund sites that appear to be within the corridor were identified that are also listed on the *Registry of Confirmed Abandoned or Uncontrolled Hazardous Waste Disposal Sites in Missouri*. These sites are:

Jackson County: Lake City Army Ammunition Plant
Lake Lotawana Sportsmen's Club
Independence FMGP

Prier Brass

Boone County: University of Missouri, Columbia, South Farm

Warren County: Zykan Landfill

2FF

Pursuant to the Missouri Hazardous Waste Management Law, Section 260.465(1), RSMo, any change of use at any site listed on the *Registry* will need prior approval from the program's director, following submittal of a detailed change of use request. The process for requesting such a change of use is outlined in Title 10, Division 25, Chapter 10 of the Code of State Regulations [10 CSR 25-10.010(3)(A)(3)].

2GG

Page III-62, under Potential Sites, refers to the acronym "SHWS," which is not defined in the document.

2HH

As the proposed corridor becomes more defined and the project is closer to construction, project planners should contact the department for up-to-date lists of sites that may contain hazardous wastes. Site specific information may aid in protecting both worker and public safety.

2II

Geology

Throughout the Geology discussion, there is a need to identify the source of the information presented, as the document does not contain a bibliography. Seismicity is not included in the discussion, although the easternmost end of the corridor could sustain damage from a severe earthquake in the New Madrid Seismic Zone, and so should be addressed. The discussion does not note occurrences of geologic structures such as faults in the corridor, possibly due to the lack of detailed geologic mapping of the area. Geologic structures are an important consideration in any area with carbonate bedrock, as the possibility for development of karst features exists, which may have an impact on construction.

2JJ

On page III-51, the first sentence notes that the "Topography across the entire state is very similar with nearly constant elevations..." The topography across the state in this area is not the same, ranging from floodplains to rugged hills to rolling plains. The phrase "nearly constant elevations" implies a flat topography without much relief.

2KK

Also on this page, the geology is not "similar" across the corridor. In fact, many parts of it are remarkably dissimilar, including rock type and engineering properties. For example, properties of Mississippian limestones are very different from those of Pennsylvanian shales. The terms "Middle Pennsylvanian" and "lower Pennsylvanian" apply time constraints that are not determined for these strata. The text should just refer to Pennsylvanian.

2LL

While the document states the area near Rocheport is noted for karst, the entire region is susceptible, and this should be considered during construction and planning. The text should note that the carbonate rocks have been subjected to dissolution processes, rather than "Solutioning."

2MM

While the potential for metallic mineral resources is limited throughout this corridor, there is potential for "economically important mineral" resources, due to the considerable areas traversed over limestone and dolomite. The document notes that coal beds are found throughout the study area, however coal beds would only be found in this region where there is Pennsylvanian age bedrock. With related shifts in economics and coal desulfurization processes, this is a potential energy resource for the future. There are currently two mines operating in Missouri, although none are operating within the corridor. There is a mention of abandoned mine shafts north of Columbia. The document should clarify if shafts are located elsewhere in the project area, and whether these shafts and associated underground workings near Columbia affect proposed interstate locations.

2NN

The text notes that the "geology in Cooper and Boone Counties is most favorable for cave development." This area may be known for caves, but there is potential for development of karst features anywhere in the corridor where carbonate rocks are present. Even without development of caves, karst features such as sinkholes and fractures will need to be considered in future studies.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

SEP 24 2001

Mr. Don Neumann
Programs Coordinator
Federal Highway Administration
209 Adams Street
Jefferson City, Missouri 65102

Dear Mr. Neumann:

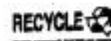
The Environmental Protection Agency (EPA) has reviewed the Draft First Tier Environmental Impact Statement (DEIS) for the **Interstate 70 Corridor Study (Kansas City-St. Louis, Missouri)** (CEQ #010290). Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The Missouri Department of Transportation (MoDOT) and Federal Highway Administration (FHWA) propose to improve the Interstate 70 Corridor in Missouri (between St. Louis and Kansas City) to:

- Increase roadway system capacity
- Reduce number and severity of traffic-related accidents
- Upgrade design features
- Preserve the existing I-70 facility
- Improve efficiency of freight movement
- Facilitate recreational facility usage through improved accessibility

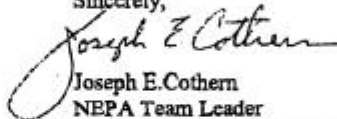
3A

EPA acknowledges the need for this project given the design vintage and the importance of this transportation arterial to the Nation's commerce. Of the alternatives presented, the "widen existing" strategy (alternative) appears to present the least impacts to the natural environment and to agricultural lands, business and home relocations, utilities, and visual quality. EPA would however, recommend that detailed study be undertaken to evaluate (in addition to widening improvements) the addition of a "truck only" roadway section at both the Kansas City and St. Louis. Inclusion of such an additional feature would need corroboration for utility from the respective Metropolitan Planning Organizations. EPA believes that addition of a "truck only" section could allow for more expeditious flow of commerce, lower emissions during peak commuter hours (see general air comment), and could merge truck traffic back onto the improved I-70 at points distant from congestion. Notwithstanding the general and specific comments on cumulative and secondary impacts, EPA has rated this document "LO", which means "Lack of Objections". A summary of EPA's rating system is provided to further explain the rating.



We appreciate the opportunity to review this DEIS. Please send two (2) copies of the final environmental impact statement (FEIS) to this office at the same time it is officially filed with our HQ Office of Federal Activities. If you have any questions, please call me at (913) 551-7148 or e-mail at cothern.joe@epa.gov.

Sincerely,



Joseph E. Cothran
NEPA Team Leader
Environmental Services Division

Enclosure(s) : Detailed Comments
Summary of the EPA Rating System
MICRA study

cc: OFA EIS Filing Section
Patricia Haman, EPA OFA
Tom Lange, MDNR
Jane Ledwin, USFWS

FEIS COMMENTS, FHWA, INTERSTATE 70GENERAL COMMENTS**Air Quality**

- 3B Conformity requirements will need to be addressed in St. Charles County and Eastern Jackson County. Ozone requirements apply to both of these counties. Also, there is a small portion (the 270 loop) in St. Louis that is under a carbon monoxide (CO) maintenance plan. Construction delays within, or upwind of, this area could challenge compliance with this plan.

Secondary and Cumulative Impact Analysis

- 3C The document is unclear as to the degree of analyses undertaken with regard to secondary and cumulative impacts, and the weighting given to secondary and cumulative impacts in the "Tiered Decision and Evaluation Process for I-70 Study Corridor". EPA recommends that the "Evaluation Methodology and Process" column of Table II-1 (II-2) be amended in the FEIS to describe the methodology and relative weighting given to secondary and cumulative impacts in the evaluation process.

- 3D Comparison of secondary impacts among strategies is presented in table II-28 (page II-59) as an (EVALUATION FACTOR). The rating portrayed for secondary impacts is equal among strategies, yet the text throughout Chapter IV predicts a greater potential for indirect (secondary) impacts for strategies in other than existing alignment. EPA believes that there is a discernable difference between strategies, and would recommend that table II-28 be changed to reflect those potential differences. Again, it would be valuable to describe how the secondary impacts rating for each strategy was derived. The FEIS should mention nearby transportation projects, land use plans, zoning ordinances and proposed residential/commercial developments that may forestall or contribute to cumulative impacts. Mention of cumulative actions in the First Tier FEIS may induce communities and development agents to more fully disclose or discern "reasonably foreseeable" developments within the I-70 study corridor as the detailed analyses of the various sections of independent utility (SIU) commence.

Wetlands and Section 404 Clean Water Act (CWA)

- 3E 1. Individual Corps of Engineers' wetlands Section 404 permits will be required. The FEIS might explain the CWA 404 permitting process to enhance public notice and participation.

