

FILE:

February 14, 2000

Corps of Engineers; Coast Guard

Dear Sir or Madam:

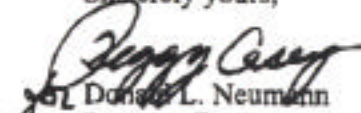
The Federal Highway Administration (FHWA) in cooperation with the Missouri Department of Transportation (MoDOT) is initiating a First Tier Environmental Impact Statement (EIS) for adding capacity to Interstate 70 across the State of Missouri. Since the project will cross the Missouri River and because of your agency's special expertise, we are requesting you to become a cooperating agency for this project.

Sections of Interstate 70 in Missouri are between 34 and 43 years old. The study corridor for this project extends from the Route 7 interchange (Exit 20) in Jackson County, to the Lake St. Louis interchange (Exit 214) in St. Charles County, an approximate distance of 199 miles. At both termini, the existing interstate route transitions from two to three lanes in each direction. The width of the study corridor is approximately 10 miles (5 miles either side of existing I-70).

As noted in the beginning paragraph of this letter, the environmental document for this project will be a First Tier EIS. The desired outcome of the First Tier EIS is to have enough public, community, and agency involvement and consensus that a decision can be made on the direction that MoDOT and FHWA will take for improvements to Interstate 70. This First Tier EIS will declare a preferred strategy and will determine the general characteristics of an alternative within that strategy. Preparing a First Tier EIS for the entire 199 mile corridor will allow us to partition the corridor, based on independent utility and logical termini, for the second tier documents. It is anticipated that a second tier environmental document would then finalize a preferred alignment within that corridor. Thus, the second tier documents could be written for I-70 segments of independent utility with immediate needs.

We intend for this First Tier EIS process to be concluded with an approved Record of Decision by the end of this year, December 31, 2000. We look forward to your response to this request and your participation as a cooperating agency on this unique and interesting project. If you have any questions or would like to discuss in more detail the project or our agencies' respective roles and responsibilities during the preparation of the First Tier EIS, please contact Peggy Casey at (573) 636-6196, ext 18.

Sincerely yours,


Donald L. Neumann
Program Engineer



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:

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.
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.
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

U.S. Department
of Transportation

United States
Coast Guard



Commander
Eighth Coast Guard District

1222 Spruce Street
St. Louis, MO 63103
Staff Symbol: (obr)
Phone: 314 539-3900 EXT 378
FAX: 314 539 3756

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 black ink that reads "Roger K. Wiebusch".

ROGER K. WIEBUSCH

Bridge Administrator

By direction of the District Commander



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.

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.



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).

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.

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

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.

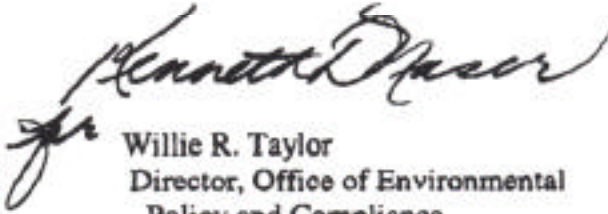
Summary Comments

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

Missouri
Department
of Transportation



Henry Hungerbeeler, Director

105 West Capitol Avenue
P.O. Box 270
Jefferson City, MO 65102
(573) 751-2551
Fax (573) 751-6555
www.modot.state.mo.us

April 25, 2001

Mr. Jerry Conley
Director
Missouri Department of Conservation
P.O. Box 180
Jefferson City, MO 65102-0180

RECEIVED

MAY 07 2001

HNTB-KCMO

Dear Jerry:

Subject: Interstate 70 Reconstruction

I have your letter dated April 4 regarding the concepts and plans we have regarding the reconstruction and improvement of Interstate 70 across much of Missouri. I was pleased to learn that your staff is optimistic that our respective needs can be addressed as we look at this major effort. Fortunately, the need for an investment in I-70 is obvious to all of us who travel the route. Unfortunately, our resources for such work are stretched. However, this does not preclude the value of working in partnership to accomplish mutual goals and goals which we hope are not opposed. Our department is striving to establish partnerships with your department and other state agencies such as the Missouri Department of Natural Resources and the Missouri Division of Tourism that allow our objectives to develop jointly as we address our needs on I-70. Previous meetings with our agencies have revealed efforts where joint partnerships may yield results that benefit the citizens of Missouri as well as travelers passing through the state. Joint development opportunities allow for greater understanding of our agencies' missions, greater ownership for the products of our efforts, and partnerships that perhaps generate a product better than the sum of its parts.

The bullet points in your letter outline possible enhancements to I-70 worth examining. In fact, some of those have been discussed as the I-70 study has developed. Also, on April 12, Mark Kross, our assistant to the director of project development and HNTB, our consultant doing the First Tier EIS study of I-70, were able to meet with your Regional Coordination Team (RCT) and the Central Unit Coordinating Team (UCT) at Rocheport to offer details on the effort and to take questions. The discussion, lasting about an hour, was beneficial for us all especially because your unit managers covering the stretch of I-70 from Warrenton to Blue Springs (or most of the I-70 study length) were present. We hope it yields dividends as your staff considers environmental concerns they have, observations on transportation matters and opportunities for joint efforts.

