

APPENDIX V-A

Public Involvement Letters and Agency Coordination Since the DEIS



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

REPLY TO
ATTENTION OF:

March 30, 2005

Missouri State Regulatory Office
(200402229)

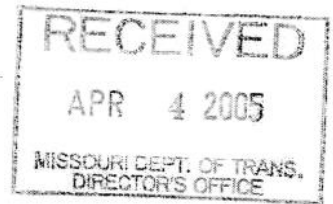
Allen Masuda
Division Administrator
Federal Highway Administration
209 Adams Street
Jefferson City, Missouri 65101



Dear Mr. Masuda:

We have reviewed the Second Tier Draft Environmental Impact Statement and Section 4(f) Evaluation for Section of Independent Utility (SIU) # 4 for the Interstate 70 Improvement Study and we offer the following comments:

1. In Chapter III, page 119, it is indicated that the application for the Section 404 permit and Section 401 water quality certification will be submitted for the project along with the Final EIS. We received the subject Department of the Army (DA) Section 404 application from MoDOT for SIU # 4 on January 14, 2005. The subject application was received two days after our receipt of the Second Tier Draft EIS for SIU # 4. In Chapter III, page 121, it is also indicated that the permit application process will be initiated with the Final EIS. We recommend that the Draft EIS be revised accordingly.
2. In the Table of Contents, page xiii, it is indicated that the Wetland Delineation Report is available. As of this date we have not received the preliminary jurisdictional wetland delineation report for SIU # 4 for our review. It is indicated in Chapter III, page 121 that the wetland delineation results will be presented in the Final EIS. It is also indicated on page S-viii that the wetland delineation results will be presented in the Final EIS.
3. In the Summary, Tables S1 through S4 do not include the linear feet of estimated stream impacts. We recommend that a column be included in the subject tables that includes the linear feet of stream impacts in addition to the number of stream crossings that are provided.
4. In Chapter III, page 132, and on page S-viii, it is indicated that specific impacts to wetlands and other waters of the United States would be assessed to determine if those impacts can be avoided or further minimized during the design phase. We assume that the design phase will not occur until after the Final EIS has already been completed. If this is correct, please provide information on how and when this assessment would be presented to our office for review and concurrence.



-2-

5. In Chapter III, page 121, and on page S-ix, there is reference to locations in Knox, Macon and Shelby Counties in regards to the Indiana Bat. As the I-70 Improvement Study is not located in the referenced counties we recommend that these sections be revised accordingly.

6. In Chapter III, on pages 118 and 123, in regards to the 303(d) listing of Hinkson Creek, we recommend clarification that Hinkson Creek is included on the 303(d) list as an impaired stream less than 1 mile downstream from the I-70 crossing of Hinkson Creek.

If you have any questions concerning this matter, please feel free to write me or call Kenny Pointer at 573-634-2248 extension 104 (FAX 573-634-7960).

Sincerely,

A handwritten signature in dark ink, appearing to read "Joe Hughes". The signature is written in a cursive style with a large initial "J" and "H".

Joseph S. Hughes
Chief, Regulatory Branch
Operations Division

Copies Furnished:

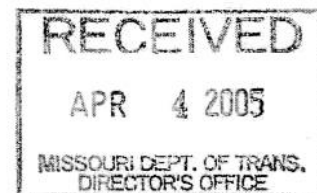
Missouri Department of Transportation
Attn: Kevin Keith
P.O. Box 270
Jefferson City, MO 65102

HNTB Corporation
Attn: Ken Bechtel
1201 Walnut Street, Suite 700
Kansas City, MO 64106



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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



MAR 30 2005

Mr. Don Neuman
Programs Engineer
Federal Highway Administration
206 Adams Street
Jefferson City, MO 65101



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

Dear Mssrs. Neuman and Keith:

RE: Review of Second Tier Draft Environmental Impact Statement for Interstate 70 Corridor Improvements, Section of Independent Utility #4, from Missouri Route BB Interchange to Eastern Columbia, Funding, Boone County, MoDOT Job Number: J4I1341G

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the subject project. 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 the Council on Environmental Quality (CEQ) number 050007.

Based on our overall review and the level of our comments, the EPA has rated the Draft Environmental Impact Statement for this project LO (Lack of Objections). A copy of EPA's rating descriptions is provided as an enclosure to this letter.

