

CHAPTER VIII Comments and Coordination

The Missouri Department of Transportation (MoDOT) and the Federal Highway Administration (FHWA) have provided numerous opportunities for the coordination of the study of the reconstruction of I-64 from west of Spoede Road to west of Sarah Street with general public and resource agencies. This chapter summarizes the public involvement and agency coordination programs that have taken place during project development.

A. Public Involvement

The complexity of the project and the diverse interests within the study corridor made it clear that the I-64 Environmental Impact Statement (EIS) required a responsive public involvement effort. A public involvement plan had been developed as part of conceptual engineering and urban design planning activities that occurred prior to the initiation of the EIS activities. These activities are often described as "The New I-64" project. These activities were continued and expanded to be consistent with the EIS process.

The Public Information & Outreach Office of MoDOT developed a detailed Public Involvement Plan (PIP) that outlined the various activities designed to meet the goal of communicating with the public and receiving regular feedback. There had been previous attempts to rebuild I-64, and there was a long history of discussion about the need for the project.

1. MEETINGS

a. Subcorridor Advisory Committees

Because of the length and complexity of the project, the corridor was defined by three subcorridors. The Greenway Subcorridor extends east from the Spoede Road interchange to just west of the McCutcheon Road Overpass. The Thruway Subcorridor extends from just west of the McCutcheon Road Overpass to the McCausland/Skinker/Oakland interchange. The Parkway subcorridor extends from the McCausland/Skinker/Oakland interchange to the corridor's eastern edge west of Sarah Street.

The first public open house was held in May 1999. At this meeting, the recommendations from the Major Transportation Investment Analysis (MTIA) were shown and discussed. The public was advised that MoDOT was moving forward with the recommendations into conceptual design. Several hundred people attended and there was extensive media coverage in print, radio and television. Comments from this meeting included concerns for personal property, locations of soundwalls, number of lanes proposed on I-64 and the location of MetroLink, the region's light rail transit system.

In August 2000, the subcommittee structure was introduced to the public at an open meeting at the St. Louis Science Center. Members of the public and interested stakeholders were invited to join three committees, one for each subcorridor. The scope of the initial meetings of the Subcorridor Advisory Committees included conceptual engineering of interchanges and urban design (UD) proposals. The Subcorridor Advisory Committees were intended to serve as intermediaries between the project team and the community. Committee members, who represented various community groups and institutions, were asked to bring the concerns of their constituents to the project team and in turn, share information about the project with their

constituents. The input provided by Subcorridor Advisory Committee members was used to develop conceptual alternatives and provide input to the EIS process.

Meetings with the committees were held at regular intervals throughout the autumn and spring of 2000, 2001, 2002 and early in 2003. Possible alternative interchange designs were presented and discussed. The Greenway Committee met at the Transportation Information Center (TIC) of the Missouri Department of Transportation (MoDOT) in Chesterfield. The Thruway Committee met first in the basement of the Richmond Heights City Hall, then in rooms at the newly constructed Richmond Heights Community Center. The Parkway Committee met at first in the conference rooms of Forest Park Hospital, then in the McDonnell Conference Center of the Saint Louis Zoo. The subcommittee meetings were open to the public and were attended frequently by non-committee members. The meetings' discussions and design concept options were covered regularly with articles in the *St. Louis Post-Dispatch* and *Suburban Journal*. Summaries of the meetings were posted on the project website. A brief synopsis of these meetings is contained in Appendix J in the Chronologies of I-64 Documentation. All concept options were displayed on the project website.

At subcorridor meetings, members were usually given maps and drawings of interchange conceptual designs, as well as charts and graphs showing traffic volumes and other pertinent information.

Table VIII-1
Greenway Subcorridor Members

Dan Apted	President, Ladue Place
Don Beimdiek	Brentwood Economic Development Council
Fred Berger	City Attorney, City of Westwood
Mike Bush	Representative, Salem United Methodist Church
Barbara Clements	Alderwoman, York Hills
John Conroy	Resident
Carolyn Cummings	Resident, York Village
Quintus L. (Bud) Drennan, Jr.	Resident, Godwin Lane Association
Lori Figgel	Manager, Comprehensive Planning
Lori Fiegel	St. Louis County Planning Department
Catherine Hanaway	State Representative, District 87
John Harlan	Representative, Trail's End Subdivision
Irene S. Holmes	Councilwoman, Ward 2, Ladue
Mary Fran Horgan	Resident
Thomas M. Horgan	Resident
Ken Krueger	Trustee President, Ladue Ridge Road Subdivision
Doyt Ladd	Treasurer, Ladue Crest Lane Association
Annette Mandel	Mayor, Creve Coeur
Robert Matzke	Resident
Mark Mihalevich	Resident
Geoffrey Morrison	Trustee, Briarwood Subdivision
Jack Perry	President Trustee, Richmond Hills Subdivision
Pete Peterson	Representative, Salem United Methodist Church
Ray Potter	Subdivision Trustee, Clayton Road Park
Chuck Schierer	Alderman
Sandy Sobelman	Mayor, City of Frontenac
Michael Wooldridge	City Clerk, City of Ladue

Table VIII-2
Thruway Subcorridor Members

David Alexander	Resident	
Debra Behrendt	President, Brentwood Forest Condominium Association	
Andrew Bell	Resident	
B : W B:	Community Liaison Supervisor	
Dennis W. Bice	St. Louis County Dept. of Highway & Traffic	
Joan Bray	State Representative, District 84	
R. Lee Cannon	Associate Traffic Engineer – Crawford, Bunte, Brammeier	
Marisa Chambers	Trustee, Hampton Park Subdivision	
Tim Day	Resident	
Jerry Ebest	Director of Real Estate, Dierberg Markets	
Ісен Геогинан	Chair, Local Government Committee	
Joan Esserman	League of Women Voters	
James or Pat Finger	Resident	
Matt Fister	Chairman, Hanley Downs Board of Trustees	
Beverly Fogelman	Hanley Downs Board of Trustees	
Stephen Fons	Council Member, City of Richmond Heights	
Andrew Franke	Church of Little Flower	
John W. Geppert	Truman Bank	
Virginia Harris	Sierra Club	
Kathy Holman	Former Trustee, Lake Forest Subdivision	
Steve Hoven	Vice President Public Affairs, SSM Health Care	
Betty Humphrey	Mayor, City of Richmond Heights	
Francis Kenney	Mayor, City of Clayton	
John Kraska	President, Hanley Court Industrial Assoc.	
Juliana Lally	Gissler Avenue Association	
Rev. Nathaniel Malone	Pastor, First Baptist Church of Maplewood	
Jan Mangelsdorf	Resident	
Joellen G. McDonald	Co-Chair, Richmond Heights Transportation Board	
Michael S. McGrath	Resident, Richmond Heights Transportation Board	
Rich Moffit	Resident	
John Openlander	Public Works Director, City of Maplewood	
Alice Provaznik	Richmond Heights Transportation Board	
Scott Randall	City Manager, City of Clayton	
Georgia Rusan	Resident	
Michael Schoedel	City Manager, City of Richmond Heights	
Julia Schulte	Resident	
Bob Shelton	Economic Development Director, Brentwood	
Morris H. Sterneck	Executive Vice President, Hycel Properties Co.	
James Thomson	Resident	
Tina M. Votaw	Division Director, Real Estate & Development	
TITIA IVI. VOLAW	Bi-State Development Agency - MetroLink	
Joyce Walsh	Trustee, Hampton Park Neighborhood	
Kevin Ward	Transportation Engineer, Federal Highway Administration	

Table VIII-3
Parkway Subcorridor Members

Judy Alexander	Director of Administration and Finance, Central Institute for the Deaf
Garrett A. Balke	Chairman and CEO, Balke Brown Associates
Robert Bannister	Principal, St. Louis University High School
Jim Belval	Facilities Director, BJC Health System
Joann Berger	Treasurer, Hi-Pointe Residents Association
S. Mitchell Bowers	President, Hi-Pointe Residents Association
Paul Brockmann	Director of General Services, Missouri Botanical Garden
Edward L. Cody	Attorney at Law
Frederick Douglas	Manager, Service Development Planning
	Bi-State Development Agency
Derio Gambaro	State Representative, District 65

Jack Gillum	Adjunct Professor, Washington University
Susan Glassman	Urban Strategies
Melvin Leon Hall	President, CEO, Chairman, Lindell Bank
Robert Hilgeman	State Representative, District 64
Christine Ivcich	The Muny, Forest Park
Lyda Krewson	Alderman, Ward 28
Frank or Dorothy Mead	President, Citizen Patrol
Kevin Mills	Director of Marketing, Saint Louis Zoo
R. Mark Odom	District Director, Office of Congressman Clay
Marcella Palmieri	Southeast Housing Corp.
Bill Peick	VP, Construction and Property Management, Tenet Healthcare
John Raniero	President, Cheltenham Neighborhood Association
Norm Shipley	Project Director, BJC Health Systems
Ronald C. Smith	Acting President, St. Louis Community College at Forest Park
Connie Tomasula	St. Louis Planning Agency
Elaine Torres	Resident
John Wharton	Senior Director of Operations, St. Louis Science Center
Brian M. Wilson	Neighborhood Stabilization Officer, City of St. Louis
Tom Yarbrough	Bicycle Program Manager, Trailnet

b. Aesthetic Advisory Committee

Project leaders intended to use The New I-64 as an opportunity to offer aesthetic enhancements to the highway, many of which could be incorporated with minimal budget impact. To this end, a separate Aesthetic Advisory Committee was formed. Half of its members were drawn from the Subcorridor Advisory Committees, and half were professionals in urban design, art, and architecture from the St. Louis community.

The Aesthetic Advisory Committee's first meeting was held at MoDOT's Transportation Information Center in Chesterfield on October 25, 2000. The Aesthetic Advisory Committee was given three roles: to assist in developing the words and images that would define an aesthetic theme for The New I-64; to provide direction to the Subcorridor Advisory Committees; and to help choose two design collaboration artists, one from St. Louis and one from outside the region, from a list developed by MoDOT consultants. These two artists would not execute commissions directly themselves, but would serve on the Aesthetic Advisory Committee, help choose the aesthetic theme, and work with commissioned artists on specific projects on various elements of the highway, bridge, and walkway, and landscaping designs, to make sure that individual commissions reflected the aesthetic theme.

On October 25, 2000, three St. Louis artists, selected from a short list developed by a project consultant, were interviewed by the project team. On November 17, 2000, the three—Phil Robinson, Janet Sanders, and Ron Fondaw—gave presentations to the Aesthetic Advisory Committee. On January 9, 2001, two artists from outside the St. Louis area, Valerie Otani and Leila Daw, gave presentations to the Aesthetic Advisory Committee (A third candidate, Patrick Suchard, withdrew his name from consideration.) After consulting with the Aesthetic Advisory Committee, the project team announced on January 11, 2001 the selection of the two design collaboration artists, Phil Robinson and Valerie Otani.

On November 30, 2000, the Aesthetic Advisory Committee met to begin choosing the aesthetic theme for The New I-64. Members examined an "image bank" of photographs of buildings, landmarks, monuments and residences in the St. Louis region that reflected St. Louis's aesthetic history. The group developed an urban design theme that would seek to utilize traditional materials (brick and stone), existing St. Louis architecture (art deco images on current I-64 bridges), and native vegetation as part of I-64 reconstruction. This theme was presented to the Aesthetic Advisory Committee in March 2002 and was well received. It was presented to the public at an open house on April 3, 2002, and was included in the January 29, 2003 Public Hearing.

Table VIII-4	
Aesthetic Advisory Committee Members	

Michael Byron	Associate Professor of Art, Washington U.
Esley Hamilton	Preservation Sites Historian St. Louis County Parks and Recreation
Catherine Hanaway* (*withdrew autumn 2001)	State Representative, District 87 (Greenway)
Christine Ivcich	The Muny at Forest Park (Parkway)
Dick Kirschner* (*withdrew Spring 2002)	Principal, Mackey Mitchell Associates
Ken Krueger	Trustee President, Ladue Ridge Road Subdivision (Greenway)
Irv Logan	Missouri Dept. of Conservation
Betsy Millard	Executive Director Forum for Contemporary Art
Valerie Otani	Project Artist
Phil Robinson	Project Artist
Michael Schoedel	City Manager, Richmond Heights (Thruway)
Jacqueline Tatom	Associate Prof. of Architecture Washington University
Joyce Walsh	Trustee, Hampton Park Neighborhood

c. Public Meetings

The kickoff meeting for The New I-64 was held on May 27, 1999 in the lower level of the Richmond Heights library. At this meeting, the public was shown the recommendations from the MTIA approved by the region's metropolitan planning organization in 1997. The public was informed that the conceptual design was beginning and their input was valued.

A second public meeting was held August 30, 2000. At this meeting, the three Subcorridor Advisory Committees were created as one method to provide public and stakeholder input into the project.

An open-house public meeting for the EIS was held on April 3, 2002. Its purpose was to obtain input from the community, to explain the role of the Environmental Impact Statement (EIS) in the project, present and obtain input on the process used to identify and refine the alternatives being studied in the EIS, and to present visual information on the progress of ideas for aesthetic treatments of design elements. The Public Open House was held in three rooms of the Richmond Heights Community Center from 2 p.m. through 8 p.m. It was publicized through press releases to local media and a mass mailing. Approximately three hundred people attended, including many who were introduced to the project for the first time. Feedback forms were provided. The meeting was previewed by the St. Louis Post-Dispatch and the local Fox TV affiliate in the days prior to the meeting. The meeting itself was covered by all the major media in St. Louis including the *St. Louis Post-Dispatch*, *Suburban Journal*, KMOX, KTRS and KWMU radio and all four TV stations.

Comments from the April 3, 2002, meeting included support for the need for the project, concerns about personal property, the need for sound walls throughout the corridor, support for the proposed aesthetics, concern about traffic flow at various interchanges, and concern about some of the options a the I-170 interchange. Comments were received from people requesting that property impacts be minimized and urging selection of the option that impacted them the least.

The public hearing provided an opportunity for the public to view the Draft EIS and project concepts. There was also an opportunity to make comments and have them considered in the NEPA process. Any substantive comments are addressed in this Final EIS for I-64.

d. Forest Park Stakeholder Meetings

Forest Park presented special challenges. In the summer of 2001, the I-64 team held a series of meetings with city of St. Louis officials and Forest Park stakeholders, many of whom also sit on the Parkway committee. Specific participants included the St. Louis Zoo, Forest Park Community College, Balke properties, BJC Hospital, Forest Park, and the St. Louis Development Corporation (part of the city of St. Louis). Meetings were held in the first-floor conference room of the Equitable Building in downtown St. Louis. Issues discussed by the team included possible impacts of I-64 reconstruction to Forest Park property; the design of the Hampton interchange; landscape treatments of Oakland Avenue; plans by St. Louis Community College to improve its curbside appearance; pedestrian walkways and handicapped accommodations along and across Oakland; plans by St. Louis Community College to improve its curbside appearance; possible impacts of the project to the Saint Louis Zoo parking lot; and the relocation of the pedestrian tunnel under I-64. The project team's conceptual design reflects this collaborative effort on these issues. A brief synopsis of these coordination meetings is included in the Section 4(f) Evaluation, F. Coordination Summary.

e. Meetings and Communications with Public Officials

The project team identified a number of public officials who may have an interest in the project's outcome. Beginning in 1999, members of the I-64 project team began a series of ongoing meetings with elected officials, business leaders, and other stakeholders along the I-64 corridor. These were usually held at the request of municipalities or other groups that asked project team members or leaders to give presentations about the project. The purpose of these meetings was to present the latest conceptual designs to specific municipalities or other groups, and to hear concerns specific to those designs or proposals. Meetings are further detailed in the Project Chronology located in Appendix J.

Table VIII-5
Elected Officials on I-64 Mailing List

Rep. Todd Akin
Tom Bauer, Alderman, 24 th Ward
Paula Carter, State Senator, District 5
Marit Clark, Alderwoman, 6 th Ward
Rep. William Clay, U.S. District 4
Rep. William Clay Jr., State Representative, District
Senator Patrick Dougherty, Missouri District 4
Nancy Greenwood, Mayor, Chesterfield
Catherine Hanaway, State Representative, District 87 (Greenway)
Robert Hilgeman, State Reprentative, District 6 (Greenway)
Betty Humphrey, Mayor, Richmond Heights (Thruway)
Lyda Krewson, Alderwoman, 28 th Ward (Parkway)
David Levin, State Representative, District 82
Annette Mandel, Mayor, Creve Coeur (Greenway)
Dan McGuire, Alderman
Mike Schoedel, City Manager, Richmond Heights (Thruway)
Pat Secrest, State Representative, District 82
Betty Sims, State Representative, District 24
Francis Slay, Mayor, City of St. Louis
Buzz Westfall, County Executive, St. Louis County

From August 2001 to November 2001, the project team met regularly with a group of elected officials to discuss their concerns and provide updates on the project team's conceptual design work. This group included the mayor or designated representative from each municipality on the corridor, as well as the state representatives and senators representing the corridor. After

this series of meetings, the group felt its specific project issues were being addressed and MoDOT was being attentive to the issues of the community. Communication with this group took place through project newsletters and updates.

f. Other Meetings

The Missouri Department of Transportation was invited to speak and attended several hundred other meetings in the community along the corridor from 1999 through 2004. These meetings included neighborhood associations, informal neighborhood groups, chambers of commerce, groups of realtors, elected official town hall meetings, property developers and individual meetings. A meeting was held with Paraquad, to discuss issues relating to access for the disabled. Meetings held are listed in the Project Chronology in Appendix J.

2. THE NEW I-64 WEBSITE

The New I-64 project team commissioned an innovative website that came online in October 2000. The New I-64 website contains sections that show maps and conceptual designs distributed at Subcorridor Advisory Committee meetings. Another website section allows the public to post comments directly to the MoDOT Project Manager and receive replies. Website visitors who provided mailing information were added to the project mailing list. By the spring of 2002, approximately two thousand people had left their names and mailing information on the web mailing list.

3. PROJECT NEWSLETTERS

Five project newsletters and six update letters were produced, in June 2000, December 2000, February 2001, July 2001, August 2001, September 2001, October 2001, March 2002, June 2002, January 2003 and December 2003. The first newsletter was two-color; the other four were four colors to better convey graphic information. The six update letters were one or two-page summaries to inform the public on the project status. All were mailed to the mailing list and distributed at meetings of the Subcorridor Advisory Committees. Bundles of newsletters were also given to municipal entities for placement and distribution at public sites. The newsletters and letters were mailed to nearly 2,000 people on the project mailing list and were posted on the project website.

4. MEDIA

Providing information to the local residents, local business owners and regional interests regarding project process, project progress and opportunities for input was an important step in developing the EIS. To accomplish this, a number of different outlets were identified for reaching the public. The Missouri Department of Transportation's Public Information Office periodically issued press releases when project decisions or milestones were reached. Meetings of the Subcorridor Advisory committees were regularly covered by the *St. Louis Post-Dispatch*, St. Louis's metropolitan daily newspaper. Newspaper articles referring to The New I-64 reconstruction are listed and included in the Project Chronology. The *St. Louis Post-Dispatch* has covered the project team's conceptual designs in detail over the last four years. Articles have shown maps of the options and included information on the topics debated as the I-64 team refined its concepts. Several local TV news organizations also reported on Subcorridor Advisory Committee meetings, and I-64 project team leaders were interviewed on-site during a Thruway meeting for a PBS special on community involvement in local political issues.

Additional publications that were available to inform the public about the draft EIS included:

• Church newsletters, which are published by some of the neighborhood churches and are available to those local populations during religious services.

• The St. Louis American (Stlamerican.com), The St. Louis Metro Sentinel (Stlsentinel.com), St. Louis Argus and Take Five are newspapers and publications that focus on the African-American community. Also, the Organization for Black Struggle occasionally publishes and distributes a newsletter.

- The West End Word (stlcriticalmass.org/media/west_end_word.htm) is a religious publication and provides a communication mechanism with minority communities and neighborhoods of the study corridor.
- *The Scene* (Fp.stlcc.cc.mo.us/scene) is a small newspaper published and distributed six times a semester through Forest Park Community College.
- St. Louis Chinese American News (Scanews.com) and St. Louis Chinese Journal (Every-day.net) are two newspapers that are published for readers of Asian-Chinese descent in St. Louis.
- Red Latina and Que Pasa (Quepasastl.com) are biweekly and monthly Hispanic publications, respectively. Both are distributed throughout St. Louis and were found in the Parkway Subcorridor neighborhoods. Both publications are owned by the Hispanic Media Group in St. Louis. The organization also produces a weekly Spanish-speaking television show entitled "Enterate" on KPLR, Channel 11. Other resources to reach Hispanic communities in St. Louis include radio such as "Alma Latina" program on the noncommercial station KDHX 88.1 FM and WEW 770 AM hosts the program "Radio Cucui."
- St. Louis Post Dispatch (Stltoday.com) publishes suburban journals in the Bosnian language.

5. PROJECT VIDEOS

As part of its public involvement strategy, MoDOT commissioned videos on topics of particular interest to residents living near the I-64 project corridor. The videos were shown at subcorridor advisory committee meetings, at the April 3 public open house, and at various other meetings. One video explained the single-point urban interchange, a type of interchange design proposed for many I-64 interchanges. Another dealt with issues surrounding sound walls and noise mitigation, a topic of great interest to homeowners immediately adjacent to the highway.

6. SUMMARY OF PUBLIC COMMENTS RECEIVED PRIOR TO THE DRAFT EIS

Comments on proposed I-64 conceptual designs were received through a number of media. Letters from interested members of the public were received by a designated contact person, who either responded or passed them on to the appropriate team leaders. Comments were posted to the I-64 website and responded to by project leaders; a summary of the web comments and comments from the public information meeting are included in Appendix J.

Numerous public comments were gathered prior to the release of the DEIS. The majority of those comments were in favor of improvements to I-64 and the quick completion of those improvements. The comments in favor of improving I-64 were particularly interested in increased capacity, improving the flow of through traffic and improving the interchanges.

Of these comments received, many also expressed opposition to improvements which would take residential property. This is particularly true for the Brentwood Boulevard/I-170/Hanley Road/Galleria Parkway interchange. There were comments indicating preferences for Option 1,

Option 2a and Option 3. The main concern expressed in the public comments regarding this interchange were the impacts on residential property. Residents of the Brentwood Forest Condominiums were very opposed to any of the options that would require improvements to the south of the existing alignment because this would require the taking of the Town & Country apartment complex. The taking of the Town & Country apartments would move the interstate closer to the condominiums and would have consequences on the noise level and views of those residents.

The use of Option 2 along I-64 received support because the footprint required for the roadway would be smaller and there would be less impacts to property along the corridor. Some individuals preferred Option 3 to Option 2 because they felt that the stacked interstate would be built at a height above that of their property and those property owners were not only concerned about the increase in noise but also in the impact to their view and their property values. It was pointed out by MoDOT staff at numerous meetings and through returned phone calls that the elevation of the stacked alternative would not be different than the current elevation of I-64.

A few of the comments were concerned only with the impact to their property value in terms of the appearance of the improvements. There were also some comments by residential property owners whose homes would be taken by one or more of the options and they preferred the option or options which would not affect their property for that reason only.

Other comments relayed the concern for noise impacts and the need to retain trees that would act as noise and view barriers and the need to build sound walls. The majority of those individuals commenting asked that sound walls be constructed to minimize the noise from traffic on I-64 and be used as an aesthetic element to improve the look of the corridor.

Some of the comments expressed the desire to eliminate a few of the interchanges in order to improve traffic flow. One of these comments was specific to the optional Oakland interchange, saying that this interchange was not needed because access was provided elsewhere. Along this same line, a few comments expressed concerns about impacts to residential streets either during construction, for example at the Spoede and I-64 interchange, and after construction if the ramp configurations are changed, as has been proposed for the McCausland interchange. Another comment suggested that the ramps from I-64 to I-170 north be improved to two lanes to better handle the flow of traffic at that interchange. One comment suggested that traffic signals be installed at the Kingshighway interchange to accommodate turning movements onto I-64. A traffic signal is included as part of the recommended single point interchange design. One of the interchanges that received a considerable number of comments on the website was Bellevue Avenue and the access there for St. Mary's hospital. The majority of the comments asked that this access be kept open while a few felt that there was insufficient traffic to warrant the interchange and that the interchanges in that area are too close together. Comments related to maintaining Big Bend as a half interchange were also received.

A related comment was the concern that pedestrian access would be eliminated or reduced and that bus stops would not be accommodated because of improvements and stressing the importance of these considerations. Several comments were received via the website relating to the importance of the availability of pedestrian and bicycle access connecting the neighborhoods and Forest Park, in particular.

B. Location Public Hearing and Formal Comment Period on Draft EIS

1. PUBLIC HEARINGS

The I-64 Public Hearing was held on January 29, 2003 from 12:00 p.m. to 8:00 p.m. at the St. Louis Science Center. An open house format was used for the public hearings. This format allowed attendees to review project information at their own pace and ask questions of study representatives. Hard copies of the DEIS were available for review.