SEP-28-01 08:21 From: FHWA MO DIVISION

5736369283

T-082 P.06/08 Job-173

DEIS COMMENTS, FHWA INTERSTATE 70DETAILED COMMENTS

- 3F 1. Page 8, Table 4 (Traffic), "time savings" could also be presented in terms of "energy savings" over the life of the project. Such a conversion, and comparison, could assist in developing the Environmental Consequences of the various alternatives per 40 CFR 1502.16, (c) "Energy requirements and conservation potential of various alternatives and mitigation measures".
- 3G 2. Page 8, Table 4 (Environmental), recommend inserting the word "low" after "relatively".
- 3H 3. II-4, "Incident Detection and Management Systems"; recommend further identification of "Caltrans" as the "California Department of Transportation".
- 3I 4. II-93, 2nd paragraph, "born" should be changed to "borne".
- 3J 5. II-96, (f) "System Integration", "capitol" should be changed to "capital".
- 3K 6. III-38, "Missouri River", Study should be undertaken to evaluate bridge approach and piling vulnerability to scour effects during flood conditions. As indicated in the text of this section, considerable modification of the Overton Bottoms floodplain occurred as a result of levee failures in 1993.
- 3L 7. IV-5, "(g) "Secondary and Cumulative Impacts"; The potential for secondary and cumulative impacts between strategies should be clearly conveyed. See General Comments on this subject.
- 3M 8. IV-21, (E), (1), 2nd paragraph; recommend inserting "evaluation" between "environmental" and "process".
- 3N 9. IV-21, (E), (1), 3rd paragraph; add HC and NO_x to the table of contents' Guide to Acronyms and Abbreviations (TOC 14-16).
- 3O 10. IV-42, "Overton Bottoms", last paragraph; Did the geometry of the existing bridge approach contribute to the formation of the "blew hole" under the bridge's west end? If so, what levee structures or water directing structures would be needed to preclude scour at the bridge's approach or at the bridge piers?
- 3P 11. IV-53, 3rd paragraph; EPA is enclosing a copy of the recently completed MICRA study (June 2001) for the shovelnose sturgeon and pallid sturgeon. This document seems to be the latest and most comprehensive assessment for habitat preference for the pallid sturgeon.
- 3Q 12. IV-67, last paragraph; The document indicates that "The possibility of using Environmental Protection Agency funds for part of the infrastructure of a visitor's center was mentioned." In reviewing the participant list for that meeting (IV-67, 1st Paragraph), it is noted that EPA was not at this meeting. It would be useful to the EPA to know which agency proposed the use of EPA funds for this purpose to enable a careful review of EPA's authorities and abilities to provide such assistance.

DEIS COMMENTS, FHWA, INTERSTATE 70**Draft Environmental Impact Statement Rating Definitions****Environmental Impact of the Action****"LO" (Lack of Objections)**

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative. EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement**"Category 1" (Adequate)**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

DEIS COMMENTS, FHWA, INTERSTATE 70

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

DEIS COMMENTS, FHWA, INTERSTATE 70

Summary paragraph for HQ OFA

EPA expressed a lack of objections to the First Tier DEIS. EPA recommended that the FHWA also examine the merits of including "truck only" features (in addition to widening existing I-70) in the Metropolitan Kansas City and St. Louis sections of the I-70 improvements for enhancing the project's ability to meet stated purpose(s) and need(s).



DEPARTMENT OF THE ARMY
KANSAS CITY DISTRICT, CORPS OF ENGINEERS
700 FEDERAL BUILDING
KANSAS CITY, MISSOURI 64106-2896

REPLY TO
ATTENTION OF:

September 20, 2001

Regulatory Branch
(200000774)

Mr. Ken Bechtel
HNTB Corporation
1201 Walnut Street, Suite 700
Kansas City, Missouri 64106

Dear Mr. Bechtel:

We have reviewed the draft First Tier Environmental Impact Statement for improvements to Interstate 70 across the State of Missouri and we offer the following consolidated Kansas City District comments:

- 4A 1. We concur with the identified Sections of Independent Utility (SIU); however, we do not agree with the scope of the second tier studies for all of the SIU's. We disagree that the SIU between Odessa and Boonville (64 miles) and the SIU between Columbia and Kingdom City (15 miles) qualify as National Environmental Policy Act (NEPA) categorical exclusions, as stream and wetland crossings would be involved and as no site specific data have been or would be collected for these SIU's. We are in general concurrence with the scope of the remaining SIU's, and that Environmental Impact Statements and Environmental Assessments as indicated are appropriate for the second tier studies, provided that the Environmental Assessments contain adequate documentation, particularly regarding alternatives.
- 4B 2. In Chapter II (page 117) the draft Environmental Impact Statement indicates that the Far North Conceptual Corridor would not attract sufficient traffic to relieve the operational problems along the existing I-70 alignment through Columbia, and that the finding suggests that the Far North Conceptual Corridor should not be considered further by the second tier study. We do not concur with this statement as the various findings leading to the conclusion are not documented in the First Tier EIS. We recommend that specific traffic and environmental data be included in the First Tier EIS to document the finding, or that the Far North Conceptual Corridor be considered further in the second tier study.

-2-

4C 3. We maintain our previous comments by letters dated April 26, 2000, July 25, 2000 and June 14, 2001, regarding the inclusion of "facilitating access to recreational facilities" and improving the efficiency of freight movement" in the purpose and need statement as they are too specific for the First Tier EIS. These items appear to be covered under "roadway capacity" and "traffic safety."

4D 4. As previously mentioned in our letter dated June 14, 2001, we recommend that a definition be included for the "safety clear zone" mentioned in Chapter I (page 25) under item e (provision for a 30-foot, 6:1 safety clear zone).

4E 5. As previously mentioned in our letter dated June 14, 2001, in Chapter II (page 8), under strategy options for a new parallel toll road it is indicated that alignment options are unlimited, but that it was assumed, based on preliminary findings, that the toll road would be located to the north of existing I-70. Please describe the rationale for this assumption and include specific data supporting your preliminary findings.

4F 6. In chapter II it is indicated that for both the new parallel facility and the new parallel toll road strategies that a free flow speed of 80 mph was assumed for the parallel routes with unchanged posted speed limits on existing I-70, and that these speeds were used for the level of service calculations. As previously mentioned in our letter dated June 14, 2001, we question using the free flow speed of 80 mph for the parallel routes for the models and comparisons of the different strategies because these speeds may never be approved, which would alter the predictions/comparisons of the strategies. We recommend that approved parameters be used, or that both, approved and hypothetical be included.

4G 7. As previously mentioned in our letter dated June 14, 2001, in Chapter IV (page 2), the impacts to wetlands (based on review of NWI maps) are listed as 80 acres for the widen I-70 strategy, however, the wetland impacts described for the widen I-70 strategy beginning on page 41 do not correspond with this figure (rural areas 22 acres, Overton Bottoms 0.5 acres, Minneola Hill 1.7 acres, Columbia 2 acres, and 2 acres total for Warrenton, Wright City, and Wentzville). Please explain or revise accordingly.

4H 8. Bridge crossings and associated actions at the Little Blue River in Jackson County and at the Missouri River may affect the Kansas City District's Little Blue River Project and/or Missouri River Bank Stabilization and Navigation Project. The crossings and potential effects must be coordinated with Kansas City District's Operations Division, Technical Support Branch. Please submit your construction plans for work in these areas

-3-

directly to Mr. Wesley G. Adams, Chief, Technical Support Branch, Operations Division, Kansas City District Corps of Engineers, Room 700 Federal Building, 601 E. 12th Street, Kansas City, Missouri 64106.

- 4I 9. Please submit hydraulic calculations and analysis for the Missouri River crossing directly to Mr. Michael J. Bart, Chief, Hydrologic Engineering Branch, Engineering and Construction Division, Kansas City District Corps of Engineers, Room 843 Federal Building, 601 E. 12th Street, Kansas City, Missouri 64106, for review.

- 4J 10. Further studies and efforts along the Missouri River, especially the Overton Bottoms area, must be closely coordinated with the Kansas City District in order to avoid any effects by the I-70 work on the Overton Bottoms Unit of Kansas City District's Missouri River Fish and Wildlife Mitigation Project at Overton (see attached letters).

Formatting Suggestions

- 4K 11. We suggest that all future documents include an appendix title at the beginning of each appendix for easier reader reference, not just on one single page/listing at the front of the document as in Volume 2 of the subject draft First Tier Environmental Impact Statement. Appendices titles could be printed on the front of the tabbed divider sheets, attached to the dividers on "index tabs," or both measures could be employed, or with the use of some other evident measure.

- 4L 12. Missouri Department of Transportation and Federal Highway Administration should include copies of the attached coordination letters (and any others that are pertinent) between the Kansas City District and the Missouri Department of Transportation regarding the I-70 corridor across the Overton Bottoms and the adjacent Unit of Kansas City District's Missouri River Mitigation Project.