Overall the DEIS adequately identifies potential environmental and human health impacts, however, EPA offers the following comments for additional focus on minimization and mitigation of these impacts.

Streams

We recommend that a broad ecosystem approach be used for mitigation of the stream impacts. Page III-119 states that the preferred alternative will affect about 24,200 linear feet of streams. Due to this significant impact, within and out-of-channel options for improving stream systems should be considered. These options can be very helpful in restoring stream functions such as water quality improvement, recreation, and provisions for fish and wildlife habitat. Examples include: full meander restoration on straightened reaches, day-lighting of channels in urban areas, bank grading and stabilization, strategic in-channel placement of grade control structures, boulders and trees, and the establishment or restoration of riparian buffers.

Wetlands and Ponds

We recommend an ecologically-based mitigation approach be used to reduce wetland and pond impacts. Page III-131 states that the preferred alternative will impact 8.3 acres of wetlands and 2.2 acres of non-wetland ponds. Numerous individual impacts to a variety of wetland types and ponds were identified in the DEIS. Although we support the option of consolidating mitigation, particularly for the purpose of ensuring better mitigation success, we believe that, where practicable, the various impacted wetland types should be targeted to better ensure in-kind mitigation. In the case of ponds, the mitigation focus should be more on replacing lost primary functions including floodwater storage, livestock watering, and recreation. We also recommend that the mitigation be focused on the same H.U.C. (Hydrologic Unit Code) 8 watershed where the impacts are proposed to occur.

Environmental Justice and Residential Displacement

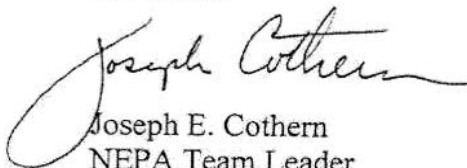
We recommend that special considerations and amenable solutions be identified for the seniors living in West Village Manor and Terrace Retirement Center. Page III-102 states that this senior citizen population includes minorities and persons on fixed/low incomes, and therefore, requires taking proactive measures to minimize adverse effects. The DEIS does not, however, identify relocation options or availability of similar housing for this specific dislocated population. The final EIS should include a discussion of how this impact will be resolved.

Air Quality

We recommend adding a discussion of the St. Louis PM fine non-attainment designation in the air quality discussion under Secondary and Cumulative Impacts – Existing I-70 Overall Corridor, page III-176. Although the eastern termini of SIU #4 is approximately 115 miles west of the designated non-attainment area, emissions from the increased traffic flow on I-70 could contribute to ambient air concentrations during certain meteorological conditions.

In closing, EPA commends your efforts in interagency coordination, in the inclusive public participation process, and for the rigorous analysis that will support ultimate improvement implementation. If you have any questions, please contact Ms. Kim Johnson at (913) 551-7975, or myself at (913) 551-7148.

Sincerely,

A handwritten signature in cursive script that reads "Joseph E. Cothorn". The signature is written in black ink and is positioned above the printed name and title.

Joseph E. Cothorn
NEPA Team Leader

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

RECEIVED

OFFICE OF THE SECRETARY
Washington, DC 20240

AUG 25 2005



TAKE PRIDE
IN AMERICA

RECEIVED

AUG 19 2005

MISSOURI DEPT. OF TRANS.
DIRECTOR'S OFFICE

ER 05/59

AUG 15 2005

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

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AUG 22 2005

ENVIRONMENTAL SECTION
MO DEPARTMENT OF TRANSPORTATION

Dear Mr. Masuda:

As requested, the Department of the Interior (Department) has reviewed the second tier draft Environmental Impact Statement (EIS) and Section 4(f) Evaluation for the **I-70 Corridor, section of independent utility 4**, Route BB to Eastern Columbia, Boone County, Missouri. The Department offers the following comments and recommendations for your consideration.

Section 4(f) Comments

The second level tiered EIS for the Interstate 70 (I-70) corridor, segment of independent utility (SIU) 4 considers the environmental effects of the reconstruction of I-70 from just east of Route BB (milepost 115), west through the city of Columbia, to a point east of Route Z (milepost 133), in central Missouri. The Federal Highway Administration (FHWA) and the Missouri Department of Transportation (MoDOT) previously completed a first tier EIS for improvements to the I-70 corridor between the Kansas City and St. Louis metropolitan areas. That EIS and its record of decision determined that improvement and widening of the existing I-70 corridor was the preferred strategy; that analysis considered three alternative routes through the city of Columbia; and determined a reconstruction of the existing corridor was the most reasonable. The MoDOT initially explored the northern route to bypass the existing corridor but found this option would cost a considerable amount of money and community disruption to build. The EIS for SIU 4 then considered alternative actions including widening options and new and/or reconfigured interchanges.

