

Finding of No Significant Impact I-270 North, I-70 to the Chain of Rocks Bridge, Saint Louis County, Missouri Environmental Assessment

MoDOT Job Number: J6I3020

Federal Aid Number: 2705335

Prepared for

Missouri Department of Transportation
Federal Highway Administration

April 2017



FEDERAL HIGHWAY ADMINISTRATION
FINDING OF NO SIGNIFICANT IMPACT

FOR

I-270 NORTH ENVIRONMENTAL ASSESSMENT
I-70 to the CHAIN of ROCKS BRIDGE
SAINT LOUIS COUNTY, MISSOURI

JOB NUMBERS:
MISSOURI J6I3020
FEDERAL AID NO. 2705335

The Federal Highway Administration (FHWA) has determined that the Selected Alternative (identified as the Preferred Alternative in the Environmental Assessment (EA) located at <http://www.I-270North.org>) will have no significant impact on the human environment. This FONSI is based on the attached supporting documentation and the EA which has been independently evaluated by the FHWA and determined to adequately and accurately discuss the need, environmental issues, and impacts of the proposed project, and includes appropriate mitigation measures. It provides sufficient evidence and analysis for determining that an EIS is not required. The FHWA takes full responsibility for the accuracy, scope, and content of the attached supporting documentation and the EA.

4/12/17
Date


Responsible Official

Program Development Team Leader
Title

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Supporting Documentation for Finding of No Significant Impact

23 CFR 771.121

Missouri Department of Transportation
Federal Highway Administration

REGION	STATE PROJECT NO.	PROJECT TITLE/ENVIRONMENTAL DOCUMENT TYPE
Missouri Division	J6I3020	I-270 North, I-70 to the Chain of Rocks Bridge, Saint Louis County, Missouri Environmental Assessment

Summary

The Federal Highway Administration (FHWA), Missouri Division, approved the I-270 North Environmental Assessment (EA) on November 21, 2016, for Missouri Department of Transportation (MoDOT) Job Number J6I3020. Notice of the EA's availability was sent to agencies and the document was made available for public review at numerous locations throughout the study corridor. **Appendix A** contains the Notice of Availability (NOA) and the distribution list for the EA. It is also available electronically on the study website – <http://www.I-270North.org>.

Pursuant to circulation, coordination, and evaluation of the I-270 North EA, the Preferred Alternative was accepted and is known as the Selected Alternative in this document. The Selected Alternative is intended to solve the transportation problems associated with the portion of the Interstate (I) 270 North corridor between the I-70/I-270 interchange in Bridgeton, Missouri, to the Mississippi River/Chain of Rocks Bridge, between Missouri and Illinois. The Selected Alternative will improve the existing corridor by modifying interchanges, adding lanes, altering portions of the outer road system to a one-way system, installing U-turn ramps, and using other strategies to improve operations. Nearly all of the work associated with the Selected Alternative will occur within the existing highway right-of-way.

The Selected Alternative was identified through public and agency involvement along with assessment of socioeconomic and environmental consequences. The Public Hearing was held in accordance with established MoDOT procedures. MoDOT has considered possible social, economic, and environmental effects of the proposed improvements. **Appendix B** contains the lane configuration exhibit from the EA. This exhibit shows the proposed roadway improvements over the existing aerial mapping. This is intended to provide a reference for the site-specific discussions associated with the Public Hearing comments.

Public Hearing and EA Comment Period

An open house public hearing was held Thursday, December 15, 2016, at the McCluer High School Commons Area (1896 S. New Florissant Road, Florissant, MO 63031) from 4:00–7:00 p.m. The hearing offered an opportunity for citizens to learn more about the proposal and to provide oral and written comments on the study. Voice recorders were available for attendees to record oral statements about the study. Two court reporters were also present at the Public Hearing. One recorded comments from stakeholders desiring to speak one-on-one with the court reporter while the other recorded stakeholder comments presented via an open microphone for any other interested stakeholders to hear. Comments were also received online. The Environmental Assessment document, public hearing displays, and opportunity to comment on the study were available on-line at MoDOT's I-270 North website at <http://www.i-270north.org>.

To comply with EA notification requirements, two Notices of Availability (NOA) were published. The original notice listed December 31, 2016 (30 days from the NOA) as the end of the comment period. Due to the comment period occurring during a portion of the winter holidays, a second NOA was issued to extend the comment period to January 6, 2017. On December 21, 2016, the Osage Nation sent a letter requesting copies of the EA and the cultural resources survey for review and comment. Copies were provided and the Osage Nation was notified that the comment period would be further extended to January 26, 2017 to provide adequate time for their review and comment.

Several substantive comments were received via the public hearing, social media, and during the comment period. These will be discussed in the following sections:

- Section 3 – Written public comments received at the Public Hearing
- Section 4 – Verbal public comments received at the public Hearing
- Section 5 – Agency comments received following their review of the EA
- Section 6 – Comments received as a result of study-related outreach

As a result of the comments received pursuant to the Public Hearing, the circulation of the EA for review, and other associated study-related outreach efforts, important clarifications were developed. These are discussed in this finding of no significant impact (FONSI).



Important Updates Pursuant to Public Hearing and EA Reviews/Outreach

As a result of the Public Hearing, the circulation of the EA for review, and other associated study-related outreach efforts, important clarifications were developed. These are discussed in this FONSI and highlighted in these text boxes.

Written Public Hearing/EA Comments

In all, 12 written comments were received at the Public Hearing. Largely from private citizens, these comments dealt with numerous substantive issues that have been discussed throughout the study. In general, the responses to the issues received relied on data contained in the EA or from the various outreach strategies as are detailed in the EA. The transcribed comments are contained in **Appendix C**. The substantive comments focused on several issues, including:

- A. Construction Sequencing
- B. Emergency Medical Services (EMS) Response Times
- C. Tax Loss
- D. Construction Impacts
- E. Women-Owned Business Enterprises and Minority-Owned Business Enterprises (WBE/MBE) Usage
- F. Traffic Noise Impacts

A. Construction Sequencing

Four comments offered suggestions in regards to the construction sequencing of the various components of the Selected Alternative. One comment suggested that major intersections take precedence; one comment suggested that the Route 367 interchange take precedence and one comment suggested that the Lindbergh interchange take precedence.

Response: The anticipated scheduling for the study is shown in **Table 1**. It is based on need, available funding, the need to reduce construction-related delays and impacts, as well as constraints upon the region's fiscal capacity. All elements of the Selected Alternative were adopted in the long-range transportation plan (Connected2045 was approved on June 24, 2015 by the East-West Gateway Board of Directors).

Table 1. I-270 Projects in the Long Range Transportation Plan

Project #	Location	Year of Expenditure Costs ^a	Period
2045019	I-170 To Lindbergh Boulevard (from east of McDonnell Boulevard to west of Hanley/Graham Road)	\$93,000,000	2016-2025
2045018	Old Hall Ferry Road to Hanley/Graham Road (from east of Old Halls Ferry Road to west of Hanley/Graham Road)	\$289,000,000	2016-2025
2045022	MO 367 Interchange (from east of Old Halls Ferry Road to east of Bellefontaine Road)	\$107,000,000	2026-2035
2045020	Riverview Road to Lilac Avenue (from east of Bellefontaine Road to east of Riverview Drive)	\$163,000,000	2026-2035
2045021	McDonnell Boulevard to MO 370 (from east of McDonnell Boulevard to west of MO 370)	\$86,000,000	2026-2035
2045023	Dorsett Road to MO 370 (from west of MO 370 to east of I-270/I-70 interchange)	\$211,000,000	2036-2045

^a Assumes 3 percent inflation per year and right-of-way costs

The first phase of the Selected Alternative will be implemented as MoDOT Project J6I3020B that is included in the 2017 – 2021 Statewide Transportation Improvement Program. Project J6I3020B will include small scale improvements consistent with the Selected Alternative. They will have independent utility (i.e. is a single and complete project that could be constructed and operate without the construction of adjacent segments in the study area) and address current and future projected transportation needs.

B. EMS Response Times

Two comments expressed concern about emergency service response times associated with the Selected Alternative. A specific concern was associated with response time to the St. Louis Community College from West Florissant-Ferguson Fire House #2. Another specific concern was about access from Florissant Road to I-270 in the case of an accident between Florissant and Elizabeth/Washington.

Response: As part of the evaluation of the Reasonable Alternatives, an operational analysis was conducted. **Table 2** provides a summary of how the Reasonable Alternatives operate (this is Table 3-2 from the EA). While all of the Reasonable Alternatives were considered adequate to minimally satisfy the operational needs of the I 270 corridor, Reasonable Alternative 1 (the Selected Alternative) was determined to provide superior operations.

Relative to Level of Service (LOS), traffic operations on the mainline freeway were analyzed¹. Using the Highway Capacity Manual Methodology for freeway Level of service, the LOS under the one-way frontage road options is materially better than the corresponding two-way frontage road configuration. Between Hanley Road and Old Hall's Ferry Road, the LOS under the one-way system is predominately LOS C (3 segments C/1 segment B). Under the two-way the LOS is predominantly LOS D (3 segments D/1 segment B). The difference between LOS C and D is substantial, but difficult to quantify. LOS C is typically described as a near-free flow condition, while LOS D is typically described as a medium flow condition with local disruptions. LOS C is typically associated with speeds of 75 percent of free flow conditions, while LOS D is typically associated with speeds of 63 percent of free flow conditions.

Vehicular conflicts under the one-way system will be lower resulting in an expected 25 percent reduction in crashes when compared to the No Build. Relative to out-of-direction travel, detailed traffic analysis showed that on average, total distance traveled would be higher under a one-way system, but average travel times were less. This is true overall and for most important destinations/pathways. Conflicts with other vehicles are reduced under the one-way system because drivers will use the U-Turn lanes which do not require travel through signalized intersections. Overall, the two-way system will operate equivalent to a no-build scenario in the design year.

The specific issue raised by the commenters was associated with out-of-direction travel for EMS from the West Florissant-Ferguson Fire House #2 to the St. Louis Community College. The Fire House is located at 10701 West Florissant Avenue. The Saint Louis Community College — Florissant Valley campus is located at 3400 Pershall Road. The current response would be a trip of 0.9 miles - West Florissant Avenue (north) to Pershall Road and east to the college. Under the one-way system, the trip

Out-of-Direction Travel and the St. Louis Community College

At the Public Hearing, questions of access to the college were raised.

Eastbound trips are unaffected.

Westbound I-270 trips currently exit at West Florissant Avenue and travel south to Pershall Road arriving at the college after a total trip of 0.6 miles.

Under the one-way outer road system, users would exit I-270 to Dunn Road.

From the West Florissant intersection, users would proceed to a Texas Turn-Around to cross I-270 to Pershall Road – arriving at the college after a trip of 1.2 miles.

¹ LOS is a qualitative assessment of a road's operating conditions. It indicates the capacity per unit of demand. A standard measurement scale is used reflecting the relative ease of traffic flow on a scale of A to F, with free-flow being rated LOS-A and congested conditions rated as LOS-F.

would be roughly 1.7 miles - West Florissant Avenue (north) to Dunn Road (east) to the Texas Turn-Around to Pershall Road (west) to the college. Out-of-direction travel, by even minimal amounts, is an impact of the Selected Alternative. It is mitigated by the system's higher travel speeds, fewer crashes and improved flow conditions. **Figure 1** shows the route. The entire roadway configuration associated with the Selected Alternative is shown in **Appendix B**.

Table 2. Performance/Operating Characteristics Summary for the Reasonable Alternatives

Reasonable Alternative	Description	Key Features	Level of Service (2040)	Transit Impacts	Bike/Pedestrian Impacts	Freight Movement Impacts
AREA 1: I-70 TO MCDONNELL BOULEVARD						
ST. CHARLES ROCK ROAD						
Alternative 1	Diverging Diamond Interchange	<ul style="list-style-type: none"> Synchronized signals reduce delay Reduced number of conflict points 	C	Unable to exit/re-enter freeway in same direction	Can be more difficult to navigate	Easier to make turns for oversize/overweight trucks
Alternative 2	Diamond Interchange	<ul style="list-style-type: none"> Greater driver familiarity Exiting traffic can re-enter freeway in same direction 	C	--	Easier to navigate	--
MO 370 TO MCDONNELL BOULEVARD						
Alternative 1	Diverging Diamond Interchange	<ul style="list-style-type: none"> Synchronized signals reduce delay Reduced number of conflict points 	C	Unable to exit/re-enter freeway in same direction	Can be more difficult to navigate	Easier to make turns for oversize/overweight trucks
Alternative 2	Partial Cloverleaf Interchange	<ul style="list-style-type: none"> Loop ramp allows free flow NB to WB movements New one-way connector improves traffic flow 	C	--	--	Guardrail often damaged on loop ramps by trucks
AREA 2: EAST OF MCDONNELL BOULEVARD TO HANLEY ROAD/GRAHAM ROAD						
LINDBERGH BOULEVARD						
Alternative 1	Partial Cloverleaf Interchange	<ul style="list-style-type: none"> Improved connection between WB 270 and NB Lindbergh Improved connection for SB Lindbergh and WB I-270 Eliminating loop ramp reduces conflicts/improves safety Continuous Dunn Road under Lindbergh 	D	--	Eliminating loop ramp improves navigation	Guardrail often damaged on loop ramps by oversize/overweight trucks
AREA 3: HANLEY ROAD/GRAHAM ROAD TO OLD HALLS FERRY ROAD						
ONE-WAY OUTER ROAD SYSTEM						
HANLEY ROAD/GRAHAM ROAD						
Alternative 1	Diamond Interchange	<ul style="list-style-type: none"> Dunn/Pershall Road operate as one-way outer roads Access to/from I-270 via slip ramps 	B		One-way outer roads tend to benefit pedestrians due to fewer conflict points	25 percent fewer crashes
NEW FLORISSANT ROAD TO WASHINGTON STREET/ELIZABETH AVENUE						
Alternative 1	Split Diamond Interchange	<ul style="list-style-type: none"> Dunn/Pershall Road operate as one-way outer roads Access to/from I-270 via slip ramps 	C			
WEST FLORISSANT AVENUE TO OLD HALLS FERRY ROAD						

Table 2. Performance/Operating Characteristics Summary for the Reasonable Alternatives

