

2 Environmental Commitments

3 During the design and implementation of the Preferred Alternative, MoDOT is committed to obtaining
4 necessary permits and performing other actions that would minimize and mitigate the impacts of the
5 project on the environment. In addition to adhering to the provisions of MoDOT construction standards
6 depicted in the Engineering Policy Guide, the following specific environmental commitments are
7 summarized in this section.

- 8 1. MoDOT will coordinate with local emergency services, Metro, and schools in advance of any
9 roadway changes that would disrupt normal travel patterns.
- 10 2. MoDOT will ensure that the contractor develops a MoDOT-approved maintenance of traffic plan.
- 11 3. MoDOT will coordinate, cooperate, and communicate, as required, with the representatives of the
12 railroads located in the corridor throughout the project.
- 13 4. MoDOT will coordinate, cooperate, and communicate with affected utility companies located in the
14 corridor throughout the project.
- 15 5. The SHPO has provided Section 106 concurrence for the Preferred Alternative.

16 MoDOT will continue coordination with the SHPO related to the Section 106 process should design
17 modifications and/or construction activities result in impacts to the following properties:

- 18 • The Myers residence (180 Dunn Road) is a house and barn with the NRHP boundary as the parcel
19 lines.
- 20 • The Gittemeier House (1067 Dunn Road) is two-story German vernacular residence with the NRHP
21 boundary as the parcel lines.
- 22 • The historic district at the Ferguson Pine Meadows 1st Addition subdivision (approximately ¾ miles
23 east of the Washington/Elizabeth interchange).
- 24 • Archaeological sites SL545, SL547, and SL548, located in the northeastern portion of the I-270/MO
25 370 interchange. These sites were not safely accessible and therefore MoDOT will ensure that
26 contractor construction proceeds with caution at this location, especially near SL545 where historic
27 burials were reported.

28 MoDOT will assist FHWA with continued Native American Tribal coordination.

- 29 6. MoDOT will ensure that:
 - 30 • All tree clearing will be conducted in the winter months when bats are in hibernation (November 1 –
31 March 31), and;
 - 32 • During the project development process for each phase, potential impacts to threatened and
33 endangered species will be re-evaluated, and coordination with both MDC and the USFWS will take
34 place to verify that the “not likely to adversely affect” determinations for listed bats remain valid.
- 35 7. MoDOT will ensure that all structures scheduled for demolition are inspected for asbestos-
36 containing material and lead-based paint. MoDOT and the contractor shall submit all required
37 demolition notices, abatements notices, and project notifications to MDNR as required by regulation
38 prior to beginning demolition activities. Asbestos-containing material and demolition debris will be
39 disposed according to state and federal regulations. The reports of these inspections for asbestos
40 and the presence of lead-based paint will be included in the construction bid proposal.

- 1 8. MoDOT will ensure that any known and unknown hazardous waste sites that are found during
 2 project construction are handled in accordance with Federal and State laws and regulations. If
 3 regulated solid or hazardous wastes are found during construction activities, the MoDOT
 4 construction inspector will direct the contractor to cease work at the suspect site. The construction
 5 inspector will contact the appropriate environmental specialist to discuss options for remediation.
 6 The environmental specialist, the construction office, and the contractor shall develop a plan for
 7 sampling, remediation and continuation of project construction. Independent consulting, analytical
 8 and remediation services shall be contracted if necessary. As necessary, the MDNR and USEPA will
 9 be contacted for coordination and approval of required remediation activities.
- 10 9. MoDOT will coordinate with the USACE related to any required excavation or other land disturbance
 11 within the St. Louis Airport Sites FUSRAP Record of Decision boundary. Coordination will begin prior
 12 to the commencement of construction for each project phase that affects the Decision boundary
 13 and will continue through the duration of construction activities for the project phase.
- 14 10. MoDOT will upgrade existing pedestrian facilities to be ADA compliant and provide additional
 15 pedestrian and bicycle connectivity where reasonable.
- 16 11. MoDOT will provide feasible and reasonable noise abatement for areas along the corridor that are
 17 considered impacted. A preliminary (NEPA stage) noise analysis was conducted as part of this study.
 18 That analysis recommended noise barriers at six locations along the corridor. Further analysis may
 19 be needed depending upon alignment changes. MoDOT will use the Noise Policy in place at that
 20 time to conduct the analysis and final recommendations will be made at a later design stage. At that
 21 time, if noise abatement is found to be feasible and reasonable, MoDOT will seek the input of
 22 impacted property owners and residents before deciding on building noise barriers.
- 23 As construction will likely be phased, feasible and reasonable noise abatement will be provided
 24 based on the location and limits of I-270 construction in each phase. For a given area, noise
 25 abatement will be constructed in parallel with the roadway improvements for the corresponding
 26 area.