The EIS identifies a single property eligible for consideration under section 4(f) of the Department of Transportation Act of 1966 (48 U.S.C. 1653(f)). This property is the Bowling property, a 30-acre parcel consisting of a brick mansion, a stucco four-square house, a granary, two garages, and two portable buildings. The mansion is an example of an eclectic revival colonial, elaborately detailed, constructed in 1913, and considered eligible for the National Register of Historic Places. The stucco house is not individually eligible but is considered a contributing element to the entire 30-acre property, which is included in the eligible site boundaries. The remaining structures are not eligible either individually or as contributing elements.

Mr. Allen Masuda

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The northern end of the property will be affected by the preferred alternative because of the need to remove the existing on- and off-ramps for I-70/Business Loop I-70 and construct a new interchange. The evaluation notes the impacts are exactly the same for both reasonable alternatives for this new interchange, and the need for the new interchange is being driven by the need to realign the interchange for I-70/U.S. 63 just east of this interchange. A total of 2.7 acres will be taken from the Bowling property; neither eligible structure will be directly affected, but the right-of-way will come within 60 feet of the back of the brick mansion.

The Department would concur with a determination that there are no feasible or prudent alternatives to the use of this property since it would appear avoidance alternatives are not available. The I-70 corridor through Columbia is narrowly confined due to the fact development has grown up to the edge of the right-of-way, and the level of service through this corridor is deteriorating. There are few options available to FHWA and MoDOT to avoid this particular property. The Department cannot concur with a determination that all possible measures to minimize harm to this property have been employed. The consultation process with the Missouri State Historic Preservation Officer has not yet reached a conclusion, and that process will likely define the mitigation necessary to reduce the impacts to the historic property. Other mitigation has been suggested (minimize the footprint of the right-of-way, restoration of the lands and vegetation, and compensation to the owner for the loss of the property), but little specific mitigation has been put forward, such as maintaining the wooded portions of the property as much as possible to provide noise and visual screening. The Department will reserve its determination until such time that we have more information on acceptable mitigation to review.

Specific Comments

Section III.D.4.a Affected Environment, Page III-118, first paragraph, first sentence

The definition of the 7-day Q10 low flow provided in this section is inaccurate and misleading. The sentence states that for Perche Creek, in every 10 years, there will be a period of 1 week where the flow is zero. A more accurate definition would be that in any given year, there is about a 10 percent chance there will be a period of a week (or more) with no flow. We would appreciate this being corrected in the final EIS.

Summary Comments

The Department would agree there are no alternatives to the preferred alternative which would result in the use of a 4(f) property, but we cannot concur with measures to minimize harm until such time as the consultation processes further refine the necessary mitigation. We note the draft EIS adequately addresses the potential impacts of the project alternatives on fish and wildlife resources, including federally listed threatened and endangered species. Finally, we note an incorrect definition provided for the flow of Perche Creek.

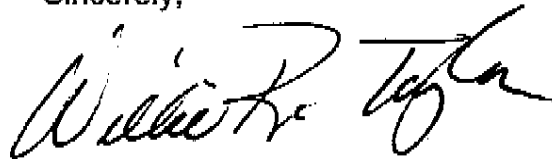
Mr. Allen Masuda

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The Department has a continuing interest in working with the FHWA and MoDOT to ensure that impacts to resources of concern to the Department are adequately addressed. For matters related to section 4(f), please contact the Regional Environmental Coordinator, Nick Chevance, National Park Service, Midwest Regional Office, 601 Riverfront Drive, Omaha, Nebraska 68102, telephone; 402-661-1844. For matters related to the comments on the 7-day Q10 low flow, please contact Lloyd Woosley, Office of Environmental Affairs Program, USGS, 423 National Center, Reston, Virginia 20192, telephone 703-648-5028.

We appreciate the opportunity to provide these comments.