Reasonable Alternative	Description	Key Features	Level of Service (2040)	Transit Impacts	Bike/Pedestrian Impacts	Freight Movement Impacts
Alternative 1	Split Diamond Interchange (to Old Halls Ferry)	<ul style="list-style-type: none"> Dunn and Pershall operate as one-way outer roads Access to/from I-270 via slip ramps No direct ramps from WB I-270 to New Halls Ferry 	C	One-way outer road system could potentially add approximately \$800,000 to Metro’s annual operating costs and increase travel time and transfer fares for customers living/working along the one-way road sections	One-way outer roads tend to result in out-of-direction travel for bicyclists creating more conflicts with automobiles	
Alternative 1a	Split Diamond Interchange (to New Halls Ferry)	<ul style="list-style-type: none"> Dunn and Pershall operate as one-way outer roads Access to/from I-270 via slip ramps No direct ramps from WB I-270 to Old Halls Ferry 	C			
TWO-WAY OUTER ROAD SYSTEM						
HANLEY ROAD/GRAHAM ROAD				Two-way outer road system is considered to be the same as the No-Build or current routes	Two-way outer roads tend to create more conflicts for pedestrians	Ramp Connections to New Halls Ferry: 30 percent fewer crashes
Alternative 2	Diamond Interchange	<ul style="list-style-type: none"> Dunn and Pershall Roads operate as two-way outer roads 	B			
NEW FLORISSANT ROAD TO WASHINGTON STREET/ELIZABETH AVENUE						
Alternative 2	Split Diamond Interchange	<ul style="list-style-type: none"> Dunn and Pershall Roads operate as two-way outer roads New Florissant and Washington Street/Elizabeth Avenue operate as one interchange 	D			
WEST FLORISSANT AVENUE TO OLD HALLS FERRY ROAD				Two-way outer roads tend to provide more direct travel routes for bicyclists	Ramp Connections to Old Halls Ferry: 32 percent fewer crashes	
Alternative 2	Split Diamond Interchange (to Old Halls Ferry)	<ul style="list-style-type: none"> Dunn and Pershall Roads operate as two-way outer roads No direct ramps from WB I-270 to New Halls Ferry 	D			
Alternative 2a	Split Diamond Interchange (to New Halls Ferry)	<ul style="list-style-type: none"> Dunn and Pershall Roads operate as two-way outer roads No direct ramps from WB I-270 to Old Halls Ferry 	D			
AREA 4: EAST OF OLD HALLS FERRY ROAD TO RIVERVIEW DRIVE						
MO 367						
Alternative 1	Partial Cloverleaf Interchange	<ul style="list-style-type: none"> Provides free flow movement from EB I-270 to MO 367 	C	-	-	Guardrail often damaged on loop

Table 2. Performance/Operating Characteristics Summary for the Reasonable Alternatives

Reasonable Alternative	Description	Key Features	Level of Service (2040)	Transit Impacts	Bike/Pedestrian Impacts	Freight Movement Impacts
		<ul style="list-style-type: none"> • Transitions SB MO 367 ramps from freeway to arterial • Removes loop ramps improving safety and operations 				ramps by oversize/overweight trucks
BELLEFONTAINE ROAD						
Alternative 1	Diamond Interchange	<ul style="list-style-type: none"> • Removes slip ramps • Relocates Dunn Road 	B	-	-	-
Alternative 2	Partial Cloverleaf Interchange	<ul style="list-style-type: none"> • Removes slip ramps • Relocates Dunn Road • Loop ramp allows free flow NB to WB movements 	B	-	-	Guardrail often damaged on loop ramps by oversize/overweight trucks
LILAC AVENUE						
Alternative 1	Diamond Interchange	<ul style="list-style-type: none"> • Moves WB I-270 ramps closer to the freeway to avoid relocating Dunn Road 	B	-	-	-
Alternative 2	Partial Cloverleaf Interchange	<ul style="list-style-type: none"> • Relocates a portion of Dunn Road • Loop ramp allows free flow NB to WB movements • Requires EB I-270 off-ramp to go under Dunn Road 	B	-	-	Guardrail often damaged on loop ramps by oversize/overweight trucks
RIVERVIEW DRIVE						
Alternative 1	Diamond Interchange	<ul style="list-style-type: none"> • Requires extension of ramps to the east when the bridge is replaced 	B	-	-	-
Alternative 2	Partial Cloverleaf Interchange	<ul style="list-style-type: none"> • Moves all ramps to the west of Riverview Drive • Relocates Dunn Road 	B	-	-	Guardrail often damaged on loop ramps by oversize/overweight trucks

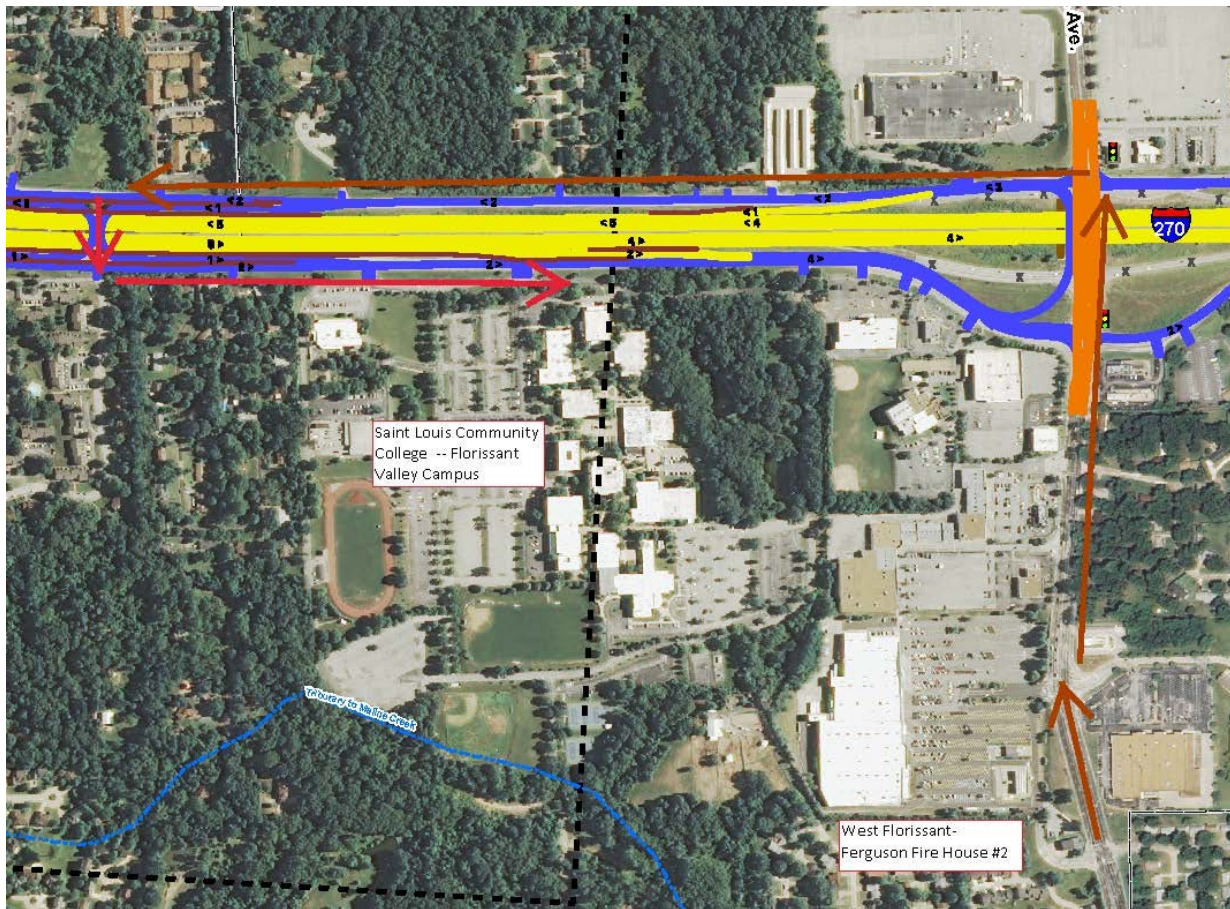


Figure 1. Route from West Florissant-Ferguson Fire House #2 to the St. Louis Community College

Relative to the specific issue associated with access for an EMS run from the West Florissant-Ferguson Fire House #2 to an accident on mainline I-270 between the Elizabeth Avenue/Washington Street and West Florissant Avenue. For accidents on either the eastbound or the westbound lanes, there will be no substantive change to the existing route used from West Florissant-Ferguson Fire House #2. For example, to access an accident on the westbound lanes on I-270, responders would travel north to West Florissant Avenue, east on I-270 east to the Elizabeth/Washington interchange to I-270 westbound, the same as they do now.

As shown with the St. Louis College example, there are scenarios where traffic will experience out-of-direction travel. This level of out-of-direction travel is not expected to have a significant impact on the community. The one-way system will improve traffic flow and will therefore improve travel times. Additionally, MoDOT performed a safety analysis using the Highway Safety Manual. This analysis showed that across the entire study length, the Selected Alternative would reduce crashes by almost 20 percent. In the portion of I-270 between Hanley/Graham and Old Halls Ferry, the Selected Alternative would reduce crashes by more than 25 percent. This will reduce the need for EMS highway runs.

The EA identified numerous fire, emergency medical and police stations throughout the study corridor (**Figure 2**). During the EA, meetings were conducted with EMS providers to discuss how the alternatives would affect their response to emergencies. The emergency responders serving the area between Hanley/Graham and Old Halls Ferry currently have a plan on how they access incidents at various locations. It was discussed that once the Preferred Alternative and the eventual design is complete; the emergency responders would develop a new plan for accessing incidents in north St. Louis County. While the Selected Alternative configuration will change how emergency responders travel to incidents, a new plan based on the final design of the improvements should allow emergency responders to continue to efficiently access and address incidents.

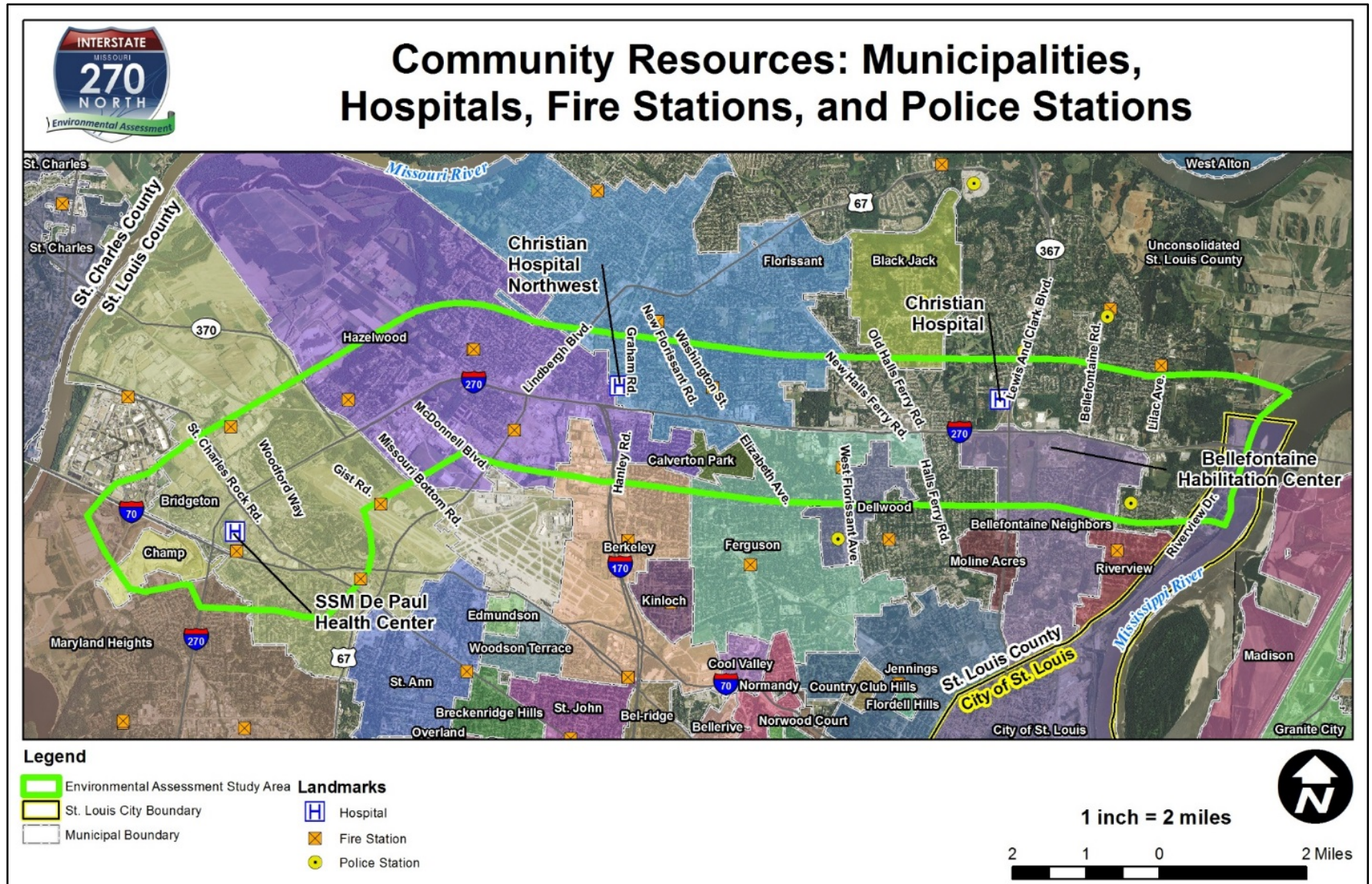


Figure 2. Environmental Assessment Community Resource Map

C. Tax Loss

One commenter was concerned that the Selected Alternative’s structure displacements would negatively affect tax revenues for the City of Florissant. They estimate that their assessment would be “lowered by at least one cent”.

Response: Minimization of right-of-way acquisition and structure displacement was an important criterion for the development and evaluation of alternatives. The Selected Alternative is contained within the MoDOT right-of-way to an extraordinary degree. The Selected Alternative is expected to require the acquisition of 23 residences and buildings housing nine commercial operations. Many of the structure displacements are located within Florissant – mostly concentrated between Graham Road and New Florissant Road. Exhibit 5 in the EA shows the expected displacements.

The EA performed an analysis of available replacement properties and found that the relocations are expected to be readily absorbed into the local market. It is not anticipated that there will be difficulty finding adequate replacement properties for those who are displaced. Relocation resources are available, without discrimination, to all residential properties and businesses impacted by the study. For instance, in the 63135 zip code alone, over 100 comparable residential properties were available. Similar levels of vacancies exist all along the I-270 corridor. Among the affected commercial properties, similar searches found retail availability through the area. Just within Florissant, Bridgeton, and Hazelwood, 35 office sites are currently available and 102 retail sites are available. It appears that adequate replacement facilities would be available for those displaced because of the study. Further, because of the improvements associated with the study, it is anticipated that the value of I-270 adjacent properties will increase, as operations improve. This should more than offset the loss of a small number of buildings.

