

U.S. Department  
of Transportation

United States  
Coast Guard



Commandant  
Eighth Coast Guard District

1222 Spruce Street  
St. Louis, MO 63103  
Staff Symbol: (obr)  
Phone: 314-539-3900, x378  
FAX: 314-539-3755

Kross, Mddot  
HVP  
KWB  
#32254

16591.1  
March 1, 2000

Mr. Donald L. Neumann  
Program Engineer  
US Department of Transportation  
Federal Highway Administration  
209 Adams Street  
Jefferson City, MO 65101

Subj: FIRST TIER ENVIRONMENTAL IMPACT STATEMENT, I-70 ACROSS THE  
STATE OF MISSOURI PROJECT

Dear Mr. Neumann:

I appreciate the invitation to attend the First Tier Environmental Impact Statement meeting concerning I-70 across the State of Missouri held in Jefferson City on 23 February 2000. I was unable to have anyone attend due to prior commitments.

However, the Coast Guard is very interested in the project and wants to be included in future meetings and discussions. The Coast Guard accepts your offer to be a cooperating agency in the EIS preparation and review. I look forward to working with you and your staff on this very important 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

Copy: Mr. Jerry Muggs, HNTB  
JAM



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

RECEIVED

JUL 10 2000

HNTB-KCMO

REPLY TO  
ATTENTION OF:

July 5, 2000

Regulatory Branch  
(200000774)

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

Dear Mr. Bechtel:

This is in response to HNTB's request for our review of the revised draft of Chapter I for the First Tier Environmental Impact Statement for improvements to Interstate 70 (I-70) across the State of Missouri from the Route 7 Interchange (Exit 20) in Jackson County, to the Lake St. Louis interchange (Exit 214) in St. Charles County.

The revised draft of Chapter I which was presented during the meeting on June 21, 2000, did not include any changes in the purpose and need statement. In response to your earlier request for our review of the proposed "purpose and need" statement, we commented that we were in general agreement that the purpose of the project is to increase roadway capacity, improve traffic safety, upgrade roadway design features, and system preservation of the existing I-70 facility. We commented in a letter dated April 26, 2000. We also commented that the inclusion of "facilitating access to recreational facilities" and "improving the efficiency of freight movement" were too specific for the purpose and need of the First Tier EIS.

Although we maintain our previous comments, we do not object to the purpose and need statement in Chapter I as the EIS does not involve evaluation of a Section 404 Department of the Army permit.

If you have any questions concerning this matter, please feel free to write me or call Kenny Pointer at 573-634-4788.

Sincerely,

Lawrence M. Cavin  
Chief, Regulatory Branch  
Operations Division





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

REPLY TO  
ATTENTION OF:

April 26, 2000

RECEIVED

MAY 01 2000

HNTB-KCMO

(200000774)

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

Dear Mr. Bechtel:

This is in response to your request for our review of the purpose and need as described in Chapter I for the First Tier Environmental Impact Statement for improvements to Interstate 70 (I-70) across the State of Missouri from the Route 7 interchange (Exit 20) in Jackson County, to the Lake St. Louis interchange (Exit 214) in St. Charles County.

We have reviewed your proposed "purpose and need" statement for the First Tier EIS as stated in Chapter I and are in general agreement that the purpose of the project is to increase roadway capacity, improve traffic safety, upgrade roadway design features, and system preservation of the existing I-70 facility. However, we believe that including "facilitating access to recreational facilities" and "improving the efficiency of freight movement" is too specific for the purpose and need of the First Tier EIS.

We believe that the needs for goods movement and access to recreational facilities would be satisfied under the general needs to increase roadway capacity, etc.

Promoting the use by motorists of recreation facilities and identifying freight movement as a project purpose are too specific. As this project does not involve evaluation of a Section 404 Department of the Army permit, we believe that the purpose and need for the First Tier EIS should be very general.

If you have any questions concerning this matter, please feel free to write me or call Kenny Pointer at 573-634-4788 (FAX 573-634-7960).

Sincerely,

Lawrence M. Cavin  
Chief, Regulatory Branch  
Operations Division

Copies Furnished:

Federal Highway Administration  
Attn: Donald Neumann



DEPARTMENT OF THE ARMY  
KANSAS CITY DISTRICT, CORPS OF ENGINEERS  
STATE REGULATORY PROGRAM OFFICE - MISSOURI  
221 BOLIVAR STREET, SUITE 103  
JEFFERSON CITY, MISSOURI 65101

June 14, 2001

REPLY TO  
ATTENTION OF:

(200000774)

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

Dear Mr. Bechtel:

This is in response to HNTB's request for our review of the preliminary draft of the First Tier Environmental Impact Statement for improvements to Interstate 70 (I-70) across the State of Missouri from the Route 7 Interchange (Exit 20) in Jackson County, to the Lake St. Louis Interchange (Exit 214) in St. Charles County.

Based on our review of the preliminary draft of the First Tier EIS, we offer the following comments:

1. We maintain our previous comments by letters dated April 26, 2000, and July 5, 2000, 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."

2. In Chapter I, we recommend that a definition be included for the "safety clear zone" mentioned on page 24 under item e (provision for 30-foot, 6:1 safety clear zone), and that an explanation be provided for the acronyms of RIC, PSR and IRI for the table on page 25.

3. 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.

4. In the interchange improvement options section of Chapter II, it is mentioned several times that the interchanges could be reconstructed with a greater degree of access management pursuant to guidance currently under consideration by MoDOT. Please include specific information on the guidance that is being referenced.



5. 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. 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.

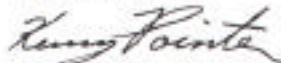
6. In Chapter II (page 66), in the evaluation of reasonable strategies it is indicated that secondary impacts are not expected to be a differentiating factor between the various strategies, and that it is estimated that the widen I-70 strategy would have greater impacts to the aural environment. We have concern with these statements as secondary impacts for the parallel route strategies were not addressed, and as there would definitely be secondary impacts associated with noise with the parallel route strategies. Please include the rationale for this assumption.

7. 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 40 do not match this figure (rural areas 22 acres, Overton Bottoms 0.5 acres, Minneola Hill 1.75 acres, Columbia 2 acres, and 2 acres total for Warrenton, Wright City and Wentzville). We realize that specific field 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 order to accurately assess the wetland and stream impacts (including impacts to intermittent streams).

8. We assume that sections of independent utility will be addressed in the Second Tier EIS for the selected preferred alternative (Widen Existing I-70), along with specific impacts to wetlands and the intermittent and perennial streams.

Other than the above mentioned items we are in general concurrence with the preliminary draft of the First Tier EIS. If you have any questions concerning this matter, please feel free to write or call me at 573-634-4788 (FAX 573-634-7960).

Sincerely,



Kenny Pointer  
Regulatory Project Manager  
Missouri State Regulatory Office



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
901 N. 5TH STREET  
KANSAS CITY, KANSAS 66101

MAY 01 2000

RECEIVED  
MAY 04 2000  
HNTB-KCMO

Mr. Jerry Mugg  
HNTB Corporation  
1201 Walnut St., Suite 700  
Kansas City, MO 64106

re: Review of the Draft Purpose and Need - Chapter 1, for the I-70 Improvement  
Study Draft Environmental Impact Statement

Dear Mr. Mugg:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Purpose and Need chapter for the I-70 Improvement Study Draft Environmental Impact Statement (DEIS). Our review is provided pursuant to your solicitation of comments during the I-70 Improvement Study, Interagency Scoping Process. Please find our comments enclosed.