Sincerely,



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

cc:

Mr. Don Neumann
Programs Engineer
Federal Highway Administration
206 Adams Street
Jefferson City, Missouri 65101

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



CH2M HILL
727 North First Street
Suite 400
St. Louis, MO
63102-2542
Tel 314.421.0900
Fax 314.421.3927

January 10, 2005

Ms. Kay Carder
Federal Emergency Management Agency
2323 Grand Avenue, Suite 900
Kansas City MO 64108

Subject: Draft EIS

Dear Ms. Carder:

On behalf of the Federal Highway Administration, please find the enclosed 1 copy of the SIU 4 Draft EIS for your review. Comments should be sent by March 28, 2005 to the addresses listed on the title page.

Sincerely,
CH2M HILL

A handwritten signature in blue ink, appearing to read "Buddy Desai".

Buddy Desai, P.E.
Project Manager

BD:jrm

*Not a FEMA
Cognizance issue.
Returned for use
somewhere else.*

*Rich Leonard
816-283-7009*



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION VII
Iowa, Kansas,
Missouri, Nebraska

901 Locust Street
Suite 404
Kansas City, MO 64106
816-329-3920
816-329-3921 (fax)

November 30, 2004

Ms. Peggy J. Casey, P.E.
Environmental Project Engineer
Federal Highway Administration
209 Adams Street
Jefferson City, Missouri 65101

Re: Review of Environmental Analysis
Documentation for I-70 SUIs 2, through 6

Dear Ms. Casey:

We have reviewed the Environmental Analysis Documentation for I-70 study area segments 2, 3, 4, 5 and 6. Based on our review, we have no additional comments. Thank you for the opportunity to participate in this important study process.

If you have any questions or would like additional information, please contact Joni Roeseler at (816) 329-3936.

Sincerely,

A handwritten signature in black ink that reads "Mokhtee Ahmad".

Mokhtee Ahmad
Regional Administrator



MISSOURI DEPARTMENT OF CONSERVATION

Headquarters

2001 West Truman Boulevard, P.O. Box 150, Jefferson City, Missouri 65102-0180
Telephone: 573-751-4115 ▲ Missouri Relay Center: 1-800-735-3966 (TDD)

JOHN D. HOSKINS, Director

March 22, 2005

Improve I-70 Document Comments
P.O. Box 410482
Kansas City, MO 64141

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

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

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MAR 25 2005

Regarding: I-70, 2nd Tier EIS Comment for SIU4

Gentlemen:

Gene Gardner has been representing this department and providing MDC comments on the I-70 project, but his transfer to our Wildlife Division leaves me temporarily coordinating.

We are in general agreement with the Environmental Impact Statement for Section of Independent Utility 4, but a field review of document details provided the following comments:

- Chapter III, Section D.4.a. Affected environment – page 118
 - Hinkson Creek had not been approved for the 303(d) list in 2002, but has since been added to that list.
- Chapter III, Section D.6.c. Measures to minimize harm to floodplains – page 128
 - Where this section states that post-construction erosion control measures will include "...reseeding with a mix of fast-growing grasses," our suggestion is to specify switchgrass, prairie cordgrass or other native floodplain species adapted to our region.

COMMISSION

STEPHEN C. BRADFORD
Cape Girardeau

ANITA B. GORMAN
Kansas City

CYNTHIA METCALFE
St. Louis

LOWELL MOHLER
Jefferson City

I-70, 2nd Tier EIS comment for SIU4
Page 2
March 22, 2005

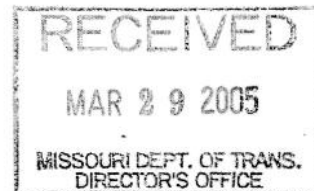
- Chapter III, Section D.9.b. Environmental consequences – federally listed species – page 140
 - Sinking Creek, which flows through Rocheport Cave crosses the project corridor at the Highway J/O junction, where a diamond intersection is to be constructed. Extreme care should be exercised to assure that construction generated silt, debris or other pollutants are not permitted to enter the stream that flows into the cave.
- Chapter III, Section D.14.c. Measures to minimize harm – landscape enhancements to visual resources – Page 167
 - MoDOT should be acknowledged and encouraged to continue use of native wildflowers in medians. If trees or shrubs are planted in the median areas, we encourage that they be indigenous as well.

Thank you for the opportunity to comment.