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

2. VIRTUAL EIS

The DEIS was made available on the study web site at *www.thenewi64.org*. Visitors to the web site were able to review the DEIS and submit comments through an online comment form and e-mail.

3. PUBLIC VIEWING LOCATIONS

The DEIS was made available at 13 locations throughout the corridor. These include:

- St. Louis City Hall
- Richmond Heights City Hall
- Brentwood City Hall
- Clayton City Hall
- Ladue City Hall
- Frontenac City Hall
- Town & Country City Hall
- St. Louis County Executive Office
- East-West Gateway Coordinating Council
- St. Louis City Public Library
- St. Louis County Public Library
- Richmond Heights Public Library
- Forest Park Community College Library

4. SUMMARY OF DRAFT EIS AND PUBLIC HEARING COMMENTS

A total of 1590 comments were received during the comment period for the DEIS. Comments were received from a number of entities. Those received from the agencies and the cities are addressed later in this chapter.

Table VIII-6
Summary of All Comments Received

Source Type	Letters/Forms	Comments
Federal Agencies	5	20
State Agencies	4	15
Local Agencies	2	2
State Elected Officials	3	3
Local Elected Officials	5	26
Organizations		
Public Comments	1398	1526
Total	1415	1590

a. General Summary of Public Comments

About half of the comments submitted during the formal comment period were of a general nature. Table VIII-7 presents and categorizes consistent comments and themes received from the public in review of the DEIS.

Table VIII-7
Summary of Consistent General Comments

General Public Comment	Count
Concerns about property owners being held in limbo due to the right-of-way acquisition timeframe	11
Concern that changes to I-64 will affect property values	14
Concern about the number of homes being taken	23
Concern about the acquisition of all or part of specific properties	45
Concern that property owners will not be adequately compensated	7
Concern that adequate replacement housing will not be affordable or available in current neighborhood	4
7. Concern about children being removed from the Clayton school district	5
8. Concerns about drainage on the highway and the runoff on nearby properties	6
Concern about the lack of MetroLink in the corridor	3
10. Make the additional lane an HOV lane	1
11. Bicycle riders need lanes on all crossover bridges	3
12. Bicyclists need design which will allow for wide outer lanes and long enough signal cycles to allow cyclists to flow with traffic and for pedestrians to cross the intersections safely.	1
13. Separate bicycle and pedestrian traffic from the interchanges	1
14. Supportive of the urban design/aesthetic portion of the project	6
15. Concern about the view from homes if I-64 is raised	6
16. Try to leave as many trees and green space as possible	2
17. Use right-of-way leftover from converted clover leaf interchanges for city parks	1
18. Concern about the replacement of landscaping/trees on private property that would need to be removed for construction	2
19. Replace narrow sidewalk over Deer Creek at Clayton Road and Warson	1
20. Consider adding a memorial to Charles Lindbergh at the I-64 and Lindbergh interchange	1
21. Concern about the level of lighting	4
22. Desire to have noise walls constructed	16
23. Concern that noise walls won't work and will obstruct views	5
24. Noise walls should be built prior to construction	3
25. Concern about the effects of vibration	1
26. The project is encouraging urban sprawl	2
27. Provide brighter reflectors and striping for visibility	1
28. Provide a barrier between oncoming traffic that is high enough to shield drivers from headlights	1
29. Concern about a fault line that runs through neighborhood and may do damage if hit during construction	1
30. Reduce congestion on northbound Kingshighway leading into the BJC complex and its parking	1
31. Improve alternate routes prior to construction on I-64 to reduce delays	1
32. Roundabouts are too complicated/ are a good solution	2
33. MoDOT should keep people informed of the construction schedule and delays	2

General Public Comment	Count
34. MoDOT should adopt a construction schedule to complete intersections as separate projects	2
35. Concern that MoDOT is choosing the most expensive alternative	1
36. Consider turning portions of I-70 and I-44 into toll roads to pay for the project	1
37. General supportive comments	20

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

• Concern about property owners being held in limbo due to the right-of-way acquisition timeframe – Due to the unknown timeline and the lack of funds to begin the improvements, property owners are being held in limbo as to the actual impacts to their property and the timeframe for making acquisitions.

Response: Property that is noted as being acquired for a MoDOT project in an Environmental Impact Statement may concern property owners, especially when timing of project implementation is not precisely known. The New I-64 Improvement is a multi-year project and right-of-way will be acquired over a number of years. To address immediate concerns about property acquisition, the MoDOT right-of-way specialists can consider hardship acquisitions when so requested by the property owner and approved by MoDOT's Central Office and FHWA. This can allow property owners who must move for one reason or another to have their property acquired by MoDOT ahead of the usual acquisition procedure timeframes. Additionally, improvements made to the property in the interim period, between Record of Decision and Project Implementation, are figured into the appraised valuation of the property. Additional information can be found in Chapter IV, Section C. Right-of-Way Impacts.

• Concern that changes to I-64 will affect property values – The changes to I-64 are causing a decrease in property values that affect the ability to sell a property and a concern about the method for compensating property owners, particularly for those properties that MoDOT is not purchasing but that will be affected by the changes.

Response: MoDOT has found over the years, that there is no fixed rule about changes in property values due a highway project being redesigned, such as the New I-64. Some properties may experience an increase in valuation, due to improved access, or visibility. Other properties may experience no change or could decline in their apparent valuation or desirability in the real estate market. There are numerous factors which go into making a particular property valuable or desirable within the real estate market and proximity to transportation corridors is just one factor. Efforts have been made to enhance property values by providing for urban design treatments. Improved pedestrian access, noise attenuation, open space, and landscaping are all part of the proposed action to not only mitigate but enhance the existing neighborhoods, commercial areas and public facilities. More information can be found in Chapter IV, Section C. Right-of-Way Impacts and Chapter V Urban Design.

• Concern about the number of homes being taken – The impacts to the homes in the corridor, particularly in Richmond Heights are too numerous especially since this area has already been impacted numerous times in the past by highway expansion.

Response: Efforts have been made to minimize impacts to residences. A key criteria of the project is to minimize property impacts. Strategies utilized to minimize property impacts include use of retaining walls and minimizing cut and fill sections. Even with these design strategies, a number of residences would be taken. Property impacts are described in Chapter IV, Section C. Right-of-Way Impacts.

 Concern about the acquisition of all or part of specific properties – Questions were raised about the extent of the exact impact to specific properties within the I-64 Study Corridor and whether these would be total or partial acquisitions.

Response: The EIS identifies potential property impacts of the refined alternatives. A total taking is indicated if the entire property is included in the property impacts. A partial taking is indicated if a portion of the property is included in the property impacts. The potential property impacts are indicated in conceptual engineering plates shown in Appendix C. A more specific assessment of property impacts will be completed as part of more detailed engineering in subsequent study and be available for public review at a design public hearing as further engineering is completed.

 Concern that property owners will not be adequately compensated – The concern is that property owners will not be adequately compensated for the impacts to their property.

Response: MoDOT uses prescribed procedures in accordance with the Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended. This act requires that just compensation be paid to the owner of private property taken for public use. The right-of-way specialists utilize professional appraisers who are familiar with the neighborhoods and local market conditions to ascertain the fair market value of the property to be acquired. If the property owner is not satisfied with the offer, they make a counter offer to the right-of-way specialist. If the right-of-way specialist and the property owner are still unable to reach an agreement, the matter can be submitted to a third party mediator, at no cost to the property owner. The mediator can often find agreement and negotiate a valuation that the property owner can accept. However, should the mediation efforts not produce an agreement, the property owner can choose to take it to court.

• Concern that adequate replacement housing will not be affordable or available in the current neighborhood – Homeowners are concerned that they will not be able to find housing within their current neighborhoods because there won't be any available and they won't be able to afford what is there.

Response: The EIS does indicate that in certain locations in the I-64 corridor the number of housing units currently for sale within the general area of the acquisitions appeared to be inadequate to meet anticipated demand. However, it should be noted that improvements to the New I-64 will be phased over several years and not all of the replacement housing will need to be available at the same time. Throughout the project, the right-of-way specialists will be working with individual property owners to obtain replacement housing that meets their needs.

Relocation assistance payments are designed to compensate displaced persons for costs that have been imposed on them by a MoDOT project. A displaced owner-occupant may be eligible to receive up to \$22,500 for a replacement housing payment. This includes the amount by which the cost of a replacement dwelling

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exceeds the acquisition cost of the displacement dwelling, increased interest costs and incidental costs.

Should this project include persons who cannot readily be moved using the relocation program benefits and/or procedures, i.e., when there is a unique housing need or when the cost of available comparable housing would result in payments in excess of statutory payment limits, the MoDOT's relocation policy commits to utilizing housing of last resort. Housing of last resort involves the use of payments of statutory maximums or the use of other unusual methods of providing comparable housing.

The Uniform Act requires that comparable, decent, safe and sanitary replacement housing within a person's financial means be made available before that person may be displaced.

Concern about children being removed from the Clayton School District – The
children in those homes that are being acquired will not be able to continue to attend
Clayton School District because the homeowners won't be able to find replacement
housing that is affordable within the school district.

Response: Within the framework of relocation policies, MoDOT has the ability to take into account issues that contribute to the real estate value of the property to be acquired. The appraisal valuation takes into account school districts in regard to their contribution to the overall value of a property. Specifics about an individual property valuation is beyond the scope of an Environmental Impact Statement document and this information is developed at the time the property is appraised and then acquired by MoDOT. Items such as this are an integral part of the right-of-way negotiation process. The analysis conducted as part of the EIS, indicated that some of those displaced would have to relocate to other communities in the metro area. See Chapter IV, Section C. 3.

MoDOT offers a relocation assistance program to individuals, families, business owners, farm operators, and non-profit organizations that are partially or totally displaced by a state highway project. Relocation assistance payments are designed to compensate displaced persons for costs that have been imposed on them by a MoDOT project. Any displaced owner-occupant or tenant of a dwelling who qualifies as a displaced person is entitled to payment of his or her actually moving and related expenses, as MoDOT determines to be reasonable and necessary. Reasonable expenses can include the cost or a portion of the cost of out of district educational tuition fees that may be assessed.

• Concern about drainage on the highway and the runoff on nearby properties – Erosion due to runoff is causing, property owners adjacent to I-64, problems which are getting worse as time goes on and there is concern about the amount of water that collects on the highway when it rains.

Response: The design of the project must be accomplished in a way that there will not be drainage impacts to nearby properties. Drainage will be accommodated by design of ditches and culverts. Drainage of water off of the highway will improve as a result of improved pavement design through the reconstruction of I-64. A more detailed assessment of drainage issues will be evaluated in the subsequent design phase.

• Concern about the lack of MetroLink in the corridor – Efforts should be coordination to include MetroLink as part of the I-64 corridor.

Response: Coordination with MetroLink has taken place throughout the EIS preparation, and during prior study. The Cross County Major Transportation Investment Analysis (MTIA) included the expansion of MetroLink (light rail transit) as part of its planning study. The I-64 corridor was examined at that time as a possible MetroLink corridor. However, the MTIA recommended and approved a strategy to expand MetroLink north of Forest Park to the city of Clayton and then south paralleling I-170 crossing under I-64 and ending at I-44. Bi-State Development Agency (Metro) is currently designing this extension. Agency coordination has taken place to accommodate the future MetroLink crossing of I-64 and the construction of a MetroLink station west of Hanley Road. More information can be found in Chapter I, Section B., 3. Cross County MTIA or contacting Bi-State Development Agency (Metro).

 Make the additional lane an HOV lane – Why not make the additional lane a carpool or HOV lane, which would help traffic to flow more smoothly and encourage people to carpool, eliminating congestion?

Response: High Occupancy Vehicle (HOV) lanes on the I-64 corridor were studied prior to the I-64 Environmental Impact Statement as part of the Cross County Major Transportation Investment Analysis (MTIA) and the Daniel Boone MTIA. Typically, HOV lanes are created by adding lanes rather than converting existing lanes. Lanes are not being added through much of the I-64 corridor. Secondly, transit trips are being accommodated by MetroLink located or planned adjacent to I-64, so that the usage would be primarily car pool and not transit buses. Those studies concluded that HOV for the short segment between I-270 and I-170 would not adequately address congestion relief goals.

• **Bicycle riders need lanes on all crossover bridges** – Bicyclists need lanes on all crossover bridges to cross between north and south areas not just in Forest Park.

Response: Bicycle lanes are shown to be provided at bridges that are connectors for existing or proposed bicycle corridors and trails as identified by local and regional government agencies. More information can be found in Chapter II, Section C., 2., d. Pedestrian and Bicycle Design improvements and Considerations and Chapter IV, Section F. Pedestrian and Bicyclist Considerations.

 Bicyclists need design which will allow for wide outer lanes and long enough signal cycles to allow cyclists to flow with traffic and for pedestrians to cross safely –

Response: Bicycle lanes are shown to be provided at bridges that are connectors for existing or proposed bicycle corridors and trails as identified by local and regional government agencies. More information can be found in Chapter II, Section C., 2., d. Pedestrian and Bicycle Design improvements and Considerations and Chapter IV, Section F. Pedestrian and Bicyclist Considerations.

Separate bicycle and pedestrian traffic from the interchanges –

Response: The proposed action includes provisions for bicycle travel. A description of bicycle and pedestrian improvements and considerations can be found in Chapter II, Section C., 2., d. Pedestrian and Bicycle Design improvements and Considerations and Chapter IV, Section F. Pedestrian and Bicyclist Considerations.

• Supportive of the urban design/aesthetics portion of the project – Comments were received in support of the urban design and aesthetic portions of the project.

Response: Comment noted.

• Concerns about the view from the homes if I-64 is elevated – The concern is that homeowners will look out the front windows of their homes and be looking directly at I-64 if it is elevated.

Response: The vertical profiles prepared as part of the conceptual engineering shows locations where I-64 would be constructed higher in elevation than the current alignment. Possible visual impacts of the proposed highway infrastructure would be addressed by coordinating with local groups to provide aesthetic treatments of retaining and noise walls, railings and right-of-way areas. To mitigate the loss of visual buffers for residents, landscape plantings would seek to restore visual buffer areas through the use of evergreen and deciduous material that would be located where it may achieve the greatest level of visual screening. Vertical profiles were reduced in some locations since the DEIS was published, and will be further explored as the project is designed. More information can be found in Chapter V Urban Design.

• Try to leave as many trees and green space as possible – Too many trees are being taken in Forest Park and in the rest of the corridor when the desire is to have as much green space as possible.

Response: The project will follow MoDOT's tree replacement policy, as described in Chapter IV, Section M.2. which calls for replacing trees in Forest Park. Proposed mitigation efforts include locating walls to preserve existing vegetation where possible, new plantings will replace existing vegetation that is removed. Available right-of-way will be used for tree replacement to the greatest extent that is practicable.

Use right-of-way leftover from converted clover leaf interchanges for city parks –
 Would like the land no longer used for right-of-way at some of the interchanges given back to the municipalities to be used for city parks.

Response: These opportunities are being explored in discussions with local municipalities. The preferred alternative includes a provision to return land currently used for highways to park use in the vicinity of Forest Park. Discussions have also taken place to examine park uses for the ramp areas at Laclede Station Road.

 Concern about the replacement of landscaping/trees on private property that would need to be removed during construction –

Response: MoDOT has an approved Tree Planting Policy which provides for planting two trees for every one tree removed due to construction. Due to design constraints, trees will be planted in the vicinity of the original tree removal to the extent practicable. Landscaping, including tree planting, will be detailed during subsequent design phases of the project. During the right-of-way and/or easement acquisition process, landscaping and tree planting locations may be discussed with the property owners.

Replace narrow sidewalk over Deer Creek at Clayton Road and Warson – Where
the highway crosses Clayton Road at Warson the sidewalk is very narrow over Deer
Creek and should be considered when being reconstructed.

Response: This sidewalk is located outside the project area, and its replacement would be a decision made by the City of Ladue.

Consider adding a memorial to Charles Lindbergh at the I-64 and Lindbergh interchange – The concrete memorial to Charles Lindbergh was removed years ago, and could be replaced with something incorporated into the design.

Response: Efforts will be made to integrate the Lindbergh memorial or similar elements into the urban design treatments at the Lindbergh interchange. The architectural theme of the corridor uses the existing bridge designs in a modern interpretation of the streamline modern style. The memorial previously located at I-64 and Lindbergh was part of the research in establishing the architectural theme for the corridor. Urban Design Guidelines are currently under development. More information can be found in Chapter V Urban Design.

• Concern about the level of lighting – The concern is that the level of lighting at the interchanges will cast too much light over the surrounding homes and neighborhoods.

Response: MoDOT will work to avoid light trespass by installing shields on light fixtures and redirecting lamps to create better performing lighting schemes minimizing adverse impacts. Lighting impacts are discussed in Chapter IV, Section Q., 5. Lighting Impacts.

Desire to have noise walls constructed – The traffic noise has always been a problem
and the desire to have that noise abated by sound walls is desired by a number of
property owners.

Response: The Build Alternatives, including the Preferred Alternative, qualify for noise abatement measures such as noise walls. The final decision on the installation of abatement measures will be made upon completion of detailed design and public involvement process. Construction of a noise wall will require a majority of resident approval. More information regarding noise impact analysis and policies can be found in Chapter IV, Section H. Noise Impacts.

• Concern that noise walls won't work and will obstruct views — A noise wall would ruin views for some homeowners and will only add costs to the project without decreasing the noise in the surrounding communities.

Response: As part of the Build Alternatives, noise abatement measures such as noise walls would reduce the equivalent sound level to 66 dBA or lower in most cases, with reductions of five dBA or greater at the nearest first floor receivers. Noise barriers can only address impacts in the area close to the highway, within the first two or three rows of houses. If an area is eligible for noise mitigation, a majority of the affected homeowners must state a desire to have a noise wall in order for it to be constructed. More information on MoDOT's noise abatement policy including resident approval can be found in Chapter IV, Section H. Noise Impacts.

As part of the Build Alternatives, the visual impact of walls facing residential areas would be addressed in two ways. One, the walls would be located to preserve existing vegetation where possible. Second, where existing vegetation must be removed, new plantings would be installed to help screen and visually soften the walls, if possible. More information can be found in Chapter IV, Section Q. Visual Impacts and Chapter V Urban Design.

• Noise walls should be built prior to construction – Noise walls should be built prior to construction which would keep the costs in current dollars and would minimize the noise and dust during the construction period.

Response: Wherever possible as part of the Build Alternatives, sound walls and retaining walls would be installed in their final locations as soon as possible after the noise wall consideration process and public involvement have run their courses to help mitigate the noise impacts from the highway and construction. More information can be found in Chapter IV, Section S., 4. Noise.

• Concern about effects of vibration – Concern about the effects of vibration on homes caused by construction and the closer proximity to I-64.

Response: MoDOT has contractual provisions requiring contractors working in close proximity to homes, businesses, etc., to monitor vibrations due to said construction activities. While these provisions do not totally eliminate the possibility of construction related effects to nearby structures, they do provide specific control measures and limits as a means to reducing the potential for adverse effects. For more information see Chapter IV, Section S., 5. Vibration.

• The project is encouraging urban sprawl – The project is being built to accommodate those people who chose to live out west and work downtown and further encourages sprawl which is not responsible ecologically, financially or sociologically.

Response: The proposed action is consistent with the St. Louis Region's Long Range Transportation Plan and the MTIA completed for the I-64 and I-170 corridors. The purpose and need for the project addresses several goals including community redevelopment described as special design elements on I-64 that would improve aesthetics, enhance neighborhood connectivity and serve as a stimulus for growth. Since the study area includes part of the city of St. Louis and an eastern portion of St. Louis County, community redevelopment elements of the project would encourage investment in the central city. More information can be found in Chapter I, Section D. Overview of Purpose and Need and Chapter V Urban Design.

• Provide bright reflectors and striping for visibility – Reflective strips will help to improve visibility at night.

Response: Use of improved light reflective pavement markings are under study by MoDOT and are being considered for the I-64 reconstruction. MoDOT Design Standards will be followed when addressing the use of reflectors and striping on I-64.

• Provide a barrier between oncoming traffic that is high enough to shield drivers from headlights – The barrier between the two directions of traffic should be high enough to block out the headlights of the oncoming traffic.

Response: MoDOT design standards provide for use of a median barrier in situations where right-of-way constraints preclude use of a wider grass median. The MoDOT design standards specify use of a 42-inch high barrier. Use of higher barriers and light attenuation features are under study by MoDOT and higher barriers may be used when I-64 is reconstructed.

• Concern about a fault line that runs through neighborhood and may do damage if hit during construction – The homeowners have been told that there is a fault line that runs beneath Little Flower Church and Convent and they are concerned that construction of retaining walls may cause damages to the surrounding homes.

Response: The available literature and mapping only identifies the St. Louis Fault, which is just east of the study corridor. This does not mean that there are not other faults in the area but that information is not currently available. A full geological and geotechnical investigation will be done as a part of the design phase of the project. The results of these investigations will factor into design decisions and considerations at this as well as other locations on the project alignment. See Chapter III, Section B. 3. Geology for more information.

 Reduce congestion on northbound Kingshighway leading into the BJC complex and its parking – Northbound Kingshighway leading into the BJC complex is very congested and needs to be addressed.

Response: The preferred alternative includes reconstruction of Kingshighway north of I-64 to the BJC complex, and traffic flow to the complex would be improved. See Plate Number P6 in Appendix C.

• Improve alternate routes prior to construction on I-64 to reduce delays – Comment asking for alternates to I-64 to be improved prior to construction to help reduce delays.

Response: MoDOT is completing improvements to I-70 before beginning work on the improvements for I-64. MoDOT will also coordinate with local communities on construction management strategies including methods to improve traffic flow on alternative arterial routes prior to I-64 construction. Construction impacts, including the maintenance of traffic during construction, use of Intelligent Transportation System approaches which describes alternate routes, and promotion of alternative transportation modes that could be used to mitigate traffic impacts during construction are explained in Chapter IV, Section S. 7. Traffic Impacts.

Roundabouts are too complicated/ are a good solution –

Response: Roundabouts are proposed as part of the preferred alternative at the Spoede interchange. A series of interchange concepts were evaluated at this location. The roundabout concept was found to provide the greatest benefit for traffic operation, had fewer environmental impacts and was found to have a greater potential to support the existing environment. For more information on the study of interchange concepts, see Appendix A.

 MoDOT should keep people informed of the construction schedule and delays – Keeping drivers informed of the construction schedule and delays will help with traffic management.

Response: During subsequent design phases individual projects and project schedules will be identified. A detailed traffic maintenance plan will be developed for each individual project. The use of a public information campaign to keep the public informed of progress is discussed in Chapter IV, Section S. 7. Traffic Impacts.

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 MoDOT should adopt a construction schedule to complete intersections as separate projects – Due to current economic conditions, MoDOT should adopt a construction schedule to complete the intersections as separate projects rather than as total corridor project.

Response: The proposed action is too large to be constructed in one construction phase. The reconstruction will be completed in a series of separate phases. A discussion of the sequence anticipated for the construct projects in the I-64 Corridor is described in Chapter IV. S. 7. a. Construction Sequencing.

• Concern that MoDOT is choosing the most expensive alternative – Concern that MoDOT is choosing the most expensive alternative, when less expensive alternatives address the project objectives.

Response: Of the eight Refined Alternatives, the Preferred has the second lowest project cost. The Preferred Alternative was considered to best meet the purpose and need of the project and minimize impacts.

Consider turning portions of I-70 and I-44 into toll roads to pay for the project –
Missouri should consider turning portions of I-70 and I-44 into toll roads/turnpikes to
raise the needed funds for the project.

Response: Toll financing is not being studied as part of this EIS. Currently MoDOT does not possess the authority to own or operate toll roads.

b. Specific Public Comments

The other half of the public comments were considered specific in nature. Table VIII-8 categorizes these specific comments. General responses were provided in the following section.