EPA thanks you for the opportunity to review and provide comments on the draft Purpose and Need for this project. If you have any questions regarding this letter, please call me at 913-551-7551, or you may write to me at the above address.

Sincerely,

Royce B. Kemp  
NEPA Compliance Team  
Environmental Services Division

enclosure

cc: Ken Bechtel, HNTB  
Kathy Harvey, MODOT  
Peggy Casey, FHWA





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

RECEIVED  
JUL 18 2000  
HNTB-KCMO

JUL 13 2000

Mr. Jerry Mugg  
HNTB Corporation  
1201 Walnut St., Suite 700  
Kansas City, MO 64106

re: Review of the Draft Affected Environment - Chapter 3, for the I-70 Improvement Study  
Draft Environmental Impact Statement

Dear Mr. Mugg:

The U.S. Environmental Protection Agency (EPA) has reviewed the Affected Environment chapter for the I-70 Improvement Study Draft Environmental Impact Statement (DEIS). Our review is provided pursuant to your solicitation of comments through the I-70 Improvement Study, Interagency Scoping Process. Please find our comments enclosed.

EPA thanks you for the opportunity to review and provide comments on this project. If you have any questions regarding this letter, please call me at 913-551-7551, or you may write to me at the above address.

Sincerely,

Royce B. Kemp  
NEPA Team  
Environmental Services Division

enclosure

cc: Ken Bechtel, HNTB  
Kathy Harvey, MODOT  
Peggy Casey, FHWA

## EPA Comments on the Draft Purpose and Need - Chapter 1, for the I-70 Improvement Study - Draft Environmental Impact Statement

1. A general comment on the draft chapter: This document requires more thorough proofreading, some sentences are either not complete or do not make sense. For example, the first sentence on page 1 seems to end without being completed. The numbering and lettering of the sections and sub-sections is not accurate or consistent. And, the second paragraph on page 1 describes three sections, but does not match the three sections listed and described in the document.
2. Project Description Section - This section may become more clear if the proposed action is summarized in the beginning of the section instead of the end and then followed with the major elements of the project and other supporting information for the project description.
3. Project Description Section - This section should briefly explain the tiering process and how it applies to this project. This section should also explain what MoDOT and FHWA expect to accomplish through the tiering process and a schedule of events and due dates for the project.
4. Purpose and Need Section - The initial Purpose and Need statement includes "expectations of a nationally important highway," presumably as a need for the proposed action. It is unclear what this means and how it relates to this proposal. Further discussion, or a supporting explanation, should be included in this section to identify how this correlates to the project.
5. Purpose and Need Section - This section may be trying to presenting too much supporting data and information of the project objectives which could be better incorporated into an appendix and referenced (e.g., numerous tables on accident data, which could be summarized and/or referenced) , or referred to by title and page number in the case of data obtained from previous studies which are accessible and readily available for review. A statement of those studies already undertaken, and future studies which will be relied upon for this NEPA analysis, should also be referenced in this section.
6. This chapter of the EIS should list the decisions that are to be made by the agencies involved in this project throughout the NEPA process.
7. Unless identified elsewhere in the EIS, this chapter should contain a brief section presenting significant environmental issues and areas of controversy identified through the scoping process or those that can be reasonably expected to occur as a result of this project. It should also indicate where in the EIS these issues are addressed in more detail.
8. The Planned Improvements subpart should further describe how this project and proposed action are affected by planned improvements to the I-70 Corridor.



## EPA Comments on the Draft Chapter 3, Affected Environment - I-70 Improvement Study, Draft Environmental Impact Statement

1. Existing Land Use - Urbanized Areas. This section appears to contain the same information found in the Counties Section of Existing Land Use, which describes these same cities. If the purpose of this section is to describe in greater detail the characteristics of these urbanized areas, then relevant discussion should be given to the area potentially affected by the project boundaries.
2. Demographic and Social Characteristics - Income and Poverty, and Minority Populations Sections. These sections do not adequately describe the areas affected within the project boundaries. Executive Order 12898 requires that federal agencies "identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low income populations." While the Income and Poverty, and Minority Populations Sections report on *county-wide* minority and low income populations, it would be appropriate to further delineate and describe minority and low income populations at the census block and tract level within those counties affected by this project. This information will assist in assessing adverse affects to this segment of the population and may curtail any future Environmental Justice conflicts.
3. Natural Environment - Air Quality. This section does not adequately describe the air quality in, and around, the project area. The focus of this section should be on the air quality in the major metropolitan areas because the increased emissions generated from increased vehicle traffic will have a significant affect on those areas. Transportation conformity issues should be discussed with the Metropolitan Planning Organizations (MPO's) and described in this section. This section also incorrectly states that the Kansas City Air Quality Control Region (AQCR) is classified as a non-attainment area for Ozone. The Kansas City AQCR is, however, classified as an air quality maintenance area.
4. Natural Environment - Water Quality. This section lacks sufficient detail of existing water quality. Given the potential for a significant increase in runoff and associated pollution from the project alternatives, a more comprehensive description should be given of the watersheds and streams within the affected project boundaries. From the information supplied in this section, it is unclear if existing environmental conditions are fully described within each individual water quality characterization (e.g., habitat loss). EPA recommends using additional data available from EPA's Surf Your Watershed (<http://www.epa.gov/surf3/>) and the 1998 Missouri Unified Watershed Assessment Report in this section. It may also be helpful to illustrate on maps some of the water resources potentially affected by this project, such as the Outstanding Water Resource Waters.
5. Natural Environment - Wetlands. Overall, this section contains a good, general description of the wetlands within the project boundaries. However, it should be noted that farmed wetlands are not included in NWI data, but may still be jurisdictional wetlands and, therefore, subject to the permitting requirements of Section 404 of the Clean Water Act. Within the project boundaries, it is estimated that there exists the potential for impacting 100+ acres of these

wetlands. Because of the general nature of the wetland section, further delineation of wetlands will be required as the project progresses into the next tier. A map depicting the location of wetlands would also be beneficial in this section.

6. Terrestrial and Aquatic Communities - Significant Terrestrial and Aquatic Communities. This section lists several Missouri conservation areas, but is not consistent in describing the location relative to the project boundary. A map illustrating where these areas are located would be beneficial.

7. Terrestrial and Aquatic Communities - Threatened and Endangered (T&E) Species. The Federally Threatened Virginia sneezeweed (*Helenium Virginicum*) appears to be absent from the list of T&E plant species. A table representing the T&E plant species would also be desirable in this section. Additionally, a brief discussion should be given explaining coordination efforts with the U.S. Fish and Wildlife Service.

8. Historic and Archeological Resources - This section indicates that a greater number of cultural resources are identified in Boone and Cooper Counties because researchers from the University of Missouri in Columbia were more likely to document resources in that area. To ensure a complete analysis of the study area, a discussion of the measures to be taken to establish the identification of other eligible, or potentially eligible, historic properties and archaeological resources should be included in this section.