D. Construction Impacts

One commenter was concerned about community disruptions during construction. They understand that all disruptions cannot be avoided, but they hope that they will be “well managed”.

Response: Construction impacts typically result from utility relocations, roadway construction, and other related activities. These commonly result in impacts that are short-term and temporary in nature. Typical construction impacts include air, water, and noise pollution, and problems with the disposal of construction debris. Traffic patterns may also be altered during construction. To address these impacts, MoDOT has developed a series of Standard Specifications for Highway Construction. These specifications include, but are not limited to, air, noise, and water pollution control measures. The Standard Specifications for Highway Construction also include traffic control and safety measures. MoDOT would implement these standards as a part of the construction of the project.

The EA devotes an entire section to construction impacts (EA Section 4.3). Additionally, many of the study’s Environmental Commitments (see page 8-1) deal with the minimization of construction-related impacts.

E. WBE/MBE Usage

One commenter was concerned about the construction work force and Women-Owned Business Enterprises and Minority-Owned Business Enterprises (WBE/MBE). They cited a goal of 30 percent minority and 7 percent women. They also suggested that a Community Benefits Agreement (CBA) be established to accomplish this.

Response: To provide opportunities to businesses owned and operated by disadvantaged individuals, MoDOT has established the Disadvantaged Business Enterprise Program. The program is administered

by MoDOT's External Civil Rights Division. The office is responsible for the certification of firms owned and operated by socially and economically disadvantaged individuals. MoDOT updates its goals on an annual basis. Assistance programs include mandatory utilization goals, a Business Assistance Center, an Entrepreneurship Training Program, a Business Coaching Program and a Protégé/Mentor Program. Additional information about the program can be found at: http://www.modot.org/business/contractor_resources/External_Civil_Rights/DBE_program.htm

Community Benefits Agreements are complex, multi-party contracts executed to provide community benefits during the construction of a proposed development. In this case, the concern is WBE/MBE involvement. Because of MoDOT's Disadvantaged Business Enterprise Program, a study-specific CBA is unnecessary.

F. Traffic Noise Impacts

One commenter was concerned about the decisions regarding noise abatement in the vicinity of the Sugartree Homes community. The commenter also suggested the use of residential sound insulation; similar to the program used by the Federal Aviation Administration (FAA).

Response: Many of the existing noise sensitive land uses experience traffic noise impacts. An extensive noise analysis was conducted for this study. The proposed improvement of I-270 will moderately increase the already high traffic noise levels. A total of 19 Noise Study Areas were established. Traffic noise level measurements were conducted at locations representative of the sensitive receptors adjacent to I-270. The purpose of this data collection is primarily for model validation purposes. Existing measured noise levels adjacent to I-270 vary between 59.3 and 71.6 A-weighted decibels (dBA). Due to their close proximity to I-270, most existing locations approach or exceed the FHWA Noise Abatement Criteria.

The Traffic Noise Model (TNM) was used to assess impacts for the Selected Alternative using the peak noise hour traffic during the year 2040. Based on the modeled traffic noise conditions, a traffic noise impact was identified for nearly all of the Noise Study Areas. For the receptors that would experience a traffic noise impact, a barrier analysis was conducted. To be recommended for further consideration, a barrier must be both feasible and reasonable. To be considered feasible, a barrier must provide 67 percent of first row, impacted receivers with a minimum of 5 dBA noise reduction. All but three noise study areas were able to achieve the feasibility standard. For the receptors that could achieve the feasibility standard, barrier analysis was continued to investigate reasonability. To be considered reasonable, a barrier should not exceed 1,300 square feet per benefitted receptor. It should also provide a benefit of a minimum of 7 dBA for 67 percent of first-row receptors. Based on the configuration of the Selected Alternative, the following Noise Study Areas are both feasible and reasonable:

- Carrollton Village Condominiums
- Ville Maria Subdivision
- Hathaway Manor (S)
- Brookes Park
- Northwest Quadrant of the Lindbergh Boulevard Interchange
- Marysville (within an outer road barrier at St. Cornelius Lane)

Relative to the Sugartree Homes community, it falls within the Noise Study Area called the Hathaway Manor (North) Noise Study Area. It includes single-family residences as well as the grouped condominiums at Sugartree. Sugartree consists of condominiums to form larger buildings. A total of 33 first row residences exist in this Noise Study Area (31 experience a traffic noise impact). Several noise barriers were tested to create a reasonable and feasible noise barrier in this location. This included a noise barrier adjacent to I-270 as well as a multi-part noise barrier along the outer road. The outer road barrier had multiple parts because it had breaks to accommodate the existing access roads. The primary

reason that not enough receivers obtain enough insertion loss from the barrier is because they are elevated above the roadway. This decreases the effectiveness of the barrier as fewer pathways are intercepted by the barrier. MoDOT does not have a noise insulation program. **Figure 3** depicts a plan view and a skew view at the Sugartree condominiums. Additionally, as the segments are designed and constructed the noise evaluations will be reconsidered, to determine if a reasonable and feasible barrier can be developed.

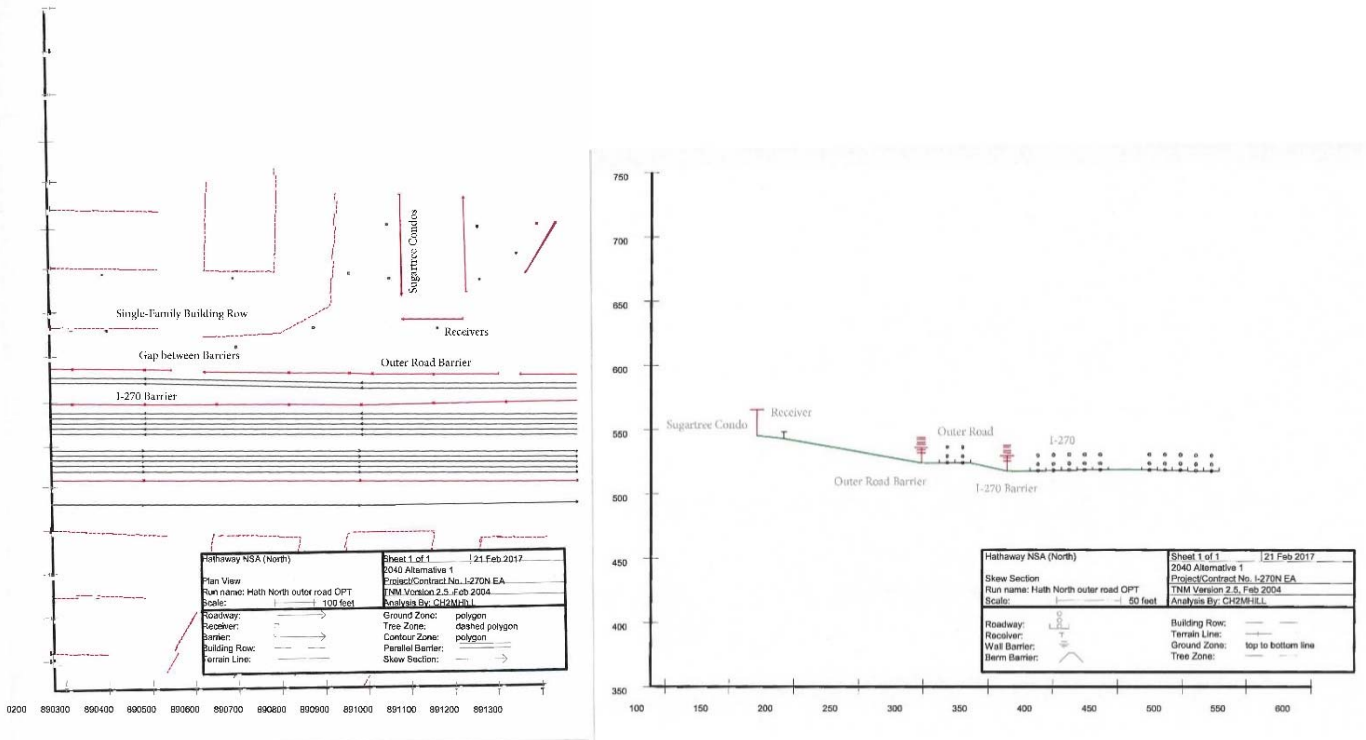


Figure 3. Plan and Skew Views at Sugartree Condominiums

Verbal Public Hearing Comments

As part of the Public Hearing, court reporters were used to capture verbal comments. Two court reporters were used, one captured stakeholder comments in a one-on-one setting while the other captured stakeholder comments in an open microphone setting. Four comments were received in this manner. The transcribed comments are contained in **Appendix D**. The comments are discussed below.

A. Reporter – Shaunda White (Open Microphone Setting)

A single comment was received by Ms. White. The commenter is a 60-year resident (35 years in Old Town Florissant). He has served on the Florissant City Council and on the St. Louis County Interstate 270/Highway 367 Corridor Advisory Commission. He offered that the “preferred alternative may be very good”. However, he thinks the one-way traffic on Dunn and Pershall (between Hanley and New Halls Ferry) is “a very bad idea and will result in serious problems”. He believes this will increase traffic through those crossing that exist in this area. Additionally, he believes that appropriate counterflow alternatives to the north of I-270 don’t exist. He believes that the closest option to travel westbound (against the eastbound flow of Dunn Road) is St. Anthony Road – a narrow residential road. He believes that the same situation exists to the south of I-270. The eastbound counterflow alternative for Pershall Road would be Airport and Chambers Roads.

Response: Traffic modeling results show that this type of redistribution of pathways is limited and localized. Overall, travel times are expected to be lower under the Selected Alternative, even with some instances of out-of-direction travel. The improvement strategies associated with the Selected Alternative (one-way outer roads, intersection improvements, and U-Turn lanes) will allow Dunn and Pershall to operate efficiently and with less congestion during peak traffic periods. The improved conditions will limit the benefits of using local roads to avoid the out-of-direction travel. Only local users will have the knowledge for these detours. Local land use mechanisms (speed humps, enforcement, chicanes, etc.) should be adequate to limit increased cut-through traffic. Because most of the cut-through traffic will be done by local users, these measures are not expected to be necessary or widely desired.

B. Reporter – Angie Kelly (One-on-One Setting)

Three comments were received by Ms. Kelly. One comment was that the commenter’s family are in 100 percent agreement with the Preferred Alternative. They think it will be good for the community.

The second comment said that the “basic idea is good”. The commenter liked the idea that the outer roads are going to be made one direction on both sides of the interstate. They also like the idea of the flyover ramp from I-270 to Route 367.

The third comment came from a life-long North County resident, currently living at 11006 Thousand Oaks Drive in the Sugar Tree Homes Condos. The concern is about the level of noise and vibration that comes into these homes. Representatives from MoDOT gave the commenter a thorough understanding of the Preferred Alternative. She understood that there will be no sound abatement in this area. That is a concern because they have to sleep with ear plugs, and vibration continues to increase. The main concern was about the noise being generated into homes on the north side of I-270, specifically, in Sugar Tree Homes. The commenter suggested the use of residential sound insulation, similar to the program used by the Federal Aviation Administration.

Response: MoDOT acknowledges these comments. The noise barrier comment is more thoroughly addressed in FONSI Section 3F.

Agency Comments

The EA was widely distributed as shown in **Appendix A**. This section addresses the comments that arose from the circulation of the EA. All tribal and agency letters are contained in **Appendix E**. Letters were received from:

- Metropolitan St. Louis Sewer District (MSD)
- Miami Tribe of Oklahoma
- United States Environmental Protection Agency (USEPA)
- Trailnet
- Osage Nation
- Missouri Department of Natural Resources (MNR)
- United States Fish and Wildlife Service (USFWS)

To assist with the identification of issues and responses, the letters from the MNR, USEPA, and Trailnet were annotated to provide summary responses next to the comments. More detailed responses are provided in this section.

A. Metropolitan St. Louis Sewer District

In a letter to MoDOT dated January 4, 2017, MSD provided input. MSD notes that existing sanitary sewers cross the corridor. Some may be slated for improvement. Further, some neighborhoods and streams are sensitive to flooding and erosion. Consequently, MSD requests that MoDOT consult with the watershed leads to identify potential design issues. The Maline/Watkins/Riverview Watershed Lead is John Alexander (314-768-2707 – jcalex@stlmsd.com). The Cowmire/Missouri/Coldwater Watershed Lead is Jason Peterein (314-768-2773 – jtpete@stlmsd.com).

Response: Coordination with MSD was added to the Environmental Commitments for the Selected Alternative (see page 8-1).

B. Miami Tribe of Oklahoma

In an email letter to MoDOT (January 3, 2017), the Miami Tribe offered no objection to the study at this time, as they are not currently aware of existing documentation directly linking a specific Miami cultural or historic site to the study site. However, as this site is within the aboriginal homelands of the Miami Tribe, if any human remains or Native American cultural items falling under the Native American Graves Protection and Repatriation Act or archaeological evidence is discovered during any phase of this study, the Miami Tribe requests immediate consultation with the entity of jurisdiction for the location of discovery. The contact information of the Tribal Historic Preservation Officer (Diane Hunter) is 918-541-8966, or by email at dhunter@miamination.com.

Response: Coordination with the Miami Tribe, if necessary, was added to the Environmental Commitments for the Selected Alternative (see page 8-1).



Important Update: Addition of Environmental Commitment # 17

Pursuant to coordination with the MSD, MoDOT will continue to consult with MSD staff as early in the preliminary design phases as possible so that potential design issues and coordination opportunities can be identified and planned for.



Important Update: Additions to Environmental Commitments 5 & 18

If human remains or cultural resources that may be eligible for listing on the National Register of Historic Places are encountered during construction, their treatment will be handled in accordance with Missouri Unmarked Human Burial Sites Act, §§ 194.400 – 194.410, RSMo, as amended. When encountered, the Contractor shall first stop all work within a 50-foot radius of the remains/site, and secondly, shall notify the MoDOT Resident Engineer and/or Construction Inspector who will contact the MoDOT Historic Preservation (HP) section.

C. United States Environmental Protection Agency (USEPA)

In a letter to MoDOT, dated January 6, 2017, USEPA raised several issues about the I-270 North EA. The complete (and annotated) letter is contained in **Appendix E**. The letter contains several substantive issues. These issues will be discussed below.