Table VIII-8
Summary of Specific Public Comments

Specific Public Comments	Count
Don't understand the rationale for all the work being done on Spoede	1
2. The design standard of twelve foot shoulders seems excessive compared to improvements west of Spoede	1
Taking two businesses in the City of Frontenac will have adverse revenue consequences for the city	1
Taking parking at Frontenac commercial properties has cost implications that are not accounted for	1
5. MoDOT should shift the project to the North of the existing Highway 40 between Lindbergh and Spoede	7
6. Reconsider taking twelve mature homes to save two commercial properties in Frontenac	2
7. Reconsider the limited access to Sheridan Hills, keep Galleria Parkway open	8
The Bellevue ramps should be kept open for access /closed to preserve the neighborhood character	1210
9. Maintain the ramps at Big Bend	8
10. Providing access to St. Mary's on Yale rather than Bellevue, is more direct, less expensive and affects less people.	1
11. Desire for a direct connection of I-64 to I-170	1
12. Add a fourth lane from I-170 to Forest Park to alleviate congestion	6
13. Reconsider the stacked option at the I-170 interchange	7

Specific Public Comments	Count
14. Extend I-170 south to I-44 at Shrewsbury	2
15. Reconsider the elimination of the movement from northbound Hanley to westbound Eager and eastbound Eager to northbound Hanley	3
16. If the bridge on Hanley is raised to 22 feet, an 18-foot noise wall will not protect property owners from noise	1
17. Provide bicycle/pedestrian access at Log Cabin Lane	1
18. Retain the ability for buses to stop at Kingshighway	2
19. Do not replace the McCutcheon Ave overpass	1
20. Straighten I-64 at McKnight	1
21. Keep all Hi-Pointe area bridges including Oakland Avenue	14
22. Retain the interchange access at Oakland Avenue as is	3
23. No need to rebuild the Oakland ramp	17
24. Do not build sound walls between Forest Park and Oakland Avenue	15
25. Don't like the preferred alternative at Clayton/Oakland/McCausland interchanges	1
26. Remove the Highland Avenue bridge	1
27. Improved access between I-64 and I-44 should be studied further	1
28. Reconsider the left entrance to westbound I-64 at Chouteau	1
29. Further encroachment to the homes on the Westside of Kingshighway threatens the neighborhood	2
30. Close the ramps from Hanley to westbound I-64	1
31. Place the ramps for I-170 and Brentwood Blvd. on the north side of the highway	1
32. The impacts of expanding McMorrow Avenue to the north to connect with Linden has not been fully explored	2
33. Extend Galleria Parkway east to Linden	1
34. Build a roadway bridge between Everett and Hanley Downs	1
35. The Bennett Avenue neighborhood is historically significant and will be adversely affected by MoDOT's preferred alternative	2
36. I-64 should be lowered between Brentwood Boulevard and Hanley Road	1
37. The Metrolink extension could be located above a lowered I-64	1
38. The entrance and exit ramps from and to I-64/I-170 can be separated from the interchanges	1
39. Eager Road should be widened to at least 5 lanes	1
40. Ramps to and from I-64 on the west side of Hanley Road will require separation from the entrance and exit ramps of I-170	1
41. Barriers need to be added between the traffic and runners along I-64 from Tamm to Hampton where the Forest Park running trail follows right next to the interstate	1

The following specific comments indicate concerns that were shared frequently by individuals and public agencies who contacted the study through various means. These issues and concerns were not the product of a scientific survey and do not necessarily reflect the issues and concerns of a wider audience. The following comment categories were reviewed and considered as part of this EIS.

 Don't understand the rationale for all the work being done on Spoede – Comment about the rationale for all the work being done just for Spoede, closing Ballas in particular.

Response: Ballas will not be closed as part of this project. The current interchange at Spoede is substandard. It has short and tightly spaced ramps that result in safety

concerns. The preferred alternative addresses the need to improve the safety of the interchange while minimizing property impacts.

• The design standard of twelve foot shoulders seems excessive compared to the improvements west of Spoede – A design standard that requires twelve foot inside and outside shoulders seems excessive when compared with the improvements immediately west of Spoede extending as far as Chesterfield.

Response: A goal of this project was to meet current design criteria. The design standard for median shoulder width follows the *Policy of Geometric Design of Highways and Streets*, produced by the American Association of State Highway and Transportation Officials (AASHTO) 2001. This standard is that on freeways of six or more lanes the usable paved width of the median shoulder should be 10 feet and preferably 12 feet where the design hour volume for truck traffic exceeds 250 vehicles per hour. Truck design hour volumes range between 350-450 on I-64.

 Taking two businesses in the City of Frontenac will have adverse revenue consequences for the city –

Response: The Preferred Alternative was revised in order to not require the acquisition of the two commercial properties in Frontenac.

 Taking parking at Frontenac commercial properties has cost implications that are not accounted for – Taking property at Frontenac commercial properties will mean that surrounding businesses may not be able to qualify for their variances and the costs of remedying the situation to maintain the variance has not been included in the project cost.

Response: The Preferred Alternative was revised in order to not require the acquisition of the two commercial properties in Frontenac, although some of the parking may still be acquired. This issue will be addressed during the right-of-way process, if necessary.

 MoDOT should shift the project to the north of the existing Highway 40 between Lindbergh and Spoede – Shifting the project to the North of existing Highway 40 between Lindbergh and Spoede would avoid the 2 commercial properties in Frontenac and would require the complete acquisition of 7 properties, rather than only partial acquisition.

Response: Alignment options between Spoede and Lindbergh were re-examined and the centerline has been shifted north. See Chapter II, C. 2.

 Reconsider taking twelve mature homes to save two commercial properties in Frontenac – MoDOT is choosing to take twelve mature homes in a quiet and secluded neighborhoods to save two new commercial properties in Frontenac.

Response: Because of further engineering refinements the acquisition of the two commercial structures was not required and there were no additional total residential acquisitions.

 Reconsider the limited access to Sheridan Hills – The Sheridan Hills neighborhood is going to lose an important exit which provides access to shopping and other conveniences and will limit response time for emergency services. **Response:** While the DEIS showed a loss of access to Sheridan Hills from McMorrow Avenue, following comments such as this, the Preferred Alternative was re-examined and refined to retain the current access into Sheridan Hills at McMorrow.

The Bellevue ramps should be kept open for access or should be closed – The
Bellevue ramps should be kept open to retain access to the existing businesses and for
emergency vehicles going to St. Mary's Hospital. The Bellevue ramps have more
impacts than are necessary and if they were closed it would bring back the
neighborhood character.

Response: Numerous comments were received both for and against maintaining access at Bellevue. MoDOT re-examined design options in this location. However, none of the newly-proposed build options were shown to reduce property impacts. Additional description of the evaluation of options in the Bellevue area is provided in Chapter II, B. 4. b.

 Maintain the ramps at Big Bend – The ramps at Big Bend should be maintained to reduce congestion and help to keep large volumes of traffic off of narrow neighborhood streets.

Response: As described in Chapter II, Section C., 2. Build Alternative, the Preferred Alternative recommends constructing a full access interchange at Big Bend Boulevard providing ramps to and from the east and west.

 Providing access to St. Mary's on Yale rather than Bellevue – The on/off ramp to Bellevue is excessively long and has greater impact than it needs to have. A ramp for St. Mary's down Yale is more direct, less expensive and affects less people.

Response: Providing access to St. Mary's via McCausland Avenue interchange and Wise Avenue near Yale Avenue was investigated but, not preferred due to the difficulty in constructing this ramp given the grades and vertical constraints. The Preferred Alternative recommends replacing the ramps at Bellevue Avenue with access to and from the west similar to existing conditions as described in Chapter II, Section C., 2. Build Alternative. More information can be found in Chapter II, Section B., 4. Big Bend Boulevard/Bellevue Avenue Interchange and in Appendix A, Section B., 8. Bellevue Avenue.

Desire for direct connection of I-64 to I-170 – The direct connection of I-64 to I-170 should be a high priority as the current access from I-64 east to I-170 north does not work.

Response: The Preferred Alternative includes direct connections between I-64 and I-170 using flyover ramps. Direct access from eastbound I-64 to northbound I-170 would be provided, unlike existing conditions. Given the importance of accommodating this and similar movements between I-64 and I-170, it is anticipated that the I-170 interchange area would be constructed in the first project phase if the project is built in six years (full funding). If lower funding levels occur, then the construction sequence may vary. More information can be found in Chapter II, Section C., 2. e. Build Alternative where the construction sequencing is described, and in Chapter IV, S. 7 Construction Impacts.

• Add a fourth lane from I-170 to Forest Park to alleviate congestion — Running a fourth lane only to I-170 will only shift the traffic four miles to the east and will not solve the problem in this area. The section of I-64 from Hampton to I-170 is some of the slowest and most congested highway in the area.

Response: As presented in Chapter I, a goal stated in the purpose and need is to improve the operating characteristics of travel between I-170 and Tower Grove Avenue without increasing the number of mainline lanes. The analysis of mainline level-of-service indicated that three directional mainline lanes between Brentwood Boulevard and McCausland will accommodate future year traffic volumes at a satisfactory level-of-service. Improved traffic flow in this section of I-64 would be realized in the Preferred Alternative through improvements in the roadway standards and TSM operations which are shown to improve safety, traffic operations and alleviate congestion in Chapter II, Section D. Traffic and Chapter IV, Section D. Economic Impacts.

 Reconsider the stacked option at the I-170 interchange — Reconsider the stacked option at the I-170 interchange which would take fewer homes and have less impact on the neighborhoods.

Response: The process to select the Preferred Alternative was to evaluate and compare the effectiveness of the alternatives based on: (1) the ability to accomplish the Purpose and Need for Action, (2) project cost, (3) the comparison of social, economic and environmental factors and (4) input from the public and review agencies. The impacts regarding right-of-way have been considered when considering the overall impacts and benefits. Additional refinements were made to Thruway Alternatives 3 and 3a "flat options" that would take fewer homes and have less impacts on neighborhoods than those shown in the Draft EIS. The stacked option would have 17 less full and 2 less partial residential property acquisitions than would the "non-stacked" or "flat" option. The stacked option is estimated to cost over \$60 million more even after right-of-way costs are considered. In addition, the stacked option has visual impacts and noise impacts that are greater than does the flat option. For these reasons, the flat option was included as part of the preferred alternative. More information regarding the selection process is in the Chapter IV, Section W. Preferred Alternative that describes the environmental consequences in detail by category in sections.

• Extend I-170 south to I-44 at Shrewsbury – I-170 should be extended south to I-44 at the Laclede Gas tanks at Shrewsbury.

Response: This consideration is outside the project area. The MTIA study concluded that this proposal would not be considered future transportation plans.

 Reconsider the elimination of the movement from northbound Hanley to westbound Eager and eastbound Eager to northbound Hanley – Access to Eager Road is essential to economic development that currently exists on Eager Road and Brentwood Boulevard and for public safety.

Response: The Preferred Alternative recommends implementing access control measures to remove left turns at the intersection of Eager Road and Hanley Road removing intersection conflict points caused by left turns, reducing congestion, improving traffic operations, reducing traffic delay times and improving traffic safety. These measures would benefit economic user costs and public safety. Conversely, a full

access intersection at that location would cause failing traffic operations, congestion, delays and increase the opportunity of vehicular crashes because the Hanley Road/Eager Road intersection is too close to the proposed full access interchange on Hanley Road/I-64 and the full signalized intersection at Dale Avenue/Hanley Road.

Access from the south on Hanley Road destined to development located Eager Road may be provided through other options. The Meridian property by DCM developers located at the southwest corner of Hanley Road/Eager Road is proposing an access street through the development between Hanley and Eager Roads connecting at Dale Avenue and Hanley Road. Under this scenario, private vehicle and public safety access such as emergency vehicles from the fire station on Dale Avenue would use the proposed access street through the Meridian development to access Eager Road properties. Emergency vehicles would also be able to use the Hanley Road interchange to access I-170 and points west of Eager Road. A proposal to re-align Eager Road with Dale Avenue creating one common intersection at Hanley Road that would have provided for northbound left-turn access at Eager Road was explored as part of this EIS but did not meet with approval by the cities of Brentwood and Richmond Heights. More description of the Preferred Alternative is provided in Chapter II, Section C., 2. Build Alternative.

A proposal has been developed by St. Louis County to provide for a tunnel section providing a left turn access onto Eager Road from northbound Hanley Road. This proposal is a local project and not part of the Preferred Alternative.

• If the bridge at Hanley is raised to 22 feet, an 18-foot noise wall will not protect property owners from noise — If the bridge at Hanley is raised to approximately 22 feet, an 18-foot noise wall will not eliminate the noise to the surrounding property owners.

Response: Following review of comments on the DEIS, engineering refinement was completed that resulted in a change to lower the grade of the Preferred Alternative at Hanley to approximately that of the existing grade. Decisions related to the location and type of noise mitigation will be made in subsequent design phases.

 Provide bicycle/pedestrian access at Log Cabin Lane – Request that an under or overpass be provided to be used by pedestrians and cyclists near Log Cabin Lane because the highway has created too long of a barrier between the north and south sides of the highway in this segment.

Response: The current under I-64 culvert has ramps for horse access. MoDOT would consider replacing the culvert and ramps for limited cross access if desired by residents. More information can be found in Chapter III, Section A, 4. Pedestrian and Bicycle Facilities.

• Retain the ability for buses to stop at Kingshighway – Retain the ability for buses to stop at I-64 and Kingshighway where BJC employees and Saint Louis University students get on and off. This can be done by revising the single-point interchange at that cross street and give buses a special light to cross Kingshighway at grade.

Response: MoDOT has consulted with Bi-State Development Agency (Metro), and Bi-State is in concurrence with the MoDOT's proposed design. The preferred alternative

will be designed in a way that will allow transit service to continue to be provided. Metro service will be revised to compliment the I-64 changes.

• **Do not replace the McCutcheon Avenue Overpass** – Given that the McKnight and Brentwood/I-170 interchanges are on either side of McCutcheon, it would not be necessary to rebuild or replace it.

Response: The Preferred Alternative recommends rebuilding the McCutcheon Avenue overpass as one way to preserve neighborhood connectivity across I-64 and to maintain bicycle and pedestrian access.

• Straighten I-64 at McKnight – Interstate 64 should be straightened at McKnight when the new bridge is built, this way there would not be a sharp exit when you exit from I-64 eastbound on McKnight.

Response: The preferred alternative includes the alignment at McKnight Road that meets MoDOT design standards while minimizing impacts to adjacent property.

• Keep all of the Hi-Pointe area bridges, including Oakland Avenue –

Response: The Preferred Alternative includes the retention of Clayton Road, Oakland Avenue, Clayton Avenue and McCausland Road bridges.

Retain the interchange access at Oakland Avenue as is – Failure to retain the
Oakland interchange would effectively isolate the segment of Oakland between Skinker
and Hampton from eastbound interstate traffic.

Response: The Preferred Alternative recommends removing interchange access at Oakland Avenue just east of McCausland Avenue. This recommendation has been made to minimize property impacts and traffic impacts on the adjacent section of Oakland Avenue. Access to and from this area will be provided by either the Hampton Avenue interchange or the McCausland Avenue interchange. More information can be found in Chapter II, Section C., 2. Build Alternative.

• No need to rebuild the Oakland ramp – The Oakland ramp should not be rebuilt as it is currently underused and this would mean less noise and less traffic on Oakland.

Response: The Preferred Alternative recommends removing interchange access (ramps) at Oakland Avenue, just east of McCausland Avenue but adding direct access from eastbound I-64 to eastbound Oakland Avenue at the Hampton Avenue interchange. Additional access is provided at McCausland Avenue. The Oakland Avenue overpass would be rebuilt. More information can be found in Chapter II, Section C. Reasonable Alternatives, 2. Build Alternative.

Do not build sound walls between Forest Park and Oakland Avenue –

Response: MoDOT has developed a Noise Standards and Noise Abatement Policy that defines when a community may be eligible for noise abatement. The policy is included in Chapter IV, Section H. The policy states that a majority of the affected homeowners must indicate a desire to have a noise wall, or the noise abatement will not be constructed. Before MoDOT decides on which if any barriers to construct, the likely

noise abatement measures will be presented and discussed at a design public meeting to provide opportunity for comment.

• Don't like the preferred alternative at Clayton/Oakland/McCausland interchanges – The preferred alternative at Clayton/Oakland/McCausland limits access to Forest Park.

Response: The reconfiguration of both the McCausland Avenue and Hampton Avenue interchanges with I-64 is expected to improve access to and from Forest Park.

Remove the Highland Avenue bridge – Remove the bridge because it doesn't get
much use and it only adds to local traffic.

Response: The Preferred Alternative recommends rebuilding the Highland Avenue overpass as one way to preserve neighborhood connectivity across I-64 and to maintain access to Highland Park. More information can be found in Chapter I, Section D. Overview of Purpose and Need and Chapter II, Section C., 2. Build Alternative.

• Improved access between I-64 and I-44 should be studied further – Further studies should be done to look at improved access between I-64 and I-44.

Response: The Cross County MTIA did not recommend new highway construction between I-64 and I-44. As such, this was not considered as part of this EIS.

• Reconsider the left entrance to westbound I-64 at Chouteau — Replace the left entrance to westbound I-64 at Chouteau with a right entrance.

Response: Providing a right entrance at this location was investigated, but was shown to be very difficult and costly to construct. In order to maintain access, the current configuration at I-64 and Chouteau is maintained.

• Further encroachment to the homes on the west side of Kingshighway threatens the neighborhood – Move to the east and fewer homes would be taken and a larger parcel of land could be given back to Forest Park.

Response: There are no total acquisitions shown in the vicinity of Kingshighway and the nearby west. Efforts to minimize the need for partial acquisitions will be made in subsequent design phases.

• Close the ramps from Hanley to westbound I-64 – This would solve the congestion problem on I-64 and then there would be no need to add new lanes.

Response: The Preferred Alternative includes maintaining full access at Hanley Road. Ramps at Hanley are shown to be provided in a way that maintains adequate level of service for ramp and mainline movements.

 Place the ramps for I-170 and Brentwood Boulevard on the north side of the highway –

Response: The build alternatives include two options for locating the I-170/I-64 interchange ramps Thruway Alternative 2a and 3a included a shift of the mainline and connection of ramps that would be located north of the existing I-64 center line. Thruway Alternative 2 and 3 included locating the mainline and ramps further south.

Thruway Alternative 3 was recommended as the Preferred Alternative in this subcorridor in order to provide for the ramp connections, lessen impacts to streams and provide for economic development opportunities on the north side of I-64.

 The impacts of expanding McMorrow Avenue or Galleria Parkway to connect with Linden has not been fully explored – The impacts of expanding McMorrow Avenue to the north to connect with Linden versus expanding it further south to connect with Antler or Redbud has not been fully considered.

Response: Following comments on the DEIS the Preferred Alternative has been refined to retain the existing access on McMorrow Avenue. Thus, there are not impacts from the project that would require a new connection between Linden and McMorrow or Galleria Parkway.

Build a roadway bridge between Everett and Hanley Downs –

Response: The local street connection is outside the scope of this project.

• The Clayton Park Addition (Bennett Avenue) neighborhood is historically significant and will be adversely affected by MoDOT's preferred alternative –

Response: Following the DEIS, the Preferred Alternative was redesigned through this area and no longer impacts the Clayton Park Addition (Bennett Avenue) neighborhood. For more discussion of the refined alternatives see Chapter II, Section C. 2. b., Thruway Subcorridor – Refined Alternatives.

Interstate 64 should be lowered between Brentwood Boulevard and Hanley Road –
This would lower the overall vertical alignment of the connecting ramps to and from I-170
and would not be a visible barrier to the adjacent property owners.

Response: The Preferred Alternative was redesigned through this area following comments on the DEIS and no longer will be higher than the existing grade.

• The Metrolink extension could be located above a lowered I-64 — The extension would be over the lowered I-64 and its ramps when the highway improvements are finally made.

Response: It was considered but was not selected for the following reasons: the Metrolink grade would be steep, there would be considerable property needed as this is the same area where the MetroLink station will be, and during MetroLink planning the neighborhood preferred a cul-de-sac over a through-street.

 The entrance and exit ramps from and to I-64/I-170 can be separated from the interchanges – The ramps can be entirely separated from the Brentwood Boulevard and Hanley Road interchanges.

Response: The Build Alternatives as shown do provide for connections between I-170, I-64 and Hanley Road. Given the close spacing of Brentwood Boulevard, I-170 and Hanley Road, some movements will require weaving between lanes on ramps. The current design concept includes weaving sections between the local traffic destined to Hanley or Brentwood and the system-to-system movements. The weaving sections are required to provide both access to the local interchanges and provide for the

system-to-system movements. Traffic analysis has found that the weaves can be made at a satisfactory level of service. Additional information related to level of service can be found in Appendix B.

• Eager Road should be widened to at least 5 lanes – Widening will provide suitable access to the adjacent developments on the south side of Eager Road.

Response: Eager Road is a local street maintained by the City of Brentwood and is outside the project limits.

• Ramps to and from I-64 on the west side of Hanley Road will require separation from the entrance and exit ramps of I-170 –

Response: The Build Alternatives as shown do provide for connections between I-170, I-64 and Hanley Road. Given the close spacing of Brentwood Boulevard, I-170 and Hanley Road, some movements will require weaving between lanes on ramps. The current design includes weaving sections between the local traffic destined to Hanley or Brentwood and the system-to-system movements. The weaving sections are required to provide both access to the local interchanges and provide for the system-to-system movements. Traffic analysis has found that the weaves can be made at a satisfactory level of service. Additional information related to level of service can be found in Appendix B.

Separate bicycle and pedestrian traffic from the interchanges –

Response: As part of the urban design considerations a hierarchy of interchanges was defined that includes regional, community and neighborhood interchanges. Pedestrian walkways are provided at various levels of separation from vehicular traffic for each of the interchange types. The regional interchanges provide the highest level of separation from vehicular traffic. The pedestrian and bicycle treatments associated with all of the interchange types are shown in Exhibits V-1, V-2 and V-3.

C. Agency Coordination

Resource agency coordination has been ongoing throughout the I-64 EIS. Environmental scoping to identify issues and concerns that would affect the definition and evaluation of the alternative improvements occurred throughout the study, including the formal scoping meeting. In addition to the formal scoping meeting, study team progress meetings and individual meetings were held with various agencies to discuss the environmental issues and concerns in more detail. Copies of written correspondence regarding the I-64 EIS is provided in Appendix I.

1. ENVIRONMENTAL SCOPING MEETING

On November 15, 2001, an environmental scoping meeting was held at the FHWA office in Jefferson City, Missouri. Prior to the meeting, special invitations were submitted to public agencies. Accompanying the invitation was an information packet about the project, including an aerial photograph of the study corridor. A "Notice of Intent" to perform the study and announcement of the time and date of the scoping meeting was published in the Federal Register in advance of the meeting.

Those agencies and groups invited to attend the meeting are listed below. All agencies and groups were provided the minutes of the meeting and any materials handed out at the meeting.

VIII-30 The New I-64

• Federal Agencies

U.S. Army Corps of Engineers, St. Louis District U.S. Environmental Protection Agency, Region VII U.S. Fish and Wildlife Service Federal Transit Administration Federal Highway Administration (X) National Park Service

State Agencies

Missouri Department of Conservation Missouri Department of Natural Resources (X) Missouri Department of Transportation (X) State Emergency Management Administration

(X) - attended scoping meeting

At the scoping meeting, an overview of the study was presented, including a presentation of the purpose of the project, socio-economic and environmental issues. Issues discussed by the participants included the following:

a. Project Overview

A project overview was provided as part of the scoping meeting. The study area is located along I-64 from west of Spoede Road in St. Louis County to west of Sarah Street in St. Louis. The project also includes 0.8 miles of I-170 in the vicinity of the I-64/I-170 interchange. The notice of intent was published on October 24, 2001 in the Federal Register. A key part of this project is to upgrade the freeway to current interstate standards.

The project history was explained. The corridor was identified for improvement in the St. Louis region's long range transportation plan in 1994 and subsequent updates. The MTIA report was completed in 1997. Conceptual design plans and urban design concept work has been underway since 1997. Some environmental documentation had been prepared for portions of the corridor in 1999 and 2000.

Public involvement has been active prior to the initiation of the EIS and has continued. Three subcorridor advisory groups have functioned for nearly two years and were utilized during this EIS.

b. Purpose of the Project

The general location of the study area was shown and background information was summarized. The project length is twelve miles and includes 17 interchanges within the project area. The proposed action includes adding through lane capacity between I-170 and Spoede Road. The purpose of the project is to:

- Replace the deteriorating facility and substandard interchanges
- Increase mainline capacity between I-170 and Spoede
- Improve safety
- Improve traffic operation and decrease congestion
- Support community redevelopment

c. Engineering Considerations

A number of alternative improvement concepts will be considered in the EIS. These improvement concepts were discussed as part of the scoping meeting. The concepts will include a no-build concept, the application of transportation system management (TSM) strategies, and development of build concepts. The build concepts will include features such as: adding one lane in each direction between Spoede and I-170; interchange configurations that use less land area such as compressed diamonds and single point urban diamonds, potentially removing interchanges and adding auxiliary lanes.

d. Environmental Considerations

Background information was provided on environmental issues that will be addressed in the EIS. The study corridor is a developed urban corridor. Many of the potential impacts will be to the built environment more so than to the natural environment. The corridor includes a number of park properties including Forest Park in the city of St. Louis, Missouri. A cultural resource survey will be conducted to identify archeological sites and structures that may be eligible for inclusion on the National Register of Historic Places.

Other considerations include hazardous waste sites, historical or minority neighborhoods, how the project will look from adjacent neighborhoods and to the driving public. Given the density of development in close proximity to I-64, identification of noise sensitive receptors and noise mitigation measures is a key part of this project. An environmental justice analysis will be completed, based on information from the year 2000 census.

e. Agency Concerns

- There was a question as to how other non-highway modes will be considered in the EIS.
- The agencies expressed concerns about whether construction impacts are a consideration in this EIS relating to the Saint Louis Zoo and to the adjacent neighborhoods.
- The agencies wanted to know how general public involvement will be conducted, beyond the adjacent neighborhood and stakeholders because it will be important to include other users.
- Another concern was whether the study of air quality and working with air quality models to assess air quality impacts of the alternatives would be conducted.
- In regard to parks and historic sites and structures, there was an inquiry about the approach for addressing the proximity impacts.
- There are numerous historical structures and neighborhoods adjacent to I-64. There was concern that mitigation for one impact, e.g. residences sound wall, will contribute to additional homes or businesses being taken for the sound wall location.
- Another issue that was identified was that the location of all the mines in the area should be determined.
- Concerns over timing of the overall I-64 project were discussed, the need to replace deteriorating bridges, as well as the mainline.