Yours truly,



SHANNON CAVE
PUBLIC INVOLVEMENT COORDINATOR



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Matt Blunt, Governor • Doyle Childers, Director

www.dnr.mo.gov

MAR 24 2005

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: Draft Environmental Impact Statement, Interstate 70 Corridor, Boone County,
Missouri, Second Tier, Section 4

Dear Messrs. Neumann and Keith:

Thank you for the opportunity to review and respond to the Draft Environmental Impact Statement (DEIS) for the Interstate 70 Second Tier study for Section 4. The department's comments on this DEIS are provided below.

Water Resources

New bridges associated with the widening of I-70 should be wide enough to allow flood flows to pass safely beneath the bridges. Some of the existing bridges on I-70 are not long enough to allow flood flows to pass beneath. This is evident on the DEIS maps depicting floodplains, particularly on Exhibit III-4C, which shows the restriction of the Perche Creek floodplain beneath I-70. The DEIS does state on page III-119 that the bridges over Perche Creek would be widened during relocation, but it is not clear whether this refers to the need to cross the wider interstate or the full width of the creek's floodplain. It should be noted that the term "regulatory floodway" is an artificially narrow term that does not reflect the entire storage area of the 100-year floodplain. If bridges can be constructed to cross most of the 100-year floodplain and all of the "floodway," whether mapped by the Federal Emergency Management Agency or not, then streams, floodplains and wetlands will all function more naturally.

The increased number and length of culverts that will be needed when I-70 is widened is discussed on pages III-120 and III-121. Bridges are preferable over culverts to 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. Where bridges are not feasible, culverts should be designed so they do not change the low-flow characteristics of the streams. When culverts are constructed to allow several inches of water to remain in the culvert, aquatic habitat characteristics are retained. Culvert designs that allow the original substrate (natural bottom culverts) to remain intact are preferable. This can be accomplished by using arches instead of boxes.

Wherever possible, habitat enhancement at stream crossings should be utilized to reduce wildlife-vehicle accidents. Traffic accidents involving deer or other animals account for 5% of all crashes in Section 4 (page I-24). The I-70 Corridor Enhancement Plan indicates that no stream crossings in Section 4 are suitable for habitat enhancement (page 18), yet the DEIS states that the crossings of Perche and Hinkson Creeks would "continue to provide viable wildlife migration corridors across I-70" (page III-135). The department commends MoDOT for incorporating the Enhancement Plan's Habitat Enhancement Guidelines in Section 4 to the extent practicable (page III-136), as streams are an important natural resource.

A stream, its channel configuration and its adjacent floodplain, including wetlands, ponds and riparian vegetation, are interrelated portions of a dynamic ecosystem that constitute a valuable natural resource. Disruption of this system through filling, relocating, shortening, or changing the shape and vegetation of the stream channel may result in negative impacts on the stream's water quality and associated habitat value. The value of headwater streams, both ephemeral and intermittent, are being increasingly recognized as critical habitat for the breeding, brooding, feeding and other life functions of various aquatic and terrestrial species of wildlife. Channel modifications may cause cumulative impacts to watersheds, including bank instability, loss of aquatic habitat (pool and riffle complexes), bed degradation, loss of riparian areas, prevention of fish passage and migration and channel incision downstream. Impacts should be avoided and minimized to the extent possible.

Geology

The DEIS accurately reports that there are no currently known large faults or other structures in this area, but this may be due to the fact that there has been limited geologic mapping in the area. The potential for faults needs to be considered as project planning proceeds, especially as faults and other structures cause fracturing of the rock that may lead to development of karst structures. Similarly, even though there are no known sinkholes within the project's boundaries, the karst topography of the area may result in the discovery of karst features such as caves and sinkholes as the project progresses. This potential should be considered during future planning and design efforts. The DEIS notes that there are a number of abandoned underground coal mines

Mr. Don Neumann
Mr. Kevin Keith
Page 3

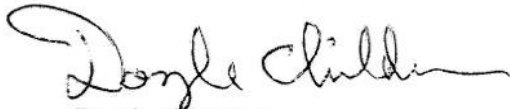
in Boone and Callaway Counties. The project planners should know that the department's databases cannot be considered a complete record of mining activities in the state, as the potential for finding previously undocumented mines does exist in the project vicinity.

While the project area is not a region with high seismic risk, there will be construction in floodplain areas. Floodplain sediments are known for their tendency to move during large earthquakes, and this issue should be considered during future phases of project development.

We appreciate the opportunity to provide comments on this 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

A handwritten signature in cursive script that reads "Doyle Childers".