- **Study Purpose:** The letter suggests that the characterization of the study’s Purpose and Need should be more fully expressed within the main body of the EA. Currently, EA Section 2 presents a summary of the study’s Purpose and Need (the transposition problems that the study is intended to address). The complete 50+ page Purpose and Need statement is contained in Appendix B of the EA.

Response: According to FHWA guidance on study development and documentation (August 21, 1992) the body of the NEPA document “should be a succinct statement of all the information the decision maker and public need to make the decision”. The document should summarize methodologies and conclusions. Lengthy technical discussions of modeling methodology, baseline studies, or other technical work should go into the appendix. Consequently, the study team acknowledges the comment and will retain the existing EA configuration.

- **Evaluation of Alternatives through their Ability to Satisfy the Elements of the Purpose and Need:** The letter suggested that the EA did not adequately evaluate the effectiveness of the alternatives in addressing the 9 major elements used to describe the transportation problems that the study is intended to address.

Response: The study team continually endeavored to present the pros and cons of the complex alternatives as clearly as possible. The strategies used in the EA were honed through the public involvement process and through the interaction with the Technical Advisory Committee (TAC) and the Community Advisory Group (CAG). EA Tables 3-2, 3-3, 4-4 and 3-5 are the distillation of those experiences. EA Section 3.2.4 documents the evaluation and screening associated with the Conceptual Alternatives. EA Section 3.3.6 outlines the decision-making factors used to differentiate amongst the Reasonable Alternatives. These sections focus on impacts and the ability of the alternatives satisfy the study’s purpose and need.

- **Addressing Interchange Density:** The letter suggests that the study does not meet the interchange spacing guidelines (two to three miles between interchanges) used by MoDOT.

Response: Though the Engineering Policy Guide (940.2) does state 2 to 3 mile spacing between interchanges (Access Management [Guidelines](#)) it is not practical in a highly urbanized region to comply with this guidance. AASHTO A Policy on Geometric Design of Highways and Streets, page 10-68 states “Minimum interchange spacing is 1 mile in urban areas and 2 miles in rural areas. In urban areas, spacing less than 1 mile may be developed by grade-separated ramps or by adding collector-distributor roads.”

The density of interchanges is highest in the area between I-170 and Old Halls Ferry Road. This 4-mile section has seven crossroads with access to I-270. While it is true that the Selected Alternative does not completely eliminate access to any of these cross roads, it would be misleading to assume that it doesn’t comply with MoDOT guidelines. The improvement of the outer road system will reduce crashes, eliminate conflict points and improve operation, while also maintaining access. The Selected Alternative addresses the specific transportation problems associated with the poorly operating interchanges (Purpose and Need Element #3) such as weaving operations, substandard operations along the crossroads, and low operating speeds. The Selected Alternative accomplishes this while also maintaining access at all locations that currently have access.

- **Greenhouse Gas (GHG) Emissions Resulting from Study Changes in Highway Design:** The letter suggests that the EA did not include an adequate GHG assessment.

Response: Science continues to expand our understanding of the impacts of anthropogenic GHG emissions. The nature of how federal agencies address GHG and climate changes is also an evolving area of research.

In 2016, the CEQ issued *Final Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews* (Published in the Federal Register on August 5, 2016). This guidance applies to all EAs and Environmental Impact Statements (EISs) that commence on or after August 5, 2016. For ongoing EAs and EISs, like the I-270 North EA, the guidance suggests that “agencies should consider applying this guidance to studys in the EIS or EA preparation stage if this would inform the consideration of differences between alternatives or address comments raised through the public comment process....” The alternatives for this study are reconfigurations of the existing system intended to increase the efficiency rather than to increase the number of users. Relative to GHG, the differences among the alternatives is minor-focused on elements like interchange designs and outer road configurations. These elements are not expected to measurably affect the levels of GHG inputs, among the alternatives.

- **Construction-Related Impacts to the Adjacent Communities:** The letter suggests that the EA did not address the impacts that the construction of the study would have on emergency responses times, school transportation, safety of pedestrians and public transportation.

Response: The I-270 North study will pursue strategies to reduce construction-related disruptions, minimize costs, and accelerate construction. In the decision making process, no discernible differences among the Reasonable Alternatives, relative to construction disruptions, have been identified. Because this is different than the operational impacts discussed throughout the EA, a separate section (4.3) was included in the EA.

To address construction-related issues associated with response times and safety for pick-ups/drop-offs, bike/pedestrian use and community access, seven Environmental Commitments have been established. They are identified below. These commitments require a MoDOT-approved maintenance of traffic plan. Construction schedules, road closures, and detours will be coordinated with police forces, schools, Metro, Little Creek Nature Area, and emergency services to reduce impact to response times of these agencies. Further, the design process will include consultation to ensure compatibility of the roadway design with continued service. Additionally, proper design, construction strategies, timing and technical assistance will be coordinated during construction.

1. Environmental Commitment #1: MoDOT will coordinate with local emergency services, Metro, and schools in advance of any roadway changes that would disrupt normal travel patterns.
2. Environmental Commitment #2: MoDOT will ensure that the contractor develops an adequate maintenance of traffic plan.
3. Environmental Commitment #3: MoDOT will coordinate, cooperate, and communicate, as required, with the representatives of the railroads located in the corridor throughout the study.
4. Environmental Commitment #4: MoDOT will coordinate, cooperate, and communicate with affected utility companies located in the corridor throughout the study.
5. Environmental Commitment #10: MoDOT will upgrade existing pedestrian facilities to be Americans with Disability Act (ADA)-compliant and provide additional pedestrian and bicycle connectivity where reasonable.
6. Environmental Commitment #15: MoDOT will work with the administrators of the Little Creek Nature Area, a non-Section 4(f) resource, to investigate opportunities to minimize impacts, provide a visual buffer of trees/shrubs, and incorporate potential driveway improvements.

7. Environmental Commitment #16: MoDOT will work with Metro to investigate reasonable roadway modifications that further improve efficiencies for Metro’s operations.

- **Construction Noise:** The letter suggests that the EA did not include an adequate construction noise assessment.

Response: Section 4.3 of the EA addresses construction impact, including construction noise. Noise from heavy construction equipment and haul trucks would result in unavoidable short-term impacts. Residents adjacent to the roadway would be most impacted by construction noise. MoDOT has developed a series of Standard Specifications for Highway Construction. These specifications include noise control measures to minimize construction impacts. MoDOT would implement these standards as a part of the construction of the study. For example, contractors may be required to equip and maintain muffling equipment for trucks and other machinery to minimize noise emissions. Operations with high temporary noise levels, such as pile driving, may require abatement restrictions placed upon it such as work hour controls and maintenance of muffler systems.

- **Hazardous Material Investigations:** The letter suggested that the entirety of the sites identified in the EA’s environmental site assessment screening be included in the Phase 1 and Phase II testing to be conducted during construction.

Response: The EA specifies that *“All 20 facilities that pose a potential for environmental concern are close enough to the Reasonable Alternatives to assume to be affected by the construction of either alternative. Site-specific Phase I and Phase II testing would need to be conducted in the areas of planned construction to evaluate whether contamination was actually present, and at what concentrations.”*

The scoping of these ESAs will take into consideration this recommendation. The scoping of ESAs for those sites affected by construction, will consider testing that will include the entire property.

- **Coordination with Superfund Sites:** The letter suggested that the study coordinate with the agencies responsible for the 2 superfund sites identified in the EA – the Westlake Landfill and the St. Louis Airport Formerly Utilized Sites Remedial Action Program (FUSRAP) Sites.

Response: Environmental Commitment #9 memorializes that MoDOT will coordinate with the USACE related to any required excavation or other land disturbance within the St. Louis Airport Sites FUSRAP Record of Decision (ROD) boundary.

On January 3, 2017, USEPA–Superfund Division contacted the study’s Environmental Lead to respond to the outreach submitted regarding the Westlake Landfill. The EPA representatives felt that the I-270 North study would be unaffected by the Westlake Landfill. MoDOT is committed to continued coordination, through the study’s public involvement and agency plan.

D. Trailnet

Trailnet is a nonprofit organization dedicated to fostering healthy, active, and vibrant communities where walking, bicycling and the use of public transit are a way of life. As part of this mission, Trailnet participates in transportation planning. They help communities design streets, sidewalks, and trails that



Important Update: Clarification of ESA Scoping

Environmental Commitment #8 updated as follows:

EA Table 4-14 identifies 20 facilities that pose a potential for environmental concern. Site-specific Phase I and Phase II testing would need to be conducted in the areas of planned construction to evaluate whether contamination was actually present, and at what concentrations. Pursuant to stakeholder coordination, the scoping of this work will consider the entire property.

invite residents to bike and walk safely, have more opportunities for healthful physical activity close to home, and enjoy the advantages of a livable community.

In their letter, Trailnet offered a number of comments, some of which are substantive in nature. The complete (and annotated) letter is contained in **Appendix E**. These issues are presented along with responses below.

- **A One-Way Outer Road is Not Encouraged:** The letter suggests that the design should be based on safety rather than speed, that the Metro bus transit station requires two-way traffic and that bicyclists have no safe access within a one-way system.

Response: Relative to safety, the one-way system is expected to reduce crashes by 25 percent when compared to the No Build. Relative to out-of-direction travel, total distance traveled can be higher under a one-way system, but overall travel time is less. This is true overall and for most important destinations/pathways. Relative to conflicts with other vehicles, they are minimized under the one-way system as traffic is flowing in only one direction on the outer roads and fewer vehicles will travel through signalized intersections due to the free-flow U-Turn lanes.

- **Does the Selected Alternative include Bike/Pedestrian Amenities?** The letter asked about sidewalks, improved bus stations and bike lanes. The letter also asked if the parcel acquisition took into account pedestrian and bicycles facilities.

Response: As an Environmental Commitment (Section 8, Environmental Commitment #10) MoDOT will upgrade existing pedestrian facilities to be ADA-compliant and provide additional pedestrian and bicycle connectivity where reasonable.

Additionally, consistent with public involvement and stakeholder coordination, where prudent and feasible, plans for appropriate pedestrian and bicycle access will be developed during the final design process. MoDOT coordination with interested parties during the final design process is a standard component of the study development process.

- **Trailnet Supports Effective Travel Demand Management Programs:** This led to the following recommendations: Alternative 2 at McDonnell Boulevard, a two-way outer road system at Hanley/Graham and Alternative 1 at Lilac Avenue.

Response: The Selected Alternative includes a Diverging Diamond Interchange (DDI) at McDonnell Boulevard. This is Alternative 1. Trailnet suggests that Alternative 2 (a partial cloverleaf) will better provide “bike/ped opportunities with a Park and Ride lot.” MoDOT acknowledges the difficulties that DDI have for pedestrians, but ultimately chose it because its synchronized signals reduce delays and the design has a lower number of conflict points.

The Selected Alternative utilizes a one-way outer road system. This configuration will cause some trips to experience out-of-direction travel. The level of out-of-direction travel is not expected to constitute a significant impact to the community. The one-way system will improve traffic flow - minimizing travel times. Additionally, it will reduce the likelihood of crashes.

The Selected Alternative includes a diamond interchange at Lilac Avenue (Alternative 1) as suggested by Trailnet.

E. Osage Nation

The Osage nation requested a copy of the “Environmental Assessment and the cultural resources survey report”. They indicated that they anticipated responding.

Response: The requested materials were supplied on January 11, 2017 and the comment period was extended to January 26, 2017. No further comments were received from the Osage Nation.

F. Missouri Department of Natural Resources (MDNR)

On December 27, 2016, Robert Stout (Chief of Policy for MDNR) provided a long letter of comments. The complete (and annotated) letter is contained in **Appendix E**. The letter contained information about the study area regarding Hazardous Waste, Solid Waste and Water Protection. Much of this information is contained in the EA.

Response: The following additions and responses were made pursuant to the MDNR letter:

Page 1 – Hazardous Waste – Request for Coordination with Army Corps of Engineers Regarding FUSRAP

The FUSRAP was initiated to clean up sites that had become contaminated from the nation’s early atomic programs. The program is administered by the U.S. Army Corps of Engineers (USACE). The

Environmental Commitment #9

MoDOT will coordinate with the USACE related to any required excavation or other land disturbance within the St. Louis Airport Sites FUSRAP ROD boundary. Coordination will begin prior to the commencement of construction for each study phase that affects the Decision boundary and will continue throughout the duration of construction.

St. Louis Airport Sites (SLAPS) is adjacent to the I-270 North study area in the southwestern quadrant of the Lindbergh Boulevard interchange.

Coordination meetings with the utility support component of the FUSRUP regarding the SLAPS were conducted as part of the I-270 North EA. The utility support component will remediate areas where the study will conduct earthwork within the FUSRAP ROD boundary (basically between Lindbergh and I-170). Coordination with the USACE will continue as the study progresses, pursuant to Environmental Commitment #9.

Prior to any earthwork within the St. Louis Airport Sites FUSRAP ROD boundary (between Lindbergh and I-170) will be coordinated, by MoDOT, with USACE (Department of the Army, St. Louis District, Corps of Engineers, 8945 Latty Avenue, Berkeley, Missouri 63134). Earthwork plans, volumes of materials, timing and construction limits are important elements needed for the utility support component of the 2005 ROD.

Page 2 – Hazardous Waste – Request for Clarification of EA Data Regarding EPA Radiological Survey

The letter suggested that the EPA radiological survey (2013) referenced in the EA identified areas of elevated gamma radiation in the Coldwater Creek area that were not of a sufficient sensitivity to make a determination about the presence/level of contamination in the Coldwater Creek. The study team accepts this contention. Further, the letter suggests that the testing conducted by the USACE under the auspices of FUSRAP provides superior information. MoDOT also accepts this contention. Because of the concerns associated with the St. Louis Airport Sites, coordination with the USACE is an Environmental Commitment (#9) of the study. FONSI Section 6C contains additional information about the study’s coordination with the USACE.



Important Update: Coldwater Creek and Radiological Survey

The MoDOT accepts the MDNR contention that the 2013 EPA radiological testing is insufficient to make a determination of the presence/level of contamination in the Coldwater Creek.

Page 2 – Hazardous Waste – Coordination with Westlake Landfill

The letter requested coordination with the USEPA Regarding the Westlake Landfill. This coordination is discussed in this FONSI in Section 6A. In short, the USEPA felt that the I-270 North study would be unaffected by the Westlake Landfill. MoDOT is committed to continue coordination with the USEPA representatives as the study begins construction.