2. AGENCY COMMUNICATIONS

Agency coordination and communication facilitated the gathering of the appropriate information for the preparation of the EIS. Table VIII-9 is a list of the agencies and individuals contacted by the project team to provide the necessary information.

Table VIII-9
Agency Communications in Preparation of the DEIS

Name	Title/Section	Agency	
Ms. Jane Beetem	Transportation Coordinator	Missouri Department of Natural Resources	
Dr. Jeffrey Bonner	President	St. Louis Zoo	
Ms. Cheryl Reams	Transportation Coordinator	Missouri Department of Natural Resources	
Mr. Charles M. Scott	Field Supervisor	U.S. Fish and Wildlife Service	
Mr. L. Scott Samuels, P.E.	Floodplain Management Engineer	State Emergency Management Agency	
Mr. Jim Wild	Transportation Manager	East-West Gateway Coordinating Council	

3. DRAFT EIS AGENCY AND CITY COMMENTS

On January 3, 2003, the FHWA and MoDOT issued the DEIS for approximately 12 miles of I-64 in St. Louis, Missouri. In accordance with the National Environmental Policy Act and Clean Water Act, substantive comments offered by public agencies, the general public, or other interested parties need to be adequately addressed by the Final EIS. The following section presents the agency and city review comments received for the DEIS. The 45-day minimum comment period on the DEIS ended on February 15, 2003. The official comment period was extended twice and came to a close on May 30, 2003.

Comments on the DEIS were received from the following agencies and are included in the following section:

- U.S. Department of Energy January 17, 2003
- U.S. Department of Housing and Urban Development February 24, 2003
- U.S. Department of Agriculture, Natural Resources Conservation Service February 28, 2003
- U.S. Environmental Protection Agency April 10, 2003
- U.S. Department of Interior April 23, 2003
- Missouri State Emergency Management Agency January 14, 2003
- Missouri State Historic Preservation Office January 23, 2003
- Missouri Office of Administration, Intergovernmental Relations January 27, 2003
- Missouri Department of Natural Resources April 17, 2003
- City of St. Louis, Division of Parks February 26, 2003
- City of Ladue March 24, 2003
- City of Brentwood April 7, 2003
- Andrea C. Ferster Law Offices for the City of Richmond Heights April 14, 2003
- City of St. Louis June 17, 2003
- City of Frontenac July 16, 2003
- St. Mary's Health Center August 13, 2003
- City of Richmond Heights Resolution November 18, 2002
- St. Mary's Health Center June 10, 2003

Ken Bechtel

From: Sent: KROSSM@mail.modot.state.mo.us Friday, January 17, 2003 8:18 AM

Sent: To:

Clyde Prem; Ken Bechtel; HOFFAL@mail.modot.state.mo.us;

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HOPKIC@mail.modot.state.mo.us; BURCHM@mail.modot.state.mo.us

Cc:

HARVEK@mail.modot.state.mo.us

Subject:

U.S. Department of Energy Comments on FHWA-MO-EIS-02-02-D, I-64

Here are the comments of the US Dept of Energy for the I-64 DEIS. Please see that these are included in the FEIS. Thanks!

----- Forwarded by Mark S Kross/SC/MODOT on 01/17/2003 08:18 AM

"Thrower, Alexander" <Alexander.Thrower@em.doe.gov> on 01/16/2003 03:38:21 PM

To: "'krossm@mail.modot.state.mo.us'" <krossm@mail.modot.state.mo.us>

cc: "Nielson, Melissa" <Melissa.Nielson@em.doe.gov>

aubject: 0

U.S. Department of Energy Comments on FHWA-MO-EIS-02-02-D

Dear Mr. Kross:

A copy of the above-referenced EIS was sent to Ms. Jessie Hill Roberson, Assistant Secretary for Environmental Management at the U.S. Department of Energy, for review and comment. The draft was forwarded to this office for a response, and in a conversation with Ms. Mary Plassmeyer of your office on January 13, 2003, she indicated it would be acceptable to send you comments electronically.

We have evaluated the material you sent regarding the project, and we have no specific comments at this time. However, the Department does have an interest in roadway safety and upgrades, as they benefit shippers and usually pose no problems to Department of Energy shipments during construction, assuming appropriate detours are available if necessary.

Thank you for the opportunity to comment. If you have any questions or if we can provide you with any further information, please contact me on (202) 586-7905 or via e-mail at alexander.thrower@em.doe.gov.

Sincerely,

Alex W. Thrower Program Analyst Office of Transportation, EM-24 Office of Integration and Disposition Office of Environmental Management U.S. Department of Energy 1000 Independence Avenue, SW Washington, DC 20585

1



U.S. Department of Housing and Urban Development

St. Louis Area Office Robert A. Young Federal Building 1222 Spruce Street - 3rd Floor St. Louis, Missouri 63103-2836

February 24, 2003

Mr. Don Newmann Project Coordinator Federal Highway Administration 209 Adams Street Jefferson City, MO 65102

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

Dear Messieurs Newmann and Keith:

Thank you for sending the DEIS on Interstate 64/U.S. Route 40 Corridor for comment. Time does not permit me to review each aspect of the DEIS; I have had to focus primarily on the potential for an impact to HUD-funded housing and affordable housing rather than to review the document's compliance with all federal environmental laws.

After conferring with the Office of Public Housing and Office of Multi-Family Housing staff in the St. Louis HUD Office, it appears that this project will not directly affect HUD-funded Multi-Family housing that was built using HUD funds. Because HUD funds can also be used by local housing authorities to subsidize both single-family and multi-family rental units, we urge you to ensure that both the City of St. Louis Housing Authority and St. Louis County Housing Authority have had an opportunity to review this document, particularly as it relates to displaced units/households.

The discussion of residences and businesses to be displaced in Chapter IV under Section C. Right-of-Way Impacts includes statements regarding relocation policies. As is often the case, there will be affordable housing taken as a result of this project. It is our hope that the extra replacement housing payments that you have available in the event that the cost of a replacement dwelling exceeds the acquisition cost (p. IV-27) will soften the financial burden on lower-income displaced households.

Please be advised that the statements regarding whether or not noise barriers will be constructed are not consistent throughout the document. The Summary, for example, is noncommittal about the construction of these barriers compared to statements made in some of the public meetings in the appendix J. It appears that the vast majority of

2A

2B

2 statements from the public would support the construction of noise barriers even though this adds to the cost of the project. The projected noise level exceeds the noise level that HUD uses for residential housing and those recommended by EPA. Thank you for your consideration of these comments. I can be reached at (314) 539-6528 if you have any questions. Sincerely, Regional Environmental Officer

United	States	Department	of	Agricu	ture





1215 Fern Ridge Parkway Suite 212, St. Louis, Missouri 63141

Phone: 314-453-9811 ext. 3

To: Don Neumann FHA Kevin Keith MDOT Dennis Potter NRCS Date: February 28, 20003

The I-64 /U.S. Route 40 Corridor running from Sarah Street to Spoede Road includes .5 acres of the Wilbur Soil which is prime farmland. The area of Wilbur is on the I64 #2 sheet and circled in red. The remaining soils are complexes with urbanland which most has previously been disturbed. If this Wilbur area were to be disturbed an AD 1006 form would need to be completed for farmland conversion.

Included is: arcview maps of the project, a soil legend, and the acreage's of the soil map units.

Call if I can be of any other assistance.

i) m.S/c

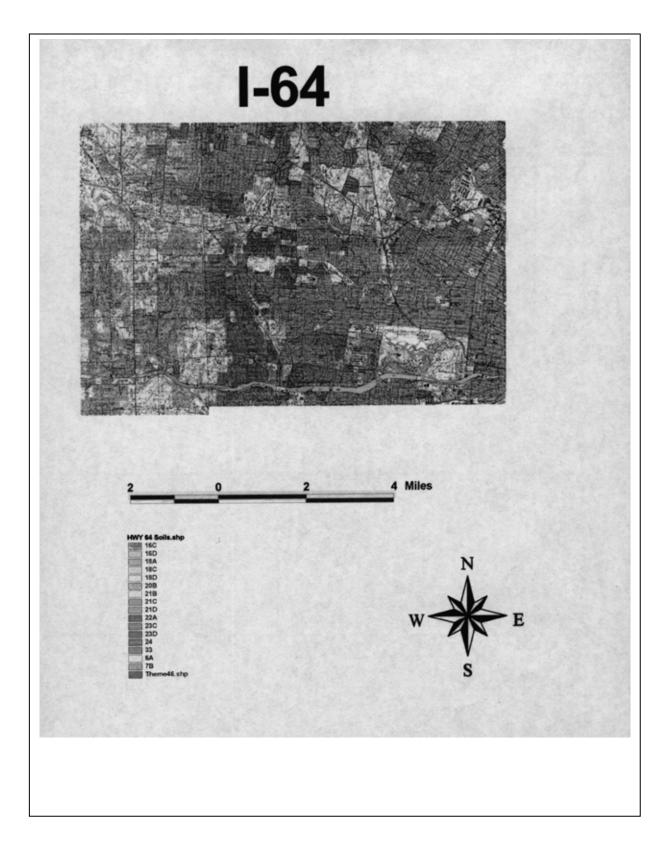
David M. Skaer

3

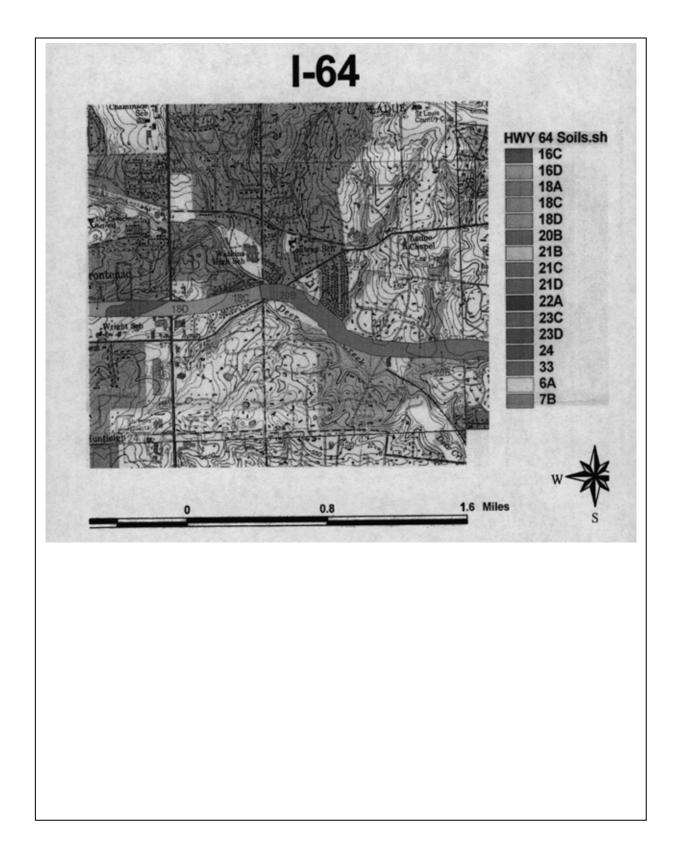
NRCS Resource Soil Scientist

The Natural Resources Conservation Service works in partnership with the American people to conserve and sustain natural resources on private lands.

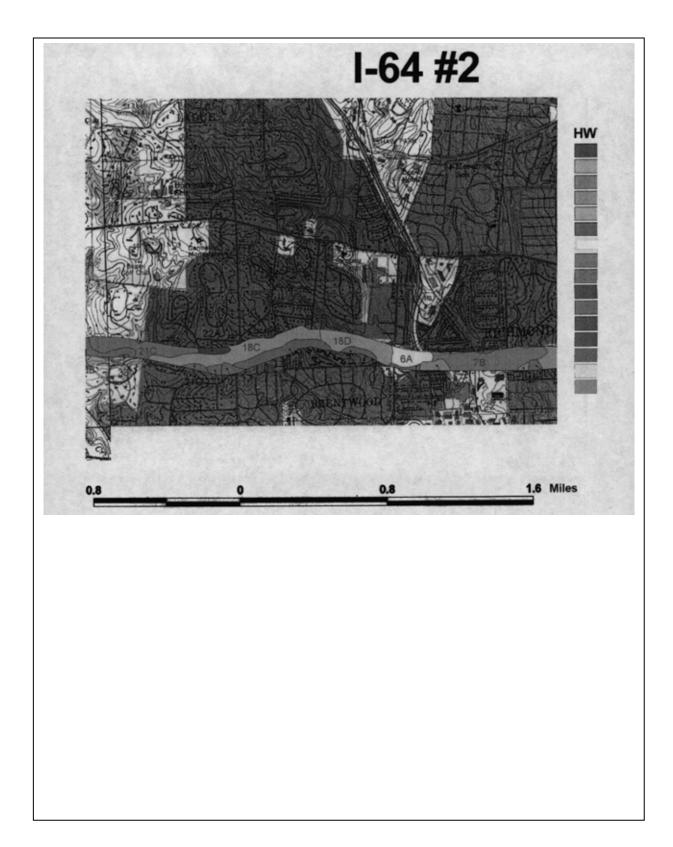
An Equal Opportunity Employer



Letter No. 3 – USDA Natural Resources Conservation Service (page 2 of 8)

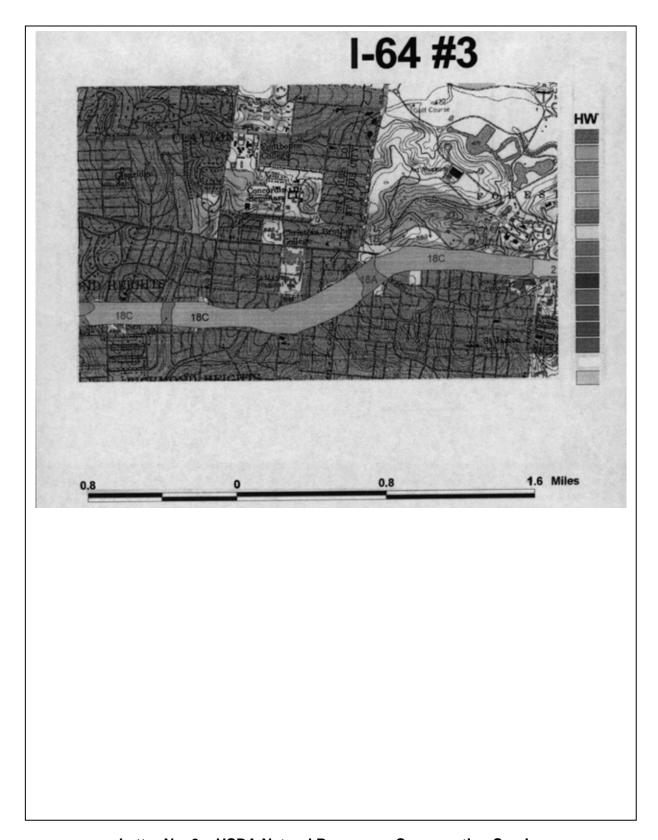


Letter No. 3 – USDA Natural Resources Conservation Service (page 3 of 8)

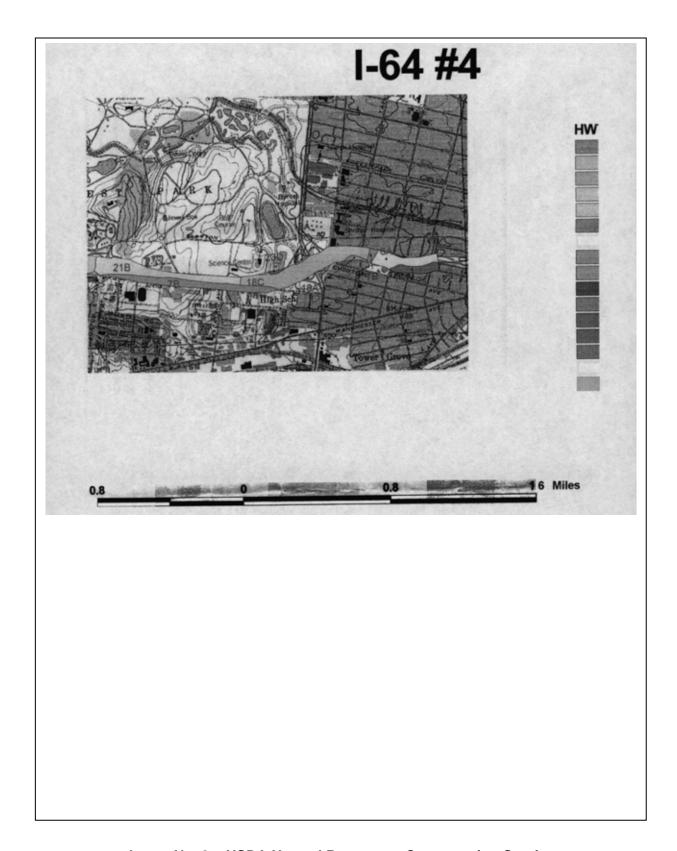


Letter No. 3 – USDA Natural Resources Conservation Service (page 4 of 8)

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Letter No. 3 – USDA Natural Resources Conservation Service (page 5 of 8)



Letter No. 3 – USDA Natural Resources Conservation Service (page 6 of 8)

ST. LOUIS COUNTY

SOIL LEGEND

Map symbols consist of numbers or a combination of numbers and a letter. The numbers represent the kind of soil. A capital letter following these numbers indicates the class of slope. Symbols without a slope letter are for nearly level soils or

SYMBOL	NAME
18	Winfield silt laem, 2 to 5 percent slopes
10	Winfield sitt loam, 5 to 9 percent slopes
10	Winfield silt loam, 9 to 14 percent slopes
28	Mentro sitt laam, 2 to 5 percent slopes
2C	Mentro silt losm, 5 to 9 percent slopes
20	Menfro silt loam, 9 to 14 percent slopes
2£	Menfro silt loem, 14 to 20 percent slopes
2 F	Menfro sift loam, 20 to 45 percent slopes
3D	Clarksville cherty sitt leam, 5 to 14 percent slopes
37	Clarksville cherty sitt toem, 14 to 50 percent slopes
40	Union sitt loam, 9 to 14 percent slopes
5A	Iva silt loam, 1 to 3 percent slopes
6A	tirban land, bottom land, 0 to 3 percent slopes
7B	Urban land, upland, 0 to 5 percent slopes
8E	Gass silt loam, 14 to 20 percent slopes
100	Gasconade-Rock outcrop complex, 5 to 14 percent slopes
1 0 F	Gasconada-Rock outcrop complex, 14 to 50 percent slopes
12	Nevin silt loem
130	Goss cherty sitt loem, 5 to 14 percent slopes
13F	Goss cherty sitt learn, 14 to 45 percent slopes
14C	Menfro sitt toem, harst, 2 to 14 percent slopes
14E	Menfre sitt loam, harst, 9 to 30 percent slopes
16C	Urban land-Harvester complex, karst, 2 to 9 percent slopes
160	Urben land-Harvester complex, tarst, 9 to 20 percent slopes
170	Crider-Mentro sitt loams, 5 to 14 percent slopes
17F	Crider-Menfre sitt leems, 14 to 30 percent slopes
18A	Urben land-Harvester complex, 0 to 2 percent slopes
18C	Urban land-harvester complex, 2 to 9 percent slopes
180	Urban land-Harvester complex, 9 to 20 percent slopes
19C	Urban land-Goss complex, 2 to 9 percent slopes
190	Urban land-Goss complex, 9 to 20 percent slopes
298	Fishpat-lirban land camplex. 0 to 5 percent slopes
218	Winfield-Urbae land complex, 2 to 5 percent slopes
210	Winfield-Urban land complex, 5 to 9 percent slopes
210	Winfield-Urban land complex, 9 to 20 percent slopes
22A	Iva-Urban land complex, 1 to 3 percent slopes
23B	Menfro-Urban land complex, 2 to 5 percent slopes
23C	Menfro-Urban land complex, 5 to 9 percent slopes
23D	Menfro-Urben land complex, 9 to 20 percent slopes
24	Nevin-Urben land complex
27	Pits, sand and grave
28	Pits, quary
29	Dumps-Orthonis complex
31	Elsah sit loam
31	Haymond silt karm
32 33	Wilbur silt loom
33 40	Eudora silt loam
41	Booker clay
4; 42	Blake silty clay loam
	Waldron silty clay
43	Sarpy loamy fine sand, rarely flooded
44	Sarpy learny fine sand, frequently flooded
45	
46	Parkville clay
49	Blake-Eudora-Waldron complex
52A	Freeburg silt loam, 0 to 2 percent slopes
528	Freeburg sitt loam, 2 to 5 percent slopes
53A	Bremer silt loam, 1 to 3 percent slopes
55A	Ashton sift town, 0 to 2 percent slopes
558	Ashton silt loam, 2 to 5 percent slopes
56A	Weller sitt laam, 0 to 2 percent slopes
	Weller silt loam, 2 to 5 percent slopes

Letter No. 3 – USDA Natural Resources Conservation Service (page 7 of 8)

Shape	Soil_id	Count	Area	Acres
Polygon	16C	1	51125.497	12.6
Polygon	16D	1	36222.154	9.0
Polygon	18A	5	56448.508	13.9
Polygon	18C	10	1126662.373	278.4
Polygon	18D	3	169041.581	41.8
Polygon	20B	4	275097.497	68.0
Polygon	21B	3	119436.112	29.5
Polygon	21C	5	136318.081	33.7
Polygon	21D	4	25631.825	6.3
Polygon	22A	2	16281.122	4.0
Polygon	23C	3	92084.305	22.8
Polygon	23D	1	3216.306	0.8
Polygon	24	1	26971.753	6.7
Polygon	33	1	2043.410	0.5
Polygon	6A	2	99354.201	24.6
Polygon	7B	3	238026.447	58.8

Letter No. 3 – USDA Natural Resources Conservation Service (page 8 of 8)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

APR 1 0 2003

Mr. Don Neumann Programs Engineer Federal Highway Administration P.O. Box 1787 Jefferson City, MO 65102

Dear Mr. Neumann:

RE: Draft Environmental Impact Statement (DEIS) for Interstate 64/U.S. Route 40 Corridor, City of St. Louis and St. Louis County, Missouri

The U.S. Environmental Protection Agency (EPA) has reviewed the DEIS for Interstate 64/U.S. Route 40 Reconstruction also known as "The New I-64." Our review is provided pursuant to the National Environmental Policy Act (NEPA) 42 U.S.C. 4231, Council on Environmental Quality (CEQ) regulations 40 C.F.R. Parts 1500-1508, and Section 309 of the Clean Air Act (CAA). The DEIS was assigned CEQ number 020529.

Based on our overall review and the level of our comments, the EPA rated the DEIS for this project EC-2 (Environmental Concerns-Insufficient Information). Please refer to the attached "Summary of Rating Definitions" for further details on EPA's rating system.

The EPA's concerns are related to the projected impacts to the properties eligible for the National Register of Historic Places and parks/recreational areas. Section 4(f) considerations are significant in this project, since the Section 4(f) mandates: "Avoiding impacts to public parkland and cultural resources deemed eligible for the National Register of Historic Places, unless it is successfully demonstrated that no feasible and prudent alternative exists that avoids "use" or impacts to the resource and that the project includes all possible planning to minimize harm from such use." The preferred build alternative will adversely effect several (4f) properties. EPA requests that steps be taken in consultation with the State Historical Preservation Office (SHPO) to identify mitigation measures to minimize harm and impacts to the historic structures, neighborhoods and public parkland. Appropriate mitigation measures should be presented in the Final Environmental Impact Statement (FEIS).

4A



We also have concerns regarding neighborhoods that are minority and/or low income and should be duly considered with respect to disproportionate impacts under the Environmental Justice (EJ) Executive Order (E.O. 12898). There are several sensitive populated areas within the project corridor and many of these areas are experiencing cumulative environmental impacts and/or human health burdens. EPA appreciates the efforts already undertaken to identify these areas and for working with the neighborhoods to address the impacts of this project. We encourage you to continue to explore opportunities to reduce impacts to these communities and to continue to communicate with the residents throughout the project planning and during construction. Details of the plans to mitigate EJ impacts should be presented in the FEIS.

Additional comments related to our review of the DEIS are enclosed. These comments focus on air quality, environmental justice, and watershed impacts, along with general comments related to mitigation and implementation of the project.

The EPA appreciates the opportunity to review and comment on the DEIS. Please send a single copy of the Final EIS to the address indicated on the letterhead above (Mail Routing: ENSV/IO) when it is filed with EPA's Washington, D.C. office. If you have any questions, please contact Ms. Kim Johnson, NEPA Reviewer at (913) 551-7975.