Doyle Childers
Director

DC:jb

Matt Blunt
Governor

STATE OF MISSOURI

Ronald Reynolds
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



March 1, 2005

Mr. Buddy Desai, P.E.
Project Manager
CH2MHILL
727 North First Street, Suite 400
St. Louis, Missouri 63102-2542



Re: Comments on Draft EIS-MODOT Project

Dear Mr. Desai:

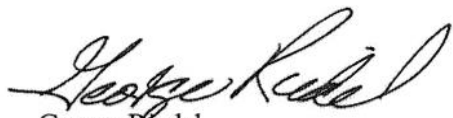
We very much appreciate the opportunity to comment on the draft EIS for MODOT Project J4I1341G in Boone County, Missouri. Please accept this letter as comment on the proposed plan.

The State of Missouri is a participant in the National Flood Insurance Program (NFIP). Any development associated with this project located within a special flood hazard area (SFHA), as identified by the Federal Emergency Management Agency (FEMA), must meet the requirements of the State of Missouri Executive Order 98-03. This would require obtaining a floodplain development permit for the proposed project. This permit must be obtained prior to the commencement of any construction/development activities. This permit would be obtained from this agency.

If the proposed development is also located within a regulatory floodway, a "No-Rise" Certificate and statement as to the effects of possible flooding, is required before the development can be permitted. This analysis must be performed by a licensed engineer and to current FEMA standards.

If you have any questions concerning this letter or the requirements of Executive Order 98-03, please feel free to contact me a (573) 526-9141.

Sincerely,


George Riedel
Branch Chief, Floodplain/Mitigation

GR:zf

cc: Connie Wisniewski, Mitigation Specialist, FEMA R-VII
Community File – Boone County
MODOT File



CITY OF COLUMBIA, MISSOURI

OFFICE OF CITY MANAGER

April 26, 2005

RECEIVED

Ms. Kathy Harvey, Improve I-70 Project Manager
Missouri Department of Transportation
P.O. Box 270
Jefferson City, MO 65105

MAY 02 2005

RE: April 19, 2005 Meeting: Addendum to the CATSO Improve I-70 Document Comments

Dear Ms. Harvey,

I want to thank you for the opportunity to meet and discuss my letter of March 18, 2005 regarding the Columbia Area Transportation Study Organization comments on the Tier 2 I-70 EIS. The majority of the March 18th letter focused on our perceived lack of consideration given the CATSO LRTP and specifically, the Scott Boulevard Extension and Interchange with I-70. Your explanations and the associated documentation were very informative and support the I-70 Project Team's decisions regarding the CATSO LRTP and the Scott Boulevard Extension. It is apparent that the decision regarding the status of the Scott Boulevard Extension and I-70 interchange involved both CATSO and City of Columbia staff and was consistent with the Purpose and Need Statement for the I-70 EIS. However, I would like to state for the record that CATSO is satisfied that all the issues related to the status of Scott Boulevard Extension are addressed as much as possible in the I-70 EIS.

MoDOT and the I-70 Study Team are to be commended for their fine work throughout the five years involved in completing the I-70 EIS. CATSO supports the findings contained in the I-70 EIS and the recommended improvements for I-70 including:

1. The final preferred design alternative for I-70 through Columbia;
2. The one-way frontage road system to provide access to and from I-70;
3. The improved collector street connectivity associated with the preferred design alternative for I-70, in particular the extension of Clark Lane and Conley Road, which will be a substantial benefit to local traffic; and
4. The planned bicycle/pedestrian connectivity improvements identified and other planned projects to provide facilities and remove barriers.

Additionally, as we discussed the local impacts associated with the construction phase(s) for the I-70 improvements is an area of particular concern. CATSO would like to emphasize the importance of developing a coordinated strategy to include every effort to mitigate the loss of business revenue and loss of businesses associated with the temporary access changes during the multi-year construction on I-70.

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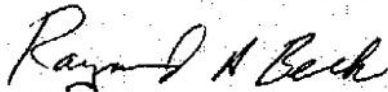
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I would like to recognize the I-70 Project Team's cooperation with CATSO in the planning phase, the evaluation of the design alternatives, and in providing the initial assessment on the access justification report for a future Scott Boulevard interchange on I-70; including documenting the identified system and regional benefits associated with this planned improvement.

CATSO appreciates the work done on its behalf to provide the opportunity for us to pursue the future extension of Scott Boulevard and new I-70 interchange. We look forward to working with MoDOT in the preparation of the Access Justification Report (AJR) for the Scott Boulevard/I-70 interchange.