Page 2 – Hazardous Waste – Coordination Needs with Army Corps of Engineers Regarding FUSRAP

The letter provided some input regarding the needs associated with coordinating with the USACE. Regarding coordination with USACE, EA Section 4.10.3.2 identifies the specifics of coordination needs. For example, earthwork plans, volumes of materials, timing and construction limits are the important elements needed for the utility support component of the 2005 ROD.

Page 6 – Water Protection - Metropolitan No-Discharge Stream



**Important Updates:
Water Protection**

The letter identifies the following water protection updates:

- The Coldwater Creek as a metropolitan no-discharge stream.
- The letter identified that Watkins Creek is listed as impaired due to E. coli.
- The Coldwater Creek is listed as impaired due to chloride.
- The Watkins Creek has an approved TMDL for E. coli.

The letter mentioned that the Coldwater Creek was a metropolitan no-discharge stream. The study acknowledges this. As specified in 10 CSR 20-7.031(7) discharges to these streams is prohibited. However, permitted stormwater discharges are exempt.

Page 7 – Water Protection – 303(d) Impaired and 305(b) Threatened Waters

The letter identified that Watkins Creek is listed as impaired due to E. coli and Coldwater Creek is listed as impaired due to chloride. This is acknowledged.

Page 7 – Water Protection – Waters with Approved Total Maximum Daily Loads (TMDLs)

The letter identified that the Watkins Creek has an approved TMDL for E. coli and that extra protections may be included in permits in order to comply with TMDL allocations.” This is acknowledged.

G: United States Fish and Wildlife Service (USFWS)

In addition to circulating the EA, coordination with the USFWS regarding potential Indiana or Northern long-eared bat impacts was conducted. This coordination is documented in the EA in Section 4.6.3. The EA established measures to reduce adverse effects to bats, commitments to coordinate with the USFWS and MDC during future design phases, and future Section 7 consultation if necessary. In the EA, the FHWA made a determination that the study is not likely to adversely affect Indiana and Northern long-eared bats. The USFWS concurred with this determination in their response (**Appendix E**).

Other Study-Related Outreach

As part of the completion of the EA and the Public Hearing, a series of other outreach activities were conducted. These efforts are discussed below.

A. Coordination with Westlake Landfill

On January 3, 2017, the U.S. Environmental Protection Agency –Superfund Division contacted the study’s Environmental Lead to respond to the study team’s outreach regarding the Westlake Landfill. In September 2016, the MoDOT contacted the regulatory agencies with the responsibility for the landfill to discuss the questions that our Technical Advisory Committee (TAC) and Community Advisory Group (CAG) had about the possibility of contamination associated with haul roads going through the community to the landfill.

Westlake Landfill is located on a 200-acre parcel about 1-mile north of the I-70 interchange within the city limits of Bridgeton, Missouri (<http://westlakelandfill.com/History.aspx>). The site contains a mixture of radiological-contaminated soils, municipal refuse, and construction/demolition debris. The portions of the Westlake Landfill closest to I-270 are visible on Sheet 2 of 13 in **Appendix B**.

The EPA representatives felt that the I-270N study would be unaffected by the Westlake Landfill. They felt that the testing that has occurred over the years has established that there is no contamination associated with the landfill that could affect the construction of the Selected Alternative. The study team is committed to continued coordination with the EPA representatives as the study begins construction.

B. Coordination with Florissant Mayor Robert Schneider

Prior to the Public Hearing, the mayor and city council of the City of Florissant submitted a letter to the I-270 North Community Advisory Group (CAG) Members. As part of the Public Involvement Plan, a CAG was established to assist in developing a comprehensive understanding of the study and refining potential solutions. CAG members were broadly categorized in two areas—municipal/service stakeholders (such as municipal engineers and fire chiefs) and general interest stakeholders (such as residents, business owners, and commuters). The mayor and his City Engineer were both members of the CAG.

In their letter, the City of Florissant identified reservations about the one-way outer roads proposed for Dunn Road and Pershall Road. The complete (and annotated) letter is contained in **Appendix F**. The letter contains several substantive issues. These issues will be discussed below.

- **Increased Traffic on I-270 Crossroads as the Result of U-Turns Required by One-Way Traffic Patterns:** The letter suggests that many of the access routes between the north and south sides of I-270 pass through the City of Florissant. They specifically identified North Hanley Road, New Florissant Road, Elizabeth Avenue/Washington Street, West Florissant Avenue, and New Halls Ferry Road. In their view, “these are already heavily traveled and, especially during rush hours, very heavily congested”.
Response: The EA included a detailed traffic analysis and traffic modeling to evaluate future traffic operations. This analysis confirmed that the crossroad and intersection improvements included in the Selected Alternative would adequately accommodate future traffic volumes. Further, modeling results show that crossroad and intersection configuration improvements, combined with proposed U-Turn lanes at New Florissant, West Florissant, and New Halls Ferry, will improve operations. These

improved operations combined with the reduction of conflict points will improve safety at intersections and along on crossroads.

- **Increased Response Times for Emergency Service Responders:** The letter suggests that one-way traffic patterns would increase traffic delays and increased response times for emergency responders from the City of Florissant and/or the Florissant Valley Fire Protection District.

Response: The study team acknowledges that configuration in the Selected Alternative will result in changes in access to and from I-270 and therefore will affect how emergency responders get to incidents on the outer roads and I-270. The I-270 study team met with emergency responders a number of times during the study to discuss the effects the Preferred Alternative configuration will have on their ability to respond to incidents. Discussions revolved around how emergency responders currently travel to incidents, especially when neighboring units are asked to assist with emergencies. One of the key discussion items was that any reconstruction of the I-270 corridor would significantly alter the existing roadway and interstate access/ramp configurations, regardless of the outer road configuration.

The emergency responders serving the area between Hanley/Graham and Old Halls Ferry currently have a plan on how they access incidents. It was concluded that as final design nears completion, the emergency responders would develop a new plan for accessing incidents in north St. Louis County. While the Selected Alternative configuration will change how emergency responders travel to incidents, a new plan based on the final design of the improvements will allow emergency responders to continue to efficiently access and address incidents.

In addition, as mentioned above, traffic analysis and modeling show that improvements to the crossroads and intersections, and the inclusion of U-Turn lanes, will improve safety and reduce the number of incidents for which emergency responders will be required to respond. Additionally, MoDOT performed a safety analysis of the Preferred Alternative and the existing system using the Highway Safety Manual. This analysis showed that across the entire study length (between I-70 and the Chain of Rocks Bridge), the Preferred Alternative would reduce crashes by almost 20 percent compared to retaining the existing configuration. In the portion of I-270 between Hanley/Graham and Old Halls Ferry, the Preferred Alternative would reduce crashes by more than 25 percent compared to retaining the existing configuration.

The highest levels of out-of-direction travel occur at destinations located just upstream of the starting point. An example is an EMS run from the West Florissant-Ferguson Fire House #2 to the St. Louis Community College. The Fire House is located at 10701 West Florissant Avenue. The Saint Louis Community College - Florissant Valley campus is located at 3400 Pershall Road. The current response run would be a trip of 0.9 mile - West Florissant Avenue (north) to Pershall Road and east to the college. Under the one-way system, the trip would be roughly 1.7 miles - West Florissant Avenue (north) to Dunn Road (east) to the Texas Turn-Around to Pershall Road (west) to the college (**Figure 4**). Out-of-direction travel, by even minimal amounts, is an impact of this study. It is mitigated by the system's higher travel speeds, fewer crashes and improved flow conditions.

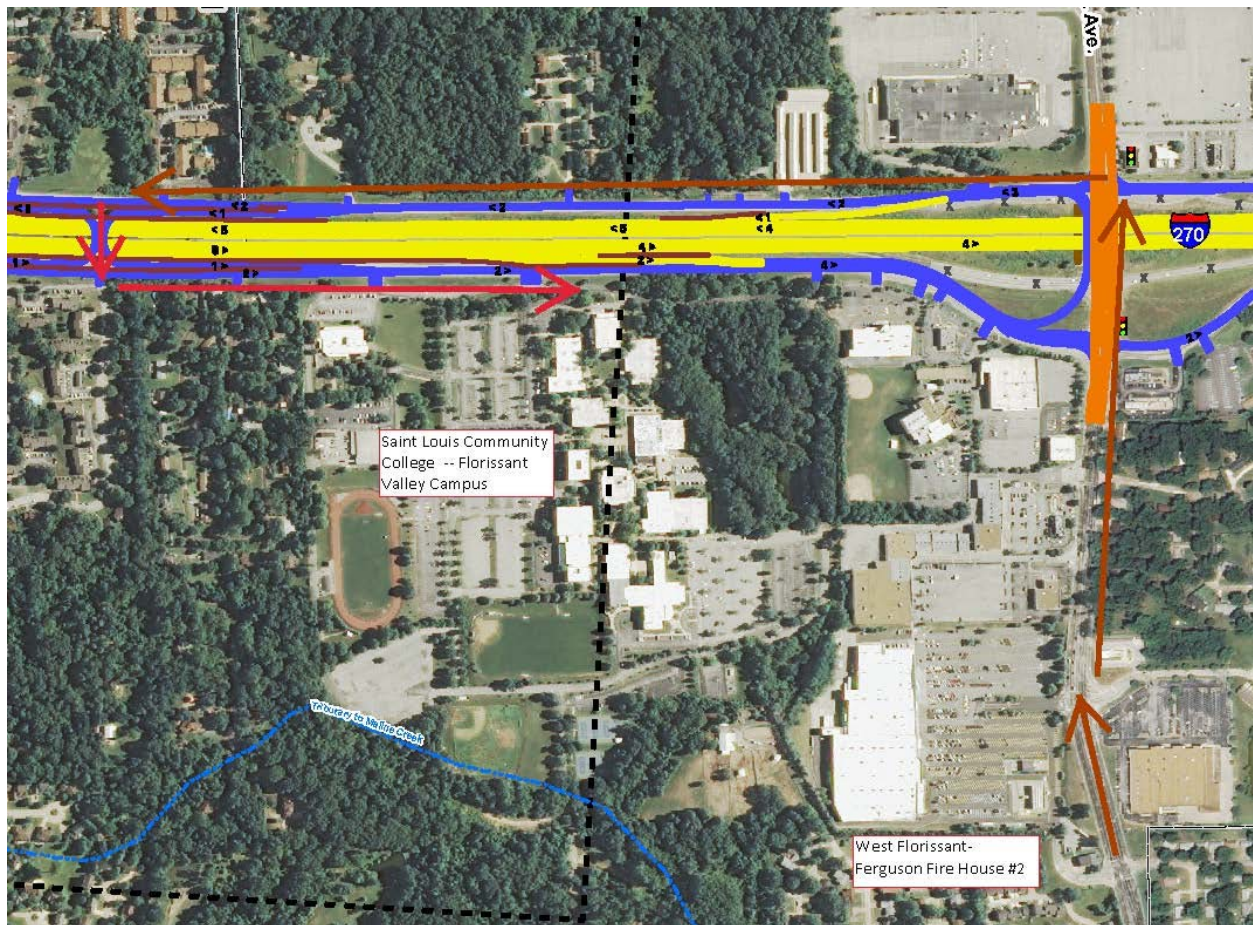


Figure 4. Route from West Florissant-Ferguson Fire House #2 to the St. Louis Community College.

- **Specific Delays and Out-of-Direction Travel:** The letter also cites “significant” problems for specific users. The specified users included:
 - Saint Louis Community College
 - North County Metro Station
 - St. Louis Christian College
 - North County Christian School
 - Little Creek Wildlife Area
 - Ferguson-Florissant School District
 - Greater Grace Church
 - Ferguson Florissant Science and Technology School
 - Grandview Plaza Shopping Center
 - Johnny Londoff Chevrolet
 - Jewel Banquet Center (formerly Yacavelli’s)
 - Joe’s Auto Mart Shopping Center
 - Rizzo’s Plaza

Response: The Selected Alternative and specifically the one-way outer roads as proposed will change access to the corridor for all users. Detailed traffic analysis performed during the study show that, on average, future trips to and from many destinations would require traveling a longer distance; however, these trips will take a shorter time to complete. Crossroad and one-way outer roads improvements, intersection improvements (including fewer signals), and appropriately spaced U-Turn lanes will all enhance travel times to the benefit of all users. For example, travelers from St. Louis Community College – Florissant Valley desiring to travel westbound on I-270 currently make a left turn onto Pershall, followed by right turn on Washington/Elizabeth, a left turn onto Dunn, travel through the New Florissant intersection, and then finally onto I-270 at the slip ramp just west of New Florissant. These movements require traveling through three signalized intersections (two at Washington/Elizabeth and one at New Florissant). This decreases safety

because of the number of conflict points and it adds traffic to all three intersections. Under the Selected Alternative configuration, travelers would turn right onto Pershall, travel through the U-Turn lane at West Florissant, and use the slip ramp just west of West Florissant to get onto westbound I-270. This trip reduces traffic on Washington/Elizabeth and the New Florissant intersection, and would not require traveling through any signalized intersections resulting in a quicker and safer trip.

Similar levels of pathway alteration are expected throughout the corridor.

- **Availability of “Counter Flow” Routes:** The letter says that there are no acceptable or convenient, counter flow routes in the immediate area. By counter flow the letter means routes on either side of I-270 intended to handle the anticipated traffic in the opposite direction of the outer roads.

The letter suggests, that motorists will want to stay on the side of I-270 that they are on to travel in the direction opposite to the corresponding one-way frontage road. For example, they expect motorists to use St. Anthony Lane to travel east-bound for their trips north of I-270. This would significantly increase traffic on that roadway.

Response: Traffic modeling suggests that this type of redistribution of pathways is limited and local. Overall, travel times are expected to be lower under the Selected Alternative, even with some instances of out-of-direction travel. The improved conditions will limit the benefits of using local roads to avoid the out-of-direction travel. Only local users will have the knowledge for these detours. Local land use mechanisms (speed humps, enforcement, chicanes) should be adequate to limit increased cut-through traffic. Because it will be practiced by local users, these measures are not expected to be necessary or widely desired.

- **The enumerated impacts represent an Unfunded Mandate to Florissant:** The letter suggests that the one-way system will force the citizens of Florissant to deal with increased traffic without funding to remediate specific problems. It suggests that there are no FHWA/MoDOT projects designed to address local issues that may arise. The City of Florissant will also be forced to expend manpower and find funds to deal with the problems arising from the conversion to a one-way system.

Response: According to the cost estimates used in the long-range transportation plan (*Connected2045*), the I-270 North study is expected to cost nearly one billion dollars. As discussed in the Purpose and Need, the intent of the study is to solve many of the substantive transportation issues that the local communities have with the I-270 corridor. Additionally, construction projects of this magnitude have multiplier effects that benefit the local community. Improved operations along the I-270 corridor can improve property values, spur development and reinvigorate communities. Merchants generally benefit from increased sales to construction crews. Additionally, this type of project requires many types of equipment and services that are cost effective when supplied locally.