Sincerery

For U. Gale Hutton, Director

Environmental Services Division

ixc:

Mr. Kevin Keith, MODOT

Enclosure

<u>DETAILED COMMENTS</u> <u>The New I-64 DEIS</u> <u>St Louis County and the City of St. Louis</u>

Air Quality

The PM fine and 8-hour ozone national air quality standards are currently being implemented. Designations for attainment and nonattainment areas for the 8-hour ozone are scheduled to be published on April 15, 2004, and the PM fine designations are scheduled to be published in December 2004. Based on monitoring, St. Louis is projected to be nonattainment for both standards. If designated nonattainment, all transportation projects in the area will be subject to transportation conformity analysis one year after the publication date of nonattainment areas. Recognizing that construction is scheduled to begin in 2008, this project may be subject to conformity analysis for both 8-Hour Ozone and PM fine.

Due to the fact that air monitors in the St. Louis area are measuring ambient concentrations above the 8-hour ozone and PM fine air quality standards, additional mitigation to reduce air quality impact should be considered for this project. For example, reduction of Ozone and PM fine precursors could be accomplished by requiring engine retrofits or alternative fuels such as bio-diesel in both on-road and off-road diesel engine construction equipment.

Water Quality

4D Section III(B)(2)(a) references the EPA Index of Watershed Indicators (IWI) as a reference for watershed health evaluations. The IWI is no longer current and may not be a reliable source of information.

Environmental Justice (EJ)

Exhibit IV-2 Environmental Justice Analysis by 2000 Census Block illustrates the minority population percentage for each census block. For Environmental Justice purposes, it would be beneficial to also show low income areas and identify the geographic boundaries of areas that have both low income and high minority populations.

Historical and Archaeological Preservation

4F Section IV (O)(4) identifies that preferred alternatives will have adverse impacts on the Lavinia Gardens and Bennett Street historical districts. Please clarify the adverse impacts to these neighborhoods and if these impacts will remove their eligibility for historical designation.

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)

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.



United States Department of the Interior

OFFICE OF THE SECRETARY Washington, D.C. 20240

APR 2 3 2003

ER-03/35

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

Dear Mr. Masuda:

As requested, the Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement (DEIS) and Section 4(f) Evaluation for the Reconstruction of I-64/US-40 Corridor, City of St. Louis and St. Louis County, Missouri, prepared by the Federal Highway Administration (FHWA) and the Missouri Department of Transportation (MoDOT). The Department offers the following comments and recommendations for your consideration:

SECTION 4(F) EVALUATION COMMENTS

We concur with FHWA and the MoDOT that there are no feasible and prudent alternatives to the proposal as presented. We cannot concur that all possible planning needed to minimize potential harm to all resources has been employed. We are puzzled by the summary statement that follows each property description 5A and evaluation: "Subsequent steps in the Section 4(f) evaluation process will determine if there is no prudent and feasible alternative to . . . " the use of each of these properties... It is not clear what subsequent steps are next and why the FHWA has not made the determination of whether there are no prudent and feasible alternatives at this point in the process. It would appear if there were other steps to take in order to make that determination, then perhaps this evaluation is premature.

There are several properties under evaluation for this project. These include four historic bridges, two historic districts, six properties individually eligible for the National Register of Historic Places (National Register), and three parks/recreation areas. Within one of these parks, Forest Park, City of St. Louis, there are a variety of property types that will be affected, such as the St. Louis Zoo, open space areas, parking lots for specific recreation areas (such as the St. Louis Zoo),

Mr. Allen Masuda

2

playgrounds, and pedestrian crossings. In general, the project is highly constrained by development on all sides, but FHWA and MoDOT feel they must do something to address the deteriorating conditions which threaten public safety. Attempts to expand the existing facilities will ultimately disturb a wide variety of properties, both those considered Section 4(f) resources and those that are not. In situations like this, the Department understands the difficulty in meeting Section 4(f) requirements; however, Section 4(f) places affirmative responsibilities on FHWA, which must be met, before the process can move forward. To that end, the Department will offer its opinion on the determinations that appear to have no alternatives. We will reserve our concurrence on those that appear not to have exhausted all options.

- The Department would agree there appear to be no alternatives to the taking of the historic bridges, and it appears FHWA and MoDOT have begun the process of minimizing harm to those properties. We would concur with the second proviso if FHWA and MoDOT can demonstrate that the State Historic Preservation Officer (SHPO) agrees with the mitigation proposed in the draft programmatic agreement presented in Appendix K, by providing a copy of the signed agreement with the final evaluation.
- The Department would agree there appears to be no prudent or feasible alternative to the use of the two historic districts; or at least there is no apparent alternative that would result in fewer disturbances than the preferred alternative. The avoidance alternative, especially in the case of the Bennett Street Historic District, would be very costly both in actual money and in community disruption. Again, we would concur with a determination on all efforts to minimize harm to these resources if FHWA and MoDOT can demonstrate that the SHPO agrees with the mitigation proposed in the draft programmatic agreement presented in Appendix K, by providing a copy of the signed agreement with the final evaluation.
- The Department would agree there appears to be no prudent or feasible alternative to the use of the six historic properties, those individually eligible for listing on the National Register. The avoidance alternative is reported to be between three and four times the cost of the preferred alternative. Thus, the avoidance alternative would be neither prudent nor feasible. We would also concur with a determination on all efforts to minimize harm to these resources if FHWA and MoDOT can demonstrate the SHPO agrees with mitigation proposed in the draft programmatic agreement presented in Appendix K, by providing a copy of the signed agreement with the final evaluation.
- Commenting on the individual park properties, the Department would agree there appears to be no prudent or feasible alternative to the use of the Heights Community Center. This facility is located opposite the project from one of the historic districts, and the only avoidance alternative would be very costly both in actual money and in community disruption. We would concur with a determination

Mr. Allen Masuda

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on all efforts to minimize harm to this resource if the City of Richmond Heights can come to an agreement with the FHWA and MoDOT on sufficient mitigation for the loss of 0.1 acre of parking space. This mitigation can be either land to replace the acreage lost to the project, or through compensation at the land's fair market value. The FHWA and MoDOT should demonstrate what the mitigation is and that the City of Richmond Heights agrees with the mitigation in the final evaluation.

5F

The Department would agree there appears to be no prudent or feasible alternative to the use of A.B. Green Athletic Complex, belonging to the City of Richmond Heights. This facility is located opposite the project from other Section 4(f) eligible properties and the only avoidance alternative would be very costly both in actual money and in community disruption. We cannot concur with a determination all efforts to minimize harm to these resources have been employed since it would appear that FHWA and MoDOT have not finalized plans for mitigation at this location. One factor is the need to acquire property for the project, which could be mitigated through replacement land or compensation. None was mentioned in the evaluation. A second factor is the constructive use of the property due to increased noise impacts. The noise can be mitigated to a degree by noise barriers but the barriers will need to be 14 feet tall, and are not often desirable within park settings. The extent of discussions with the City of Richmond Heights was not presented in the evaluation. The Department will have to see what comes from the

discussions with the City before concurring with any determination.

5G

The impacts to portions of Forest Park, owned by the City of St. Louis, present more difficult issues. Forest Park, the seventh largest urban park in the nation, consists of a wide array of natural, cultural and recreational facilities, visited by as many as 12 million visitors yearly. A portion of the property was used for the 1904 World's Fair. Specific properties within the park make up an historic district, and there are other properties individually eligible for inclusion on the National Register. The I-64/US-40 project skirts the southern boundary of Forest Park, and would impact several discrete portions of Forest Park. The evaluation treats each of these portions of the park in terms of specific impacts and presents mitigation to minimize harm for each. This treatment is well presented and, despite its complexity, is understandable.

5H

The Department believes there may be no prudent or feasible alternative to the use of portions of Forest Park. The project is currently within the southern boundary of the park. Two alternatives were explored briefly that would route the project away from the park but these would only involve other Section 4(f) resources, as well as have the potential for significant community disruption. The other alternative, which was considered and then rejected for the other resources mentioned above, is extremely expensive and may still involve constructive uses due to noise and visual impacts. The Department cannot concur with any determination all efforts to minimize harm to these resources have been employed since it would appear

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VIII-52 The New I-64

Mr. Allen Masuda

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FHWA and MoDOT have not finalized plans for mitigation for any of the specific locations within Forest Park. The extent of the discussions with the City of St. Louis were not presented in the evaluation and there is no clear picture of whether the City has agreed with some or any of the suggestions made so far. The Department will await the results of the discussions with the City before concurring with any determination.

The Department also notes there is one property not discussed in the evaluation that is an eligible Section 4(f) property. This property was also identified as having been assisted by the application of Land and Water Conservation Funds (L&WCF) Act (Act), which requires consideration under Section 6(f) of that Act as well as Section 4(f). Highland Park, located in Richmond Heights, is immediately adjacent to the project and includes a playground and covered picnic table. There would be no direct use of the park by the addition of right-of-way for the project (see page III-5 of the DEIS). The FHWA and MoDOT have determined there would be no constructive use of the property because (1) the property is already affected by the existing I-64 corridor, and (2) the additional 1 decibel rise in noise will not be noticeable by any park users. The Department concurs there would be no Section 4(f) use of this park, and there appears to be no impact to the Section 6(f) property as well.

SUMMARY COMMENTS

The Department notes that FHWA and the MoDOT do not appear to have made any final determinations on the presence of avoidance alternatives for all resources. While we do not understand why this determination was not made, we have concurred with most of the determinations made, given the avoidance alternatives discussed in the DEIS and the Section 4(f) evaluation. Should other avoidance alternatives arise that are not discussed in this document, the Department reserves a right to rescind or amend our comments on this evaluation. Our recommendations have been given for all Section 4(f) resources. We cannot concur that all measures to minimize harm have been employed for any of the resources. It is apparent FHWA and MoDOT have put considerable time and effort into consultation with the various parties, and that more time and effort is needed before final recommendations can be made and accepted by the resource owners. The Department looks forward to a review of the final document.

The Department has a continuing interest in working with the FHWA and MoDOT to ensure impacts to resources of concern to the Department are adequately addressed. For matters related to Section 4(f), please contact the Regional Environmental Coordinator, National Park Service, Midwest Regional Office, 1709 Jackson Street, Omaha, Nebraska 68102, telephone 402-221-7286.

We appreciate the o	opportunity to provide	e these comments.
		Sincerelly,
		11 11 The
		Mului
		Willie R. Taylor Director, Office of Environmental
		Policy and Compliance

VIII-54 The New I-64

Final Environmental Impact Statement

Bob Holden Governor

STATE OF MISSOURI

Jerry B. Uhlmann Director



EMERGENCY MANAGEMENT AGENCY

DEPARTMENT OF PUBLIC SAFETY OFFICE OF THE ADJUTANT GENERAL

PO Box 116, Jefferson City, Missouri 65102 Phone: 573/526-9100 Fax: 573/634-7966 E-mail: mosema@mail.state.mo.us

January 14, 2003

Mr. Don Neumann, Project Engineer Federal Highways Administration 209 Adams Street Jefferson City, MO 65101

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

Re: Comments on the Draft Environmental Impact Statement (DEIS) for the Interstate 64 Improvement Project, St. Louis City and St. Louis County, Missouri

Dear Sirs:

We very much appreciate the opportunity to comment on the above-mentioned project. Please accept this letter as comment on the proposed Interstate 64 improvement project DEIS.

In Chapter IV- Environmental Consequences, Page IV-59, Paragraph 1.b – Floodplain Permits, it states: "A norise certificate would be issued by SEMA." is incorrect. The State Emergency Management Agency (SEMA) only issues the Floodplain Development Permit (FPDP) for the proposed project. The Missouri Department of Transportation (MoDOT) would be the party responsible for providing the "No-Rise" Certificate to this agency prior to SEMA issuing a FPDP for this project. If MoDOT has hired a consultant to perform the "No-Rise" Certification, that is also acceptable to meeting the requirements of Executive Order 98-03.

If you have any questions concerning this letter or the requirements of Executive Order 98-03, please feel free to contact me a (573) 526-9119.

Sincerely,

L. Scott Samuels, P.E.

Floodplain Management Engineer

Tonya Leibold, Mitigation Specialist, FEMA R-VII

MoDOT File

cc:

STATE OF MISSOURI

Bob Holden, Governor • Stephen M. Mahfood, Director

DEPARTMENT OF NATURAL RESOURCES

www.dnr.state.mo.us

January 23, 2003

Ms. Diano Heckemeyer
State Design Engineer
Missouri Department of Transportation
P.O. Box 270
Jefferson City, Missouri 65102

RE: Project number: 053-SLC-02, Job No. J610978, I-64 Project, St. Louis City and St. Louis County, Missouri (FHWA)

Dear Ma. Heckemeyer:

Thank you for submitting information on the above referenced project for our review pursuant to Section 106 of the National Historic Preservation Act (P.L. 89-665, as amended) and the Advisory Council on Historic Preservation's regulation 36 CFR Part 800, which requires identification and evaluation of cultural resources.

After reviewing the report, we find it to be adequate. We concur with the determinations of eligibility as listed in Tables A and B, except for the Bennett Street properties (see below). Additionally, we concur that bridge number K468 (not included in the table) is also eligible for listing on the National Register of Historic Places. In addition we also concur with that there will be an adverse effect on the National Register of Historic Places eligible buildings, bridges, including bridge number K468, and districts as listed on Tables A and B in the comments section of the tables. We also concur that there will be no adverse effect on the remaining eligible properties listed on Tables A and B. We look forward to the preparation of a Memorandum of Agreement (MOA) that outlines the steps needed to mitigate the adverse effect.

In addition, we also concur that the remaining buildings, including the Bennett Street properties, and bridges are not eligible for listing on the National Register of Historic Places.

If you have any questions, please write Missouri Department of Natural Resources, State Historic Preservation Office, Attn: Review and Compliance, P.O. Box 176, Jefferson City, Missouri 65102, or call Alison Dubbert at (573) 751-7958. Please be sure to include the SHPO Project Number (053-SLC-02) on all future correspondence relating to this project.

Sincerely,

STATE HISTORIC PRESERVATION OFFICE

LaVerne Brondel

Deputy State Historic Preservation Officer

LB:ad

c: Kate Shea Don Neumann Kathy Harvey Bob Reeder Karen Daniela

Integrity and excellence in all we do

Enclosure: St. Louis I-64 NRHP Eligible Properties

C PARTS

Bob Holden Governor

Jacquelyn D. White Commissioner

State of Missouri
OFFICE OF ADMINISTRATION
Intergovernmental Relations
Post Office Box 809
Jefferson City, 65102
573/751-4834

January 27, 2003

Kevin Keith Chief Engineer Missouri Department of Transportation PO Box 270 Jefferson City, MO 65102

Dear Mr. Keith:

Subject: 0301249 - U.S. Department of Transportation and Missouri Department of

Transportation
DOT Assistance
Draft Environmental Impact Statement

The Missouri Federal Assistance Clearinghouse, in cooperation with state and local agencies interested or possibly affected, has completed the review on the above project application.

None of the agencies involved in the review had comments or recommendations to offer at this time. This concludes the Clearinghouse's review.

A copy of this letter is to be attached to the application as evidence of compliance with the State Clearinghouse requirements.

Sincerely,

Ewell Lawson, Director Intergovernmental Relations

EL:ab



Bob Holden, Governor • Stephen M. Mahfood, Director

DEPARTMENT OF NATURAL RESOURCES

APR 17 2003

www.dnr.state.mo.us

Mr. Don Neumann Programs Engineer Federal Highways Administration 209 Adams Street Jefferson City, MO 65101

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

Re: Interstate 64 / U.S. Route 40 Corridor Draft Environmental Impact Statement, City of St. Louis and St. Louis County, Missouri

Dear Messrs. Neumann and Keith:

Thank you for the opportunity to review and respond to the Draft Environmental Impact Statement (DEIS) for the Interstate 64 / U.S. Route 40 Corridor project in the City of St. Louis and St. Louis County, Missouri. This effort will be a significant reconstruction project in a sensitive urban area, and we appreciate the thorough review this project has received from your agencies.

Comments related to the department's varied interests are enclosed. We appreciate the opportunity to provide comments on this important transportation project. If you have any questions or need clarification, please contact me or Ms. Jane Beetem, phone number 573-522-2401. Her address for correspondence is Department of Natural Resources, P.O. Box 176, Jefferson City, MO 65102. Thank you.

Sincerely,

DEPARTMENT OF NATURAL RESOURCES

Director

Integrity and excellence in everything we do

COMMENTS OF THE MISSOURI DEPARTMENT OF NATURAL RESOURCES APRIL 9, 2003

DRAFT ENVIRONMENTAL IMPACT STATEMENT INTERSTATE 64 / ROUTE 40 CORRIDOR CITY OF ST. LOUIS AND ST. LOUIS COUNTY

Parks

The department commends MoDOT for the consideration given to bicycle and pedestrian facilities within the project area. The department advocates the enhancement of these facilities, particularly improvements to meet ADA standards and increase user safety. The department also applauds MoDOT's coordination with local and regional stakeholders regarding the incorporation of existing and proposed bicycle/pedestrian trails and corridors.

Regarding lands protected by the Land and Water Conservation Fund (LWCF), a review of our records indicates that the area of Forest Park impacted by the project is not funded by the LWCF. However, a continued sensitivity concerning impacts to Forest Park must be maintained, most especially regarding the potential impacts to the St. Louis Zoo. The project as described in the DEIS does not affect lands under the jurisdiction of the department's Division of State Parks.

<u>Air</u>

The department's Air Pollution Control Program did not identify any significant air pollution impacts expected to directly result from the proposed project on the National Ambient Air Quality Standards. The DEIS contains the findings of a detailed air quality analysis, as required by an agreement completed by the department, Missouri Department of Transportation (MoDOT) and the Federal Highway Administration (FHWA) in 1988. The proposed project was included in the conformity determination approved by the U.S. Department of Transportation and the U.S. Environmental Protection Agency on April 22, 2002, as well as the St. Louis regional long-range transportation plan approved on March 27, 2002.

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Water Resources

In planning roads over regulatory floodways, the department recommends use of piers rather than fill, as piers facilitate greater water conveyance than that allowed by roads built on fill. Other floodplain issues involve the need for clarification of statements in the DEIS that seem to be contradictory. In describing anticipated floodplain impacts (p. IV-58), the document states that the crossing at Brentwood Boulevard would be "free of significant hydraulic obstructions." The DEIS states on the next page "Should there be an increase in the floodway elevations as a result of the project; a Conditional Letter of Map Revision (CLOMR) would be submitted to FEMA and SEMA." If the floodway has no significant obstructions, then there should be no need for any revision to the floodplain map. Unless the project involves removal of existing constrictions of a stream in order to lower flood heights and flood velocity, the department recommends against any changes that would require such a revision of the floodplain map.

Right-of-way concerns

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In general, concrete-lined ditches that discharge stormwater directly into streams will increase erosive forces within those streams, as well as conveying pollutants directly into those waters. Facilities to moderate the flow of stormwater should also be integral parts of highway construction. Stormwater retention and detention can trap sediment and other contaminants while reducing the erosive storm surges that damage streams below the construction areas and completed impervious surfaces.

Woody vegetation should be planted along roadbeds to help offset the increased runoff rate caused by impermeable road surfaces. Native vegetation is recommended to be in keeping with Executive Order 13112, which directs agencies to prevent the introduction of invasive species (such as the typical mix of cool-season grasses along highway right-of-ways). Native plant material that will require little long-term maintenance/mowing is encouraged. By reducing or eliminating mowing in these areas, the amount of water intercepted and retained by vegetation will increase, reducing erosion and peak flows. Vegetation also provides filters and can absorb some roadside contaminants. Using native vegetation will benefit aquatic organisms that have terrestrial life stages and have evolved floristic environmental cues.

Culverts

In general, culverts should be designed so that they do not change the low-flow characteristics of the streams. The project described in the DEIS appears to follow this recommendation, as page 12 of the summary states: "...existing culverts would be replaced with new, longer culverts, or would be extended..." and "streams that are currently bridged will continue to be bridged in order to avoid or minimize impacts." Should it prove necessary for existing culverts to be modified, MODOT should be wary of the hydraulic changes that may occur as a result. Parallel culverts with different bottom elevations may allow for cross sectional areas similar to the existing channel morphology, and also allow extra capacity for high flows (if desired). Increasing the cross-sectional area of a culvert may negate the detention/water storage that had historically occurred upstream of the culvert. This may cause a greater quantity of water to flow downstream, perhaps overtopping structures that cannot accommodate increased flow. Culvert designs that allow the original substrate to remain intact are

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preferable (e.g., using arches instead of boxes). Grade controls may be necessary to control any headcuts/channel incision that may occur from this project.

Efforts should be made to use bio-engineered structures when constructing stream crossings, such as incorporating plant material (preferably native) 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. In general, concrete-lined ditches that discharge stormwater directly into streams can cause erosion within those streams, as well as conveying pollutants directly into those waters. Native (preferably woody) vegetation should be planted along the roadbed to mitigate for the increased runoff rate caused by impermeable road surfaces. This would be in keeping with Executive Order 13112, which directs agencies to prevent the introduction of invasive species (such as the typical mix of cool-season grasses along highway right-of-ways). Facilities to moderate the flow of stormwater should also be integral parts of highway construction. Stormwater retention and detention can trap sediment and other contaminants while reducing the erosive storm surges that damage streams below the construction areas and completed impervious surfaces.

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). Grade controls may be necessary to control any headcuts/channel incision that may occur from this project.

Geology

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VIII-60

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- Few references are noted in the text, and there is no section at the end of the DEIS

 1 listing references used. It would be helpful for readers to know the sources of information used in development of the geology section of the DEIS.
- Seismic risks are not addressed in the DEIS. This is an area that could be strongly affected by a large earthquake in the New Madrid Seismic Zone. As a result, this issue needs to be more thoroughly addressed in this EIS.

The project area is in the Missouri River Hills ecoregion. The text in the first paragraph, section 3a on page III-23, notes that the region is "generally composed of glacial material deposited on sedimentary rocks." Glacial material of any substantial thickness on top of the bedrock in this area is not common, and will primarily consist of minor loess deposits. Similarly, at the top of page III-23, the preparers may want to change the word "locally" to "regionally". And on page III-24, at the end of the third full paragraph, the word "plans" should be "planes".

The possibility of karst features was mentioned on page III-23 in the third paragraph.

These features will need to be identified and taken into account during construction.

Increased runoff caused by construction and newly paved areas may exacerbate some karst problems.

Page III-23 contains the following statement: "The study corridor is underlain by a thick sequence of mostly carbonate rocks." This statement, while technically correct, is misleading. While a thick sequence of carbonate rocks is under the entire corridor, the bedrock for the majority of this route is the Pennsylvanian Cherokee and Marmaton Groups. These are comprised of limestone, sandstone, siltstone, and shale, with some clay and coal. There is generally more limestone in the Marmaton than in the Cherokee. Only the westernmost portion of the corridor is underlain by the Mississippian St. Louis Limestone. In the same paragraph, it should be noted that the origination of the Desmoinesian Series may range from marine to marginal marine to terrestrial environments. Departmental staff doubt that coal beds were deposited under marine conditions. In any case, there are numerous historical records of coal being mined both separately and in conjunction with clay in the city of St. Louis, so the possibility of historic mines should be investigated by project planners.

The type of bedrock underneath individual sections of shale and sandstone will need to be taken into account. These sections in the Pennsylvanian sediments will have different substrate properties than will the carbonate sediments. Shales especially exhibit a tendency to slump once excavation begins.

At its eastern extent, the corridor intercepts a small fault that cuts directly across the corridor. Just west of this fault, the corridor also intercepts a fold structure. Faults and folds often are optimum sites for karst development when they intercept carbonate rocks at or near the surface, as they cause fracturing within the rocks. The presence of these two structures also implies that there may be other unmapped structures in the corridor.

<u>Cultural Resources</u>

9K

9M

Additional consultation is recommended with this department's State Historic Preservation Office (SHPO) regarding the eligibility of the Bennett Street properties for the National Register. In addition, the SHPO did not find that building number 193 meets the criteria for National Register listing. Also, bridge number K468 was found by the SHPO to meet the criteria for eligibility, although it was not included in the list of eligible bridges contained in the DEIS. A Programmatic Agreement is being developed by the SHPO and MoDOT regarding this project.

4



CITY OF ST. LOUIS DEPARTMENT OF PARKS, RECREATION & FORESTRY DIVISION OF PARKS



5600 CLAYTON AVENUE IN FOREST PARK ST. LOUIS, MO 63110-1310

GARY D. BESS DIRECTOR (314) 289-5310 FAX (314) 535-3901

FRANCIS G. SLAY

DIVISION OF PARKS (314) 289-5300 DIVISION OF RECREATION (314) 289-5320 DIVISION OF FORESTRY (314) 613-7200

February 26, 2003

Ms. Lesley Hoffarth, P.E. Project Manager Missouri Department of Transportation 1590 Woodlake Drive Chesterfield, Missouri 63017

RE: The New I-64 Draft Environmental Impact Statement

Dear Ms. Hoffarth:

The City of St. Louis Department of Parks, Recreation and Forestry has had the opportunity to review the Draft Environmental Impact Statement (EIS) for the Proposed New I-64 Improvements. Please be advised that the Parks Department understands the impacts to Forest Park as described in the Section 4 (f) Evaluation. In addition, the Parks Department understands and concurs that the proposed mitigation efforts as described in the 4 (f) Section of the Draft EIS are appropriate.