Referring to your bullet points on some possible enhancements to I-70 that could be explored in the next phase of planning, we discussed the following possibilities:


- “Management of shoulders and medians can emphasize native plants and landscapes or contribute to exotic propagation and weed problems.” Management of our rights of way is a costly and often dangerous task for our forces. The establishment of natural communities and landscapes with your professional assistance and perhaps with joint maintenance would assist our respective agencies fulfill our missions with a shared beneficial effect. Your managers suggested linear corridors along I-70 with prairie, riverine, and upland vegetation that would showcase Missouri ecosystems. Possibly, a pleasing travel experience will make drivers less stressed with a concomitant reduction in accidents, injuries and fatalities.
- “Wildlife will interact with roads and drivers, and specific design features should be considered to encourage viewing opportunities but minimize accident risk.” Our staff indicated that information about wildlife crossings would help us consider this issue. Perhaps we shall be able to provide natural cover beneath certain bridges that occur where wildlife passage occurs to keep the accident rates reduced. Viewing opportunities might be possible, provided there is wildlife to be seen and we can engineer some means to get travelers off the interstate for viewing opportunities.
- “Adjacent areas managed by public agencies can enhance the view from the highway, provide restful stops, or show people Missouri’s nature at its best. The highway system can encourage people to explore, enjoy and relax in our beautiful state, not just find a way across it.” This concept is germinating with discussions related to the Rocheport/ Overton Bottoms I-70 crossing of the Missouri River. Such a concept might be expanded to cover the length of I-70.
- “Rest stops can provide information, inspiration and enticement to enjoy parts of Missouri not on the road itself.” Our discussions with a host of agencies, including yours, the Department of Natural Resources, the US Fish and Wildlife Service, the US Army Corps of Engineers, other local partners and the Missouri Division of Tourism are yielding the concept of a Central Missouri Welcome Center near Rocheport. Shared interests mean that many stories can be told. Shared management of such a facility would benefit the partners. Our December 2000 “Missouri Interstate Rest Area Plan” now includes an interagency interpretive rest area conceptually in the Rocheport area.
- “Partnerships may be developed to protect some of the more striking views along I-70 for the enjoyment of future generations.” We have discussed this and agree that some focal points include the crossings at the Loutre, Missouri, and Lamine Rivers. If we have an opportunity to work with other agencies and private landowners in these areas, and elsewhere along the I-70 corridor, to maintain and/or establish natural views, then this objective might be realized.

Mr. Jerry Conley
April 25, 2001
Page 3

- "Damage to resources during construction have to be considered on a site-by-site basis, but a mitigation program could be considered on a larger scale." Although early in the process for site-specific discussions of mitigation, the concept of coordinated and combined mitigation has merit. That would especially be true if management of such larger mitigation areas was assumed by agencies such as the Missouri Department of Conservation and/or the Missouri Department of Natural Resources. Monitoring and management of natural areas is a responsibility MoDOT has to fulfill, but we feel that the state, its environment and the citizens benefit more if natural resource agencies have a key role in that maintenance. For example, we are looking at such opportunities with the Missouri Department of Natural Resources regarding wetland mitigation banks we might establish to address transportation impacts and which the Missouri Department of Natural Resources can maintain.

I appreciate the offer of assistance regarding the development of sensitive environmental features for I-70. As you can see, our agencies are working together to achieve this objective. I hope that such efforts on I-70 set a framework for partnerships on future projects. I am a firm believer that cooperating to achieve our joint objectives, though difficult at times, can yield a better product for our citizens. I appreciate the opportunity to hear your thoughts about our efforts.

Sincerely,



Henry Hungerbeeler
Director

hh/msk-pd

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Copies: Mr. Steve Mahfood - MoDNR
Mr. Chris Jennings - Tourism
Mr. Jerry Mugg - HNTB

JAM

Missouri
Department
of Transportation



Henry Hungerbaeler, Director

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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."

Mr. Robert G. Dimmitt, P.E.

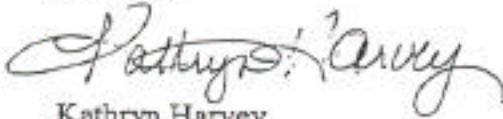
Page 2

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,

A handwritten signature in cursive script that reads "Kathryn Harvey".

Kathryn Harvey
Liaison Engineer

kh/dr

J:\ROFWED\Kathy\Robert Dimmitt1.doc

Copies: Mr. Roger Schwartz-D5
Mr. Mark Kross-ps

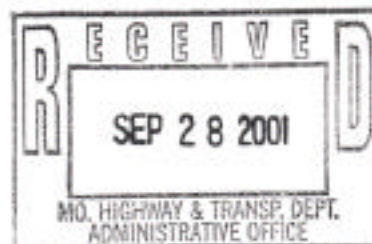
STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

John Holden, Governor • Stephen M. Mallick, 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.