Relative to funding for local projects, MoDOT has a Local Public Agency (LPA) program intended to be used by cities and counties to sponsor projects utilizing federal transportation funds provided under the current transportation bill, the Moving Ahead for Progress in the 21st Century (MAP-21). The local agency may reference MoDOT's Standard Specifications for Highway Construction for issues not addressed in the LPA Policy. The LPA Policy addresses the following four local programs that are funded under the current transportation act:

- Highway Bridge Program
- Surface Transportation Program - Urban
- Surface Transportation Program - Enhancement
- Congestion Mitigation and Air Quality

Additional information regarding federal requirements is available through the MoDOT district representative. The MoDOT district representative is also the primary contact to furnish the necessary guidelines and coordinate the necessary reviews and approvals. MoDOT personnel will advise and assist the local agency in meeting the requirements of the program.

- **Limiting the Scope of the Study:** The letter encouraged MODOT to focus primarily on updating the capacity of I-270 and eliminating consideration of changes to the outer road system.

Response: The Purpose and Need Statement of the study identified the interrelated nature of the outer roads with I-270. It would be impossible to create an acceptable facility without addressing all of the elements of the system. Following the Public Hearing, a coordination meeting was held on January 12, 2017, with the City of Florissant to continue the discussion of the City's concerns. The meeting discussed the status of the study and focused on the specific comments expressed in the letter. Many intractable issues seemed to be able to be resolved with an explanation of the consequences of the Selected Alternative. At the conclusion of the meeting the Mayor asked if the other City representatives in attendance agreed that the City should support the study and the Preferred Alternative. All agreed that they should and that they are committed to working with MoDOT to continue to move the study forward. The meeting minutes are contained in **Appendix F**.

C. Coordination with Formerly Utilized Sites Remedial Action Program (FUSRAP)

The Saint Louis Airport/Hazelwood Interim Storage/Futura Coatings Co. site consists of three areas used for storing radioactive and other wastes from uranium processing operations conducted in Saint Louis by the Atomic Energy Commission (AEC) and its successor, the U.S. Department of Energy. Radioactive metal scrap and drums of waste were stored in the airport area in uncovered and un-stabilized piles from 1947 to the mid-1960s, when they were transferred 0.5-mile northeast to AEC's Hazelwood Interim Storage area. Buildings in the airport area were razed, buried, and covered with clean fill after 1967. In 1969, the land was conveyed to the Lambert Saint Louis Airport Authority. Hazelwood Interim Storage and the Futura Coatings Co. plant cover 11 acres adjacent to Latty Avenue, Coldwater Creek, and Hanley Avenue. In 1966, Continental Mining and Milling Co. acquired the property and recovered uranium from wastes purchased from AEC's Saint Louis operations. In 1967, the company sold the property, and by 1973 most processing residues had been removed. Under the direction of the Nuclear Regulatory Commission, the present owner excavated contaminated soil and is storing it in two large piles in the eastern portion of the 11 acres. Since the 1970s, the Futura Coatings Co., a manufacturer of plastic coatings, has leased the western portion. The chemicals of concern include uranium, thorium, and radium in sediment and soil. Investigations and removals are ongoing at this site (<http://www.epa.gov/superfund/sites/npl/nar1244.htm>). In 2005, a ROD was finalized to outline the cleanup of this site (also known as the St. Louis Airport Sites). The cleanup is being administered by USACE under the FUSRAP. The FUSRAP area is shown on **Figure 5**.

SECTION 6 – OTHER STUDY-RELATED OUTREACH

\\07220\work\Col\North County\log\North County ROD Boundary.mxd



Figure 5. FUSRAP ROD Boundary

The known Superfund sites (Westlake Landfill and the Saint Louis Airport/Hazelwood/Futura Coatings Co. site/Coldwater Creek complex) are also believed to constitute a risk to the construction of the Selected Alternative. Coordination with the FUSRUP was part of this study. The utility support component of the 2005 ROD will remediate areas where the study will conduct earthwork within the FUSRAP ROD boundary (basically between Lindbergh and I-170). Coordination with USACE will continue as the study progresses.

Prior to any earthwork within the St. Louis Airport Sites FUSRAP ROD boundary (between Lindbergh and I-170) MoDOT will coordinate with USACE (Department of the Army, St. Louis District, Corps of Engineers, 8945 Latty Avenue, Berkeley, Missouri 63134). Earthwork plans, volumes of materials, timing and construction limits are important elements needed for the utility support component of the 2005 ROD.

D. Coordination with Greater Grace Church

Church leadership contacted MoDOT to discuss the impacts of the study on their church at 3690 Pershall Road. Specifically, they were concerned with elements that would block the visibility of the church from the highway. They were also concerned about impacts from the one-way outer road.

The study team coordinated with Bishop Jones to address these concerns. Relative to visual screening, the study element that might shield the church from view is the ramp needed to facilitate the U-Turn over the highway. The turn-around road starts near the northwestern corner of the church property. The elevation of the new outer road will be virtually the same as it is currently. From that point, it ascends steadily until it reaches the turnaround point. The road will be supported by a mechanically stabilized earth wall (depicted as a red line on **Figure 6**). This wall will partially shield the view of the church. It will affect those drivers travelling eastbound on I-270. The church will still be visible, but obscured on their approach toward the church. Westbound views will not be affected.

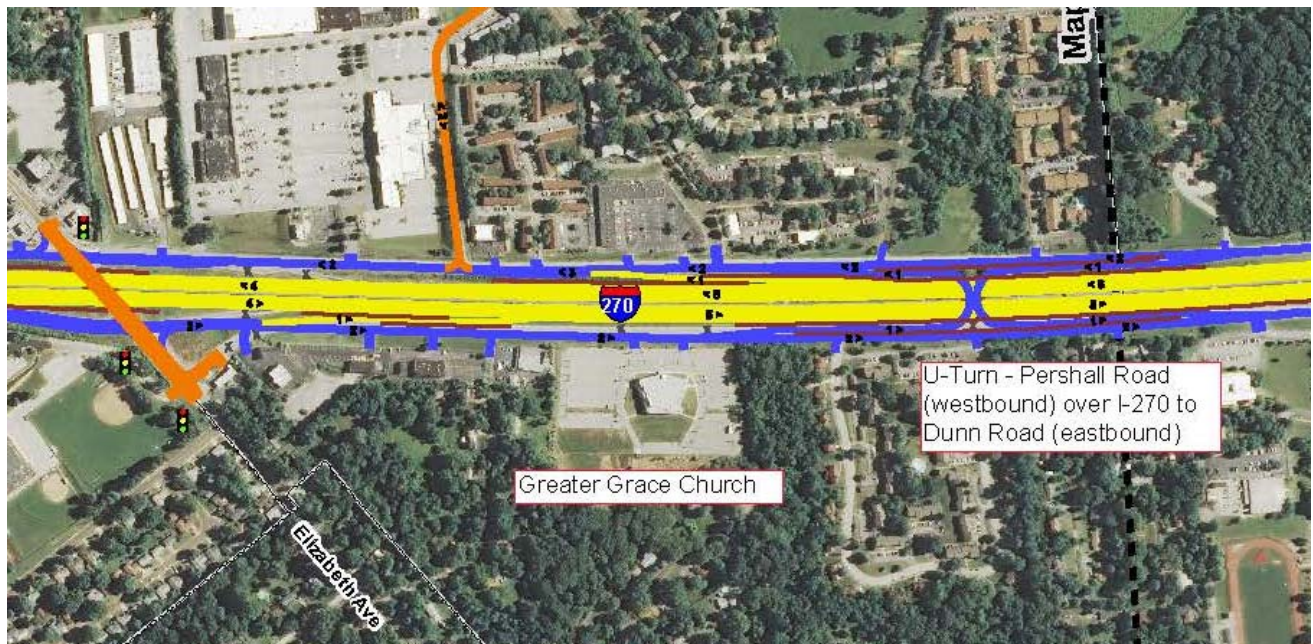


Figure 6. Selected Alternative and Greater Grace Church

Relative to the impact from the one-way outer road on the church, travelers destined for the church will be largely unaffected. Eastbound travelers will use the off ramp/exit to Washington/Elizabeth, which allows quick access to Pershall Road. Westbound travelers will continue to use the Pershall Road directly to the church. The study team appreciates the concerns of existing businesses and residences regarding the conversion to a one-way outer road. However, the benefits of the system greatly outweigh their costs. Relative to out-of-direction travel, total distance traveled can be higher under a one-way system, but overall travel time is expected to be lower. This is true overall and for most important destinations/pathways. Relative to conflicts with other vehicles, they are minimized under the one-way system.

Summary of Impacted Resources

The process that led to the identification of the Selected Alternative included evaluating impacts. The impact analysis was multi-faceted, encompassing numerous elements, such as right-of-way requirements, environmental impacts, socio-economic consequences, disruptions to important cultural resources, community impacts, building relocations, safety, and other engineering considerations along with an examination of the compatibility with local transportation priorities.

Impacts associated with the Selected Alternative include the acquisition of land and structures, stream and floodplain crossings, alterations to the bike/pedestrian environment, noise impacts, and work in proximity to several neighborhoods. **Table 3** presents an impact summary for the Selected Alternative. The Selected Alternative conforms to the criteria contained within the MoDOT Engineering Policy Guide, the study's Purpose and Need, and the study's desired operational characteristics/performance measures. It also minimizes impacts to the human and natural environment.

The impacts associated with the Selected Alternative have not changed since the EA was approved.

Table 3. Environmental Impact Summary for the Preferred Alternative
I-270 North Environmental Assessment

DESCRIPTION	PRELIMINARY STRUCTURE ACQUISITION ESTIMATES	PRELIMINARY PROPERTY ACQUISITION ESTIMATES	PARKS AND RECREATION IMPACTS	ENVIRONMENTAL JUSTICE IMPACTS	WATERWAY IMPACTS	BIKE/PEDESTRIAN IMPACTS	KEY TRAFFIC PATTERN IMPACTS
SAINT CHARLES ROCK ROAD							
Improved Interchange (Alternative 1)	None	Less than 1 acre	No property acquisition from Carrollton Disc Park; operational impacts are not expected	Diverging diamond interchanges can limit some transit bus and emergency medical services operations.	Nearly identical Cowmire Creek Crossings	Depending on design, diverging diamond interchanges can require pedestrians to cross free-flowing traffic	<ul style="list-style-type: none"> Synchronized signals reduce delay Reduced number of conflict points
MCDONNELL BOULEVARD							
Improved Interchange (Alternative 1)	None	Less than 1 acre	None	Diverging diamond interchanges can limit some transit bus and emergency medical services operations.	None	Depending on design, diverging diamond interchanges can require pedestrians to cross free-flowing traffic	<ul style="list-style-type: none"> Synchronized signals reduce delay Reduced number of conflict points
LINDBERGH BOULEVARD							
Improved Interchange (Alternative 1)	None	± 4 acres	No property acquisition from Brookes Park, but trees within right-of-way may be removed	Improved interchange will benefit local users.	None	Direct Dunn Road connection through Lindbergh Boulevard interchange should improve bike/pedestrian operations	<ul style="list-style-type: none"> Improved connection between WB 270 and NB Lindbergh Boulevard Improved connection for SB Lindbergh Boulevard and WB I-270 Eliminating loop ramp reduces conflicts Continuous Dunn Road under Lindbergh Boulevard
HANLEY ROAD/GRAHAM ROAD							
Improved Interchange with One-Way Dunn/Pershall Roads (Alternative 1)	Two single-family residences at Pershall Road and Brackleigh Lane	Less than 2 acres	No expected impacts to the Myers House	Metropolitan Saint Louis Transit Agency (Metro Transit) estimates that one-way outer roads will increase their operating expenses.	None	One-way outer roads tend to benefit pedestrians (because of fewer conflict points). One-way outer roads tend to result in out-of-direction travel by bicyclists, thus creating more conflicts with automobiles	<ul style="list-style-type: none"> Dunn and Pershall Roads operate as one-way outer roads Access to/from I-270 via slip ramps
NEW FLORISSANT ROAD TO WASHINGTON STREET/ELIZABETH AVENUE							
Improved Interchange with One-Way Dunn/Pershall Roads (Alternative 1)	<ul style="list-style-type: none"> Twenty-one single-family residences: six at Santa Cruz Drive, and fifteen between DuBourg Lane and Jean Drive Plaza Duchesne: Kwik Mart and five others and Gary's A+ Auto/ Joe's Auto Mart Creative Cuts: Pershall/Jean 	± 13 acres	None	One-way operation at New Florissant Road and Washington Street is primarily within the existing corridor. Important exceptions include the creation of a connection between Dunn Road and Waterford, behind the Grandview Plaza Shopping Center and the possible mid-block crossover at Grandview Drive.	Limited culvert extensions for Fountain Creek	One-way outer roads tend to benefit pedestrians (because of fewer conflict points). One-way outer roads tend to result in out-of-direction travel by bicyclists creating more conflicts with automobiles	<ul style="list-style-type: none"> Dunn and Pershall Roads operate as one-way outer roads Access to/from I-270 via slip ramps

Table 3. Environmental Impact Summary for the Preferred Alternative
I-270 North Environmental Assessment

DESCRIPTION	PRELIMINARY STRUCTURE ACQUISITION ESTIMATES	PRELIMINARY PROPERTY ACQUISITION ESTIMATES	PARKS AND RECREATION IMPACTS	ENVIRONMENTAL JUSTICE IMPACTS	WATERWAY IMPACTS	BIKE/PEDESTRIAN IMPACTS	KEY TRAFFIC PATTERN IMPACTS
WEST FLORISSANT AVENUE TO OLD HALLS FERRY ROAD							
Improved Interchange from West Florissant Avenue to New Halls Ferry Road with One-Way Dunn/Pershall (Alternative 1a)	None	± 6 acres	Little Creek Nature Area: Acquisition limited to narrow linear strip along Dunn Road. Driveway will be improved as necessary	Metro Transit estimates that one-way outer roads will increase their operating expenses. Additional turnarounds provided from WB Dunn Road to EB Pershall Road between Washington Street /Elizabeth Avenue and West Florissant Avenue and from EB Pershall Road to WB Dunn Road at New Halls Ferry Road.	All alternatives have limited culvert extensions of existing culverts within Maline Creek tributaries at New Halls Ferry Road and Old Halls Ferry Road. These alternatives have no other impacts	One-way outer roads tend to benefit pedestrians (because of fewer conflict points). One-way outer roads tend to result in out-of-direction travel by bicyclists, thus creating more conflicts with automobiles	<ul style="list-style-type: none"> Dunn and Pershall Roads operate as one-way outer roads Access to/from I-270 via slip ramps No direct ramps from WB I-270 to Old Halls Ferry Road
MO 367							
Improved Interchange (Alternative 1)	None	± 1 acres	No direct impacts to Bellefontaine Conservation Area	-	Limited culvert extensions of existing culverts for Maline Creek tributaries	-	<ul style="list-style-type: none"> Provides free flow movement from EB I-270 to MO 367 Ramps on SB MO 367 to transition from freeway to arterial Removes two loop ramps, thus improving safety and operations
BELLEFONTAINE ROAD							
Improved Interchange (Alternative 1)	Pizza Hut restaurant	± 8 acres	None	-	New crossing of Watkins Creek for relocated Dunn Road and replacement of existing culverts elsewhere	-	<ul style="list-style-type: none"> Removes slip ramps Relocates Dunn Road
LILAC AVENUE							
Improved Interchange (Alternative 1)	None	None	None	-	None	-	<ul style="list-style-type: none"> Moves WB I-270 ramps closer to the freeway to avoid relocating Dunn Road
RIVERVIEW DRIVE							
Improved Interchange with Two-Way Dunn Road (Alternative 1)	None	None	No impact to Dundee Park or Watkins Estate	-	Limited culvert extensions of existing culverts within Watkins Creek	-	<ul style="list-style-type: none"> Will require extension of ramps to the east when the bridge is replaced

Commitments

During the design and implementation of the Selected Alternative, MoDOT is committed to obtaining necessary permits and performing other actions that would minimize and mitigate the impacts of the study on the environment. In addition to adhering to the provisions of MoDOT construction standards depicted in the Engineering Policy Guide, the following specific environmental commitments are summarized in this section. Pursuant to the circulation of the EA, two additional Environmental Commitments have been added to the study (#s 17 and 18). Additionally, commitments #5 and #18 have been updated.