We look to the future when this project will be implemented. If you have any questions or need additional information, please feel free to contact our offices at your convenience.

Sincerely,

10

Gary D. Best, Director

PARKS, RECREATION & FORESTRY

GDB:DWS:ds

cc: Daniel Skillman

Anabeth Weil Russell Volmert

CITY OF LADUE

City Hall

March 24, 2003

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

Dear Mr. Keith:

This letter is to serve as the City of Ladue's response to the draft Environmental Impact Statement (DEIS) prepared by the Missouri Department of Transportation (MoDOT) for the reconstruction of the existing I-64/U.S. Route 40. It is the City's intent that this letter and attachment be included in the public record of the final Environmental Impact Statement.

The City of Ladue retained the services of Lonnie E. Haefner, Ph.D., P.E., to conduct a professional technical and issues review of the I-64 DEIS, as it affects the City of Ladue. Dr. Haefner's commentary is attached. At its meeting of February 18, 2003, the Ladue City Council accepted Dr. Haefner's report as reflecting its concerns regarding the I-64 project.

To briefly summarize some of the key points of the City's objections and concerns:

- The use of 12' wide median shoulders in both directions causing unnecessary right-of-way encroachment into residential property;
- 11B The construction of additional traffic lanes in each direction when other areas are not receiving additional lanes and are using ITS and other transportation systems management techniques.
- No sub-regional traffic circulation analysis has been made available, preventing the City from identifying the traffic flow impacts on our arterial streets and presenting this information to our citizens.
- 11D The impact of this project on the Clayton Rd. / Lindbergh Blvd. intersection which is currently saturated and will only worsen unless improvements are expanded to include this intersection;
- 11E The current air quality study indicating the impact of this project in the Ladue area leaves a vague implication as to the status of emission levels versus what may be ultimately legally acceptable;
- 11F Significant increases in vertical height at I-64 / Lindbergh Blvd and points east will cause visual disruption of the environment;
- The City of Ladue is strongly and unanimously committed to minimizing the lighting impact throughout the project length in Ladue, particularly at the interchanges;
- Minimizing the community impact by staging all of the construction in Ladue over one uninterrupted timeframe.

9345 CLAYTON ROAD, ST. LOUIS COUNTY, MISSOURI, 63124-1587, (314) 993-3439

The City is committed to maintaining Ladue's residential quality of life and minimizing the impact of this
project on the community. Representatives of the City are available to meet with MoDOT and other
entities to discuss and resolve these issues.

Sincerely,

Page 2

Jean B. Quenon Mayor

Jen B. Frenon

RESOLUTION NO. 891

A Resolution of the Board of Aldermen of the City of Brentwood providing comments to the Missouri Department of Transportation (MoDOT) regarding the Draft Environmental Impact Statement (DEIS) for the New I-64 recommendations for highway re-building.

Whereas, the Missouri Department of Transportation (MoDOT) is currently designing the rebuilding and expansion of Highway 40/Interstate 64 under the project title, "The New I-64", and;

Whereas, "The New I-64" is accepting public comment and suggestions until April 14, 2003, and;

Whereas, the City of Brentwood is impacted by recommendations on the Thruway and Greenway study areas and our residents and businesses are impacted by regional transportation decisions.

Now, therefore, Be It Resolved that the Board of Aldermen submits the following comments and suggestions regarding the preferred alternatives recommended in the DEIS:

- 1.) Comment:
- Section ES-5 of the DEIS states that improved accessibility will contribute to increased sales tax collections within the corridor.

Suggestion:

The recommended elimination of left turn movements on to and off of Eager Road at Hanley Road will not improve accessibility to the major retail corridors of Eager Road and Brentwood Blvd. The EIS should address the concerns of those businesses and the potential for loss of sales tax collections.

- 2.) Comment:
- 12B Chapter IV, Environmental consequences of noise impacts and noise abatement states that communities are eligible for sound walls only if noise levels are at 66 decibels or above.

Suggestion:

Due to the impacts that will result from the recommended re-alignment of the roadway to the South between Brentwood Blvd. and McKnight Road, MoDOT should abate noise below the 66 decibel level, especially as it impacts the residents of Brentwood Forest and York Village due to the removal of existing structures and landscaping that currently provide a noise buffer.

- 3.) Comment:
- Section ES-7 (K) references the Manchester Road Corridor Revitalization proposal. We appreciate the acknowledgement of this plan and MoDOT's ongoing support of the project.

Suggestion:

The New I-64 recommendation should include a commitment from MoDOT to work with the cities to fund improvements to Manchester Road as a construction alternative route <u>prior</u> to any eonstruction work beginning on I-64.

4.) Comment:

Chapter IV Environmental Consequences (K) Floodplain Impacts, addresses new construction in the floodplain, not the impact of additional run-off that will be created down stream of the new pavement and associated construction.

Suggestion:

The EIS should evaluate the impact downstream (specifically Hanley Industrial Court) and reduce the potential for flooding by creating detention as part of the I-64 construction project.

- 5.) Comment:
- 12E Chapter V addresses Urban Design. We applaud MoDOT for the attention given to urban design throughout the study phase of the project.

Suggestion:

Maintain the attention to urban design through construction, including aesthetics and screening of sound walls, the character of bridge construction, and landscaping throughout the corridor.

- 6.) Comment:
- Section I -11 (b) addresses the need for connectivity to pedestrian access. Again we applaud MoDOT for the attention to pedestrian access.

Suggestion:

Maintain the attention to pedestrian access especially the safety of access across the highway at McKnight, McCutcheon, Brentwood Blvd. and Hanley Road.

- 7.) Comment:
- Chapter IV 24 Section (a.) states that two single-family residences would be purchased in the City of Brentwood under the Preferred Greenway Alternative 1.

Suggestion:

The EIS should be reviewed to coincide with MoDOT documents that reference more than two total acquisitions in the City of Brentwood. The EIS should also make specific recommendations for the disposition of early buy-out property including maintenance and the potential negative environmental impacts of vacant properties.

ADOPTED BY THE BOARD OF ALDERMEN THIS 7TH DAY OF APRIL, 2003.

APPROVED BY THE MAYOR THIS 7TH DAY OF APRIL, 2003.

SS/PAT KELLY	
Pat Kelly, Mayor	

Attest:

SS/CHRIS SEEMAYER

Chris Seemayer, City Clerk

RESOLUTION NO. 891

ANDREA C. FERSTER

LAW OFFICES
1100 SEVENTEENTH STREET, N.W., 10th FL.
WASHINGTON, D.C. 20036

TEL.(202) 974-5142 FAX (202) 331-9680

April 14, 2003

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

Re: I-64/U.S. 40 Corridor

Dear Mr. Neumann:

These preliminary comments are submitted on behalf of the City of Richmond Heights concerning the Draft Environmental Impact Statement (DEIS) and Section 4(f) Evaluation circulated by the Federal Highway Administration (FHWA) and the Missouri Department of Transportation (MoDOT) for the above-referenced project, which was prepared pursuant to the National Environmental Policy Act (NEPA), 42 U.S.C. § 4332(2)(C).

The City of Richmond Heights is a municipal corporation and political subdivision within the State of Missouri, representing a diverse population of approximately 9,500 residents. The City contains both residential and commercial areas, and its residential neighborhoods date back to the 1920s through 1940s, many of which directly abut I-64 and I-170. The City will be significantly and adversely affected by the Thruway section of the Project, which will result in the full destruction of at least 108 single-family homes, 134 multi-family units, and 16 businesses, as well as the partial taking of up to 150 additional properties. Because many of these adversely affected properties are historically and/or architecturally significant, the City of Richmond Heights has been recognized as a consulting party under Section 106 of the National Historic Preservation Act, 16 U.S.C. § 470f. For the reasons we now discuss, the City does not believe that the Project, as currently designed, conforms to the requirements of NEPA or Section 4(f)of the Department of Transportation Act, 23 U.S.C. § 138.

Failure to Provide Documents.

At the outset, the City of Richmond is extremely disappointed that its repeated requests for copies of the underlying studies and technical reports for the DEIS have been ignored by MoDoT. Specifically, on February 26, 2003, the City submitted a request under Missouri Open Records law requesting copies of a number of the technical reports and documents, which contain the more detailed analysis of the information that was presented in summary form in the DEIS. A

copy of the City's letter is attached hereto. As the City explained in its subsequent request for an extension of time to comment on the DEIS, the City simply cannot prepare thorough comments, particularly to the analysis of alternatives, without this underlying documentation.

MoDoT has failed to provide this information within the time frames contemplated by the law; indeed, MoDoT officials recently informed City officials that MoDot intended to charge the City \$6,000 for these documents. This exorbitant fee is contrary to the binding regulations of the Council on Environmental Quality (CEQ) implementing NEPA, which provide that agencies shall "[m]ake environmental impact statements, the comments received, and any underlying documents available to the public, . . . without regard to the exclusion for interagency memoranda . . . Material to be made available to the public shall be provided to the public without charge to the extent practicable, ... " 40 C.F.R. § 1506.6((f) (emphasis added).

As the obligation to comply with NEPA rests with the FHWA, the City hereby requests that the FHWA provide the City with the requested documentation, and that the comment deadline be extended until at least two weeks after the City has received these documents. Without these documents, the comments on the DEIS provided by the City today are necessarily preliminary and general in nature, and the City reserves the right to supplement these comments after receipt of the requested documentation.

The Evaluation Under Section 4(f) Is Incomplete and Any Conclusions Under Section 4(f) Are Premature.

The DEIS discloses that the project will adversely affect a number of historic properties that are eligible for the National Register of Historic Places. Specifically, the DEIS acknowledges that the interchange ramps from I-170 to I-64 will result in the taking of eight properties within the Lavinia Gardens Historic District. DEIS, Vol. I, 4(f)-10. The reconstructed interchange at Hanley Road will take three residences from the Bennett Street Historic District. <u>Id.</u> at 4(f)-13. The long weave/merge ramps required as a result of the Bellevue interchange will result in the demolition of three historic properties that are individually eligible for the National Register of Historic Places. Id. at 4(f)-13 to 4(f)-14. The access ramps for the Big Bend interchange would require the demolition of several historic properties that are individually eligible for the National Register of Historic Places. Id. at 4(f)-13. As a result of this impacts, the FHWA must undertake to evaluate alternatives that would avoid this impacts under the stringent mandate of Section 4(f) of the Department of Transportation Act, 23 U.S.C. § 138.

Section 4(f) requires the FHWA to avoid all use of parks, historic resources, recreational areas, and wildlife refuges unless there is no prudent and feasible alternative to such use, and to undertake all possible planning to minimize harm to these protected resources. An alternative that

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will avoid or minimize harm to historic resources cannot be rejected unless it presents "unique problems," or there are "truly unusual factors present . . . or the cost or community disruption resulting from alternative routes reache[s] extraordinary magnitudes..." Citizens to Preserve Overton Park, Inc. v. Volpe, 401 U.S. 402, 413 (1971) (emphasis added); 23 C.F.R. § 771.135(a)(1).

Compliance with the substantive requirements of Section 4(f) is predicated upon completion of the procedural requirements for identifying the impacts on historic properties under Section 106 of the National Historic Preservation Act, 16 U.S.C. § 470f. Corridor H Alternatives, Inc. v. Slater, 166 F.3d 368, 371 (D.C. Cir. 1999); City of Alexandria v. Slater, 198 F.3d 862, 871 (D.C. Cir. 1999). Section 106 is a procedural law that requires all federal agencies to take into account the effects of federal undertakings on historic properties in consultation with the Advisory Council on Historic Preservation, the State Historic Preservation Officer (SHPO), and other consulting parties. Complete identification of historic properties under Section 106 process is therefore necessary before the FHWA can comply with Section 4(f).

Here, the FHWA has not yet completed the consultations required by Section 106. As the DEIS acknowledges, this process requires a final identification of historic properties by the SHPO, which will occur prior to the issuance of the Final EIS, and ultimately contemplates the 13C execution of a Programmatic Agreement between the FHWA and the SHPO "that outlines procedures for mitigating the Project's impact to NRHP eligible properties. DEIS, Vol. I, at IV-62. As a consulting party under Section 106, the City is currently in the process of reviewing MoDoT's efforts to identify historic properties, and determine whether any significant properties or districts were overlooked or incorrectly evaluated. As a result, the evaluation of impacts on historic properties contained in the DEIS is incomplete, since more historic properties may be identified as part of the ongoing consultations under Section 106.

Based on its preliminary investigations, the City believes that additional properties may be eligible for the National Register, either individually or as part a historic district, and that more historic properties will be impacted by the Bellevue and Big Bend interchanges and their associate ramps and merge/weave lanes than are acknowledged in the DEIS. As a consulting party to the Section 106 process, the City intends to ensure that these potential historic districts are fully evaluated during the course of the Section 106 consultations with the State Historic Preservation Officer and the federal Advisory Council on Historic Preservation. This process is likely to result in the identification of additional historic properties and districts whose impacts must be considered under Section 4(f)'s stringent mandate to avoid the use of historic sites.

For those historic properties that have been identified to date, the DEIS purports, in a section entitled "Section 4(f) evaluation," to evaluate various "avoidance alternatives" involving

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different alignment (such as stacking the facility within the existing right-of-way), which alternatives are then rejected based on considerations of cost or community impact. However, this evaluation fails to consider many, less drastic but equally effective design options for avoiding impacts to Section 4(f) properties, and defers altogether any consideration of efforts to minimize harm to Section 4(f)-protected historic properties. Instead, the DEIS states that this evaluation will be undertaken through the Section 106 process, and in "[s]ubsequent steps in the Section 4(f) Evaluation process." DEIS, Vol. I, at 4(f)-13, 4(f)-15.

As we now discuss, when these "subsequent steps" in the Section 4(f) evaluation are carried out, the FHWA must undertake a careful and hard look at the interchanges for the project, and will be required to reconsider a number of the design options that have been presented in the DEIS. Some of these design options and alternatives are identified and discussed below.

DEIS Must Evaluate Design Options for Interchanges that Would Reduce the Project 3. Impact on the Community and On Protected Resources.

Notably absent in the DEIS/Section 4(f) Evaluation is any consideration of alternative design options for the interchanges on I-64. The City of Richmond Heights believes that the FHWA is obligated under both NEPA and Section 4(f) to consider alternative designs that will reduce the footprint and impact of these massive interchanges on the community. Moreover, given the FHWA's obligation to evaluate alternatives and minimize harm to properties protected by Section 4(f), the FHWA must consider interchange design options that involve slightly lowered design speeds and compressed designs, such as a compact diamond for the Big Bend and Hanley Road interchanges. These interchange design options, which have not been considered in the DEIS, are reasonable, prudent, and feasible alternatives that would avoid and/or minimize harm to historic properties and residences and businesses within the City of Richmond Heights.

The evaluation of alternatives is the "heart" of an environmental impact statement," and the FHWA must consider all reasonable alternatives that would further the purpose and need of the project. See City of Grapevine v. Department of Transportation, 17 F.3d 1502, 1506 (D.C. Cir. 1993), cert. denied, 513 U.S. 1043 (1994) (citing 40 C.F.R. § 1502.14). The DEIS states that the purpose of the Project is to reconstruct a 10.9-mile segment of I-64 and its interchanges in order to replace deteriorating and substandard interchanges, and improve safety, and improve traffic operation and decrease cohesion, and promote community redevelopment. DEIS, Vol. I, at I-11.

Notably, increasing highway capacity is not a project goal for most of the project except for the segment between Spoede Road and I-170. Id. In particular, MoDoT does not propose to increase the capacity of the segment of I-64 east of Brentwood Blvd., in order to protect the

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residential and commercial properties that are densely developed on either side of I-64. Instead, the Level of Service on I-64 in the design year under the Build Alternative will be "C" or "D." <u>Id.</u> Table II-11. A "D" level of service represents an "unstable flow" with "lower speeds." <u>Id.</u>, Table I-3.

Despite the fact that the DEIS does not contemplate free-flowing traffic on the Main Line even under the preferred alternative, with respect to interchanges, the DEIS applies a design criteria applicable to a free-flowing, high-speed freeway. As a result, the DEIS sets forth only interchange options that full satisfy current design standards, and fails to consider any design options that deviate in any way from these design standards. The rigid application of design standards to all interchanges results in massively-sized ramps and lengthy merge/weave lanes that will destroy or harm hundreds of homes and businesses in the City of Richmond Heights.

However, the FHWA has an obligation under Section 4(f)(2) to minimize harm to historic properties. One such alternative is design options involving compressed ramps on interchanges and lowered design speeds, which would reduce the footprint of the interchange, and therefore reduce the impact of these facilities on adjacent properties. This alternative cannot be rejected simply because these design options do not conform to "current design standards." The FHWA's regulations specifically permit the FHWA to grant design exceptions where conditions warrant that exceptions be made. 23 C.F.R. § 625.3(f). Likewise, FHWA guidance acknowledges that highways can be flexibly designed to protect scenic and historic values, including by lowering design speed, where appropriate. FHWA, Flexibility in Highway Design, at xi (FHWA-PD-97-062).

As the DEIS points out, many of the current interchanges are well below the generally accepted standards. Bringing those configurations closer to current design standards will realize significant safety improvements over the existing conditions, even if a design variance is required in order to retain the flexibility to avoid or minimize harm to historic properties. In this context, the FHWA cannot simply rely on the purported need to satisfy "current design standards" as a talisman for refusing to evaluate alternative design concepts that would minimize harm to Section 4(f)-protected properties. Stop H-3 Association v. Coleman, 533 F.2d 434, 1446 (9th Cir.), cert. denied, 429 U.S. 999 (1976) (FHWA cannot reject alternative of tighter ramps based on conclusorily-stated "safety" concerns).

4. The DEIS Fails To Adequately Evaluate the Alternative of Eliminating the Bellevue Interchange.

The City of Richmond Heights strongly believes that the DEIS improperly rejected the design option of eliminating the Bellevue interchange, an alternative that would both reduce

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Letter No. 13 – Andrea C. Ferster Law Offices for City of Richmond Heights (page 5 of 8)

community and environmental impacts, reduce project costs, and further the purpose and need for the project by improving safety, traffic operations, and community redevelopment. As the DEIS acknowledges, traffic operation problems exist due to the "many interchange access points spaced close together, tight weaving and short merging and diverging areas." DEIS, at I-19. Nowhere is this more apparent than with the interchange with Bellevue Road, a purely local road that, as the DEIS acknowledges, is located in close proximity to the Big Bend interchange. Id.

According to the DEIS, the "no interchange" option at Bellevue Avenue was found during the initial interchange screening process "to provide the most benefits, due to improved access management, traffic operations, impacts to environment, social environment and cost." DEIS, Vol. II, at A-9. The DEIS also notes that "removing access and traffic from Bellevue Avenue provided the greatest benefits to traffic operations specific to Bellevue Avenue." Id. For those reasons, the Major Transportation Investment Analysis (MTIA) prepared for St. Louis in 1998 did not recommend that any improvements be made to the Bellevue interchange, but instead, would have eliminated the access at Bellevue Road for vehicles westbound on I-64, and added a "U-ramp" at McCausland Avenue. DEIS, at I-9. The MTIA is the basis used for the DEIS

However, in reference to St. Mary's Health Center, whose emergency entrance is located on Bellevue Avenue, the interchange screening process also recognized that a half-diamond interchange could be effective "if access at Bellevue Avenue is determined to be necessary for emergency response." DEIS, Vol. II, at A-9 (emphasis added). Therefore, the interchange screening process recommended that the "no interchange option" along with a half diamond interchange option be carried forward for discussion in the DEIS. Id, at A-10.

However, the DEIS contains no indication that any reasoned determination was made that access to Bellevue Avenue was "necessary for emergency response." Instead, the DEIS merely notes that access to I-64 through Bellevue Avenue "provides a direct route to the emergency facilities of St. Mary's Hospital and minimizes the cut through traffic in the neighborhood." DEIS, Vol. I, at II-17. The DEIS then simply concludes that "the no interchange option at Bellevue Avenue was considered detrimental and emergency response times." Id.

Significantly, there is no reference in the DEIS that any travel time studies were conducted evaluating and comparing travel times for eastbound vehicles on I-64 coming to the hospital using the Bellevue exit as opposed to exiting at the Big Bend interchange or the McCausland Avenue "U-ramp" previously considered. Nor does the DEIS even claim that a differential in travel times will have an impact on persons seeking medical care at St. Mary's, or provide any data or information about the number or type of traumas received at St. Mary's Health Center, or other information that would support the bare assertion that loss of access to I-64 at Bellevue is "detrimental" to emergency response time. Thus, there is no data that demonstrates that the

Comments on DEIS by City of Richmond Heights, MO The New I-64 in St. Louis and St. Louis Co., MO April 14, 2003 Page 7

elimination of the Bellevue Avenue interchange would be "detrimental to response times." However, as noted above, the City has not yet received a response to its request for the underlying documentation upon which the conclusions in the DEIS rest. The City therefore reserves the right to supplement this response upon receipt of the requested documentation.

Because of the significance that the DEIS appears to place on the highly conclusory and vague assertions about the hospital's need for access from I-64 at Bellevue, the City of Richmond Heights has commissioned its own travel-time study to compare the travel times of using other interchanges to exit I-64 to access St. Mary's Hospital. The results of this study are attached. According to this study, increases in the inbound travel times ranged from 8.5 to 43.8 seconds, depending on the route used. Moreover, medical transport providers work within the limitations placed upon them and often modify routing to accommodate short-term and longer term access impacts. For example, MoDOT currently has two adjacent interchanges closed along I-270 that have eliminated access to Christian Northeast Hospital at the Graham Road interchange during the reconstruction of the north terminus of I-170 (approximately two years time-frame). MoDOT chose this construction alternative based on total time to complete the interstate improvement project. The impact on emergency response times was obviously of marginal significance to MoDoT's decision to close the interchange adjacent to that medical institution.

Here, the planned interchange at Bellevue would require the demolition of at least one historic property, a large multi-family apartment building located at 1330/1338 Hawthorne Place, which is individually eligible for listing in the National Register, and thus, entitled to protection under Section 4(f). DEIS, Vol. I, at 4(f)-14. The Section 106 process may well identify additional historic properties that will be taken by this unnecessary interchange. In the context of Section 4(f), the rationale offered in the DEIS for retention of the Bellevue interchange in order to satisfy vague and unspecified needs for access to St. Mary's Health Center simply does not constitute a cost or community disruption of "extraordinary magnitude" justifying the rejection of an alternative as imprudent. See, e.g., Association Concerned About Tomorrow, Inc. v. Dole, 610 F. Supp. 1101, 1117 (D. Tex. 1985) (dislocation of school did not constitute community disruption of "extraordinary magnitude"); Stop H-3 Association v. Dole, 740 F.2d 1442, 1451 (9th Cir. 1984), cert. denied, 471 U.S. 1108 (1985) (dislocation of one church, four businesses, and 31 residences did not constitute community disruption of "extraordinary magnitude").

Elimination of this interchange would plainly satisfy the purpose and need of the project; indeed, the preliminary screening of this alternative suggests that it would satisfy the project purpose of reducing congestion and promoting safety better than the reconstruction of this interchange. DEIS, Vol. II, at A-9. Nor is the City's concern about the impact of St. Mary's-bound traffic on neighborhood residential streets well-founded. Rather, the City's greater concern is for the residential neighborhood in the immediate vicinity of the Bellevue interchange, which is

Comments on DEIS by City of Richmond Heights, MO The New I-64 in St. Louis and St. Louis Co., MO April 14, 2003 Page 8

adversely affected by the additional traffic using Bellevue to exit and enter I-64. This traffic is more appropriately routed to Big Bend Boulevard, which, as the DEIS itself notes, is already a principal arterial road. For that reason, the City would consider closure of the Bellevue Avenue at the location of I-64 in order to protect the integrity of that residential neighborhood.

In short, elimination of this interchange is a prudent and feasible alternative that would avoid the destruction of this significant historic property, and the rationales for rejecting this alternative contained in the DEIS do not satisfy the stringent Overton Park standard. This alternative therefore *must* be selected under Section 4(f).

The DEIS Improperly Rejects the Stacking Alternative for the Segment of I-64 Between I-170/Brentwood Blvd. and Hanley Road.

The DEIS discloses that the preferred Thruway Alternative 3, involving a collector and distributor road system between Brentwood Boulevard and Hanley Road that is adjacent to the freeway mainlines, will take eight properties within the Lavinia Street historic district. DEIS, at IV-65, 4(f)-10. The DEIS suggests that Thruway Alternatives 2 and 2a, which would narrow the footprint of the new roadway by depressing and stacking the C/D roads, would "impact" only six properties within the Lavinia Street Historic District, and an additional cost of more than \$ 66 million.