- 4M 13. For the benefit and ease of reference for all readers and/or reviewers, future versions of this and other environmental documents should provide a chronological listing of letters and other coordination found in Appendix H, "Coordination." The listing should be located at the front of the appendix and include the date, originating agency/person, and if possible some indication of which state of the process (data collection, preliminary draft First Tier EIS, draft First Tier EIS, final First Tier EIS, etc.)


We realize that specific data have not been collected for any of the strategies as this is the first tier of the EIS, and that field data will be collected during project planning in

-4-

order to accurately assess the wetland and stream impacts, including impacts to intermittent streams. If you have any questions concerning the above items, please feel free to write me or call Kenny Pointer at 573-634-4788.

Sincerely,


Lawrence M. Cavin
Chief, Regulatory Branch
Operations Division



January 6, 2000

Programs and Project Management Division
Civil Works/Military Project Management Branch

Kathryn Harvey, Liaison Engineer
Missouri Department of Transportation
105 West Capitol Avenue
P.O. Box 270
Jefferson City, Missouri 65102

Dear Ms. Harvey,

Thank you for your comment letter dated November 29, 1999 regarding the 95% Plans and Specifications review for the Overton Bottom Mitigation Project. Your letter outlines several Missouri Department of Transportation (MoDOT) concerns relating to impacts of the proposed project on Interstate 70.

In your review of the proposed project drawings (Sheet C3.2), you found no reference to the 300-foot corridor reserved for MoDOT's future expansion of the interstate. The Corps has agreed to reserve a 300-foot wide corridor parallel to the both the north and south right-of-way of Interstate 70. In reference to our telephone conversation on January 4, 2000, it was agreed that the corridor will not be reflected on the proposed plans. The Corps has determined that the information provides little benefit to a potential contractor. Let us assure you however, that with exception to the proposed modification of the existing ring levee on the north side of the interstate and the placement of an area fill on the south side of the interstate, no new facilities are proposed to be constructed within this corridor.

To reduce the potential impacts to MoDOT from the development of the wetland cell adjacent to MoDOT right-of-way south of I-70, the solicitation and specification document has been modified to require that an area fill be placed in several locations adjacent to the south right-of-way of I-70 (Enclosure, Sheet C3.3). The area fill will be constructed to an elevation of 574-feet mean sea level. This should reduce the potential for both, ponded water near the toe of the fill slope and development of wetland areas on MoDOT right-of-way.

We appreciate your reminder on obtaining a permit for work within MoDOT right-of-way. The solicitation and specification document has been modified to reflect that a

Kneuvean/3146/06Jan2000

-2-

permit is required for said work. The contractor has been made responsible for obtaining the permit from MoDOT.

If you have any questions regarding our response, please feel free to write me or to call Mr. Jud Kneuvean at 816-983-3146 (FAX 816-426-2142).

Sincerely,

SIGNED

Robert G. Dimmitt, P.E.
Project Manager

Enclosure

Missouri
Department
of Transportation



Henry Hungerbæler, Director

105 West Capital Avenue
P.O. Box 270
Jefferson City, MO 65102
(573) 761-2561
Fax (573) 761-8565
www.modot.state.mo.us

November 29, 1999

Mr. Robert G. Dimmitt, P.E.
Program Manager
Corps of Engineers, Kansas City District
691 East 12th Street, Room 807 (PM-A)
Kansas City, MO 64106

Dear Mr. Dimmitt:

Re: 95% Plans and Specifications for the Overton Bottom Mitigation Project

We received the package of information on the Overton Bottom Mitigation Project that you recently sent and have reviewed the same. In reviewing sheet C3.2, we do not see any reference to a 300-foot corridor being reserved for MoDOT. This corridor would be reserved to ensure that there are no improvements or facilities that would be affected by the proposed future expansion of the interstate, specifically the future Missouri River crossing. While we do not see any new facilities shown that fall within that 300-foot corridor, we would still like to have the reserved corridor shown on the plans. The most likely location for the new river crossing would be on the north side of the existing crossing.

South of the existing interstate corridor there is a wetland cell area proposed. As shown on sheet C3.2, that cell area would be south of the existing right of way. However, once created, we believe that the wetland area would in fact be adjacent to the interstate fill slope. Please add notes or specifications that would ensure construction of the wetland cell outside of the right of way with no impoundment against the fill slope. MoDOT is concerned that prolonged saturation of the fill material could cause deterioration of the embankment. In addition, Interstate 70 needs additional capacity. Most options to provide that capacity involve widening the existing roadbed on both sides. MoDOT does not want to be in a situation where we have to mitigate newly created wetlands.

"Our mission is to preserve, enhance and support Missouri's transportation systems."

 Printed on recycled paper

.. Mr. Robert G. Dimmitt, P.E.

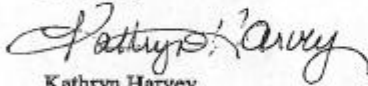
Page 2

November 29, 1999

Finally, there is proposed work within the existing right of way around the ring dike. Please be advised, and put the requirement in the construction contract, any work within MoDOT right of way requires a permit. The permit could be applied for at our district office located in Jefferson City.

Thank you for this opportunity to comment.

Sincerely,



Kathryn Harvey
Liaison Engineer

kh/dr

\\FROEWED\Kathy\Robert Dimmitt1.doc

Copies: Mr. Roger Schwartz-D5

Mr. Mark Kross-ps

U.S. Department
of Transportation
United States
Coast Guard



Commander
Eighth Coast Guard District

1222 Spruce Street
St. Louis, MO 63103
Staff Symbol: (abr)
Phone: 314 539-3900 EXT 378
FAX: 314 539 3755

16590
19 October 2001

Mr. Allen Masuda
Federal Highway Administration
209 Adams Street
Jefferson City, MO 65101

Subj: INTERSTATE 70 DRAFT FIRST TIER ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Masuda:

The subject document has been reviewed and found to be adequate. The main focus of Coast Guard attention is the need for the alteration, replacement or construction of new bridges to carry I-70 across waterways over that require bridge permits. As highway alignments are finalized we will need to review the waterways crossed to determine the need for bridge permits.

I appreciate the early coordination on this project.

Sincerely,

A handwritten signature in dark ink, appearing to read "R. K. Wiebusch".

ROGER K. WIEBUSCH

Bridge Administrator

By direction of the District Commander



U.S. Department
of Transportation
Federal Transit
Administration

REGION VII
Iowa, Kansas,
Missouri, Nebraska

901 Locust Street
Suite 404
Kansas City, MO 64108
816-329-3920
816-329-3921 (fax)

October 4, 2001

Mr. Kevin Keith
Chief Engineer
Missouri Department of
Transportation
P.O. Box 270
Jefferson City, Missouri 65102

Re: Comments, First Tier Draft EIS, I-70 Corridor
Kansas City to St. Louis

Dear Mr. Keith:

We have reviewed the Draft First Tier Environmental Impact Statement (EIS) on the Interstate 70 (I-70) Corridor. Based on our review we offer the following comments:

- 6A 1. Substantial public involvement was undertaken and public transit operators may have been involved in the process through the outreach to the Metropolitan Planning Organizations in Kansas City, Columbia, and St. Louis. However, as additional documentation is prepared, we recommend that the principal transit operators in the metropolitan areas, particularly, Kansas City Area Transportation Authority, and Bi-State Development Agency be added to the "Circulation" list included in Chapter VII. The transit operators may have some specific concerns as the process enters into the "second tier" regarding bus operations within their respective areas, such as potential locations for park and ride lots and safety concerns directly related to bus operations.
- 6B 2. We noted that the "Circulation" list provided in Chapter VII did not include the East-West Gateway Coordinating Council (EWGCC). We were unclear whether this was an oversight, as the MPOs for both Kansas City and Columbia were specifically included on the contact list. We recognize that two outreach meetings were held with the EWGCC.
- 6C 3. We request that our office also be added to the "Circulation" list.

If you have any questions, please do not hesitate to contact Louise Lloyd at 816-329-3938.