1. MoDOT will coordinate with local emergency services, Metro, and schools in advance of any roadway changes that would disrupt normal travel patterns.
2. MoDOT will ensure that the contractor develops a MoDOT-approved maintenance of traffic plan.
3. MoDOT will coordinate, cooperate, and communicate, as required, with the representatives of the railroads located in the corridor throughout the study.
4. MoDOT will coordinate, cooperate, and communicate with affected utility companies located in the corridor throughout the study.
5. MoDOT will continue coordination with the State Historic Preservation Office related to the Section 106 process should design modifications and/or construction activities result in impacts to the following properties:
 - The Myers residence (180 Dunn Road) is a house and barn with the National Register of Historic Places (NRHP) boundary as the parcel lines.
 - The Gittemeier House (1067 Dunn Road) is two-story German vernacular residence with the NRHP boundary as the parcel lines.
 - The historic district at the Ferguson Pine Meadows 1st Addition subdivision (approximately 0.75 mile east of the Washington/Elizabeth interchange).
 - Archaeological sites SL545, SL547, and SL548 are located in the northeastern portion of the I-270/MO 370 interchange. These sites could not be safely accessed to determine if previous road construction had destroyed them. Before contractor ground-disturbing activities occur in this area and after safety precautions are implemented, archaeologists will need to verify the conditions of these sites. Historic burials are reported near SL 545 and if encountered fall under Missouri's Cemeteries Law (Chapter 214. RSMo)."
 - New property acquisitions with a moderate potential for intact cultural remains identified in the Section 106 report (E1 areas) that were not accessible in the study due to landowner refusal need to be surveyed after being purchased. These are shown on Table 2 of the study's Archaeological Survey.
 - MoDOT will assist FHWA with continued Native American Tribal coordination.
 - If human remains or cultural resources that may be eligible for listing on the National Register of Historic Places are encountered during construction, their treatment will be handled in



Important Updates to the Study's Environmental Commitments

Environmental Commitment 17 and 18 are the result of comments received on the Final EA report.

Commitment 5 was updated to clarify Section 106 concurrence.

Commitment 8 was updated to clarify the study area for Phase I and Phase II testing.

accordance with Missouri Unmarked Human Burial Sites Act, §§ 194.400 – 194.410, RSMo, as amended. When encountered, the Contractor shall first stop all work within a 50-foot radius of the remains/site, and secondly, shall notify the MoDOT Resident Engineer and/or Construction Inspector who will contact the MoDOT Historic Preservation (HP) section.

6. Regarding endangered species coordination, MoDOT will work with the U.S. Fish and Wildlife Service to ensure the following:
 - All tree clearing will be conducted in the winter months when bats are in hibernation (November 1 – March 31).
 - During the study development process for each phase, potential impacts to threatened and endangered species will be re-evaluated, and coordination with both MDC and the USFWS will take place to determine if the “not likely to adversely affect” determinations for listed bats remain valid.
7. MoDOT will ensure that all structures scheduled for demolition are inspected for asbestos-containing material and lead-based paint. MoDOT and the contractor shall submit all required demolition notices, abatements notices, and study notifications to MDNR as required by regulation prior to beginning demolition activities. Asbestos-containing material and demolition debris will be disposed of according to state and federal regulations. The reports of these inspections for asbestos and the presence of lead-based paint will be included in the construction bid proposal.
8. MoDOT will ensure that any known and unknown hazardous waste sites that are found during study construction are handled in accordance with Federal and State laws and regulations. If regulated solid or hazardous wastes are found during construction activities, the MoDOT construction inspector will direct the contractor to cease work at the suspect site. The construction inspector will contact the appropriate environmental specialist to discuss options for remediation. The environmental specialist, the construction office, and the contractor shall develop a plan for sampling, remediation and continuation of study construction. Independent consulting, analytical and remediation services shall be contracted if necessary. As necessary, the MDNR and USEPA will be contacted for coordination and approval of required remediation activities.

EA Table 4-14 identifies 20 facilities that pose a potential for environmental concern. Site-specific Phase I and Phase II testing would need to be conducted in the areas of planned construction to evaluate whether contamination was actually present, and at what concentrations. Pursuant to stakeholder coordination, the scoping of this work will consider the entire property.
9. MoDOT will coordinate with the USACE related to any required excavation or other land disturbance within the St. Louis Airport Sites FUSRAP ROD boundary. Coordination will begin prior to the commencement of construction for each study phase that affects the Decision boundary and will continue through the duration of construction activities.
10. MoDOT will upgrade existing pedestrian facilities to be ADA-compliant and provide additional pedestrian and bicycle connectivity where reasonable.
11. MoDOT will provide feasible and reasonable noise abatement for areas along the corridor that are considered impacted. A preliminary (NEPA stage) noise analysis was conducted as part of this study. That analysis recommended noise barriers at six locations along the corridor. Further analysis may be needed depending upon alignment changes. MoDOT will use the Noise Policy in place at that time to conduct the analysis and final recommendations will be made at a later design stage. At that time, if noise abatement is found to be feasible and reasonable, MoDOT will seek the input of impacted property owners and residents before deciding on building noise barriers.

As construction will likely be phased, feasible and reasonable noise abatement will be provided based on the location and limits of I-270 construction in each phase. For a given area, noise

abatement will be constructed in parallel with the roadway improvements for the corresponding area.

Statement of Likelihood

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

- **Ville Maria Subdivision:** Between mile markers 22.2 and 22.7.
 - **Brookes Park:** Between mile markers 24.3 and 25.9.
 - **Northwest Quadrant of Lindbergh Boulevard Interchange (Kindercare/Library and Saint Martin De Porres):** Between mile markers 24.0 and 24.9.
 - **Marysville:** Between mile markers 26.25 and 26.75 located along the outer road at St. Cornelius Lane.
 - **Carrollton Village Condominiums:** Between mile markers 20.8 and 21.1.
 - **Hathaway Manor (South):** Between mile markers 30.7 and 31.4.
12. MoDOT will administer the acquisition and relocation of affected residential, non-profit, and commercial properties in accordance with the relocation procedures established in the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.
13. MoDOT will consider options to minimize new right-of-way acquisition.
14. MoDOT will closely monitor study changes that may result in Section 4(f) impacts. Section 4(f) resources adjacent to the I-270 North corridor are as follows:
- **Carrollton Disc Park:** Located on Lambert Airport buy-out land between St. Charles Rock Road and Woodford Way (south side of I-270), this disc golf course was developed using Land and Water Conservation Funds.
 - **Playground at Garrett Elementary School:** Located adjacent to Garrett Elementary School (1400 Ville Rosa Lane, Hazelwood). The extent of the Section 4(f) resource is limited to the immediate area of the school.
 - **Gardens at Prairie Commons Library:** Located at 915 Utz Lane, Hazelwood. This public library has a public garden, a picnic area, and park benches. It appears that some of the garden is actually in MoDOT right-of-way. Because the roadway/intersection re-configuration in this area is minimal, it is not expected that the garden will require disruption. If impacted, MoDOT will coordinate with the library relative to appropriate relocation measures.
 - **Brookes Park:** Located in the southwestern quadrant of the I-270/Lindbergh Boulevard interchange, Brookes Park is administered by the City of Hazelwood.
 - **Bellefontaine Conservation Area:** Bellefontaine Conservation Area is in the southeastern quadrant of the I-270/MO 367 interchange. The site is administered by the Missouri Department of Conservation Department.
 - **The Utz-Tesson House:** The Utz-Tesson House is located in Brookes Park. Right-of-way acquisition and disruptions affecting usage should be avoided.
 - **The Taille de Noyer House:** The Taille de Noyer House currently resides on the McCluer High School campus, hundreds of feet from I-270.
 - **The John B. Myers House:** The John B. Myers House is located at 180 Dunn Road (northwestern quadrant of the Graham Road intersection). The parcel lines are the significance boundary.

- **The Gittemeier House:** The Gittemeier House is located at 1067 Dunn Road (northwestern quadrant of the New Florissant Road intersection). The parcel lines are the significance boundary.
 - **The Ferguson Pine Meadows 1st Addition District:** This NRHP district is located along Starlight Drive in Ferguson. The boundaries of the district are Pershall Road to the north, Moonlight Drive to the west, and the Saint Louis Community College-Florissant Valley campus to the east.
15. MoDOT will work with the administrators of the Little Creek Nature Area, a non-Section 4(f) resource, to investigate opportunities to minimize impacts, provide a visual buffer of trees/shrubs, and incorporate potential driveway improvements.
 16. MoDOT will work with Metro to investigate reasonable roadway modifications that further improve efficiencies for Metro’s operations.
 17. Pursuant to coordination with the MSD, MoDOT will continue to consult with MSD staff as early in the preliminary design phases as possible so that potential design issues and coordination opportunities can be identified and planned for. The MSD point of contact for phases located within the Maline, Watkins, and Riverview watersheds is John Alexander, and may be contacted at (314) 768-2707 or jcalex@stlmsd.com. Jason Peterein is the point of contact for study phases located within the Bonfils (Cowmire), Missouri River (MOSA) and Coldwater watersheds and may be reached at (314) 768-2773 or jtpete@stlmsd.com.
 18. This portion of I-270 is within the aboriginal homelands of the Miami Tribe, if any human remains or Native American cultural items are discovered during any phase of this study, the Miami Tribe will be consulted. The Tribal Historic Preservation Officer is Diane Hunter. She can be contacted at 918-541-8966, or by email at dhunter@miamination.com. If human remains or cultural resources are encountered during construction, their treatment will be handled in accordance with Missouri Unmarked Human Burial Sites Act (see commitment #5).

Required Permits

1. MoDOT will coordinate the Selected Alternative with the Federal Aviation Administration to complete necessary permitting.
2. MoDOT will adhere to the conditions of the TS4 (Transportation Separate Storm Sewer System) permit applicable at the time of construction.
3. MoDOT will conduct an engineering analysis for the build alternative prior to submission of the floodplain development permit application to the Missouri State Emergency Management Agency. The contractor shall obtain a floodplain development permit and “no-rise” certification.
4. MoDOT will obtain authorization by an Individual Clean Water Act Section 404 Permit from USACE, including Section 401 Water Quality Certification from MDNR/Illinois EPA.
5. MoDOT will follow the requirements, including a Stormwater Pollution Prevention Plan, for the required National Pollutant Discharge Elimination System permit for stormwater discharges from the construction site(s).

Appendix A
Notice of Availability and EA
Distribution List

Appendix A

Notice of Availability and EA Distribution List

Appendix Page 2: Notice of Availability (11-15-2016)

Appendix Page 3: Notice of Availability (11-21-2016)

Appendix Page 4: EA Distribution List

NOTICE OF AVAILABILITY and PUBLIC HEARING

Environmental Assessment: I-270 North Corridor, I-70 to the Chain of Rocks Bridge St. Louis County and St. Louis City, Missouri

The Missouri Department of Transportation (MoDOT) and the Federal Highway Administration (FHWA) are pleased to announce the availability of the *I-270 North Corridor, St. Louis County and St. Louis City, Missouri Job Number J613020, Environmental Assessment (EA)*.

The EA currently is available for public review, and comments will be accepted November 30 through December 31, 2016. The EA was prepared in accordance with the National Environmental Policy Act (NEPA), the National Historic Preservation Act, 23 CFR 771, and regulations of the Council on Environmental Quality, to provide guidance in determining the appropriate actions needed to address safety and operations on I-270 between I-70 and the Chain of Rocks Bridge.

Public Review: Public involvement is considered an important component of a successful planning process. An electronic version of this document can be found on MoDOT's I-270 North website at <http://www.i-270north.org>. This website provides access to the EA and related documents on public review. Written comments can be mailed to:

**Ed Hassinger
Chief Engineer
Missouri Department of Transportation
P.O. Box 270
Jefferson City, MO 65102**

Please submit comments no later than **December 31, 2016**.

The EA will be available for review beginning November 30th at the St. Louis County Library – Bridgeton Trails, St. Louis County Library – Prairie Commons, St. Louis County Library – Lewis and Clark, City of Ferguson Municipal Public Library, and on the world wide web where indicated above. A limited number of CDs containing the EA will also be available at each of the public review sites, with additional CDs obtainable upon request from MoDOT at the address above.

NOTICE OF PUBLIC HEARING

A public hearing concerning the improvements to the I-270 North Corridor between I-70 and the Chain of Rocks Bridge in St. Louis County and St. Louis City will be held on December 15, 2016, in the McCluer North High School Gymnasium (705 Waterford Dr., Florissant, MO) from 4:00–7:00 p.m. The hearing will offer an opportunity for citizens to learn more about the proposal and to provide oral and written comments on the project.