Sincerely,

A handwritten signature in cursive script that reads "Raymond A. Beck".

Raymond A. Beck, P.E.
Chairman, Columbia Area Transportation Study Organization

cc: Improve I-70 Document Comments, P.O. Box 410482, Kansas City, MO 64141

TO: Coordinating Committee, Columbia Area Transportation Study Organization

FROM: Raymond A. Beck P.E., Chairman

DATE: February 14, 2005

SUBJECT: CATSO Comment on the I-70 EIS

The Missouri Department of Transportation (MoDOT) has released and distributed the Second Tier Draft Environmental Impact Statement and Section 4(f) Evaluation for Section of Independent Utility (SIU) #4. A majority of the section of I-70 covered in SIU #4 is contained in the Metropolitan Planning Area of the Columbia Area Transportation Study Organization (CATSO).

CATSO, as the Metropolitan Planning Organization (MPO) is the agency responsible for programming the I-70 improvements in the Transportation Improvement Program (TIP). Over the past six months, CATSO has held public hearings and amended the Major Roadway Plan to support MoDOT's preferred alternative for I-70.

MoDOT has scheduled a public hearing/open house for February 23, 2005 to receive public comment. It would be appropriate for CATSO to provide comments for the record regarding the draft I-70 EIS. The Coordinating Committee should formalize their consensus comments and direct the Chairman to draft and send a letter to MoDOT transmitting the Committee's remarks.

The following statements are offered as a starting point for discussions by the Coordinating Committee regarding the draft EIS:

1. Support for the final preferred design alternative for I-70.
2. Support for the one-way frontage road system.
3. Support for the improved collector street connectivity associated with the preferred design alternative for I-70.
4. Support for the bicycle/pedestrian connectivity issues addressed and planned improvements.
5. Recognition of the cooperative effort between MoDOT and CATSO in the planning phase and the evaluation of the design alternatives.
6. Recognition of MoDOT's cooperation in providing the initial assessment on the access justification report for a future Scott Boulevard interchange on I-70 and documenting the identified system and regional benefits associated with this planned improvement.
7. Concerns related to the importance of a coordinating the plan for construction with special emphasis on signage and to make every effort mitigate the loss of business revenue and businesses associated with the temporary access changes during construction.

Recommendation:

Direct the Chairman of the CATSO Coordinating Committee to send a letter to MoDOT on behalf of CATSO Coordinating Committee's with the committee's comments on the Second Tier Draft EIS for I-70 EIS for SIU #4..

Public Comment Regarding Improve I-70 DEIS, SIU 4
Submitted by Scenic Missouri
Via Electronic Mail

March 28, 2005

Scenic Missouri, a nonprofit organization based in Columbia, Missouri, has been concerned about the condition of Interstate 70 ever since our founding in 1993. We have been especially concerned that as it passes through Missouri, Interstate 70 has become overrun with billboards and other forms of gross hucksterism that provides an extremely unfortunate image of our otherwise very beautiful state.

Compared to the other Midwest states through which I-70 traverses (i.e. Kansas, Illinois, Indiana and Ohio), Missouri's stretch of I-70 suffers from an extremely straight and boring alignment, a high percentage of frontage roads (which leads to excessive commercial activity, even in rural areas), and relative lack of billboard and zoning regulations. Together, these elements have made I-70 one of the ugliest stretches of interstate anywhere in the nation and conspire to make the interstate a liability to tourism and economic development efforts for the state. When these negative aspects are combined with the deteriorating, congested and unsafe condition of the road itself, it is undeniable that I-70 has become a transportation crisis.

Scenic Missouri appreciates this opportunity to comment on the Improve I-70 process.¹ Indeed, there are some positive aspects of the Improve I-70 concept as presently unveiled. Foremost among the benefits of the widening plan would be an easing of congestion of the interstate and a reduction in cross-over accidents. However, we feel that the Improve I-70 plans are woefully inadequate to serve the 21st Century needs of Missouri's most vital transportation corridor.