Sincerely,

Mokhtee Ahmad
Regional Administrator

cc: Don Neumann, FHWA Mo. Division
Linda Clark, MoDOT District Office
Jerry Mugg, HNTB



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240

ER-01/780

OCT 24 2001

Mr. Allen Masuda
Division Administrator
Federal Highway Administration
Missouri Division
209 Adams Street
Jefferson City, Missouri 65101

Dear Mr. Masuda:

As requested, the U.S. Department of the Interior (Department) has reviewed the First Tier Draft Environmental Impact Statement (DEIS) for the I-70 Corridor Improvement, Kansas City to St. Louis, Jackson and St. Charles Counties, Missouri. The Department offers the following comments for your consideration.

Environmental Impact Statement Comments

The Department appreciates the opportunity to comment on this document and believes that the Federal Highway Administration (FHWA) and the Missouri Department of Transportation (MoDOT) should continue this type of analysis. Given the scope of potential impacts associated with a 250-mile long corridor, this is a proper way to consider system-wide changes without diluting local issues and concerns. We look forward to reviewing the environmental documents associated with the activities along the specific segments of the interstate system.

The DEIS is well written and understandable. The FHWA and MoDOT went to great lengths to explain the concept of the first tier environmental review. The alternatives are well developed and address the purpose and need for the project. It would appear that most potential impacts on important resources are well documented and the reader can adequately anticipate the types of impacts foreseeable at the next level of analysis. The National Park Service (NPS) has the following specific comments.

7A

It appears that a few sites receiving assistance from the Land and Water Conservation Fund will be impacted by the preferred alternative. The DEIS addresses the need to mitigate any impacted parklands with "...replacement land of at least equal recreational utility and monetary value and subject to approval by the U.S. Department of the Interior." The impacts to these properties need to be addressed by the environmental analyses at the next level, and the NPS.

7B The final EIS discussion concerning floodplains in Chapter III should note that the management of impacts to floodplains is specifically covered by Executive Order 11988, Floodplain Management. In addition, under Terrestrial and Aquatic Communities in Chapter III, Tucker Prairie in Callaway County is also listed on the National Registry of Natural Landmarks. The National Natural Landmarks Program was established in 1962, under the authority of the Historic Sites Act of 1935 (16 USC 461 et seq) to identify and encourage the preservation of the full range of geological and ecological features that are determined to represent nationally significant examples of the Nation's natural heritage. Federal agencies should consider the unique properties of these nationally significant areas in compliance with the National Environmental Policy Act (42 USC 4321 et seq).

7C The final EIS should mention that Cedar Creek, which forms the boundary between Boone and Callaway Counties, was listed on the National Rivers Inventory (NRI). In 1982, the portion of Cedar Creek from its confluence with Missouri River near Jefferson City to Route WW approximately 3 miles south of existing I-70 alignment, within the study corridor, was nominated to the NRI. The NRI is a register of rivers that may be eligible for inclusion in the National Wild and Scenic River System. Section 5(d) of the National Wild and Scenic River Act (Public Law 90-542) requires that "In all planning for the use and development of water and related land resources, consideration shall be given by all federal agencies involved to potential national wild, scenic and recreational river areas." In partial fulfillment of the section 5(d) requirements, the NPS has compiled and maintains the NRI.

7D The intent of the NRI is to provide information to assist in making balanced decisions regarding use of the Nation's river resources. Each Federal agency, as part of its normal environmental review processes, should take care to avoid or mitigate adverse effects on rivers identified in the NRI. Furthermore, all agencies are required to consult with the NPS prior to taking actions that could effectively foreclose wild, scenic, or recreational status for rivers on the inventory. The specific actions taken by the FHWA and MoDOT at the next level of analysis needs to take this specific stream into account in its planning, and coordinate with the NPS.

Section 4(f) Comments

7E This level of analysis makes it difficult to assess whether the preferred alternative in the DEIS will result in an impact to a specific Section 4(f) property, though it would appear that any of the alternatives are likely to impact some properties. We would like to encourage the FHWA and MoDOT to continue to coordinate the next level of reviews with the Department since many of these are likely to involve Section 4(f) properties.

Summary Comments

7F We request that the next level of environmental analyses, where specific project-related impacts are known, continue to be coordinated with the Department at the time the analyses are ready for review.

The Department has a continuing interest in working with the FHWA and MoDOT to ensure that impacts to resources of concern to the Department are adequately addressed. For matters related to Section 4(f) Evaluations, please contact the Regional Environmental Coordinator, National Park Service, Midwest Regional Office, 1709 Jackson Street, Omaha, Nebraska 68102.

We appreciate the opportunity to provide these comments.

Sincerely,



Willie R. Taylor
Director, Office of Environmental
Policy and Compliance

cc:
I-70 Improvement Study
Post Office Box 410482
Kansas City, Missouri 64141-0482

5. RESPONSES TO AGENCY COMMENTS ON DRAFT FIRST TIER EIS

Comment codes are used in this section to reference the specific agency letter that the responses correspond to.

COMMENT CODE: 1A

SOURCE: Missouri Department of Conservation

RESPONSE: The Missouri Department of Conservation will be invited to participate in the Second Tier studies for the sections of independent utility.

APPLICABLE REFERENCE: Summary

COMMENT CODE: 2A

SOURCE: Missouri Department of Natural Resources (MDNR)

RESPONSE: Specific discussions and considerations were given to the issue of secondary impacts by the Reasonable Strategies in the Draft First Tier EIS (see Chapter IV, page 72, 1. Land Use). As indicated, the various strategies would have different and varying implications on land use within the Study Corridor. For the most part, it is anticipated that the Preferred Strategy would continue the existing development trends and land use patterns that currently exist within the Study Corridor. Of the transportation enhancements proposed for the highway, perhaps the one difference as compared to the current highway that might affect land use is the provision of continuous frontage roads within the Corridor. However, there are some mitigating factors that strongly suggest that existing trends would not be measurably or notably changed by virtue of the continuous frontage roads. In many cases, service roads already exist along I-70. Furthermore, existing roads would be utilized to the fullest extent possible as part of the frontage road system. Access to adjacent properties along the outside of the frontage roads would be provided, but in many cases this access already exists. Direct access to I-70 would be controlled and limited to the interchange areas, as it is today. Access to I-70 will not change. In the rural areas, the frontage roads will continue to serve local traffic and will provide ingress/egress to adjacent properties. By being continuous, the frontage roads can divert more local traffic and can serve local travel more efficiently. Development trends would be expected to continue to concentrate at the interchange areas.

APPLICABLE REFERENCE: Chapter IV, H.1

COMMENT CODE: 2B

SOURCE: MDNR

RESPONSE: MoDOT is committed to constructing continuous frontage roads along I-70 as part of the Corridor's improvements. As shown in Table II-2, the reduction of highway capacity due to temporary lane closure is measurable. Reducing the highway to one lane due to an accident leaves only around 21% of the highway's capacity. Providing continuous frontage roads would greatly enhance the redundancy of the system should there be an incident that temporarily disrupts I-70's operations. In many cases, service roads already exist along I-70.

Furthermore, existing roads would be utilized to the fullest extent possible as part of the frontage road system. Access to adjacent properties along the outside of the frontage roads would be provided. However, access to I-70 would be controlled and limited to the interchange areas. In the rural areas, in addition to incident management, the frontage roads would serve local traffic and would provide ingress/egress to adjacent properties.

APPLICABLE REFERENCE: Chapter II

COMMENT CODE: 2C

SOURCE: MDNR

RESPONSE: Tables I-1 and I-2 show the historical and projected daily traffic along the I-70 Corridor. As noted in the comment, daily traffic does vary along the Corridor, and as would be expected, the areas of highest travel demand are located in the more urban areas of Kansas City, Columbia and St. Louis. However, as shown in Table I-2, by 2030 all sections of the Corridor will have unacceptable traffic operations. By 2030, the capacity of the four-lane freeway will be exceeded by the Corridor's travel demands consistently throughout the Corridor. Given the other needs of the Corridor, including safety, outdated design features, decaying infrastructure and freight movements, the need for improvements across the Corridor is consistent and uniform. Implementation of the improvements may be staged or sequenced depending on the priorities of the Corridor and the availability of funding. From solely a capacity standpoint, improving the urban areas before the more rural-like areas would be consistent with the Corridor's growth in travel demand and the dynamics of increasing traffic congestion.