9. Hazardous Waste sites - Survey Methodology. This section indicates that the Vista report used as part of the hazardous waste site data collection is not included in this document. It is unclear why this report would not be included as an appendix, or at least referenced and made available for review.



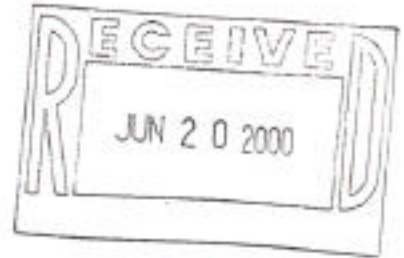
MEMORANDUM

DATE: June 19, 2000

TO: Tom Lange  
Office of the Director

FROM: Hannah Martin, Environmental Specialist  
Hazardous Waste Program

SUBJECT: I-70 First Tier Draft Environmental Impact Statement



The Hazardous Waste Program (HWP) has reviewed the preliminary draft of Chapter III, Affected Environment, of the First Tier Environmental Impact Statement for the I-70 corridor.

We note that the authors state that underground storage tank and hazardous waste generator databases were not searched at this early stage of planning. While we acknowledge that such a search over the large area now being considered would produce an unwieldy amount of information, we wish to urge the completion of such a search at a later stage, after the study area has been narrowed.

The Budget and Planning Section maintains a database of registered Missouri hazardous waste generators, and generated a list of all such facilities in the subject area. This list is enclosed.

Part C(8)(a) Survey Methodology includes a list of databases that were utilized to produce a list of hazardous waste sites in the area. A database identified as "SPL – State Priority List" is reported to have come from the DNR's Hazardous Waste Program Superfund section. The Superfund Section does not maintain a "State Priority List." The Superfund Section does maintain the *Registry of Confirmed Abandoned or Uncontrolled Hazardous Waste Disposal Sites in Missouri (Registry)*. The *Registry* is maintained by the Missouri Department of Natural Resources pursuant to the Missouri Hazardous Waste Management Law, Section 260.440, RSMo. The *Registry* is not a complete list of Superfund hazardous substance sites in Missouri. The Superfund section does maintain an internal database that includes all known Superfund sites in Missouri, and the planners should request a search of this database. We are not confident that the list in Part C(8)(b) Potential Sites is complete with regard to Missouri Superfund sites.

Part C(8)(b) Potential Sites includes a list of sites identified in the study area, and includes acronyms identifying facility/site type. One acronym used is "SHWS." The name or phrase this acronym represents is not referenced. Also, two of the sites identified are listed on the *Registry*, and should be labeled as such. The two sites listed on the *Registry* are Bob's Home Service (Zykan) Landfill in Wright City and UMC South Farm in Columbia. In accordance with Section 260.465(1), RSMo, any changes in land



use at *Registry* sites must be approved by the DNR Director. Should the project route include any portion of properties listed on the *Registry*, all pertinent laws and regulations will apply. Questions regarding the *Registry* should be directed to Ms. Hannah Martin, of the Superfund Section, at (573) 751-8629.

An additional TSD facility that was not included in the Part C (8)(b) list is the UMC Columbia, Resource Recovery Center, located at Columbia, MO. Also, several Voluntary Cleanup Program may be located in the bridge touchdown area.

Part C (8)(a) states, "A few of the sites are large, working industrial plants which are in the study area and are included for regulatory reasons, but assumed to be avoided for other reasons." We assume that the author wished to imply that the area of these sites will probably be ruled out, due to economic and practical factors. This should be explained rather than implied.

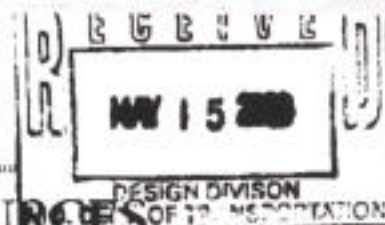
If the planners wish to investigate a site beyond the scope of the information provided, our files are available for review. Additional information regarding complaints, spills and closed investigations may be contained in county general files. If interested in reviewing files, please make an appointment through our file manager at least seventy-two hours in advance. Our file manager may be reached at (573) 751-3176.

This concludes comments from the HWP. For additional information regarding Tanks sites, please contact Mr. William Wilder, of the Tanks Section. Please direct questions regarding registered Missouri hazardous waste generators to Ms. Tina Ruble, of the Budget & Planning Section. Further questions regarding Voluntary Cleanup sites should be directed to Mr. Jim Belcher, of the Voluntary Cleanup Section. Questions regarding TSDs should be directed to Mr. Don Dicks of the Permits section. Messrs. Wilder, Belcher and Dicks and Ms. Ruble may be reached at (573) 751-3176. If you have further questions regarding Superfund sites, this project or comments from the HWP, please contact Ms. Hannah Martin, of the Superfund Section, at (573) 751-8629.



STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES

OFFICE OF THE DIRECTOR  
P.O. Box 176 Jefferson City, MO 65102-0176



May 12, 2000

<input type="checkbox"/> Asst. State Engr.	<input type="checkbox"/> Proj. Dev.
<input type="checkbox"/> Standards	<input type="checkbox"/> CADD Services
<input type="checkbox"/> Photogrammetry	<input type="checkbox"/> Cultural Res.
<input type="checkbox"/> Print Shop	<input type="checkbox"/> Sr. Adm. Sec.
<input type="checkbox"/> Bids & Contracts	<input type="checkbox"/> File
<input type="checkbox"/> Environmental	<input type="checkbox"/>

Mr. Henry Hungerbeeler  
Director  
Missouri Department of Transportation  
P.O. Box 270  
Jefferson City, MO 65102

Dear Mr. Hungerbeeler:

As a member of the inter-agency coordination group, the Department of Natural Resources appreciates this opportunity to comment on the Draft Purpose and Need Chapter of the First Tier Environmental Impact Statement (EIS) that is being prepared for the contemplated improvements to Interstate Highway 70 (I-70). Comments on the Draft Purpose and Need Chapter for this EIS are contained in this letter. Also, since statements in Section A.2. of the Draft Purpose and Need Chapter imply that Long-Range Transportation Plan programming decisions for I-70 improvements may be made following the time when a "preferred alternative" is selected during preparation of the Draft EIS, comments on the alternative actions that are presently being considered are also included.

In general, the Purpose and Need chapter needs to provide a more thorough substantiation of not only the purpose and need for the various alternatives that are under consideration but also the rationale for alternatives that have already been eliminated from consideration in this First Tier EIS. We believe that too much reliance may be being placed on the information and conclusions contained in the I-70 Feasibility Study. The I-70 Feasibility Study may have been accomplished as an internal planning document, therefore, it may not be appropriate to assume specific information and methodologies that were employed in the Feasibility Study in this First Tier EIS. For example, very specific information which describes the methodology that was used in the Feasibility Study to forecast future traffic volumes on I-70 is needed in the Purpose and Need chapter of the First Tier EIS. The percentage of total through-state traffic and through-state truck traffic on existing I-70 is has not been included in the draft Purpose and Need chapter. This type of data is basic to the analysis of alternative improvements that are being considered, and this needs to be provided.