Improve I-70 essentially calls for the construction of a completely new interstate. Yet, it would still suffer from a straight and boring alignment. Billboards would still pollute the scenic landscapes. The corridor would continue to be marked by extensive commercial activity. And while we recognize the efforts to consider aesthetic improvements of a new I-70 as reflected in the aesthetic enhancement plan, such improvements appear to be an afterthought and insufficient to redress in any meaningful fashion the currently blighted situation.²

As a whole, the Improve I-70 plans would essentially replicate the pedestrian planning of the past, much of which has led to the current crisis. Indeed, the super-sized truck speedway envisioned by Improve I-70 would utterly fail in transforming the currently broken interstate into a roadway that provides a safe, scenic and enjoyable trip for motorists and that embraces the

¹ While we make a comment concerning the Section 4 EIS in footnote 3, we primarily comment here upon our larger concern over the entire project and our alternative proposal for an autos-only "Lewis and Clark Scenic Parkway."

² We are especially concerned that the plans rely on essentially artificial or cosmetic touches, such as trying to make cement look like stone, and do not adequately embrace the landscape itself as do the best designed highways.

splendor of Missouri's landscape and sensitively connects to nearby communities³, attractions, state parks and other assets.

As an alternative to the Improve I-70 widening plan, Scenic Missouri encourages MoDOT to commit to an environmental and economic impact study of an autos-only scenic parkway that would roughly parallel a rebuilt, but not widened I-70.⁴ Together, the two expressways would work together to create a 21st Century transportation corridor that is unrivalled in the nation.

Our call for a "Lewis and Clark Scenic Parkway" recognizes the fact that scenic roads most often provide a greater return on investment than typical interstates, and can become tourist destinations in their own right. Missouri has an abundance of authentic and attractive communities, state parks, and other attractions and assets that would benefit significantly from a scenic parkway that fully embraces the spirit and core principals of context sensitive design solutions.

We encourage MoDOT to be a leader in planning and constructing inspirational highways that are noted across the country for good design and that embrace the surrounding environment. With the exception of a few well-designed highways (e.g Highway 21), MoDOT has failed on this front. Unfortunately, Improve I-70 would continue this disappointing record.

Again, this is more than a matter of scenic or aesthetic concern. It is a matter of increasing the return on our investment of transportation dollars and making Missouri a competitive state with our neighbors. A scenic parkway has the potential to add millions of dollars on an annual basis to local communities through increased tourism revenue and accompanying economic development.

Therefore, Scenic Missouri calls upon MoDOT to lead a professional and comprehensive review of a proposed scenic parkway. As part of this process, the following should be addressed:

- o A review of the costs estimated in the First Tier studies for a parallel expressway to determine if there would be substantial differences with the costs for a parallel parkway;
- o A thorough economic benefits analysis of a scenic parkway with an emphasis on tourism;
- o An analysis and prediction of the potential of tolls to amortize what portion of the costs of the parkway;

³ With respect to Columbia, we note that there are no easy solutions to being able to accommodate the growing traffic of the community while also preserving its collegial and small-town atmosphere. However, we are concerned that the proposed widening project would result in an overly urbanized feel for the community. On the other hand, we also believe that it is not in the best interests of the community to build a traditional, commercialized by-pass around Columbia. However, we have been met with a very positive response from individuals and organizations for our proposal for a scenic parkway that would preserve the surrounding beauty of the area. If studies were to show that this alternative were not feasible, it would be possible for the scenic parkway to meet up with I-70 as it passes through the Columbia area.

⁴ The Scenic Parkway would be built for highway speeds and fully embrace the principals of context sensitive design solutions. Commercial services would be convenient, but out of view. We envision the parkway to begin outside the metro areas of Kansas City and St. Louis.

o Schematic and general route alternatives including segments and phasing for a parkway.

To ensure a comprehensive review of a parkway alternative, we further request that the Department of Natural Resources, Department of Conservation, Department of Economic Development and the Division of Tourism along with three or four appointed individuals representative of the general public be included in the oversight and participation of the review process.

When billions of the public fisc are to be expended upon a transportation project of such vital importance to our state's future, it is critical that all viable alternatives be thoroughly considered and studied. The concept of a "Lewis and Clark Scenic Parkway" has yet to be reviewed by MoDOT; nor has the public officially been presented with this alternative. However, it does present an opportunity to bring to Missouri not only an inspired highway that is recognized across the nation as one of the most beautiful and memorable in the country, but also one that brings a greater economic return to our state. As such, it is incumbent upon the State to carefully consider this proposal.

Respectfully submitted,

Scenic Missouri
John Regenbogen
Executive Director
3610 Buttonwood Drive, Ste. 200
Columbia, MO 65201