APPLICABLE REFERENCE: Chapter I, C.1; Chapter II, F

COMMENT CODE: 2D

SOURCE: MDNR

RESPONSE: Traffic forecasts were performed on two occasions during this project. The first analysis was performed for the Purpose and Needs section (Chapter I) of the document and the evaluation of the various improvement strategies (Chapter II), and the second examined the various Conceptual Corridors of the recommended Preferred Strategy (Chapter II). Between the two forecasts refinements were made to the travel demand forecast model used in the forecasting. Exhibit I-4 lists numbers that were generated during the purpose and need analysis. The statement on page II-50 that eight lanes would be needed from Concordia westward to Kansas City is based on the volumes listed in Table II-17 which contains the volumes from the refined travel demand model. The refinements to the model included a more detailed network and Traffic Analysis Zone (TAZ) structure in the rural areas adjacent to I-70. The volume on I-70 near Concordia for the "No-Build" analysis of the Strategies and Conceptual Corridors is 55,700 vehicles, while the volumes near Boonville are 52,900.

APPLICABLE REFERENCE: Chapter II, F; Chapter II, H.11

COMMENT CODE: 2E

SOURCE: MDNR

RESPONSE: At this time, it is MoDOT's position that it will not consider the conversion of the existing I-70 to a toll road. Consequently, the toll road strategy was only considered in the context of building a new and parallel highway. The documentation reflects this position by MoDOT.

MoDOT will construct the I-70 improvements based on the overall needs of the Corridor, the relative priorities within the Corridor, and the availability of funding. Four-lane improvements could be constructed in the rural areas in accordance with the improvement concept, leaving the construction of the fifth and sixth travel lanes until travel demands dictate, likely before 2030.

APPLICABLE REFERENCE: Chapter II, A

COMMENT CODE: 2F

SOURCE: MDNR

RESPONSE: The consideration of the impacts of improving US 36 and US 50 on the I-70 Corridor were thoroughly explored and documented in the *Route I-70 Feasibility Study*. The Feasibility Study, which preceded the I-70 First Tier EIS, determined that improving both US 36 and US 50 would divert some traffic away from I-70, as much as 10 percent in some places, but that the I-70 problems would not be eliminated. The I-70 First Tier EIS confirmed this conclusion. For the purposes of this study, it was assumed that US 36 and US 50 would both be improved someday. (This assumption is not intended to imply a commitment to construct the US 36 and US 50 improvements.) This assumption provides a little more time before the whole I-70 Corridor would have unacceptable traffic operations.

APPLICABLE REFERENCE: Chapter I, A.2; Chapter I, B.3

COMMENT CODE: 2G

SOURCE: MDNR

RESPONSE: The need for improvements to the I-70 Corridor is driven by the associated problems of the Corridor as a whole. The Corridor is primarily rural in nature, extending approximately 200 miles across the state. Though predominately rural like, this Corridor does overlap the Columbia urbanized area and does extend into the urbanized areas of Kansas City and St. Louis. In these urbanized areas, the daily travel demands of I-70 include both the regional, interstate traveler and the daily commuter. Improvements to I-70 within these areas are needed due to regional travel, notwithstanding the other issues raised in the Purpose and Need Chapter. However, there may be the opportunity for more urban-like alternative transportation improvements to relieve the need for the widening of the I-70 Corridor beyond six lanes within the metropolitan areas of Kansas City and St. Louis. MoDOT, in association with the Mid-America Regional Council and the Kansas City Area Transportation Authority, is currently conducting the I-70 Major Investment Study in Jackson County for just this reason. Similarly, MoDOT, along with the Columbia Area Transportation Study Organization, has completed an MIS for I-70 in Columbia. Furthermore, MoDOT will continue to work with the East West Gateway Coordinating Council and the Bi-State Development Agency regarding alternative transportation opportunities in the St. Louis Metropolitan Area.

APPLICABLE REFERENCE: Summary

COMMENT CODE: 2H**SOURCE:** MDNR

RESPONSE: As the median age of the traveling public becomes older and there is an increase in demand for alternative transportation, the passenger rail service plan (i.e., frequency and capacity of trains) between Kansas City and St. Louis can be expanded accordingly. Currently, there is opportunity for the service to be expanded in response to demands when those demands materialize. Furthermore, if and when the current rail service is unable to be expanded to serve this future demand, a space provision would be provided within the median of I-70 for possible use by new passenger rail service. (This space provision would be provided but the corridor would not necessarily be designed to be fully compatible with high-speed rail. This determination would need to be made as part of the project design development process.)

APPLICABLE REFERENCE: Chapter II, G

COMMENT CODE: 2I**SOURCE:** MDNR

RESPONSE: The space provision within the rural median is not necessarily intended for high-speed passenger rail service. This space envelope is the direct result of the staging of construction in the rural areas that allows the existing four travel lanes to be maintained during construction. Since this extra space is provided, it would be prudent to set this space aside for future, yet-to-be-defined use. Optional modes or functions of this space are undetermined at this time, but would be determined according to the travel demands and technology of the future. This provision would not be provided in the urban areas because the maintenance of traffic in these areas would be different, thereby not providing the opportunity to reserve a space. Proposing this space requirement within the urban areas would have greater impacts to the adjacencies and would not be needed by the Corridor as a whole, according to the project's Purpose and Need. However, under the Metropolitan Planning Process, as administered by the Metropolitan Planning Organizations in conjunction with the local transportation agencies, improvements to the Corridor as a whole would not preclude local initiatives for alternative transportation, such as the ongoing I-70 MIS in Kansas City. This project is not proposing rail service within the Corridor. Connections of passenger rail service in Kansas City or St. Louis would need to be investigated as local initiatives.

Even though rail construction is not a part of this proposed action, design criteria for rail compatibility, such as vertical clearance, was included in the EIS. The extent of the provisions for a currently undefined median use on the I-70 improvements would be determined as part the subsequent design development for the proposed action.

APPLICABLE REFERENCE: Chapter II, C.4; Chapter II, H.2

COMMENT CODE: 2J**SOURCE:** MDNR

RESPONSE: Discussions with numerous trucking companies were held during the EIS

regarding the possible use of a high-speed truckway, as well as the relationship of freight movements within the Corridor via rail and truck. Based on the relative short length of the Corridor relative to bulk freight movements, the inefficiencies of loading and unloading freight for modal transfers, and the highly dispersed nature of non-bulk freight, it is not anticipated that a shift of freight from trucks to rail is feasible. This conclusion is supported by the fact that current rail facilities across the state are generally under capacity.

APPLICABLE REFERENCE: Chapter II, G

COMMENT CODE: 2K

SOURCE: MDNR

RESPONSE: Bicycle and pedestrian access and crossings will be considered in the second tier study documents.

APPLICABLE REFERENCE: None

COMMENT CODE: 2L

SOURCE: MDNR

RESPONSE: References to the increase in posted speed limits as a likely factor in the increase in number and severity of accidents on I-70 do not imply that the accident *rate* has increased due to the higher speed limit. The severity of traffic accidents may increase if vehicles involved in the crashes are traveling at a higher rate, but some observed trends show that accident rates actually decrease with an increase in the speed limit. Since 1996, when Montana removed posted speed limits from its primary system, fatalities have steadily decreased. The lowest rates recorded were in 1999. Higher speeds do not cause accidents. A differential in speeds, caused by slower vehicles, can create unsafe conditions.

I-70 is functionally classified as an interstate. The primary purpose of interstates is to provide safe travel, usually for longer distances, at a high rate of speed. Traffic calming is a technique used to slow traffic and improve safety of collector roadways.

APPLICABLE REFERENCE: None

COMMENT CODE: 2M

SOURCE: MDNR

RESPONSE: Environmental spills need to be addressed in two areas, prevention and response. Response to environmental spills on I-70 can be addressed through the use of Intelligent Traffic Systems (ITS). Specifically the implementation or improvement of emergency response teams along the Corridor. Prevention of truck spills on steep hills can be improved with proper signing of the roadway to alert drivers of upcoming hills. Another method of prevention would be to build truck emergency turnouts on the steepest sections of I-70. With regard to steep hills, no grades on I-70 should exceed the maximum design grades for interstate highways.

APPLICABLE REFERENCE: None

COMMENT CODE: 2N

SOURCE: MDNR

RESPONSE: Improvements to I-70 would enhance safety for all users by providing a modern transportation facility. Safety improvements will include such items as better sight distance for highway ramps, improved signing, wider shoulders, expanded recovery areas and new pavement and pavement markings for better riding conditions. Elderly drivers will benefit from the improvements, as will the rest of the driving population.