The Purpose and Need chapter of this First Tier EIS needs to be much more than a description of the need for and the alternative means to accomplish improved traffic management on I-70. The decisions and actions resulting from this First Tier EIS will have numerous and extremely significant direct, secondary and cumulative impacts. These decisions involving I-70 improvements will likely affect land use and development choices in numerous communities, both large and small, that are located along or nearby this important transportation corridor for decades to come. The transportation choices and the quality of the environment available to generations of Missourians will be affected. Consequently, we believe that the first chapter of this EIS needs to be considerably more thorough in its portrayal of the purpose and need for examining improvements to this major transportation corridor across the entire central portion of the state. The Purpose and Need chapter has to provide complete and detailed information in order to fully set the stage and provide support for the subsequent chapters of this EIS.

Existing Parallel Corridors Inter-agency project team members were told earlier in the study process that a majority of traffic using this section of cross-state I-70 is due to the connection with adjoining interstate highways in Illinois and Kansas. This fact was explained as the primary reason for eliminating the Highway 36 and 50 corridors as viable alternatives to major improvements to I-70. However, data emphasized in the draft Purpose and Need chapter portrays that a majority of traffic on I-70 is intrastate traffic. Additional data needs to be included in the Purpose and Need chapter that depicts the historical and current amount of through-state truck traffic on I-70, as a percentage of both total truck traffic and total traffic. Additional information is needed in the Draft Purpose and Need chapter to address these and other issues, including those listed below.

Highway 50 Regarding the planned improvements listed on page I-4, US 50 is described as "expected to be improved by ...2030" to a four-lane expressway. However, during discussions regarding the preliminary DEIS for US 50, MoDOT staff have indicated that "Initial analysis appears to indicate that the Purpose and Need section of the preliminary DEIS did not identify any need for a four-lane facility in the center portion of the corridor, as originally had been considered. The results of the DEIS may conclude that the area between Union and Linn may more appropriately require an upgrade to Super-2 level highway standards, rather than a four-lane highway." The current wording of the Draft Purpose and Need chapter for I-70 leads the reader to believe that US 50 will be a four-lane expressway from I-435 to I-44, which is clearly not the finding of the Highway 50 preliminary DEIS. This issue needs to be clarified in the Purpose and Need chapter of this I-70 EIS.

Highway 36 US 36 is described on page I-4 as being a four-lane expressway by 2030. Specific information needs to be provided as to whether Route 36 in Missouri is planned or expected to be ultimately designated as an Interstate highway, e.g., I-72, and, if that is the case, the expected timeframe for such a designation.



Roadway Capacity Again, it is recommended that the reader of this First Tier EIS not be required to assume nor be knowledgeable of the data, methodologies and conclusions drawn in the prior Feasibility Study prepared for I-70 improvements. It would be beneficial if the Purpose and Need chapter utilized and provided more demographic data in predicting future travel demand and levels of congestion on I-70. While some areas are experiencing population growth, St. Louis and Jackson Counties are not. Data needs to be provided in the Purpose and Need chapter that depicts how the population residing in this cross-state I-70 region of central Missouri is expected to change over time. Additional data also needs to be provided that projects the distance from the urban cores in Kansas City and St. Louis that I-70 commuters may be expected to drive on a daily basis in 2030. Additional demographic data is needed that projects the 2030 elderly population, and the transportation needs of this segment of the population relative to the improvements presently being considered for I-70. It would seem necessary and logical to include this type of information in predicting future capacity needs and traffic congestion on I-70. The effect of a modest speed limit reduction on I-70 and of making I-70 a tolled facility should be addressed as a means of increasing the capacity of the existing facility. These issues all need to be thoroughly addressed in the Draft Purpose and Need chapter of this First Tier EIS.

Alternate Transportation Modes The charts shown on page 23 indicate that more freight is moved in and out of Missouri by rail, especially in-bound, than by trucks. However, the focus of the study has been on truck traffic, and on page 26 we are told that a "majority of intrastate movement of goods takes place via truck." The potential for rail to play a larger role in both interstate and intrastate freight movement is not explored in the draft Purpose and Need Chapter. More discussion of this option is warranted, especially if improvements in inter-modal connectivity could help reduce truck traffic on I-70. This option is not explored in the Draft Purpose and Need chapter.

I am attaching a copy of an article published in the Wall Street Journal on May 1, 2000, that describes how several states are moving toward the addition of rail lines to relieve interstate highway congestion due to truck traffic. According to the article, the cost per mile of new track is \$1-\$2 million per mile, versus \$10 million per mile for adding one lane each way of interstate. The length of time required for installation of new track is estimated at four years, versus twenty years for completion of highway lane additions. Also, the cost of moving the same amount of freight from Dallas to northern New Jersey is given as \$1,094 for rail, and \$1,525 by truck. The only advantage given to freight shipment by truck was reliability, as trucks were rated as 95%+ reliable, rail as 80%-90% reliable. Benefits of rail shipments were listed as cost efficiency and environmental advantages: (1) shipment of freight by "rail is generally more efficient than road for hauling freight long distances" and (2) "trains generally consume less fuel and create less pollution to move freight than trucks." Again, exploration of the potential for utilizing rail to accomplish more freight movement, both within and through Missouri, should be provided in the EIS's Purpose and Need Chapter.



The possibility of high speed passenger rail has been discussed in several I-70 interagency coordination meetings. With regard to the necessary expansion of highway right-of-way to accommodate rail, the I-70 Feasibility Study states "It is estimated that an 80-foot addition would be sufficient for a double-track high-speed rail." In the Draft Purpose and Need, the discussion of railway use is limited to a discussion of freight movement. The illustrations provided with the Draft Purpose and Need show a 40-foot "Future Transportation Improvement Corridor." We question whether a 40'-wide addition would be sufficient to accommodate a double-track rail system, given that highway bridge piers may be located in the center of such a 40' corridor. The potential for adding commuter rail service to the I-70 corridor from outlying areas to the urban cores on each end of the state should be explored in the I-70 EIS. East-West Gateway Coordinating Council is currently studying the possibility of extending Metrolink as far west as the Spirit of St. Louis Airport in Chesterfield, Missouri. The I-70 study team should consider the possibility of connecting rail service along I-70 to this proposed rail service in Chesterfield, or to the existing Metrolink line at the Lambert Airport on I-70 in St. Louis. Several rail-related issues, including more efficient freight movement and high-speed passenger rail, seem to merit further analysis when examining the contemplated improvements to I-70, and it seems appropriate that they be included and addressed in the Purpose and Need chapter of this First Tier EIS.

Accident Data It is stated that accidents on all Missouri interstates "appear to be consistent with national experiences." Data needs to be provided that depicts how accident experiences on I-70 (frequencies and rates) compare with major cross-state interstate highways in adjacent states. On page I-12, a table of Truck Accidents by Missouri Interstate Routes compares accidents involving trucks on Missouri interstates. Information on how truck-involved accidents on I-70 compare to frequencies and rates of accidents involving trucks on interstate highway routes in surrounding states should be provided. On page I-11, a table entitled I-70 Accident Rates by County does not include St. Louis County, which should be corrected.