27 **Statement of Likelihood**

28 The preliminary noise analysis found noise barriers were feasible and reasonable at the following
 29 locations:

- 30 • **Ville Maria Subdivision:** Between mile markers 22.2 and 22.7.
- 31 • **Brookes Park:** Between mile markers 24.3 and 25.9.
- 32 • **Northwest Quadrant of Lindbergh Boulevard Interchange (Kindercare/Library and Saint Martin De**
 33 **Porres):** Between mile markers 24.0 and 24.9.
- 34 • **Marysville:** Between mile markers 26.25 and 26.75 located along the outer road at St. Cornelius
 35 Lane.
- 36 • **Carrollton Village Condominiums:** Between mile markers 20.8 and 21.1.
- 37 • **Hathaway Manor (South):** Between mile markers 30.7 and 31.4.
- 38 12. MoDOT will administer the acquisition and relocation of affected residential, non-profit, and
 39 commercial properties in accordance with the relocation procedures established in the Uniform
 40 Relocation Assistance and Real Property Acquisition Policies Act of 1970.
- 41 13. MoDOT will consider options to minimize new right-of-way acquisition.
- 42 14. MoDOT will closely monitor project changes that may result in Section 4(f) impacts. Section 4(f)
 43 resources adjacent to the I-270 North corridor are as follows:

- 1 • **Carrollton Disc Park** – Located on Lambert Airport buy-out land between St. Charles Rock Road and
 2 Woodford Way (south side of I-270), this disc golf course was developed using Land and Water
 3 Conservation Funds.
- 4 • **Playground at Garrett Elementary School** – Located adjacent to Garrett Elementary School
 5 (1400 Ville Rosa Lane, Hazelwood). The extent of the Section 4(f) resource is limited to the
 6 immediate area of the school.
- 7 • **Gardens at Prairie Commons Library** – Located at 915 Utz Lane, Hazelwood. This public library has a
 8 public garden, a picnic area, and park benches. It appears that some of the garden is actually in
 9 MoDOT right-of-way. Because the roadway/intersection re-configuration in this area is minimal, it is
 10 not expected that the garden will require disruption. If impacted, MoDOT will coordinate with the
 11 library relative to appropriate relocation measures.
- 12 • **Brookes Park** – Located in the southwestern quadrant of the I-270/Lindbergh Boulevard
 13 interchange, Brookes Park is administered by the City of Hazelwood.
- 14 • **Bellefontaine Conservation Area** – **Bellefontaine Conservation Area is in the southeastern**
 15 **quadrant of the I-270/MO 367 interchange. The site is administered by the Missouri Department**
 16 **of Conservation Department.**
- 17 • **The Utz-Tesson House** – The Utz-Tesson House is located in Brookes Park. Right-of-way acquisition
 18 and disruptions affecting usage should be avoided.
- 19 • **The Taille de Noyer House** – The Taille de Noyer House currently resides on the McCluer High
 20 School campus, hundreds of feet from I-270.
- 21 • **The John B. Myers House** – The John B. Myers House is located at 180 Dunn Road (northwestern
 22 quadrant of the Graham Road intersection). The parcel lines are the significance boundary.
- 23 • **The Gittemeier House** – The Gittemeier House is located at 1067 Dunn Road (northwestern
 24 quadrant of the New Florissant Road intersection). The parcel lines are the significance boundary.
- 25 • **The Ferguson Pine Meadows 1st Addition District** – This NRHP district is located along Starlight
 26 Drive in Ferguson. The boundaries of the district are Pershall Road to the north, Moonlight Drive to
 27 the west, and the Saint Louis Community College-Florissant Valley campus to the east.
- 28 15. MoDOT will work with the administrators of the Little Creek Nature Area, a non-Section 4(f)
 29 resource, to investigate opportunities to minimize impacts, provide a visual buffer of trees/shrubs,
 30 and incorporate potential driveway improvements.
- 31 16. MoDOT will work with Metro to investigate reasonable roadway modifications that further improve
 32 efficiencies for Metro’s operations.

33 Required Permits

- 34 1. MoDOT will coordinate the Preferred Alternative with the Federal Aviation Administration to
 35 complete necessary permitting.
- 36 2. MoDOT will adhere to the conditions of the TS4 (Transportation Separate Storm Sewer System)
 37 permit applicable at the time of construction.
- 38 3. MoDOT will conduct an engineering analysis for the build alternative prior to submission of the
 39 floodplain development permit application to the Missouri State Emergency Management Agency.
 40 The contractor shall obtain a floodplain development permit and “no-rise” certification.
- 41 4. MoDOT will obtain authorization by an Individual Clean Water Act Section 404 Permit from the
 42 USACE including Section 401 Water Quality Certification from MDNR/IEPA.

SECTION 5 ENVIRONMENTAL COMMITMENTS

- 1 5. MoDOT will follow the requirements, including a Stormwater Pollution Prevention Plan, for the
- 2 required National Pollutant Discharge Elimination System permit for stormwater discharges from
- 3 the construction site(s).