APPLICABLE REFERENCE: None

COMMENT CODE: 2O

SOURCE: MDNR

RESPONSE: The study and possibility of corridor enhancements and joint development opportunities will continue to be given consideration in developing the second tier study documents. The entire corridor, not just the Overton Bottoms and the Mineola Hill areas, will be evaluated for these opportunities.

APPLICABLE REFERENCE: Summary

COMMENT CODE: 2P

SOURCE: MDNR

RESPONSE: Comment noted and the use of scenic easements will be one of the enhancement techniques that will be evaluated.

APPLICABLE REFERENCE: Summary

COMMENT CODE: 2Q

SOURCE: MDNR

RESPONSE: Comment noted.

APPLICABLE REFERENCE: None

COMMENT CODE: 2R

SOURCE: MDNR

RESPONSE: Impacts to the Katy Trail State Park and the mitigation to those impacts will be

discussed in the second tier study documents.

APPLICABLE REFERENCE: None

COMMENT CODE: 2S

SOURCE: MDNR

RESPONSE: In Chapter III, Table III-17 - City and County Parks and Recreation Areas, there is no listing of "Rock Bridge Memorial State Park". The park in the table is "Rock Bridge Neighborhood Park", which is a city neighborhood park in Columbia. Rock Bridge Memorial State Park is located south of the Columbia city limits, and outside of the Study Corridor. Rock Bridge Memorial State Park, Finger Lakes State Park, and Confederate Memorial State Historic Site are all outside of the 5-mile radial limits (5 miles north and 5 miles south of existing I-70) of the Study Corridor. Only those that were wholly or at least partially within the 10-mile wide study corridor were included or discussed in the text. Subsequent second tier studies will include information on all parks, recreation areas, and conservation areas that intersect the study area defined in each subsequent study, and will also include those outside the study area if they are close enough to result in the potential for proximal impacts.

APPLICABLE REFERENCE: Chapter III, Section 3, and Exhibits III-2 & III-6

COMMENT CODE: 2T

SOURCE: MDNR

RESPONSE: Finger Lakes State Park, and the MDC Rocky Fork Conservation Area are two miles (3.2 km) and 0.9 miles (1.4 km) north of the limits of the Columbia Area Far North Corridor and the I-70 study corridor. Only those parks, recreation areas, and conservation areas that were wholly or at least partially within the limits of the study corridors were included or discussed in the text. Subsequent second tier studies will include information on all parks, recreation areas, and conservation areas that intersect the study area defined in each subsequent Study, and will also include those outside the study area if they are close enough to result in the potential for proximal impacts.

APPLICABLE REFERENCE: Chapter III, Section 3, and Exhibit III-6

COMMENT CODE: 2U

SOURCE: MDNR

RESPONSE: Comment noted and appreciated.

APPLICABLE REFERENCE: None

COMMENT CODE: 2V

SOURCE: MDNR

RESPONSE: Comment noted and appreciated. Stream crossing methods and mitigation will be evaluated in the second tier studies

APPLICABLE REFERENCE: None

COMMENT CODE: 2W

SOURCE: MDNR

RESPONSE: Comment noted. Wetland mitigation sites and opportunities along the entire corridor will be evaluated in second tier studies.

APPLICABLE REFERENCE: None

COMMENT CODE: 2X

SOURCE: MDNR

RESPONSE: The second tier studies for improvements to I-70 will address the Missouri River crossing at Overton Bottoms in much greater detail, certainly with particular attention to overtopping criteria and the proposed bridge and roadway elevations.

The roadway alignment and design will follow FEMA guidelines of no floodway encroachment and the roadway grade will abide by the freeboard requirements above the Standard Project Flood established by the Corps of Engineers

APPLICABLE REFERENCE: Chapter III, Section 5.c

COMMENT CODE: 2Y

SOURCE: MDNR

RESPONSE: The proposed project's effect on groundwater recharge will be mostly in redirecting rather than diminishing the flow. The increase in peak flows will be minor and can be mitigated by roadway ditches and check dams. The effects of roadway drainage will be assessed for the upstream and downstream areas.

Hydrologic and hydraulic changes that might occur with the widening of the I-70 roadway and interchanges will be addressed in the second tier studies and subsequent project development.

APPLICABLE REFERENCE: Chapter III, Section 5.c

COMMENT CODE: 2Z

SOURCE: MDNR

RESPONSE: The proposed project involves construction of additional lanes along the existing

interstate. In general, the existing bridges and culverts will be extended or replaced in kind. Second tier studies and subsequent project development will address creation of a corridor enhancement plan to maintain the integrity of the wildlife corridors and migration paths.

APPLICABLE REFERENCE: Chapter III, Section 5.c

COMMENT CODE: 2AA

SOURCE: MDNR

RESPONSE: Comments noted. Any wetlands impacted will be advanced in future environmental studies and mitigation will conform with best practices. Similarly, any stream loss will also be mitigated accordingly.

APPLICABLE REFERENCE: None

COMMENT CODE: 2BB

SOURCE: MDNR

RESPONSE: Comment noted. Discussions among the Federal Highway Administration, the Missouri Department of Transportation, and the Missouri Department of Natural Resources have already begun. The goal of the discussion is to agree on how to address the Interstate 70 historic concerns.

APPLICABLE REFERENCE: Summary; Chapter III, B.8; Chapter IV, E.10

COMMENT CODE: 2CC

SOURCE: MDNR

RESPONSE: Comments noted. More specific information will be researched and made available for determinations of eligibility during the next levels of study. The report prepared by the historic preservation consultant will be made available to you by contacting Dr. Bob Reeder of MoDOT.

APPLICABLE REFERENCE: Summary; Chapter III, B.8; Chapter IV, E.10

COMMENT CODE: 2DD

SOURCE: MDNR

RESPONSE: The nomenclature used by the database provider was listed as “SPL” which is equivalent to the “Superfund” database maintained by the Superfund Section of MDNR

APPLICABLE REFERENCE: Chapter III, B.9.a

COMMENT CODE: 2EE

SOURCE: MDNR

RESPONSE: Jackson County Lake City Army Ammunition Plant is listed and borders the study area. Lake Lotawana Sportsman Club, Independence FMGP and Prier Brass are not in the study area. Boone County University of Missouri Columbia, South Farm has been added. Warren County Zykan Landfill is listed as a site.

APPLICABLE REFERENCE: Chapter III, B.9.b

COMMENT CODE: 2FF

SOURCE: MDNR

RESPONSE: Pursuant to the Missouri Hazardous Waste Management Law, Section 260.465(1) RSMo, any change of use at any site listed on the *Registry* will need prior approval from the program's director, following submittal of a detailed change of use request. The process for requesting such a change is outlined in Title 10, Division 25, Chapter 10 of the Code of State Regulations [10 CSR 25-10.010(3)(A)(3)].

APPLICABLE REFERENCE: Chapter III, B.9.b

COMMENT CODE: 2GG

SOURCE: MDNR

RESPONSE: SHWS are sites provided by the MDNR. The following clarifications are provided: SPL – State Priority List – MDNR Superfund Section (SPL is nomenclature used by VISTA for data retrieved from MDNR) and SHWS – State Hazardous Waste Site - sites listed in the summary are sites provided by the MDNR.

APPLICABLE REFERENCE: Chapter III, B.9.a

COMMENT CODE: 2HH

SOURCE: MDNR

RESPONSE: The second tier study and subsequent project development will identify and update hazardous sites as they become applicable to the project.

APPLICABLE REFERENCE: Chapter III, B.9.a

COMMENT CODE: 2II

SOURCE: MDNR

RESPONSE: References are listed at the end of Chapter III. To clarify the issue of seismicity, the eastern end of the study area may be affected by potential seismic sources, which may require specific design considerations.

APPLICABLE REFERENCE: Chapter III, B.5.a

COMMENT CODE: 2JJ

SOURCE: MDNR

RESPONSE: The topography, as relief and contour of the land, is very similar across the corridor. Locally there is seldom over 100 feet of relief and under 400 feet from any two points in total elevation difference over 2,000 square miles (5,180 km²). Topography is predicted not to affect the location of the proposed highway.