Speed On page I-10, it is noted that there "was a decrease in the number of fatalities from 1991 to 1995 followed by increases in 1996 and later." On page I-11, the number of truck involved "fatal accidents in 1997 and 1998...nearly doubled the preceding years." This data indicates that there may be a correlation between this increase in accidents involving fatalities and the increase in the statewide speed limit in 1996. Additional information needs to be provided relative to the correlation between speed and accidents, as well as speed and the severity of accidents. Some mention has been made during the I-70 interagency coordination meetings that a greater than 70 mph speed limit may be considered in the design of an improved or new interstate facility. More specificity needs to be provided in this regard.

Truck Impacts The term "truck combinations" is not defined in the document. Please clarify if this is intended to mean truck (tractor) and trailer, trucks with multiple trailers, or other. On page I-18, the document states "The heavy truck impacts on safety, capacity, and preservation of the physical structure of the roadway supports a need for improvements." We would recommend that the Purpose and Need Chapter address how the trucking industry could better mitigate the safety hazards, overloading of the interstate, and damage caused to pavement



as a result of their heavy use of this corridor. The Purpose and Need chapter needs to add the discussion of a system that captures actual costs and distributes them fairly among respective vehicle weight classes. A toll road should be one available option that is included in the alternatives that need to be addressed.

Roadway Design Features On page I-19, it is stated that "current AASHTO and MoDOT standards recommend a 60-foot median for a divided freeway with a 70 mph design standard." The illustrations provided with the Draft Purpose and Need chapter indicates a 124'-median. Adding a 60' median width to a 40'-wide median to accommodate a Future Transportation Improvement Corridor equals a 100-foot median width. Only by adding in the 12' shoulder on each side is a 124' total median width achieved. Clarification is needed as to whether 12' shoulders are considered a part of this 124' "median." (The difference is 582 acres over the length of the corridor.) More specificity needs to be provided as to the minimum median width for a greater than 70 mph design speed.

Interchange Standards Typical interchanges are described on page I-20, where it is stated that "The cloverleaf interchange with US 65 in Saline County meets current interstate standards." Other data provided seems to indicate that this is the only interchange currently meeting interstate design standards. Of the 53 interchanges on existing I-70, 46 are diamonds, 5 are 1/2 or 3/4 diamonds, and 2 are fully directional. The circumstances that have resulted in the US 65 interchange being the only one of the existing I-70 interchanges that meets current design standards need to be specified. This chapter seems to imply that, since 50 of 51 diamond interchanges do not meet the requirement for 700 feet between ramp termini, that they would need to be rebuilt. The existing US 65 interchange consumes an enormous amount of land, therefore, clarification needs to be provided as to whether it is the study team's recommendation that the cloverleaf design is recommended to be used for all new or rebuilt interstate interchange facilities. Information that specifies the advantages of the existing US 65 interchange design over the typical diamond interchange on I-70, and how this type of design contributes to the safety of the traveling public should provide needed clarification to the reader.

### Preferred Alternative

The potential for environmental impacts is obviously greater if a new, parallel alignment is chosen, rather than widening the existing interstate. Impacts to streams, wetlands, parks, forests, agricultural lands and cultural resources should be expected to be significant. Therefore, the Department of Natural Resources would prefer that all the alternatives to constructing a new, bigger interstate highway facility on parallel right-of-way be provided full and complete discussion in not only the Purpose and Need chapter, but the entire First Tier EIS.

Environmental impacts due to widening should be expected to be minimal, compared with those associated with the construction of completely new, parallel interstate highway. Construction of a wider interstate on the existing alignment would require careful planning, but recent replacement of bridges over I-70 in St. Louis were well planned, so that major traffic backups did not occur.



While impacts to businesses due to widening of the existing interstate could be substantial, moving traffic to a parallel interstate some distance away could also result in significant adverse secondary and cumulative impacts. The stated intent for a parallel interstate has been to develop a limited access facility, with interchanges only at major north-south routes, allowing construction of only limited secondary development of support services. However, travelers may choose the closest gas, food and hotels, rather than travel a mile or more off their route, causing a negative impact on businesses located on the existing I-70. The loss of traffic along existing I-70 may encourage owners of existing businesses to relocate within sight of a new interstate facility, which may result in declining commercial property values along existing I-70, and "sprawl" type impacts along the new facility (impacts to communities and neighborhoods, loss of agricultural land, forests, wetlands, historic resources, and costly infrastructure needs such as water, sewer, fire and police protection and ambulance service).

While construction of a new and expanded parallel interstate highway may be viewed by some as more manageable from a logistics standpoint, we question whether it would accomplish the desired reduction in congestion. Unless significant numbers of travelers choose to use a new parallel facility, congestion relief on existing I-70 may not occur. By choosing to accomplish the addition of lanes to the existing facility, even during the period of construction, the traveler remains more or less on the same route, instead of having to switch between a new route and the existing highway. In this manner, the most congested areas of existing I-70 would see immediate relief as sections are widened, while those areas that are not now congested could be widened later. Also, should a parallel facility ultimately be this EIS's "Preferred Alternative," the condition of existing I-70 will continue to deteriorate, and it will still need major preservation/rehabilitation work in the near future. The alternative actions necessary for rehabilitation and preservation of the existing interstate facility need to be fully outlined. The full range of direct, secondary and cumulative long-term impacts of building a new parallel highway need to be thoroughly compared with the short-term logistical benefits of not undertaking the addition of lanes to the existing I-70 facility.

Finally, we are concerned that the timeframe being proposed for completion of this First Tier EIS (Record of Decision by December, 2000) will be insufficient to allow a complete and thorough discussion of all the issues that will be necessary with a project of this geographic scope and magnitude. We are also concerned with the statements on page I-2 of the draft Purpose and Need chapter that the preliminary identification of a preferred alternative in this I-70 EIS development process will afford the incorporation of such a preferred strategy in Missouri's Long-Range Transportation Plan and allow the development of "preliminary program estimates for funding the improvements." It would seem premature to identify any specific action regarding I-70 improvements in any formal statewide planning document until after a Record of Decision has been adopted for this First Tier EIS.



Mr. Henry Hungerbeeler

Page 7

May 10, 2000

We appreciate this opportunity to provide comments on this important matter to Missouri, and we look forward to working with you in the future as this EIS process moves forward. We would appreciate receiving a written response to the concerns expressed in this letter.

We have other issues about the I-70 EIS that we would like to discuss, and I would like to schedule a meeting in the near future to talk about them with you.

Thank you.

Sincerely

DEPARTMENT OF NATURAL RESOURCES

A handwritten signature in black ink, appearing to read 'Stephen Mahfood', with a stylized, flowing script.