The City believes that the costs of this option are inflated, and do not take into consideration overall reduction in project costs associated with eliminating the Bellevue Interchange. The City also believes that the impacts of this alternative are overstated, and that again, design variances should be considered in order to further reduce the impacts of this alternative on historic properties, as required by Section 4(f). However, it is not possible for the City to comment any further without the detailed information requested from MoDOT Once this documentation is received, the City will provide more detailed comments on this alternative.

Conclusion

The DEIS fails to identify or evaluate interchange design options that will reduce and minimize community disruption and harm to historic properties, the City of Richmond Heights. Because the Section 4(f) Evaluation is incomplete and cursory, the City requests that a new draft Section 4(f) Evaluation be circulated upon completion of the identification phase of the Section 106 process, and that the draft document include a detailed evaluation of alternative designs for the interchanges and associated merge/weave lanes that would reduce impacts on historic properties.



OFFICE OF THE MAYOR CITY OF St. Louis Missouri

FRANCIS G. SLAY MAYOR CITY HALL - ROOM 200 1200 MARKET STREET SAINT LOUIS, MISSOURI 63103-2877 (314) 622-3201 FAX: (314) 622-4661

June 17, 2003

Mr. Ed Hassinger
District Engineer
Missouri Department of Transportation
1590 Woodlake Drive
Chesterfield, Missouri 63017-5712

RE: Reconstruction of I-64

Dear Mr. Hassinger:

This is to confirm my support for the various options set forth in the Draft Environmental Impact
Statement (DEIS) relative to the reconstruction of I-64. I also support, on behalf of the City of
St. Louis, the proposed mitigation measures proposed in the Forest Park area and believe that the
entire project will enhance access to I-64 as a whole.

We appreciate the opportunity you have afforded representatives from the City to be involved in creating these mitigation strategies, and wholly support the DEIS as drafted. It has truly been a pleasure working with you in this critical project.

Sincerely,

Francis G. Ślay

Mayor, City of St. Louis

/dr

City of Frontenac



SAUNDRA SOBELMAN

Ms. Lesley Sollinger Hoffarth Missouri Department of Transportation 1590 Woodlake Drive Chesterfield, MO 63107

July 16, 2003

Dear Ms. Hoffarth:

The City of Frontenac would like to thank you and the staff at MoDOT for your earnest consideration of the city's requests during the initial planning stage of the New I-64 project. We feel that we were heard and that your organization responded with acceptable alternatives for each issue brought forward. We know that in the years ahead we will encounter additional situations that will require a continuation of our productive working relationship.

We support the MoDOT Draft EIS allowing for full access at Spoede Road via "roundabouts", on the west side of the Spoede Road overpass, as designed. This alternative maintains the natural tree boundary on the North side of the highway and has minimal property impact on the South side of the highway. Various options were presented to the city and it's residents, and this is what we agree is the most viable for our community.

Options A, B and C, which address the corridor east of Spoede Road to Lindbergh, would each move the highway significantly closer to the residential area than the highway is currently. In addition, Option A, the preferred option in the DEIS, causes the loss of two established local businesses as well as the City of Frontenac's Public Works building creating a negative impact on the operational budget of the City. The complete removal of the existing tree line, which serves as a visual buffer for the homes to the north, to accommodate the additional lanes of highway, is not acceptable to the City of Frontenac. With acceptance of either Option A or B, even with the addition of sound abatement on the north side of the highway, the proximity of the highway to the homes would be detrimental to the quality of life of these residents. At a public meeting arranged by MoDOT, of homeowners of adjacent subdivisions, the overwhelming majority of those directly affected by the expansion of Highway 40 support Option C, as anything less would deteriorate their quality of life and devastate their property values. The objective of MoDOT, relative to the communities the highway impacts, considering input from the Greenway Corridor Committee,

10555 CLAYTON ROAD • FRONTENAC, MO 63131 • PHONE 314-994-3200 • FAX 314-994-3203

municipal leaders and residents, was to maintain the character of the neighborhoods. It is the City of Frontenac's request that MoDOT take into account these factors in making a final determination on the highway corridor between Spoede and Lindbergh.

Residents of Frontenac are quite pleased that all of the plans for highway improvement provide sound abatement measures. Clearly, the sooner these steps could be implemented to improve the quality of life for those directly affected by noise and lights generated from the high volume of cars and trucks on the highway, the better. We expect that our community will, wherever physically possible, receive this abatement prior to the start of construction. This will be critical to a less intrusive construction undertaking and will further demonstrate MoDOT's consideration for its neighborhoods.

The City of Frontenac understands the necessity for improvements to the I-64 Corridor. We are supportive of MoDOT's efforts to enhance the quality and safety of this highway, which our resident's and visitors utilize with such frequency. We look forward to continuing our positive rapport with MoDOT throughout the design and implementation of this project.

Sincerely,

Saundra Sobelman Mayor, City of Frontenac

cc: Frontenac Board of Aldermen



6420 Clayton Road St. Louis, MO 63117-1872 (314) 768 8000 phone www.stmarys-stlouis.com

August 13, 2003

Lesley Solinger Hoffarth, P.E. Project Manager, The New I-64 Missouri Department of Transportation 1590 Woodlake Drive Chesterfield, MO 63017-6712

Dear Ms. Hoffarth:

In response to your request for information pertaining to the necessity of the westbound ramp onto I-64, following is information pertaining to cases received by our Emergency Department monthly as well as information regarding ambulances routed from our facility. Additionally, I have enclosed several letters documenting the vital need for access ramps to and from Bellevue and I-64.

We have spoken with all of the ambulance districts that transport patients to St. Mary's Health Center. They all stated they get called back into service from here, but the ones most impacted are Brentwood and Gateway. More than 500 patients per month arrive by ambulance. That means 500 ambulances will be traveling through the neighborhood streets to get back onto Big Bend heading west bound. Additionally, records show 10% of the ambulances leaving are sent directly to another call utilizing the west bound ramp from Bellevue, which means that approximately 50 ambulances a month would be driving rapidly through neighborhoods to access Big Bend if the Bellevue west access is closed.

Quite obviously any changes to the Bellevue interchange would most critically impact emergency patients and physicians who travel to and from St. Mary's Health Center and the four medical office buildings on our campus. However, I would also like to call your attention to other people who will be impacted if the Bellevue interchange is altered or eliminated – non-emergency patients, family members and visitors, and our employees. On any given day this collective group could equate to approximately 3,000 vehicles. On any given day this collective group could equate to approximately 3,000 vehicles. Many of them eliminated. That would have a dramatic impact on the serenity and safety of those neighborhoods. In addition, the influx of a large number of vehicles through the Clayton/Big Bend intersection — already one of the most dangerous in St. Louis — could intensify the danger to drivers and pedestrians.

Recently, more than 1,000 citizens from this community, along with the Missouri Hospital Association, St. Louis Metropolitan Medical Society, the Missouri Medical Society, EMS, the Clayton Chamber of Commerce (whose primary objection to closing the Bellevue exit was the resulting increase in congestion on Clayton streets and increased danger to its citizens), and CEO's from the other acute care facilities in the St. Louis area formally voiced their opinion to the city leaders that they wanted the Bellevue interchange to remain as is. It is

THROUGH OUR EXCEPTIONAL HEALTH CARE SERVICES, WE REVEAL THE HEALING PRESENCE OF GOD.

Lesley Solinger Hoffarth, P.E. Project Manager, The New I-64 August 13, 2003 page 2

important that their collective voice be heard and advice followed. Sadly, it is obvious the city leaders are not listening to anyone outside their **extremely small circle of those who wish to close the Bellevue exit.** The expression "don't confuse me with the facts" applies quite appropriately to the current city leaders.

If I can be of further assistance or provide you additional data, please let me know.

Sincerely,

Kenneth W. Lukhard

Xulehard

President

KL/ct

: S. Hoven

No. 02-22-A

RESOLUTION

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF RICHMOND HEIGHTS, MISSOURI, ENCOURAGING THE SELECTION OF THE MOST EFFICIENT AND LEAST DETRIMENTAL PLANS OF HIGHWAY IMPROVEMENTS AFFECTING THE NEIGHBORHOODS OF THE CITY OF RICHMOND HEIGHTS.

WHEREAS, the Missouri Department of Transportation (MoDOT) is currently designing the rebuilding and expansion of highways I-64 and I-170; and

WHEREAS, the City of Richmond Heights is situated at the hub of the regional cross-county transportation corridor and acknowledges the highway expansion project will have significant impact on our City; and

WHEREAS, throughout MoDOT's design process, the City has made every effort to reduce the potential for residential properties to be impacted; and

WHEREAS, the City of Richmond Heights which was incorporated in 1913, lost hundreds of homes and residents when I-170 and Highway 40 were originally constructed; and

WHEREAS, given the City of Richmond Heights' past sacrifices on behalf of regional transportation and the importance of the City's quiet neighborhoods, the Council believes that the reconfiguration of those highways should minimally impact the City, its residents, and neighborhoods; and

WHEREAS, the City recognizes the magnitude of the changes that may occur due to this expansion, thereby affecting our residents, businesses and neighborhoods, ranging from removal of homes, new traffic patterns on our local roads and reducing the quality of life in our community; and

WHEREAS, the proposed expansion of the Big Bend Blvd. interchange at I-64 would result in the loss of still more homes in our City; would increase the encroachment on residential properties that abut the highway; and would substantially impact the volume of traffic on Big Bend Blvd., and

WHEREAS, despite the proposed expansion of the Big Bend Blvd. interchange, a proposal to leave open the Bellevue Avenue access to I-64 remains a concurrent plan which would result in the loss of still more homes and residents; would increase the visual, noise, and air pollution at the Big Bend/Bellevue corridor; and that the additional ingresses/egresses to the Highway at Big Bend Blvd. and Bellevue could possibly conflict

with federal regulations regarding safe distances between exit and entrance ramps and would result in more congestion at said locations and

WHEREAS, the construction of a four-way highway interchange at Big Bend Blvd. and the expansion of the entrance and exist ramps of Bellevue Avenue to accommodate such a configuration would substantially increase the cost of construction to MoDOT which has limited funds available for the Metropolitan Area's transportation needs; and

WHEREAS, the City of Richmond Heights is charged with protecting the health, safety and welfare of our neighborhoods, residents and businesses.

NOW, THEREFORE, BE IT RESOLVED, BY THE COUNCIL OF THE CITY OF RICHMOND HEIGHTS, MISSOURI, as follows:

- 17A SECTION 1. The City Council of Richmond Heights recommends that MoDOT make every effort to minimize the impact on properties in our community when redesigning I-64.
- 17B <u>SECTION 2</u>. The City Council recommends that MoDOT make every effort to minimize the impact on properties at the Hanley Downs and Sheridan Hills subdivisions.
- MoDOT, as they consider modifications to the Big Bend/Bellevue corridor, make a choice to either to keep the access ramps to Bellevue Avenue open and leave Big Bend Blvd. a limited access two way interchange OR if Big Bend Blvd. is to be expanded to a four way interchange, then to close the highway access to Bellevue Avenue; but in any event, we request that MoDOT consider only one of these project designs, not both.

SECTION 3. This Resolution shall be in full force and effect from and after the date of its adoption and shall remain in effect until amended or repealed by the City.

ADOPTED this 18th day of November, 2002.

Γ:

PATRICIA S. VILLMER

DEPUTY CITY CLERK

June 10, 2003

David T. Lenczycki, PE HNTB Corporation 10 South Broadway, Suite 400 St. Louis, Missouri 63102

Dear Mr. Lenczycki:

Steve Hoven forwarded to me your e-mail request for additional information concerning the severity of the cases we treat annually in our Emergency Department. I have attached an overview of the life threatening situations we face daily, which illustrates clearly how crucial the "time" factor is to these patients.

I have also included for your information and reference a letter I sent recently to Ed Hassinger, District Engineer for MO DOT-District 6, and Don Neumann, Programs Coordinator, Federal Highway Administration-Missouri Division.

I hope this information will assist you in revising the I-64 EIS as well as in responding to comments and questions about how critical it is to the citizens of our community to maintain the Bellevue exit.

Sincerely,

Kenneth W. Lukhard President

/ct

cc: S. Hoven

St. Mary's Health Center, Emergency Department 2002 Overview

With the renovation of Highway 40, the St. Louis Community has a "once in a lifetime" opportunity to effect patient outcomes by improving access to St. Mary's Health Center Emergency Department. Improved access facilitates arrival to the Emergency Department, decreasing delay times. Although St. Mary's ED is not a trauma center, many patients with life-threatening Illnesses are treated every day. Heart disease is the number one killer and there are many other diseases that take the lives of Americans in our community daily.

2 22/DAY

More than 8000 patients a year are rushed to St Mary's Health Center of St. Mary's ED sees over 38,000 \$ 109/644

- Seconds count in a heart attack, and time is heart muscle. Last year, heart attacks killed more than a million Americans. What makes these deaths more tracic is that more than half of them occurred before reaching the hospital. When a heart attack strikes, the primary focus is early intervention to prevent acute myocardial infarction (heart damage) and full cardiac arrest. Chest pain is the number one complaint that brings people to St. Mary's Health Center Emergency Department. More than 275 patients a month are admitted to our Intensive Care units due to heart attacks. Patients should receive "clotbuster' medication or go to the cardiac catheterization lab as soon as possible after the onset of chest pain. Any delay in travel can cause serious consequences including heart damage, brain injury within 6-7 minutes, or even death.
- Stroke patients are similar to heart patients in that early intervention with clot-busting drugs can produce dramatic results and improve outcomes. Thrombolytic thorapy with these patients must be given within 3 hours of the symptom onset. Time is brain tissuel The faster these patients are identified and transported to the ER, the better chance they have to receive life-improving drugs. In 2002, 38 stroke patients have gone to the Intensive Care Units. Only 10 patients have arrived soon enough to receive the drug.
- Patients with severe infections and meningitis need antibiotics as soon as possible. This has become a large concern with West Nile virus. Twenty-three of the meningitis patients were admitted to the Intensive Care Units.
- Ectopic pregnancy is seen frequently at St. Mary's Health Center because of our longstanding reputation of providing advanced care for women's health issues. This year we have seen 31 patients with ectopic pregnancy, which is a critical condition that can cause shock from internal bleeding and requires quick interventions in our operating rooms
- Drug overdoses are more and more common. Time is vital so that the body does not absorb drugs and substances. This is a life and death situation where seconds truly count. At present, St. Mary's provides care for 15 patients a month suffering from an overdose
- Known regionally for providing a very high level of specialized care for women and babies, we have more than 2000 babies delivered a year. As a "High Risk" pregnancy center, time is of the essence in seeing these moms and babies. Most of these patients arrive by car, and some arrive by ambulance. It is very important that these patients have easy and quick access. In 2002, the Emergency Department staff delivered two babies in the driveway.

May 29, 2003

Mr. Ed Hassinger District Engineer Missouri Department of Transportation – District 6 1590 Wood Lake Drive Chesterfield, Missouri 63017-5712

Dear Mr. Hassinger:

I have reviewed the letter sent to Mr. Don Neumann from Andrea C. Ferster, attorney for the City of Richmond Heights. In particular, I read with special Interest section 4 in which the City asserts that "The DEIS fails to adequately evaluate the alternative of eliminating the Bellevue interchange." Having read this letter and the City's reported time studies, I am not surprised that they conclude that closure of the Bellevue exit represents their preferred alternative. That "conclusion," however, reflects a narrowness of thought that began with an end in mind and ignored significant issues from various stakeholder perspectives. I would like to respond to the City's desire to close the Bellevue exit by stressing a few satient points:

ADVICE OF THE MEDICAL COMMUNITY

Dozens of physicians and emergency room personnel have sent letters, placed phone calls, and attended meetings in an effort to educate the City of Richmond Heights and MO DOT as to the importance of maintaining direct access to the Emergency Department at SSM St. Mary's Health Center. In medical emergencies, time is life. Each week 700 to 800 patients are brought to or transport themselves to our Emergency Department for care. Some are critically ill, where 20 to 30 seconds can be the margin of difference between life and death.

In addition to the physicians and ER personnel of St. Mary's, other medical organizations have strongly supported the position to maintain the Bellevue exit. The St. Louis Medical Society (our community's physician organization), Missouri Medical Society, EMS, and the Missouri Hospital Association have been adarment in this regard. In addition, the hospital CEOs of Medical Centers up and down the 40/61 corridor have all formally communicated their request to keep the Bellevue exit open and functional.

2. IMPACT TO CLAYTON ROAD & SURROUNDING SIDE STREETS

The closure of the Believue exit has been formally opposed by the Board of the Clayton Chamber of Commerce due to the extremely negative impact that 21,000 cars per week would have on Clayton Road and other side streets. Both businesses and residents would suffer from this deluge of new traffic.

Mr. Ed Hassinger May 29, 2003 page 2

3. TIME STUDIES

The time studies quoted by the City of Richmond Heights are, at best, highly suspect. When this controversy arose over two years ago, several members of our executive team and I drove the various routes to our Health Center, methodically timing each route. The extra time it took to exit Highway 40 both west and east of the Bellevue ramp encoute to our Emergency Department varied from 30 seconds to 3 ½ minutes. For exempla, one option is to exit Highway 40 at Hanley Road and access St. Mary's via Clayton Road. This route encounters eight (8) stoplights plus two (2) yield signs. When a patient is transported by embulance, those 8 stoplights and 2 yield signs can be gone through without stopping. However, many patients in medical crisis arrive in personal automobiles that cannot disregard red lights or normal traffic congestion. Such a delay would prove fatal for a number of our patients. Direct access to a busy emergency department (37,000 visits in 2002) is essential.

4. PUBLIC OPPOSITION TO CLOSING BELLEVUE EXIT

The general public is opposed to the idea of closing the Bellevue exit. When people are informed as to the impact that 21,000 cars per week redirected from Bellevue would have upon their town and neighborhood, they strongly support keeping this vital exit open. One thousand letters from concerned citizens have voiced support of retaining Bellevue. How many letters were received from residents supporting the closure of Bellevue?

In surnmary, the reason that the Richmond Heights City Council stands alone in their desire to close Bellevue is that they represent an extremely small vocal group of homeowners who will be negatively impacted if the Bellevue exit remains open. The reason that St. Mary's Health Center has such a broad base of support to keep the Bellevue exit open is because it is logical and makes sense to physicians, hospital emergency department personnel, EMS, the Cleyton Chamber of Commerce Board, our St. Louis Medical Society, the Missouri Medical Society, competing hospitals, and the vast majority of residents of Richmond Heights including those living on Bellevue Avenue.

Thank you for the opportunity to express our thoughts on this vitally important issue.

Respectfully.

Kenneth W. Lukhard President

KUd

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The Honorable Betty Humphrey, Mayor-City of Richmond Heights Willie Taylor, Director, Office of Environmental Affairs-U.S. Department of the Interior Don Kilma, Advisory Council on Historic Preservation Kevin Kelth, Chief Engineer-MO DOT

Stephen Mahfood, SHPO

Don Neumann, Programs Coordinator, Federal Highway Administration-Missouri Division

4. RESPONSES TO AGENCY AND CITY COMMENTS

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

COMMENT CODE: 1

SOURCE: U.S. Department of Energy

RESPONSE: Comment noted and appreciated.

APPLICABLE REFERENCE: Chapter IV, S. 7.

COMMENT CODE: 2A

SOURCE: U.S. Department of Housing and Urban Development

RESPONSE: Relocation assistance payments are designed to compensate displaced persons for costs that have been imposed on them by a MoDOT project. These payments, which are determined by the amount of time in the displaced dwelling, include the amount by which the cost of a replacement dwelling exceeds the acquisition cost of the displacement dwelling, increased interest costs and incidental costs. The Uniform Act requires that comparable, decent, safe and sanitary replacement housing within a person's financial means be made available before that person may be displaced. MoDOT must follow the Uniform Act.

APPLICABLE REFERENCE: Chapter IV, C. 2.

COMMENT CODE: 2B

SOURCE: U.S. Department of Housing and Urban Development

RESPONSE: Public comments requesting noise barriers have been received and MoDOT is committed to fully exploring noise mitigation. To this end, MoDOT follows an established noise policy which includes conducting public meetings to determine consensus on the desire for walls at specific locations, and determining eligibility, location, type, and aesthetics of noise mitigation. These tasks will be conducted during the subsequent design process.

APPLICABLE REFERENCE: Summary, E. 3. c.; Chapter IV, H. 4.

COMMENT CODE: 3

SOURCE: USDA/Natural Resources Conservation Service

RESPONSE: Comment noted. The area referenced is outside of the study area.

APPLICABLE REFERENCE: None

COMMENT CODE: 4A

SOURCE: U.S. Environmental Protection Agency

RESPONSE: The Cultural Resources Report, concurrence by the SHPO, supplemental information from the City of Richmond Heights and DEIS and Section 4(f) Evaluation were transmitted to the Keeper of the NRHP by FHWA on February 9, 2004. The Keeper was given 45 days to respond to the eligibility of the individual architectural resources, the bridges and the historic districts as enumerated in the Cultural Resources Report. The FEIS was amended to include the Keeper's decision on the eligibility of the individual architectural resources, the bridges and the historic districts as listed in the Cultural Resources Report. The Programmatic Agreement has been executed by the signatory parties and this closes the Section 106 process. The executed Programmatic Agreement is shown in Appendix K.

APPLICABLE REFERENCE: Section 4(f)

COMMENT CODE: 4B

SOURCE: U.S. Environmental Protection Agency

RESPONSE: There were minority and low-income populations identified in the Thruway and Parkway subcorridors. There are residential acquisitions within these subcorridors but the impact to these special populations is not disproportionate to the impacts on the rest of the population. In order to minimize the impact on those whose property is being acquired, relocation assistance payments are available. These payments are designed to compensate displaced persons for costs that have been imposed on them by a MoDOT project. These payments, which are determined by the amount of time in the displaced dwelling, include the amount by which the cost of a replacement dwelling exceeds the acquisition cost of the displacement dwelling, increased interest costs and incidental costs. The Uniform Act requires that comparable, decent, safe and sanitary replacement housing within a person's financial means be made available before that person may be displaced. MoDOT must follow the Uniform Act.

Other possible impacts to residents in the corridor, including minority and low-income households, include vehicle access to I-64, pedestrian access, transit access, noise and construction impacts. Changes in access to these neighborhoods would not adversely affect the residents and would ultimately improve the access to these areas. Pedestrian access in all of the subcorridors would be enhanced within the state right of way and in the parkway some pedestrian access is being relocated to make it more accessible to residents and public transportation. Pedestrian access within the project area is also being improved where necessary to comply with ADA standards. Considerations in the planning of ramp capacity have been made to accommodate vehicle and pedestrian trips to two new light rail stations. MoDOT will follow its policy on noise abatement (Chapter IV, Section H) to mitigate noise impacts and will provide for additional public input during the design phase. MoDOT will develop maintenance of traffic and construction schedules with the goal of reducing construction-related impacts to residents throughout the corridor.

APPLICABLE REFERENCE: Chapter IV, B. 5. b.; Chapter IV, S.

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COMMENT CODE: 4C

SOURCE: U.S. Environmental Protection Agency

RESPONSE: This project is included in the conformity analysis concluded by the East-West Gateway Coordinating Council. In order to meet the standards the region will follow transportation control measures outlined in the plan. The project will be required to comply with the new conformity requirements, and further conformity analysis may be required for the proposed action.

APPLICABLE REFERENCE: Chapter IV, G. 2.

COMMENT CODE: 4D

SOURCE: U.S. Environmental Protection Agency

RESPONSE: The text has been amended to reflect that the information is based on 1998 data and that although the Index of Watershed Indicators is not current, this is the most recent information available.

APPLICABLE REFERENCE: Chapter III, B. 2. a.

COMMENT CODE: 4E

SOURCE: U.S. Environmental Protection Agency

RESPONSE: A map indicating the geographic boundaries of areas that have low income households has been added to the FEIS. A map indicating the geographic boundaries of areas with minority households is shown on an exhibit that appeared in the DEIS and is included in the FEIS.

APPLICABLE REFERENCE: Exhibit IV-2a and IV-2b

COMMENT CODE: 4F

SOURCE: U.S. Environmental Protection Agency

RESPONSE: To clarify the response, an adverse impact means that those properties will be acquired. The adverse effect on the Lavinia Gardens Historic District consists of the removal of four buildings from the district, which contains nineteen contributing primary resources. The district will still retain eligibility for listing on the NRHP following the construction of this project. Continued design to minimize impacts has eliminated the adverse effect on the Clayton Park Addition (Bennett Avenue) District, which will continue to be eligible for the NRHP following the construction of this project.

APPLICABLE REFERENCE: Chapter IV, O. 4.

COMMENT CODE: 5A

SOURCE: U.S. Department of the Interior

RESPONSE: It is the procedure for FHWA to not make a determination until the FEIS is completed as to whether there are no prudent and feasible alternatives. This makes it possible to review the comments from the public and the agencies, particularly those that oversee the 4(f) properties concerned to consider their input before a final decision is made by FHWA.