APPLICABLE REFERENCE: Chapter III, B.5.a

COMMENT CODE: 2KK

SOURCE: MDNR

RESPONSE: The geology is similar in that nearly all the rocks are flat lying sedimentary rocks such as limestone, dolomite, sandstone and shale. While there are relative differences between the rock types, those differences will not affect the location or design of the proposed facility. The text was edited to reflect only the term Pennsylvanian.

APPLICABLE REFERENCE: Chapter III, B.5.a

COMMENT CODE: 2LL

SOURCE: MDNR

RESPONSE: Indeed the entire corridor is susceptible to karst. The EIS addresses the likelihood or potential of karst in three different areas of the study area. A full geotechnical-engineering program of drilling, sampling, testing and analysis will be carried out during the design phase to identify geologic and engineering parameters.

APPLICABLE REFERENCE: Chapter III, B.5.a

COMMENT CODE: 2MM

SOURCE: MDNR

RESPONSE: Very few presently economically important mineral deposits are located in the study corridor. Surface quarries supplying economically important construction aggregate are frequent and located in areas where dolomite and limestone crop out.

Given the geology of the Study Area, coal beds can be found throughout the area underlain by

Pennsylvanian Age rocks. Coal resources range from insignificant scattered thin beds to beds several feet thick. The coal resources are high in sulfur content and no longer used for power production, but future shifts in economics and coal desulfurization processes may return this coal to a potential energy source in the future. Although no current mining is taking place, coal layers located in the lower Pennsylvanian strata have been mined in the past, mostly small operations dating from the late 1800s to 1940s. These mines supplied the railroads, steam ships, residential and commercial users. The only shafts related to coal mining may be encountered north of the Columbia area and are not expected to affect the location of the proposed facility.

APPLICABLE REFERENCE: Chapter III, B.5.a

COMMENT CODE: 2NN

SOURCE: MDNR

RESPONSE: Indeed the entire Study Corridor is susceptible to karst. The EIS addresses the likelihood or potential of karst in three different areas of the study area. A full geotechnical-engineering program of drilling, sampling, testing and analysis will be carried out during the design phase to identify geologic and engineering parameters.

APPLICABLE REFERENCE: Chapter III, B.5.a

COMMENT CODE: 3A

SOURCE: U.S. Environmental Protection Agency (EPA)

RESPONSE: The I-70 First Tier EIS considered the issues of special truck facilities as a means of improving the overall Corridor. As per our discussions with various major trucking companies, it was determined that the Corridor is not regional enough to provide opportunities of shifting or reorganizing freight movements. Providing special improvements for trucks would not likely be fully utilized and would be inefficient. Given that this project would not be of sufficient regional scope to affect truck freight movements, it is likely that even more localized truck provisions would have success. However, operational considerations could be considered such as dedicated non-truck lanes. Furthermore, in the urban areas, as daily commuter-oriented and highly peaking traffic increases, the percentage of trucks and their respective demands on capacity measurably decrease. For these reasons, typical alternative transportation options in urban areas consist of high-occupancy vehicle lanes – reducing the number of vehicles by increasing the overall vehicle occupancies. Adding exclusive truck lanes in urban areas would be inefficient. Operational options could include encouraging trucks to service urban areas during non-peak periods, or by encouraging alternative routes. These issues would need to be investigated as part of the Metropolitan Planning Process in the respective urban areas.

APPLICABLE REFERENCE: Chapter II, G

COMMENT CODE: 3B

SOURCE: EPA

RESPONSE: Comment noted. Conformity requirements will be addressed in the second tier studies. Appropriate coordination will take place with the Metropolitan Planning Organizations.

APPLICABLE REFERENCE: Chapter III, B.1; Chapter IV, E.1

COMMENT CODE: 3C

SOURCE: EPA

RESPONSE: Table II-1, Tiered Decision and Evaluation Process for I-70 Study Corridor, was intended to describe and define the overall process of the evaluation and decision making within the tiered process for I-70. This discussion was not intended to define with any specificity the methodologies that were used for each impact issue within each step of the screening and evaluations. Obviously, to present detailed methodologies of each issue, including the issue of secondary and cumulative impacts, would have been voluminous and prohibitive. The methods used for each issue are self evident within the impacts discussions contained within the document.

APPLICABLE REFERENCE: Chapter II, Table II-1

COMMENT CODE: 3D

SOURCE: EPA

RESPONSE: The analysis of secondary impacts for each Reasonable Strategy showed that due to mitigating factors, the potential secondary impacts of each are relatively similar. As a consequence, each was given a similar rating within Table II-28. This fact was further elaborated in the secondary impact discussions within the document. More detailed secondary impact discussions will be conducted in the second tier studies.

APPLICABLE REFERENCE: Chapter IV, H

COMMENT CODE: 3E

SOURCE: EPA

RESPONSE: The 404 Permit process includes an application which describes the proposed action, the area's cultural resources, wetlands, endangered species, and floodplains. The public interest review considers many additional factors. Comments by interested parties, which include the public, local, state and federal agencies, and Indian tribes, are encouraged and are all reviewed by the U.S. Army Corps of Engineers prior to acting on the permit application. The U.S. Army Corps of Engineers may issue, modify, condition or deny a permit, based on their evaluation of the likely impacts of the proposed action.

APPLICABLE REFERENCE: None

COMMENT CODE: 3F

SOURCE: EPA

RESPONSE: Comment noted. It is agreed that time savings could also be presented in terms of energy savings over the life of the project. However, for the purposes of the presentation in Table 4, the topic was specifically traffic. Therefore, factors and evaluations were limited to traffic-related issues. Energy savings are discussed in the narrative in Section G, Energy and Construction Impacts, within Chapter IV of the First Tier Draft EIS.

APPLICABLE REFERENCE: Chapter IV, G

COMMENT CODE: 3G

SOURCE: EPA

RESPONSE: Comment noted and changes completed.

APPLICABLE REFERENCE: Summary

COMMENT CODE: 3H

SOURCE: EPA

RESPONSE: Comment noted and changes completed.

APPLICABLE REFERENCE: Chapter II, A.1.b

COMMENT CODE: 3I

SOURCE: EPA

RESPONSE: Comment noted and changes completed.

APPLICABLE REFERENCE: Chapter II, H.8

COMMENT CODE: 3J

SOURCE: EPA

RESPONSE: Comment noted and changes completed.

APPLICABLE REFERENCE: Chapter II, H.8

COMMENT CODE: 3K

SOURCE: EPA

RESPONSE: Comment noted and scour counter measures will be evaluated in future second

tier studies and during subsequent design development.

APPLICABLE REFERENCE: Chapter III, B.5

COMMENT CODE: 3M

SOURCE: EPA

RESPONSE: Comment noted and changes completed.

APPLICABLE REFERENCE: Chapter IV, E.1

COMMENT CODE: 3N

SOURCE: EPA

RESPONSE: Comment noted and changes completed.

APPLICABLE REFERENCE: Table of Contents

COMMENT CODE: 3O

SOURCE: EPA

RESPONSE: Comment noted and scour counter measures will be evaluated in future second tier studies and during subsequent design development.

APPLICABLE REFERENCE: Chapter IV, E.7

COMMENT CODE: 3P

SOURCE: EPA

RESPONSE: The most recent information (i.e., MICRA Study) regarding the shovelnose sturgeon and pallid sturgeon will be used in the second tier studies.

APPLICABLE REFERENCE: Chapter IV, E.9

COMMENT CODE: 3Q

SOURCE: EPA

RESPONSE: It was a consensus opinion that there could be the possibility of using experimental EPA funds in developing part of the infrastructure for a visitor's center. This possibility will be pursued within the future Second Tier studies.

APPLICABLE REFERENCE: None

COMMENT CODE: 4A**SOURCE:** U.S. Army Corps of Engineers (USACE)

RESPONSE: Comment noted. It is recognized that stream and wetland crossings will be involved during the second tier studies. Site specific data will be collected and coordination will occur with the appropriate resource agencies.

APPLICABLE REFERENCE: Summary

COMMENT CODE: 4B**SOURCE:** COE

RESPONSE: The Draft First Tier EIS clearly documents through the traffic analyses of the conceptual corridors (section H.11 of Chapter II) that traffic would not be attracted by the Far North Conceptual Corridor. However, due to comments by public officials and community leaders in Columbia, as indicated earlier in this chapter under the topic of public comments, MoDOT will consider further the Far North Conceptual Corridor in the second tier study. The second tier study will focus on land use and community impact issues, in coordination with more detailed discussions with the community.