Stephen Mahfood  
Director

SM:tlj

Attachment

c: A. George Ostensen, FHWA, Midwestern Resource Center  
Allen Masuda, FHWA, Missouri Division  
Dennis Grams, U.S. EPA, Region VII  
Mark Wilson, U.S. F&WS  
Kathy Harvey, MoDOT  
Mark Kross, MoDOT  
Jerry Mugg, Project Manager, HNTB Corporation



# MISSOURI DEPARTMENT OF CONSERVATION

## Headquarters

2901 West Truman Boulevard, P.O. Box 180, Jefferson City, Missouri 65102-0180  
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JERRY M. CONLEY, Director

May 24, 2001

**RECEIVED**

**JUN 05 2001**

**HNTB-KCMO**

Mr. Jerry Mugg  
HNTB Corporation  
1201 Walnut St., Room 700  
Kansas City, MO 64106-2117

RE: Draft First Tier EIS - I-70

Dear Mr. Mugg:

Review of volumes one and two of the Preliminary Draft First Tier Environmental Impact Statement for the Interstate 70 Corridor in Missouri has shown the magnitude of this issue. In retrospect, I could not conceive of any other worthy approach to such an issue save through the Tiered - EIS format. While the many meetings you and MoDOT have conducted has introduced me to the tiered approach, I'm afraid that the uninformed reader of this draft document would not readily perceive the nature of the approach.

The attached annotated list of comments will provide insight to the many marginal notes made on this draft. Rather than dwell on these isolated matters however, I would prefer to focus on the message that this document sends: improved transportation efficiency first and foremost! While segments of this document have been reviewed in the past as separable efforts, this insight did not reveal itself until I had read the entire document back to back.

The National Environmental Policy Act directs the examination of project consequences to the human and natural environment. While this first tier examination of the range of engineering problems and opportunities associated with construction is exhaustive, other environmental consequences are treated more in the negative. The full range of positive environmental consequences, over and above Overton Bottoms are alluded to.

If the first tier EIS is to set the stage for all subsequent project considerations, perhaps an "environmental charette" is in order to capture a vision of the future preferred I-70 experience as an important component of the first tier EIS.

Sincerely,

JOSEPH P. BACHANT  
POLICY COORDINATOR

COMMISSION

ANITA B. GORMAN  
Kansas City

RANDY HERZOG  
St. Joseph

RONALD J. STITES  
Plattsburg

HOWARD L. WOOD  
Bonne Terre



Annotated Review of the  
Preliminary Draft  
I-70 First Tier EIS  
by the  
Missouri Department of Conservation  
May 2001

<u>Chapter/ Page</u>	<u>Item</u>	<u>Comments</u>
Summary Plus Chapter I	"First Tier EIS"	We are familiar with the tiered EIS concept thanks to your preliminary introductions and efforts to gain acceptance of the process. The reader without this background may not realize the scope or purpose of this process. The revised Chapter II contains a good approach to the concept, however, the concept needs to be introduced up front in the document.
I - 30	6. Access to Recreational Facilities	The quality of life and economic value of the I-70 corridor is well stated here, but seems lost in later chapters. Also, lost throughout is the "recreational" value of the I-70 experience per-se. If the I-70 corridor forms the initial impression of the state by travelers and recreationalists, the economic importance of the tourism industry to the state economy warrants a higher level of attention to the details of the plan that may improve the motorist's experience of the facility.
II - 4	ITS	Why list rivers among road conditions if the new facility is build up from the flood plain? The addition of travel information systems is an excellent example of enhancing the state's tourism industry. It could also be a valuable educational venue and even an "eco-tourism" mechanism in and of itself.

<u>Chapter/ Page</u>	<u>Item</u>	<u>Comments</u>
II - 65	C. Environmental Feasibility	If a "number of important issues" have been identified, where may the reader find reference to all of them or does this section capture all of them known at present?
II - 83	e - Overton Bottoms	Additional studies for the 2 <sup>nd</sup> tier should include the hydrologic impacts of the new facility to the new land uses of this reach of the Missouri River.
II-96	d. Information System	See comments in I-30 and II-4 above.
II-99	D. Billboards	The concept of scenic easements stated here with reference to the billboard issue is a matter that should be further explored in the second tier for matters such as noise control, water quality, BMPs, wildlife habitat mitigation, etc.
III - 18	3. Parklands	Successive reiterations of this section in continuing studies warrants constant checking of the data listed here given the dynamics of land acquisition and management.
III - 37	c. Flood plains	Tier 2 and future studies should examine the hydrology of all flood plains within the corridor more closely. Not only are all watersheds within the study area dynamic in terms of hydraulic condition, many FHBMs have been shown to be inaccurate or out-of-date. Several of the described flood plains are part of flood controlled watersheds. This information should be supplied to make this section complete. This section should also reference E.O. 11988 - Flood plain Management



<u>Chapter/Page</u>	<u>Item</u>	<u>Comments</u>
III - 54	7.2.	This list of significant natural communities is inconsistent with previous statements on the sole significance of the Missouri River/Overton bottoms. The subsequent subsections of Section 7 forms the description of natural diversity in the corridor and its potential for an eco-tourism-based I-70 experience.
III - 65	10	This section, coupled with comments above to the value of scenic easements and eco-tourism among others warrants further investigation.
IV - 1	B.1.	While ongoing discussions with resource agencies have not disclosed environmental impacts that would affect project feasibility, this draft alludes to the potential for environmental enhancement which seems downplayed. For example, noise abatement and visual enhancement would appear to be mutually supportive measures.
IV - 3	2.2	The discussion on wetland impacts downplays the cumulative and secondary impacts of development. The potential for a strategic area management plan and/or mitigation banking needs to be explored
IV - 5	g.	Comments noted, however expansion of these matters in second tier or later EIS's should be stipulated.
IV - 9	2.2	What is meant by the "evening out impacts" with reference to wetlands?



<u>Chapter/Page</u>	<u>Item</u>	<u>Comments</u>
IV - 21	1.2.	A project of this magnitude will likely generate much construction debris. How will this be managed?
	2.2.	Consider the efficacy of scenic easements/natural vegetation management/visual quality as factors to abate noise.
IV - 33	4.	Water quality impairment from construction induced sediment is a real problem that has not been generically addressed as a consequence of the project. Management of BMP's and water quality monitoring need to be considered.
IV - 35	6.	See comments above.
IV - 40	7.	See comments above.
IV - 51	9.	One matter not addressed in reference to "sensitive species" is the issue of telecommunication towers and other lighted object proliferation along the I-70 corridor. This proliferation has caused concern to the increased impact to avian mortality, particularly migrating birds. While this issue may not be completely within the purview of the I-70 project, it is nevertheless an environmental impact of note and one that might be either ameliorated or mitigated in subsequent tiers.
IV - 70	2.	Relegating responsibility for borrow area and waste site selection to contractors does not abrogate agency responsibility for the environmental consequences of these actions.
IV - 74	1.	Does the Clean Air Act have ramifications to this issue?



## ECONOMY

# Railroads Learn to Like Public Funding

## Plans to Expand Freight Infrastructure Arise on Both Coasts

By DANIEL MACALALABA

Staff Reporter of THE WALL STREET JOURNAL  
When it comes to accepting money from the government, some major freight railroads are switching tracks.

In Virginia, Norfolk Southern Corp. is offering the state a proposition: Help us pay the projected \$900 million to add a second track to the company's mostly single-track route that parallels Interstate 81. The railroad would then be able to handle much of the freight that now travels by truck on I-81, easing traffic and putting off an expensive highway-widening project.

In the past, railroads largely shied away from such ideas, for fear that public funding would come with strings attached. "They were clearly reluctant to work with the government," said Anthony Hatch, an independent analyst in New York. "Now, they are beginning to realize there are lots of common interests."