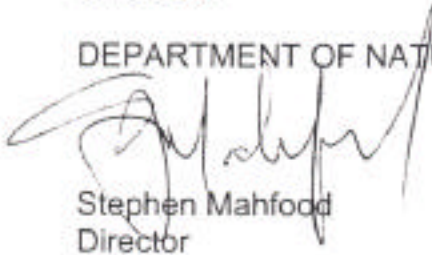
Page 2

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

A handwritten signature in black ink, appearing to read "Stephen Mahfood", is written over the typed name and title.

Stephen Mahfood
Director

SM:tj

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

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.

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.

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.

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.

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.)

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

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.

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

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.

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.

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.

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.

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.

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

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.

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

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.

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.

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.

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

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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

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)].

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

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.

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.

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.

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.

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."

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.

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.

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Missouri Constitution, Governor • Stephen R. Ashdown, Director

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

RECEIVED

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

c: Jerry Mugg (with enclosures)
Joe Cothorn
Mark Wilson
Mark Kross
Kathy Harvey



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

July 10, 2001

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

Dear Mr. Mugg: *JAM*

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

Mr. Joe Bachant, policy specialist, was our agency's original point of contact for this project, and he has done an outstanding job. However, filling a vacant position in the Policy Coordination Section has given me the opportunity to reallocate staff responsibilities, and Mr. Bachant's expertise is needed elsewhere.

Please be advised that Mr. Gene Gardner, policy coordinator, will now be our agency's point of contact for review and coordination on matters related to the above-referenced project. Mr. Gardner's e-mail address is gardng@mail.conservaion.state.mo.us, and he can be reached by phone at 573-751-4115 ext. 3353.

Sincerely,

DAN ZEKOR
POLICY SUPERVISOR

DZ:GG:dcl

COMMISSION

ANITA B. GORMAN
Kansas City

RANDY HERZOG
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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.

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

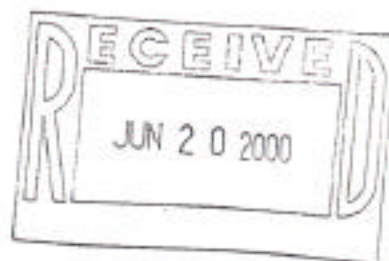
STEPHEN C. BRADFORD
Cape Girardeau

ANITA B. GORMAN
Kansas City

CYNTHIA METCALFE
St. Louis

HOWARD L. WOOD
Bonne Terre

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.



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.

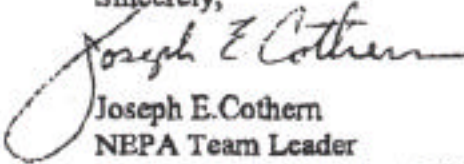
The Missouri Department of Transportation (MoDOT) and Federal Highway Administration (FHWA) propose to improve the Interstate 70 Corridor in Missouri (between St. Louis and Kansas City) to:

- 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

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. Cothorn
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

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

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

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.

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)

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.

DEIS COMMENTS, FHWA, INTERSTATE 70DETAILED COMMENTS

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".
2. Page 8, Table 4 (Environmental), recommend inserting the word "low" after "relatively".
3. II-4, "Incident Detection and Management Systems"; recommend further identification of "Caltrans" as the "California Department of Transportation".
4. II-93, 2nd paragraph, "born" should be changed to "borne".
5. II-96, (f) "System Integration", "capitol" should be changed to "capital".
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.
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.
8. IV-21, (E), (1), 2nd paragraph; recommend inserting "evaluation" between "environmental" and "process".
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).
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?
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.
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:

April 3, 2000

(200000774)

Mr. Donald Neumann
 Federal Highway Administration
 209 Adams Street
 Jefferson City, Missouri 65101

Dear Mr. Neumann:

This is in response to your letter dated February 14, 2000, requesting that the Kansas City District Corps of Engineers become a cooperating agency for a First Tier Environmental Impact Statement for adding capacity to Interstate 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 are pleased to be a cooperating agency for the First Tier EIS. Mr. Kenny Pointer will be the point of contact for our district. Mr. Pointer is in our Missouri State Office, 221 Bolivar St., Suite 103, Jefferson City, Missouri 65101.

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

Sincerely,

Lawrence M. Cavin
 Chief, Regulatory Branch
 Operations Division

Copies Furnished:

- Missouri Department of Transportation
 ATTN: Mark Kross
- U.S. Environmental Protection Agency, Region VII

FHWA
 MO DIV
 RECEIVED
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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:

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 indicted are appropriate for the second tier studies, provided that the Environmental Assessments contain adequate documentation, particularly regarding alternatives.

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.

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."

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).

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.

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.

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.

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

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.

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.

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

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.

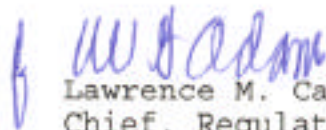
12. Missouri Department of Transportation and Federal Highway Administration should include copies of the attached coordination letters (and any others that are pertinent) between the Kansas City District and the Missouri Department of Transportation regarding the I-70 corridor across the Overton Bottoms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

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

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