APPLICABLE REFERENCE: Chapter II, H.11

COMMENT CODE: 4C**SOURCE:** USACE

RESPONSE: The organization of the Purpose and Need was based on the varying nature of problems the Corridor is experiencing. The existence or projection of traffic congestion is commonly a symptom of an underlying problem. For example, the interstate travel demands across the state are projected to exceed the ability of I-70 to adequately serve these demands, thereby resulting in traffic congestion. Another way of improving the traffic conditions of the Corridor is by changing the Corridor's travel demands. The high-occupancy vehicle lane strategy and special truck considerations of the other strategies address this. Different improvement strategies can affect the Corridor's operations differently. Furthermore, there are design considerations that can affect trucks and not overall traffic. Finally, considerations of the unique vacation or recreation travel markets can affect localized traffic conditions much differently than general long-distance travel within the Corridor.

APPLICABLE REFERENCE: Chapter I

COMMENT CODE: 4D**SOURCE:** USACE

RESPONSE: Comment noted and the definition of clear zone has been added.

APPLICABLE REFERENCE: Chapter I, C.3.e

COMMENT CODE: 4E

SOURCE: USACE

RESPONSE: In concept, the alignment of Strategy No. 5 (New Parallel Toll Road) was undefined. The approach was to determine if there are any issues or constraints that would preclude or prevent the implementation of this strategy, and if there were any operational benefits. For the purposes of the operational analysis, a representative alignment within the 10-mile wide corridor was assumed for computational purposes only. All other alignments, either north of existing I-70, south of existing I-70, or a combination thereof, would generally have similar operational results. The findings of this study regarding the application of a new toll road would not be different if multiple alignments had been considered. As shown in Table II-28, whether or not the alignment of a parallel highway is north or south of existing I-70 has little affect on traffic volumes. Consequently, because there appears to be fewer environmental issues north of existing I-70, a northern alignment for the toll road concept was utilized to represent this concept. The toll road concept analysis is summarized on Table II-28.

APPLICABLE REFERENCE: Chapter II, G

COMMENT CODE: 4F

SOURCE: USACE

RESPONSE: The option of the parallel route strategies consisting of a high-speed facility was developed to provide the best service reasonably possible to the interstate traveler. This concept would provide an incentive to attract traffic away from the existing I-70, thereby freeing up capacity along the existing highway for more local traffic. This operational option of the parallel route strategies was only intended to reflect the best case scenario for these strategies to relieve the problems along existing I-70. Of course the parallel route strategies would not have to be high-speed. The parallel route could be a more typical type of highway. The various strategies considered by this EIS were not constrained by current legislative authority, but all reasonable and feasible strategies and their operational permeations were considered. For example, MoDOT does not currently have the ability to own or operate toll facilities, yet this concept was considered by this study.

APPLICABLE REFERENCE: Chapter II, F

COMMENT CODE: 4G

SOURCE: USACE

RESPONSE: Chapter IV, Section B, Table IV-1 represents a preliminary analysis of the "Reasonable Strategies". In that phase of the study, the analysis was intended to be very broad-based and general in determining relative impacts to major environmental factors, including wetlands and other water resources. The estimated wetland acreage impacts included all of the National Wetlands Inventory (NWI) classification systems shown on the maps, including Palustrine (PAB, PEM, PSS, PFO, PUB, PUS), Riverine (R2, R3, R4), and

Lacustrine (L1, L2). The impacts for the Widen I-70 Strategy, shown in Table IV-1, were based on a 500' wide corridor (250' on each side of the existing I-70 centerline). In contrast, the subsequent impact analysis done for the Widen I-70 Strategy in Chapter IV, Section E.7, Table IV-10, utilized a methodology whereby the analysis was based on a more refined corridor, with widening on one side, or the other, of existing I-70, in many cases avoiding larger wetland areas. This refined corridor also included minimal widening in the Mineola Hill/Loutre River area, and in the area from west of Warrenton to Wentzville. In addition, this phase of the analysis considered the term "wetlands" to include only "vegetated wetland" NWI classifications, i.e. Palustrine Aquatic Bed (PAB), Emergent (PEM), Scrub-shrub (PSS), and Forested (PFO). Classifications of other water resources that were not included in "wetlands" impacts in Table IV-10 were Riverine (R2, R3, R4); Palustrine Unconsolidated Bottom (PUB) and Unconsolidated Shore (PUS); and Lacustrine (L1, L2). The Riverine classification was considered separately as "stream" impacts.

The PUB and PUS classifications considered as upland ponds, and the L1 and L2 classifications referring to lakes, are included as "aquatic community" impacts in Chapter IV, Section E.8, Terrestrial and Aquatic Communities.

The "Wetlands" item in the first column in Table IV-1 (Chapter IV) is amended to read "Wetlands/Water Resources". A footnote is also added to Table IV-1 to explain that all NWI classifications were included in the estimated "Wetlands/Water Resources" impacts.

Subsequent Second Tier studies will be able to more accurately assess impacts to waters of the U.S., including jurisdictional wetlands.

APPLICABLE REFERENCE: Chapter IV, Sections B.1. and E.7., and
Tables IV-1 and IV-10

COMMENT CODE: 4H

SOURCE: USACE

RESPONSE: Comment noted and when appropriate, pertinent information will be submitted to Mr. Adams at the office listed in the comment.

APPLICABLE REFERENCE: None

COMMENT CODE: 4I

SOURCE: USACE

RESPONSE: Comment noted and when appropriate, the hydraulic information will be submitted to Mr. Bart at the office listed in the comment.

APPLICABLE REFERENCE: None

COMMENT CODE: 4J

SOURCE: USACE

RESPONSE: Comment noted. Second tier studies that include the Overton Bottoms area will be coordinated with the listed Corps of Engineers office.

APPLICABLE REFERENCE: None

COMMENT CODE: 4K

SOURCE: USACE

RESPONSE: Comment noted.

APPLICABLE REFERENCE: None

COMMENT CODE: 4L

SOURCE: USACE

RESPONSE: Comment noted and the reference letters are included.

APPLICABLE REFERENCE: None

COMMENT CODE: 4M

SOURCE: USACE

RESPONSE: Comment noted.

APPLICABLE REFERENCE: None

COMMENT CODE: 5A

SOURCE: U.S. Coast Guard

RESPONSE: Comment noted.

APPLICABLE REFERENCE: None

COMMENT CODE: 6A

SOURCE: Federal Transit Administration (FTA)

RESPONSE: The circulation list has been amended to include the transit operators.

APPLICABLE REFERENCE: Chapter VII

COMMENT CODE: 6B

SOURCE: FTA

RESPONSE: The circulation list has been amended to include the EWGCC. The EWGCC did receive a copy of the Draft First Tier EIS but were inadvertently omitted from the list.

APPLICABLE REFERENCE: Chapter VII

COMMENT CODE: 6C

SOURCE: FTA

RESPONSE: FTA has been added to the circulation list.

APPLICABLE REFERENCE: Chapter VII

COMMENT CODE: 7A

SOURCE: U.S. Department of the Interior (DOI)

RESPONSE: Comment noted. Any impacted parklands will be addressed in the second tier environmental documents.

APPLICABLE REFERENCE: None

COMMENT CODE: 7B

SOURCE: DOI

RESPONSE: Comment noted. Due to late receipt of these comments, Executive Order 11988 will be referenced in the Record of Decision for this project.

APPLICABLE REFERENCE: Chapter III

COMMENT CODE: 7C

SOURCE: DOI

RESPONSE: Comment noted. Due to late receipt of these comments, Cedar Creek will be discussed in the second tier environmental documentation.

APPLICABLE REFERENCE: Chapter III

COMMENT CODE: 7D

SOURCE: DOI

RESPONSE: Comment noted. This will be taken into account in the second tier environmental documentation.

APPLICABLE REFERENCE: None

COMMENT CODE: 7E

SOURCE: DOI

RESPONSE: Comment noted. The second tier environmental documentation will be coordinated with the Department of the Interior.

APPLICABLE REFERENCE: None

COMMENT CODE: 7F

SOURCE: DOI

RESPONSE: Comment noted. The second tier environmental documentation will be coordinated with the Department of the Interior.

APPLICABLE REFERENCE: None

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