APPLICABLE REFERENCE: None

COMMENT CODE: 5B

SOURCE: U.S. Department of the Interior

RESPONSE: Comment noted.

APPLICABLE REFERENCE: None

COMMENT CODE: 5C

SOURCE: U.S. Department of the Interior

RESPONSE: Comment noted.

APPLICABLE REFERENCE: None

COMMENT CODE: 5D

SOURCE: U.S. Department of the Interior

RESPONSE: Comment noted.

APPLICABLE REFERENCE: None

COMMENT CODE: 5E

SOURCE: U.S. Department of the Interior

RESPONSE: Following comments on the DEIS, the Preferred Alternative was redesigned and

no longer impacts The Heights Community Center.

APPLICABLE REFERENCE: None

COMMENT CODE: 5F

SOURCE: U.S. Department of the Interior

RESPONSE: A specific mitigation plan has been developed by MoDOT and FHWA and has been presented to the City of Richmond Heights. Richmond Heights has obtained input from

the adjacent neighborhoods, met with MoDOT a second time and has provided comments on the mitigation plan. A letter from Richmond Heights describing features that the City desired to be considered as part of the mitigation plan was provided by the city and is included in the Section 4(f) appendix.

APPLICABLE REFERENCE: Section 4(f)

COMMENT CODE: 5G

SOURCE: U.S. Department of the Interior

RESPONSE: Noise levels generally increase by one decibel as a result of moving at least one travel lane closer to a receiver. Lowering the grade of the roadway facility at this location may negate that effect. A one decibel increase would be an imperceptible change in noise level to the high levels already experienced in this area. Therefore since the upgraded roadway facility would not substantially impair the utility of the park, there would not be a constructive use impact.

APPLICABLE REFERENCE: None

COMMENT CODE: 5H

SOURCE: U.S. Department of the Interior

RESPONSE: Comment noted.

APPLICABLE REFERENCE: None

COMMENT CODE: 51

SOURCE: U.S. Department of the Interior

RESPONSE: On February 26, 2003 the City of St. Louis sent a letter to MoDOT confirming that the Department of Parks, Recreation and Forestry has had an opportunity to review the Draft EIS and understands the impacts to Forest Park. The letter stated that the Parks Department understood and concurred that the proposed mitigation efforts as described in the 4(f) Section of the DEIS are appropriate. On June 17, 2003, the Office of the Mayor of the City of St. Louis also sent a letter supporting the proposed mitigation measures proposed in Forest Park.

APPLICABLE REFERENCE: Appendix 4(f)-J

COMMENT CODE: 5J

SOURCE: U.S. Department of the Interior

RESPONSE: Comment noted. DOI concurs there would be no 4(f) use of Highland Park and

no impact to the 6(f) property either.

APPLICABLE REFERENCE: None

COMMENT CODE: 6

SOURCE: State Emergency Management Agency

RESPONSE: The text has been revised to reflect the changes suggested in the comment.

APPLICABLE REFERENCE: Chapter IV, L. 1. b.

COMMENT CODE: 7

SOURCE: Missouri State Historic Preservation Office

RESPONSE: Comment noted and appreciated. Bridge K468 has not been included in the list of eligible bridges because it falls outside of the project area and is being dealt with in a separate independent project.

APPLICABLE REFERENCE: None

COMMENT CODE: 9A

SOURCE: Missouri Department of Natural Resources

RESPONSE: Comment noted.

APPLICABLE REFERENCE: None

COMMENT CODE: 9B

SOURCE: Missouri Department of Natural Resources

RESPONSE: It is anticipated that construction of the project will not result in an increase in the floodway elevations and will not otherwise require revisions to the floodplain map. The statement regarding map revision has been deleted from the text.

APPLICABLE REFERENCE: Chapter IV, L. b.

COMMENT CODE: 9C

SOURCE: Missouri Department of Natural Resources

RESPONSE: In Chapter IV, Section J. Water Quality Impacts addresses this issue. The last sentence of the third paragraph of Section J.1.b. mentions the inclusion of drainage basins. The text has been amended as follows: "Temporary and permanent runoff drainage (<u>retention or detention</u>) basins will also be designed and installed to lessen water quality impacts <u>by trapping</u> sediment and other contaminants, while reducing erosive storm surges.

APPLICABLE REFERENCE: Chapter IV, J. 1. b.

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Final Environmental Impact Statement

COMMENT CODE: 9D

SOURCE: Missouri Department of Natural Resources

RESPONSE: MoDOT will consider using native vegetation in disturbed areas as appropriate. The use of native planting and seeding is discussed in Chapter IV, Section J.1.b., end of the second paragraph regarding "methods to minimize impacts". Incorporating native vegetation is also discussed in that same section, in the 4th paragraph.

APPLICABLE REFERENCE: Chapter IV, J. 1. b.

COMMENT CODE: 9E

SOURCE: Missouri Department of Natural Resources

MoDOT will design culverts to appropriate required sizes and will be aware of the hydraulic implications resulting from adequate flows.

APPLICABLE REFERENCE: Chapter IV, J. 1. b.

COMMENT CODE: 9F

SOURCE: Missouri Department of Natural Resources

RESPONSE: In Chapter IV, Section I.4., the second paragraph discusses the incorporation of bio-engineering techniques for bank stabilization, and the use of native seeding and plantings along the buffer zones adjacent to stream banks.

The remainder of Comment No. 9F is a repeat of Comments 9C, 9D, and 9E (see corresponding responses above).

APPLICABLE REFERENCE: Chapter IV, I. 4.

COMMENT CODE: 9G

SOURCE: Missouri Department of Natural Resources

RESPONSE: A list of references was provided at the end of Chapter III in the DEIS, which includes sources of geologic information.

APPLICABLE REFERENCE: Chapter III, C.

COMMENT CODE: 9H

SOURCE: Missouri Department of Natural Resources

RESPONSE: The issue of seismic risks has been addressed through additional text in this

document.

APPLICABLE REFERENCE: Chapter III, B. 3. c.

COMMENT CODE: 91

SOURCE: Missouri Department of Natural Resources

RESPONSE: The text referred to in the comment has been revised to reflect the changes

suggested.

APPLICABLE REFERENCE: Chapter III, B. 3. a.

COMMENT CODE: 9J

SOURCE: Missouri Department of Natural Resources

RESPONSE: The study area is an urban environment making further identification of karst features difficult. However, as project design continues further geo-technical information will be obtained. If karst features are identified they will be taken into account during detailed design and construction.

APPLICABLE REFERENCE: None

COMMENT CODE: 9K

SOURCE: Missouri Department of Natural Resources

RESPONSE: The text referred to in the comment has been revised to reflect the changes suggested. Also, the approximate locations of underground mine entries and shafts, and an estimated extent of mined-out areas within the study corridor are shown in Exhibit III-1B and 1C. These locations were developed from a 1987 map developed by MDNR entitled *Underground Coal and Clay Mines in the city of St. Louis, Missouri.*

APPLICABLE REFERENCE: Chapter III, B. 3. a. and Exhibit III-1B and 1C.

COMMENT CODE: 9L

SOURCE: Missouri Department of Natural Resources

RESPONSE: This information is presented in Chapter III, Section B.3.a. and Chapter IV, Section J.2. Further geotechnical information will be obtained during final design in order to identify geologic characteristics that can influence grading operations and structural design.

APPLICABLE REFERENCE: Chapter III, B. 3. a.

Final Environmental Impact Statement

COMMENT CODE: 9M

SOURCE: Missouri Department of Natural Resources

RESPONSE: Additional consultation with the State Historic Preservation Office (SHPO) has been completed. The building number 193 was removed from list of eligible properties and the Section 4(f) Evaluation based on the SHPO's determination. Bridge K468 has not been included in the list of eligible bridges because it falls outside of the project area and is being dealt with in a separate independent project.

APPLICABLE REFERENCE: Chapter III, B. 6. c. and Section 4(f) Evaluation, D. 1.

COMMENT CODE: 10

SOURCE: City of St. Louis, Division of Parks

RESPONSE: Comment noted.

APPLICABLE REFERENCE: None

COMMENT CODE: 11A

SOURCE: City of Ladue

RESPONSE: The design standard for median shoulder width follows the *Policy of Geometric Design of Highways and Streets*, produced by the American Association of State Highway and Transportation Officials (AASHTO) 2001. This standard is that on freeways of six or more lanes the usable paved width of the median shoulder should be 10 feet and preferably 12 feet where the design hour volume for truck traffic exceeds 250 vehicles per hour, as does this portion of I-64. MoDOT's standard is 12 feet in the urban areas to allow for maintenance and disabled vehicles.

APPLICABLE REFERENCE: None

COMMENT CODE: 11B

SOURCE: City of Ladue

RESPONSE: MTIA identified the need for additional lane capacity on I-64 west of I-170, and this EIS is consistent with that recommendation. ITS and other transportation systems management techniques will be used throughout the entire corridor. There is a large volume of traffic moving between I-170 and the western portion of the county. Additional mainline capacity is included in the preferred alternative from Spoede to I-170 in order to accommodate higher projected volumes in this portion of the corridor.

APPLICABLE REFERENCE: Chapter I, D. 2. and Chapter II, D. 1.

COMMENT CODE: 11C

SOURCE: City of Ladue

RESPONSE: Additional capacity on I-64 from Spoede to I-170 should contribute to improving

the mobility of the local arterial street system.

APPLICABLE REFERENCE: None

COMMENT CODE: 11D

SOURCE: City of Ladue

RESPONSE: The preferred alternative includes the reconstruction of Lindbergh north of Clayton. The intersection operation of Clayton and Lindbergh does not negatively impact I-64, and the New I-64 does not negatively impact the Clayton/Lindbergh intersection, and as such improvements are not part of the proposed action.

APPLICABLE REFERENCE: None

COMMENT CODE: 11E

SOURCE: City of Ladue

RESPONSE: The microscale analysis included localized impacts for carbon monoxide. The Build Alternative would not result in any new violations of the regional air quality standards. The mesoscale analysis looked at impacts of the project for ozone. This analysis was performed by EWGCC when it was necessary to show conformity with the SIP. At that stage, the project was shown to produce ozone precursors, VOC and NOx, that were within the emissions budget for the area. Therefore the project would not increase the occurrence of violations to the National Ambient Air Quality Standards (NAAQS), increase the severity of violations to the NAAQS or lead to any new violations of the NAAQS. The mesoscale analysis may be updated by EWGCC as part of a future conformity analysis related to new standards being adapted by the EPA. As part of an existing conformity analysis, it is expected that the I-64 project would not be affected by the new conformity requirements. EWGCC and MoDOT will continue to monitor and adhere to any impacts of conformity requirements.

APPLICABLE REFERENCE: Chapter IV, G. 2. and 3.

COMMENT CODE: 11F

SOURCE: City of Ladue

RESPONSE: The vertical profile shown in the plates included in the Appendix C indicates an increase in height of between 10 and 30 feet. MoDOT will examine opportunities to refine the vertical profile of I-64 as they move into design to lessen the visual disruption of the environment.

APPLICABLE REFERENCE: None

COMMENT CODE: 11G

SOURCE: City of Ladue

RESPONSE: MoDOT is examining lighting options that will minimize lighting impacts to

adjacent properties. Text has been added to address the issue of lighting impacts.

APPLICABLE REFERENCE: Chapter IV, Q. 5.

COMMENT CODE: 11H

SOURCE: City of Ladue

RESPONSE: MoDOT's desire is to construct the project in as large a phase is possible over

the shortest period of time but this will be dependent upon the availability of funds.

APPLICABLE REFERENCE: None

COMMENT CODE: 12A

SOURCE: City of Brentwood Resolution No. 891

RESPONSE: The preferred alternative eliminates the northbound left turn from Hanley to Eager in order to provide sufficient spacing between I-64 ramps and Eager Road. Access to retail activity along Eager Road for this movement will need to be made through use of internal circulation. The impacts to sales and sales tax revenues is unknown and cannot be explicitly measured.

APPLICABLE REFERENCE: None

COMMENT CODE: 12B

SOURCE: City of Brentwood Resolution No. 891

RESPONSE: The noise level is shown to be at or above the 66 decibel level at this location within the I-64 corridor for the preferred alternative. MoDOT's Standards and Noise Abatement Policy is described in Chapter IV, H. 2.

APPLICABLE REFERENCE: Chapter IV, H. 2.

COMMENT CODE: 12C

SOURCE: City of Brentwood Resolution No. 891

RESPONSE: MoDOT will coordinate with local communities by providing construction scheduling information and will provide assistance to these communities in traffic management. More information about maintenance of traffic during construction can be found in Chapter IV, S. 7.

APPLICABLE REFERENCE: Chapter IV, S. 7.

COMMENT CODE: 12D

SOURCE: City of Brentwood Resolution No. 891

RESPONSE: The following paragraph has been added to the text in Chapter IV, K.1.b. Thruway Alternative 3 (Preferred):

Although this alternative would have no direct impact to the floodplain or the floodway of Black Creek at the I-64/I-170/Brentwood Blvd. interchange, the downstream effect of stormwater runoff from additional pavement will be evaluated during the design phase. It is anticipated that stormwater runoff from the additional pavement in this area would not be substantial enough to contribute to flooding downstream. However, if it is determined that there would be any measurable runoff that would contribute to flooding downstream, then detention options could be considered. As discussed in "Floodplain Permits", section L.1.b. of this chapter, before any work can be done in a regulatory floodway, a "No-rise" certificate must first be issued, requiring a hydraulic study that would show that there would be no effects on the floodway elevations. This would occur in the design phase.

In Chapter III, Section B.4.d. Floodplains, there is a short paragraph discussing a report that investigated the flooding at Hanley Industrial Court. In addition to that, the following text summarizes the report in more detail:

In May of 2001, the City of Brentwood commissioned an engineering study to determine if any measures could be taken in Black Creek or the Galleria detention pond to reduce the flooding that occurs at the Hanley Industrial Court, downstream (south) of the I-64/I-170/Brentwood Blvd. interchange, from a 2-year or more storm event. The study found that the detention pond is not used to detain stormwater. Instead, stormwater runoff from the Galleria development bypasses the detention pond and is discharged directly into Black Creek via a 66-inch diameter pipe. The berm around the detention area does not overtop and overflow into the detention area until a 5-year storm event occurs.

The study also stated that if stormwater from the Galleria development during a 2-year storm event would be discharged into the detention pond area it would result in only a 2-inch decrease in the water level, and that this would be insignificant because turbulence (waves, whitewater) can account for a 2-inch rise in water levels.

The study also looked at another option that would reduce the possibility of flooding downstream for a 2-year storm by constructing a weir in the mouth of the box culvert under I-64 and removing the berm around the detention pond. However, this would cause a rise in the 100-year base flood elevation upstream, which would violate National Flood Insurance Policy (NFIP) regulations.

This study referenced another report that was done by the same engineering firm in 1996 titled "Black Creek Flood Study", which was commissioned by the City of Brentwood to investigate the causes of flooding in Black Creek and to develop some possible solutions. Based on interviews with business owners in the Hanley Industrial Court area, it was discovered that some of the manholes in the street would blow into the air, due to overcharging, just prior to the creek overflowing its banks, and that the manhole cover blowing seemed to increase after the Galleria was constructed.

In addition, it was discovered that the Galleria storm sewer was extensively reworked to accommodate the development and that an 18-inch sanitary bypass sewer may have been

oversized and could be contributing to the problem of downstream flooding. The study recommended further investigation of this matter, however, the City of Brentwood has not conducted any additional investigations to date.

APPLICABLE REFERENCE: Chapter IV, K.1.b. and Chapter III, B.4.d.

COMMENT CODE: 12E

SOURCE: City of Brentwood Resolution No. 891

RESPONSE: Comment noted.

APPLICABLE REFERENCE: None

COMMENT CODE: 12F

SOURCE: City of Brentwood Resolution No. 891

RESPONSE: Comment noted.

APPLICABLE REFERENCE: None

COMMENT CODE: 12G

SOURCE: City of Brentwood Resolution No. 891

RESPONSE: Based on a review of the refined Preferred Alternative alignment there will be three total single-family residential acquisitions within the City of Brentwood. When properties are acquired, the houses will be demolished and removed. The property will be maintained by MoDOT.

APPLICABLE REFERENCE: Chapter IV, C. 1. a.

COMMENT CODE: 13A

SOURCE: Andrea C. Ferster Law Offices for City of Richmond Heights

RESPONSE: In response to concerns related to review time, the comment period was

extended for an additional 45 days, ending May 30, 2003.

APPLICABLE REFERENCE: None

COMMENT CODE: 13B

SOURCE: Andrea C. Ferster Law Offices for City of Richmond Heights

RESPONSE: An alternative analysis, including avoidance and whether or not an alternative is feasible and prudent, has been performed in accordance with Section 4(f) policy and guidance. This analysis for these historic properties can be found within the Final Section 4(f) Evaluation.

APPLICABLE REFERENCE: Section 4(f)

COMMENT CODE: 13C

SOURCE: Andrea C. Ferster Law Offices for City of Richmond Heights

RESPONSE: Richmond Heights requested to be a consulting party under Section 106. Consulting parties are entitled to share their views, offer ideas, and consider possible solutions regarding the section 106 review of this project. Richmond Heights' comments regarding the eligibility of resources and the effects of the project on historically significant resources have been reviewed by MoDOT, FHWA, the SHPO and other consulting parties to look at ways to avoid, minimize or mitigate the impacts to historic properties caused by the project. The evaluation of the eligibility of resources and effects on historic properties has been completed for the FEIS. The City of Richmond Heights has been invited to become a concurring party in the PA developed for this project, and there will be ongoing consultation regarding the mitigation of adverse effect with the community. The signed agreement is included in Appendix K.

APPLICABLE REFERENCE: Section 4(f), Appendix K

COMMENT CODE: 13D

SOURCE: Andrea C. Ferster Law Offices for City of Richmond Heights

RESPONSE: The City of Richmond Heights has had the opportunity to provide information that will be considered by SHPO in evaluation of properties or districts that may be eligible for the National Register. The report submitted by the City was reviewed by the SHPO, FHWA and MoDOT, the SHPO agreed with the City that the Clayton Park Addition was eligible for the NRHP, but did not agree that the remaining areas Richmond Heights requested be considered met the eligibility requirements for the NRHP. Since the Clayton Park Addition (Bennett Street) was treated as an eligible resource in the Draft EIS no additional historic properties were identified. At the request of the City of Richmond Heights, the FHWA forwarded information on all the potential historic districts, identified by the City, to the Keeper of the National Register of Historic Places for determinations of eligibility, as a result all historic properties within the project area in the City have been identified.

APPLICABLE REFERENCE: None

COMMENT CODE: 13E

SOURCE: Andrea C. Ferster Law Offices for City of Richmond Heights

RESPONSE: The EIS considers and evaluates alternative design options for interchanges on I-64. Numerous alternative designs and interchange types, including compressed designs such as single point and compact diamonds, were considered as part of the initial screening of options at interchange locations. These options were evaluated with respect to impacts to the natural and built environment. Based on the initial evaluation, the reasonable interchange options were incorporated as part of the build alternatives evaluated in the DEIS. Following the receipt of comments on the DEIS, interchange design options were further evaluated to look at efforts to minimize property impacts such as examining flexibility of turning radius, use of retaining walls and changes in vertical profile. Since the DEIS, property impacts within the city of Richmond Heights still exist, but were reduced. Single point and compact urban diamond interchanges were evaluated at both Hanley Road and Big Bend Boulevard interchanges. Both interchange options had similar property impacts regardless of interchange type, and recommendations to the preferred alternative were carried forward that were considered to satisfy the purpose and need for the project.

APPLICABLE REFERENCE: None

VIII-100 The New I-64

COMMENT CODE: 13F

SOURCE: Andrea C. Ferster Law Offices for City of Richmond Heights

RESPONSE: The design standards of ramps follow the *Policy of Geometric Design of Highways and Streets*, produced by AASHTO 2001. Following comments on the DEIS, MoDOT re-evaluated flexibility in design in relation to turning radius and retaining wall type and location. MoDOT did not investigate lessening any standards as to require design exceptions, but did look at the range of AASHTO acceptable design criteria. MoDOT's proposed design is within the acceptable range right now, at or near the low end of that acceptable range. At a concept level of design, slight changes in design criteria do not make a big enough difference to save properties. The purpose of this document is to fully identify the likely worst case scenario impacts to the environment given the use of acceptable design criteria. As MoDOT moves on to detail design, every effort will be made to further minimize property impacts.

APPLICABLE REFERENCE: None

COMMENT CODE: 13G

SOURCE: Andrea C. Ferster Law Offices for City of Richmond Heights

RESPONSE: The FHWA requires that geometric design standards developed by AASHTO be followed as part of a commitment to improve highway safety. The existing I-64 within the project area does not meet the current design standards. It is the desire of FHWA and MoDOT to design I-64 to meet current standards. MoDOT and FHWA do not want to build a substandard facility.

APPLICABLE REFERENCE: None

COMMENT CODE: 13H

SOURCE: Andrea C. Ferster Law Offices for City of Richmond Heights

RESPONSE: St. Mary's Hospital has indicated the importance of the Bellevue ramps for emergency response. A study completed for the City of Richmond Heights estimated travel times for the route from I-64 eastbound to St. Mary's Hospital using Bellevue Avenue. In response to comments a traffic analysis was done for each of the interchange options that were refined as part of the Build Alternatives. That information is now contained in the EIS as part of Chapter II, Section B. Engineering Refinements, 4. Big Bend Boulevard/Bellevue Avenue Interchange.

APPLICABLE REFERENCE: Chapter II, B. 4.

COMMENT CODE: 13l

SOURCE: Andrea C. Ferster Law Offices for City of Richmond Heights

RESPONSE: The selection of the Preferred Alternative is based on three primary considerations – (1) the effectiveness of the alternatives to accomplish the Purpose and Need for Action, (2) the comparison of the alternatives' overall impacts and benefits, and (3) input from the public and review agencies. The impacts regarding right-of-way have been considered when considering the overall impacts and benefits. The stacked option would have 28 less full

and 6 less partial residential property acquisitions than would the "non-stacked" or "flat" option. The stacked option is estimated to cost over \$60 million (with staged construction over a 16 year period, beginning in the year 2008 and assuming an annual construction cost inflation rate of three percent) more even after right-of-way costs are considered. In addition, the stacked option has visual impacts and noise impacts that are greater than does the flat option. For these reasons, the flat option was included as part of the preferred alternative.

APPLICABLE REFERENCE: Summary, F. and Chapter IV

COMMENT CODE: 14

SOURCE: City of St. Louis

RESPONSE: Comment noted.

APPLICABLE REFERENCE: None

COMMENT CODE: 15

SOURCE: City of Frontenac

RESPONSE: Comment noted.

APPLICABLE REFERENCE: None

COMMENT CODE: 16

SOURCE: St. Mary's Health Center

RESPONSE: Comment noted.

APPLICABLE REFERENCE: Chapter II

COMMENT CODE: 17A

SOURCE: City of Richmond Heights Resolution

RESPONSE: Following the receipt of comments on the DEIS, interchange design options were further evaluated to look at efforts to minimize property impacts such as examining flexibility of turning radius, use of retaining walls and changes in vertical profile. As a result of this effort, property impacts within the city of Richmond Heights still exist, but were reduced. Recommendations to the preferred alternative were carried forward that were considered to satisfy the purpose and need for the project. After the EIS is completed, the project will continue to examine ways during final design and construction to further minimize property impacts.

APPLICABLE REFERENCE: Chapter II, B.4.

VIII-102 The New I-64

COMMENT CODE: 17B

SOURCE: City of Richmond Heights Resolution

RESPONSE: Following the receipt of comments on the DEIS, interchange design options, including the areas adjacent to the Hanley Downs and Sheridan Hills subdivisions, were further evaluated to look at efforts to minimize property impacts such as examining flexibility of turning radius, use of retaining walls and changes in vertical profile. As a result of this effort, property impacts within the city of Richmond Heights still exist, but were reduced. Recommendations to the preferred alternative were carried forward that were considered to satisfy the purpose and need for the project. After the EIS is completed, the project will continue to examine ways during final design and construction to further minimize property impacts.

APPLICABLE REFERENCE: Chapter II, B.4.

COMMENT CODE: 17C

SOURCE: City of Richmond Heights Resolution

RESPONSE: Following the receipt of comments on the DEIS, interchange design options were further evaluated to look at efforts to minimize property impacts such as examining flexibility of turning radius, use of retaining walls and changes in vertical profile. Recommendations to the preferred alternative were carried forward that were considered to satisfy the purpose and need for the project that includes providing full access at Big Bend Boulevard interchange and access at Bellevue Avenue interchange. As a result of this effort, property impacts within the city of Richmond Heights still exist, but were reduced. After the EIS is completed, the project will continue to examine ways during final design and construction to further minimize property impacts while maintaining access at both interchanges.

APPLICABLE REFERENCE: Chapter II, B.4.

COMMENT CODE: 18

SOURCE: St. Mary's Health Center

RESPONSE: Comment noted.

APPLICABLE REFERENCE: Chapter II, B.4.