Several years ago, Conrail and the state of Pennsylvania jointly funded expansion of rail tunnels to handle more efficient freight trains. And in California, a public-private partnership is building the 20-mile Alameda Corridor from the ports of Long Beach and Los Angeles to freight yards near downtown Los Angeles. The railroads, Union Pacific Corp. and Burlington Northern Santa Fe Corp., will pay back \$1.5 billion of the total \$2.4 billion over a 30 year period through fees on the freight that's handled.

Some economists like the idea. Although trucks are faster and more reliable, rail is generally more efficient than road for hauling freight long distances. And rail

Tracking the Economy on Page A16.

has some environmental advantages, because trains generally consume less fuel and create less pollution to move freight than trucks.

"It's a pure productivity gain," said David Wynn, chief economist of Standard & Poor's, a division of McGraw-Hill Cos. "If you can move more goods with fewer people and less oil, the economy can grow faster."

### Delivering the Goods

Rail Is Cheaper and Quicker to Build...

But Less Reliable

	Adding Track	Adding Lanes <sup>1</sup>
Cost Per Mile	\$1 mil. - \$2 mil.	\$10 mil.
Time <sup>2</sup>	Four years	20 years

	Rail Intermodal	Highway/Truck
Cost <sup>3</sup>	\$1,094	\$1,525
Reliability	80%-90%	95%+

<sup>1</sup>A highway lane in each direction on Interstate-81 in Virginia. <sup>2</sup>Time to expand Norfolk Southern route and widen Interstate-81 in Virginia. <sup>3</sup>Freight rate from Dallas to northern New Jersey with 48-foot container on rail and 46-foot truck trailer on highway.



Some railroads are suspicious of government funding. "If you get into a situation where you are accepting public funds for freight infrastructure, it allows other parties to have a say in your core business. Obviously, we are opposed to that," said Mark Hallman, a spokesman for Canadian National Railway Co., which until recent years was owned by the Canadian government.

An official of Burlington Northern Santa Fe said the company has become more "receptive to exploring these types of possibilities." Analysts said the change reflects railroads' massive capital needs, as well as the fact that they have spent so much of their own money to buy each other.

"The returns in the railroad business are still not enough to sustain the country's track network," said Scott Flower, an analyst at Salomon Smith Barney. "The railroads must thoroughly rethink how they operate and potentially how they are funded."

In Virginia, Norfolk Southern's proposal comes as the state plans to spend \$3.5 billion of federal and state funds to add a lane in each direction on I-81. One reason for the widening is the heavy truck traffic—about five million trailer trucks a year—on the highway.

Officials of Norfolk Southern in Norfolk, Va., noted that one of the company's rail routes closely parallels I-81 through Virginia. With the company's takeover of Con-

Please Turn to Page A16, Column 1

## Government's Money Starts to Look Good For Some Railroads

Continued From Page A2

rail track in the Northeast, the route could haul trucks on rail cars between the Gulf States and the New York market. The route would need a second track, new freight terminals and some straightening for a total cost of about a third of widening the interstate.

"If we are ever going to be truly competitive, we have to have an even playing field," said Wiley Mitchell Jr., senior general counsel of Norfolk Southern. "That is just as fair and should be just as much acceptable policy to invest money in a right-of-way for a railroad as it is to invest money in a right-of-way for trucks."

Some trucking interests are skeptical of the Norfolk Southern proposal. "At this stage, we have a problem with diverting scarce highway construction resources to an untried endeavor," said Mike Russell, a spokesman for the American Trucking Associations, a trade group in Alexandria, Va. "Regardless of the response to the Norfolk Southern proposal, I-81 will need work."

For their part, officials at the Virginia Department of Transportation said they will study the Norfolk Southern proposal. They will gather information about the origins and destinations of trucks on I-81 to help determine how many trucks the railroad could divert from the highway. Typically, railroads are competitive with highways when freight is moving at distances of more than 700 miles.

Meanwhile, the railroad's plan is gaining supporters. John S. Edwards, a Virginia state senator, said trucks currently account for 40% of the traffic on some sections of I-81, increasing congestion and safety concerns. "You come down a hill and there's a truck right in front of you and a truck behind you and a truck trying to pass on the left," he said. "You feel like a sardine ready to be canned."



STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES

Jeff Compton, Governor • Stephen M. Ashford, Director

OFFICE OF THE DIRECTOR  
P.O. Box 176 Jefferson City, MO 65102-0176

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JUL 26 2000  
HNTB-KCMO

July 17, 2000

Mr. Henry Hungerbeeler  
Director  
Missouri Department of Transportation  
P. O. Box 270  
Jefferson City, MO 65102

Dear Mr. Hungerbeeler:

The Missouri Department of Natural Resources appreciates the opportunity to comment on the preliminary draft of the Affected Environment Chapter of the First Tier Draft Environmental Impact Statement (DEIS) that is being prepared for contemplated improvements to Interstate Highway 70 (I-70) in Missouri.

Social and Economic Characteristics

It is recommended that the subsections on Counties and Urbanized Areas of the Land Use section provide greater detail than simply providing the percentages of each county's land area that is "developed" and "undeveloped." Another example of too general a description of existing land use is provided in the third paragraph of Section B.1.:

Outside of a community's limits, all kinds of land uses occur in a spread out manner. Land uses that can be found dispersed throughout the study area include commercial, industrial, retail, residential and public. Public services such as social service agencies and farm service agencies are also usually spread outside community boundaries.

We suggest that the above paragraph represents far too general a description of existing land use in the EIS's cross-state study area. Examples of additional county-specific information that we recommend be provided in the Affected Environment chapter of the EIS include the following: names of primary urbanized areas and rural communities, distinguishing community characteristics, population development patterns, population densities, building densities, acreage of land in farms, total annual economic value of agricultural products and local zoning and development plans and other transportation services and facilities that exist, including both highway and rail. The EIS alternative action of a parallel interstate highway would provide the potential for local road closures as well as presenting barriers to community growth. In order to adequately describe the potential impacts of Chapter IV that are determined to be associated with the various alternative actions under consideration, greater detail must be provided in Chapter III, the Affected Environment.



Parklands

There is no mention of Graham Cave's designation as a National Landmark. In 1961, the cave was recognized by the Secretary of the Interior as being of national significance. While the cave is owned and preserved by the department's Division of State Parks, the Landmark designation will have implications on future mitigation procedures for the I-70 project. There are special requirements for protecting National Landmarks under Section 106 of the National Historic Preservation Act. The requirements are outlined in the Advisory Council on Historic Preservation's regulations under 36 CFR 800.11.

Page III-22

- Rock Bridge State Park is listed as a city park.
- In addition to the state parks mentioned in the report, Finger Lakes State Park is within the 5-mile radius and Confederate Memorial State Historic Site is probably within six or seven miles of I-70.
- Katy Trail State Park also has significant historic elements - the corridor itself, two depots and a tunnel. Both the Booneville Depot and Sedalia Depot are on the National Register of Historic Places. The Trail has been designated by the National Park Service as a part of the Lewis & Clark Trail and the American Discovery Trail and it has been designated as a Legacy Millennium Trail by the White House Millennium Council (one of 53 in the country).

Land and Water Conservation Fund (LWCF)

The thirty-nine (39) parks identified in this First Tier DEIS concur with this department's current records. Adherence to Section 6(f) conversion requirements will be necessary for six parklands if the identified parklands are converted to other than outdoor recreational use. Many schools have also received funding through the LWCF program. To ensure that schools have been identified, it is suggested a separate paragraph be prepared identifying all schools in the study area/corridor. Ft. Zumwalt in O'Fallen, a 6(f) park, is not listed.

Historic and Archaeological Resources

While a comprehensive list of cultural resources within the study corridor is not expected at this time, there are several areas where basic, easily accessible information is missing. There needs to be some indication in the report that there is a lack of information on the cultural resources in the area. The counties have not been comprehensively surveyed for architectural or archaeological resources. In many cases, the surveys that do exist are twenty years old and do not contain information on buildings that have reached the 50-year mark in the last two decades.

This section should acknowledge the need for future research in the study area to identify National Register eligible resources. The lack of information may, in the future, be filled by research in the Cultural Resource Inventory and the Archaeological Survey of Missouri (ASM). Several properties in the study area have been previously determined eligible for the National Register of Historic Places. While these properties are not listed on the Register at this time, they are of concern when looking at future review of the project under Section 106 of the National Historic Preservation Act. Additionally, numerous archeological sites have been found



and reported to the ASM. There is no mention of previously recorded sites in the study area that may be of concern in road planning. A breakdown by county of the number of properties determined to be eligible for the NR and previously recorded with ASM (similar to what was done with NR listed properties) would help to give a more realistic picture of cultural resources concerns in the corridor.

#### Century Farms

Century Farms are not referred to in either the Farmland or the Cultural Resource Sections of the DEIS. The University of Missouri-Columbia, College of Agriculture, Food and Natural Resources, and the University Extension recognize Century Farms. These farms were first recognized in 1976. At that time nearly 3,000 farms in 105 Missouri counties were recognized. Since that time, more than 1,500 farms have been given this designation. While many of these may not be National Register-eligible sources, they are Missouri resources that should be acknowledged in the DEIS. Inserting summaries of available information into the report and acknowledging the need for future study are essential to give an accurate assessment of the impact of the project on the cultural environment.

#### Natural Areas

This preliminary draft of Chapter III mentions the Missouri Natural Areas Program and identifies designated natural areas within the 10-mile study corridor. Graham Cave is listed in this section. The designation should read "Graham Cave Glades Natural Area." Similarly, Tucker Prairie should be listed as "Tucker Prairie Natural Area." Tucker Prairie is also a National Natural Landmark and a long-term research station. Both of these are important values that should be recognized. Tucker Prairie is all that remains of what once was a vast prairie that extended into sections of 13 counties. Since 1951, when it was acquired using National Science Foundation and private funds, research has been a major focus. Previous highway construction resulted in the taking of 35 acres of prairie from the area.

In a 1991 study of threats to state parks, aesthetic degradation, air pollution and noise were identified as moderate to low threats to Graham Cave State Park. With the increased traffic on I-70, and especially the increase of heavy truck traffic, these threats are more evident and have a greater impact on the park today. Highway noise is now "an existing threat causing immediate damage."

#### Geology

##### Page III-37

Due to the extreme range in geology throughout the study corridor it is critical to consider characteristics of the underlying bedrock. Other than the dip of beds, structure is not addressed. A search will need to be made of structures in the areas the proposed new highway may traverse. Limited numbers of known structures in the areas covered by Pennsylvanian sediments is not necessarily indicative of few structures. Rather, it is a result of the difficulty of mapping in areas with Pennsylvanian strata, or with glacial sediments. Structures are important both for consideration of earthquake hazards, and because solution structures (such as sinkholes) can be concentrated along them.



### Mining

#### III-37

While noting the potential for crushed stone quarries, as well as old coal workings, the potential for affecting oil and natural gas operations should also be noted in the DEIS.

### Seismic Issues

Seismic hazards are not addressed in this DEIS. As one terminus is in St. Louis, this will need to be addressed in some detail.

### Water Resources

Watershed impacts are at least as important as lakes and rivers and in certain circumstances, more so. Most watersheds lie partially inside and outside of the I-70 study corridor boundaries. In future study of this project corridor, we would recommend that all 11-digit watersheds within the corridor be identified and water resources and uses be identified and analyzed. The 8-digit basins currently in the Affected Environment Chapter will be too large for examination at a sufficiently detailed level. The 11-digit watersheds are where the impacts to end-users of water are usually realized. Additionally, watersheds outside of the corridor but adjacent to or downstream from the corridor can equally be impacted. Depending upon a variety of factors, the corridor may completely encompass impacted areas, or in other instances, the impacted area may extend well beyond the set corridor with most of the impacted body of water actually outside the corridor. We recommend that watersheds, surface and ground waters outside of the corridor but interconnected with watersheds, and surface and groundwaters within the corridor be identified and analyzed.

We also recommend that detailed data be included for the above items as well as for the lakes and rivers already identified in the DEIS. Specifically, these data should include but not be limited to: maps of lakes, rivers, streams, watersheds, use data, flow data, recharge data, soil types, land use characteristics, runoff patterns, and similar hydrologic function data.

### Air Quality

There are several grammatical errors that should be corrected in the Air Quality section of the Affected Environment Chapter. The necessary grammatical corrections and clarification of transportation control measures for Kansas City and St. Louis has been provided, and is attached to this document.

### Hazardous Waste

The Hazardous Waste Program has reviewed the Affected Environment Chapter. Their comments are attached to this document.



Farmland


A high percentage of the land in the study corridor is farmland. A fairly high percent of this farmland is considered prime farmland. Page III-26 states that "Prime farmland produces the highest yields with minimum inputs of energy and economic resources, and farming it results in the least damage to the environment." The farmland that "Meets the requirements only in areas where the soil is drained or protected from flooding" should be considered carefully in subsequent analysis of the of alternate I-70 improvement strategies. Unless evidence is provided otherwise, it would be reasonable to assume protection from flooding and drainage, as appropriate, has been installed on this highly productive land. Our concern is that the farmland impacted by this project be carefully studied so that it is appropriately categorized in the DEIS.

Since the alternative action of constructing a new, parallel interstate highway is being considered in an area within five miles of the existing I-70 highway, it is recommended that narrative be added to this Affected Environment chapter that addresses and describes the potential for the severing of farm units and other properties. The economic and social consequences associated with such action should be addressed in the DEIS. This includes the likely result of uneconomic or nonproductive land remnants and landlocked parcels between existing I-70 and a new facility. The reduced value and utility of these lands should be heavily weighed with consideration to new construction on previously untraversed lands. Finally, a new parallel interstate may present adverse travel requirements for landowners that reside or farm in the geographical area between existing I-70 and a new parallel interstate highway. The potential for economic consequences to the farming community as a result of the construction of a new parallel facility are remarkable, requiring further study and discussion in the Affected Environment chapter.

Thank you for the opportunity to provide comments on this chapter of the First Tier DEIS.

Sincerely,

DEPARTMENT OF NATURAL RESOURCES



Stephen Mahfood  
Director

SM:tlj

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