This meeting site is accessible to individuals with disabilities. To request translation services, other special accommodation and project information, please call 1-888-Ask-MoDOT (1-888-275-6636), TTY 1-800-735-2966 for the hearing impaired or e-mail SL270NorthEA@modot.mo.gov.

NOTICE OF AVAILABILITY and PUBLIC HEARING

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**Ed Hassinger
Chief Engineer
Missouri Department of Transportation
P.O. Box 270
Jefferson City, MO 65102**

Please submit comments no later than **January 6, 2017**.

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This meeting site is accessible to individuals with disabilities. To request translation services, other special accommodation and project information, please call 1-888-Ask-MoDOT (1-888-275-6636), TTY 1-800-735-2966 for the hearing impaired or e-mail SL270NorthEA@modot.mo.gov.

DISTRIBUTION LIST

The following lists indicate the locations where the Environmental Assessment will be sent for review and public viewing. Unless noted otherwise, these copies are digital. The document is also available on the project website – <http://www.I-270North.org>

Federal Agencies (CD copies)

- Federal Emergency Management Agency
- Department of Agriculture – Natural Resources Conservation Service
- Federal Transit Administration
- Army Corps of Engineers, St. Louis District
- Department of Housing and Urban Development
- Department of Interior
- Environmental Protection Agency
- Fish and Wildlife Service
- Federal Aviation Administration

State Agencies (CD copies)

- Missouri Department of Conservation
- Missouri Department of Natural Resources
- Missouri Department of Transportation
- Missouri Federal Assistance Clearinghouse
- Missouri State Emergency Management Agency
- Missouri Department of Economic Development
- Missouri State Historic Preservation Office
- Illinois Department of Transportation

Local Agencies and Organizations (CD copies)

- St. Louis County Executive
- St. Louis County St. Louis County Department of Highways & Traffic and Public Works
- St. Louis County Parks and Recreation
- St. Louis County Council
- East-West Gateway Council of Governments
- Great Rivers Greenway District
- Metro

- Trailnet
- Metropolitan St. Louis Sewer District
- City of St. Louis – Board of Public Service
- City of St. Louis – Streets Department
- City of St. Louis – Parks, Recreation, and Forestry

Municipalities (CD copies)

- Bellefontaine Neighbors
- Berkeley
- Black Jack
- Bridgeton
- Calverton Park
- Castle Point
- Champ
- Dellwood
- Ferguson
- Florissant
- Glasgow Village
- Hazelwood
- Maryland Heights
- Spanish Lake
- City of Saint Louis

Elected Officials – Federal and State (CD copies)

- Governor – Jay Nixon
- U.S. Senator – Roy Blunt
- U.S. Senator – Claire McCaskill
- U.S. Representative – Lacy Clay
- Missouri Senator – Gina Walsh
- Missouri Representative – Sharon Price

Native American Tribes (CD copies)

- Absentee-Shawnee Tribe of Indians of Oklahoma
- Delaware Nation
- Delaware Tribe of Indians
- Eastern Shawnee Tribe of Oklahoma
- Iowa Tribe of Kansas and Nebraska

- Iowa Tribe of Oklahoma
- Kaw Indian Nation of Oklahoma
- Kickapoo Tribe in Kansas
- Miami Tribe of Oklahoma
- Osage Nation
- Ponca Tribe of Nebraska
- Ponca Tribe of Oklahoma
- Quapaw Tribe of Oklahoma
- Sac and Fox Tribe of the Missouri in Kansas and Nebraska
- Sac and Fox Tribe of the Mississippi in Iowa
- Sac and Fox Nation of Oklahoma

Libraries (Hard copies)

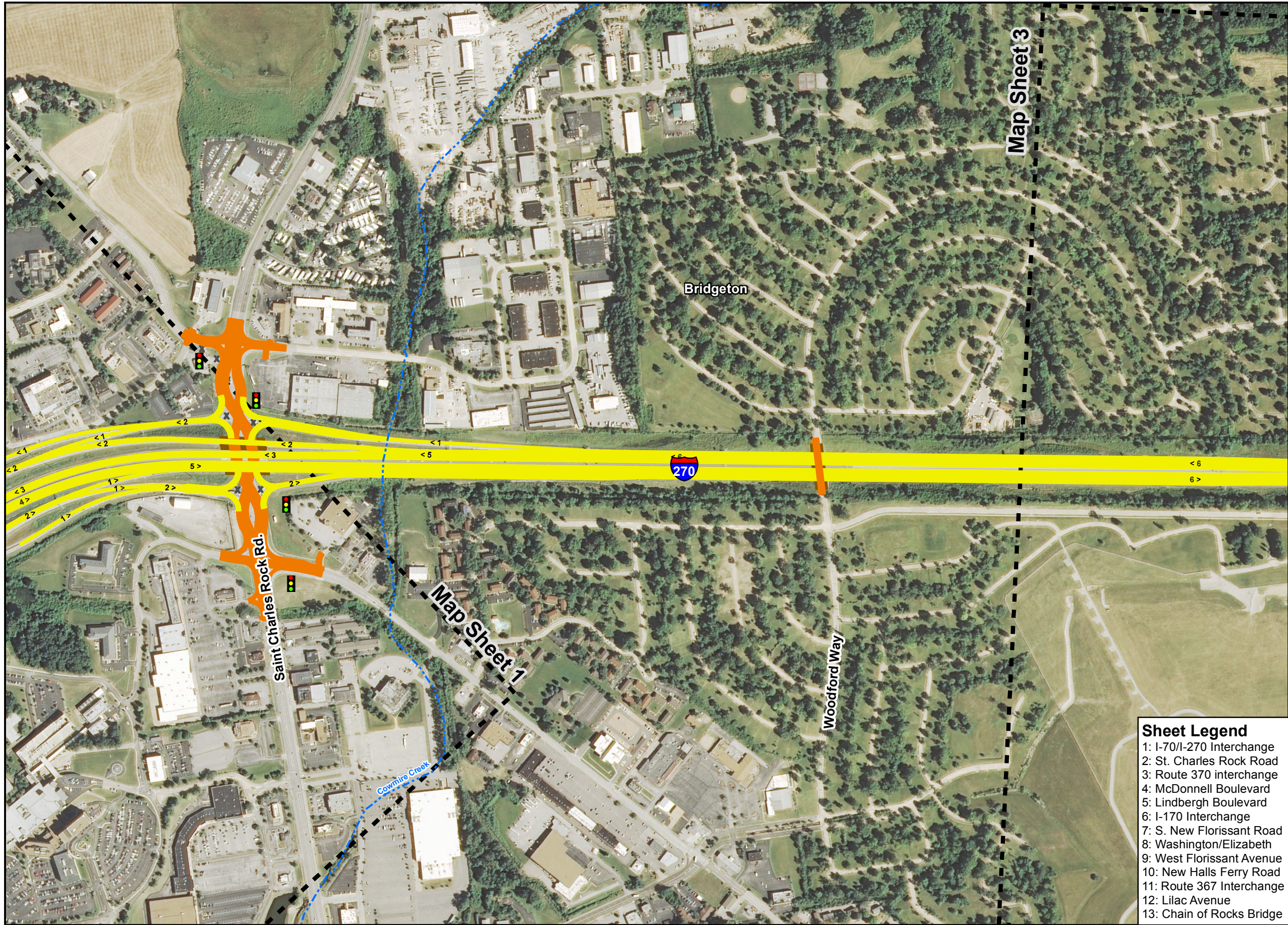
- St. Louis County Library – Bridgeton Trails
- St. Louis County Library – Prairie Commons
- St. Louis County Library – Lewis and Clark
- City of Ferguson Municipal Public Library

Other (CD copies)

- Members of the Technical Advisory Committee
- Members of the Community Advisory Group

Appendix B
Exhibit: Selected Alternative and Lane
Configuration

Map Area 1



Legend

- Matchlines
- Perennial Stream
- Intermittent Stream
- Municipal Boundary
- Freeway/Ramps
- One-Way Local/Connector Road
- Two-Way Local/Connector Road
- Bridge
- Wall
- 2 > One-Way - Number of Lanes
- < 3 > Two-Way - Number of Lanes
- Signalized Intersection
- X Removal of Existing Pavement



0 300 600

Scale in Feet

Updated on 8/26/2016

I-270 NORTH ENVIRONMENTAL ASSESSMENT
 PREFERRED ALTERNATIVE AND LANE CONFIGURATION
 SHEET 2 OF 13

Sheet Legend

- 1: I-70/I-270 Interchange
- 2: St. Charles Rock Road
- 3: Route 370 interchange
- 4: McDonnell Boulevard
- 5: Lindbergh Boulevard
- 6: I-170 Interchange
- 7: S. New Florissant Road
- 8: Washington/Elizabeth
- 9: West Florissant Avenue
- 10: New Halls Ferry Road
- 11: Route 367 Interchange
- 12: Lilac Avenue
- 13: Chain of Rocks Bridge

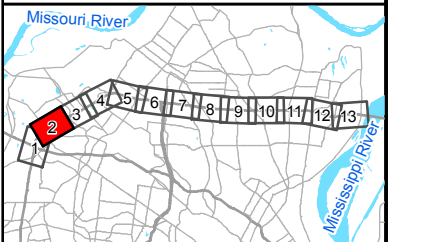
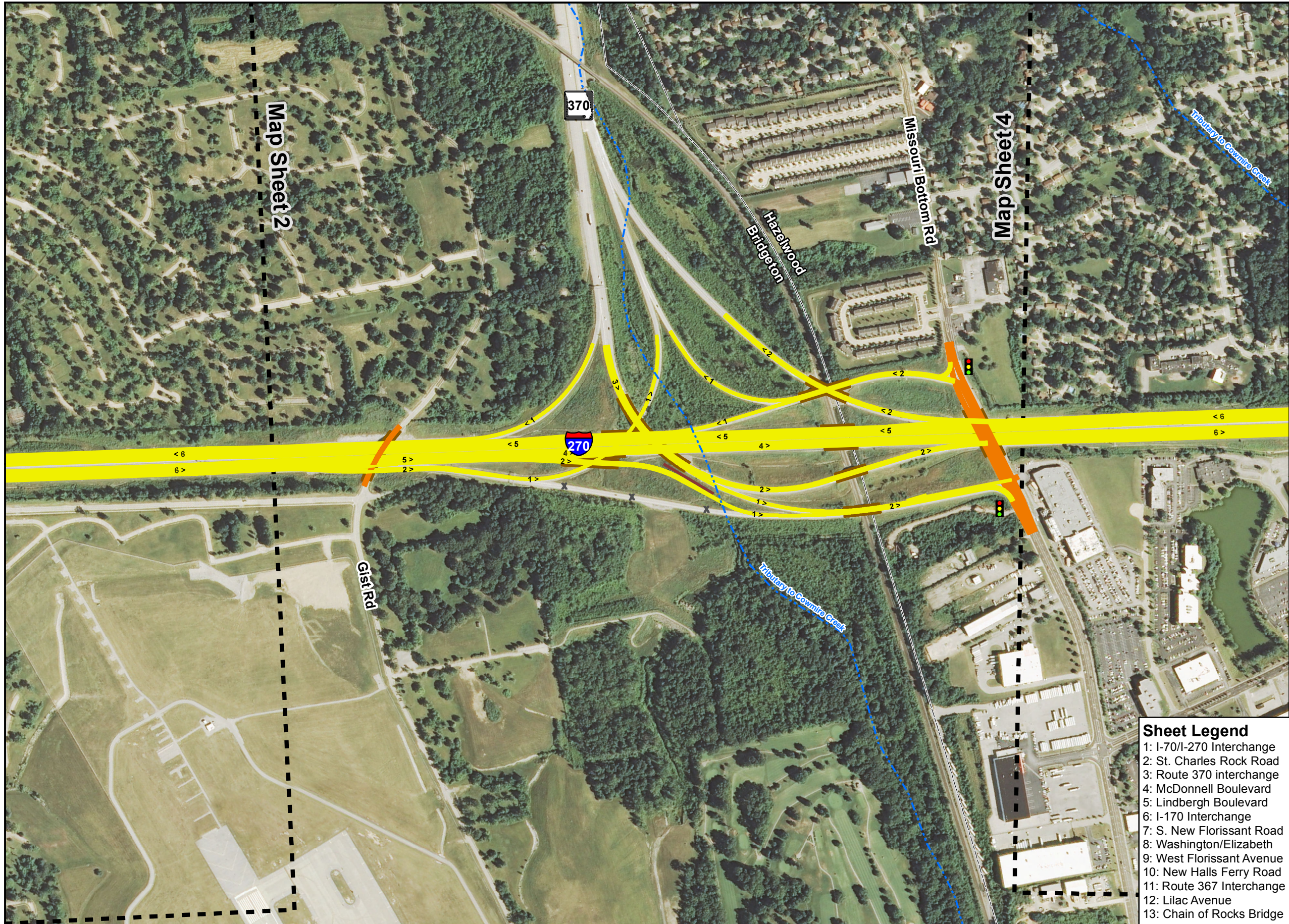


Exhibit 6

Map Area 1



Legend

- Matchlines
- Perennial Stream
- Intermittent Stream
- Municipal Boundary
- Freeway/Ramps
- One-Way Local/Connector Road
- Two-Way Local/Connector Road
- Bridge
- Wall
- 2 > One-Way - Number of Lanes
- < 3 > Two-Way - Number of Lanes
- Signalized Intersection
- X Removal of Existing Pavement



0 300 600
Scale in Feet
Updated on 8/26/2016

Sheet Legend

- 1: I-70/I-270 Interchange
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- 3: Route 370 interchange
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- 6: I-170 Interchange
- 7: S. New Florissant Road
- 8: Washington/Elizabeth
- 9: West Florissant Avenue
- 10: New Halls Ferry Road
- 11: Route 367 Interchange
- 12: Lilac Avenue
- 13: Chain of Rocks Bridge

I-270 NORTH
ENVIRONMENTAL
ASSESSMENT
PREFERRED ALTERNATIVE
AND LANE CONFIGURATION
SHEET 3 OF 13

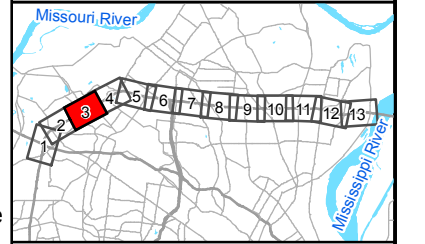


Exhibit 6

Map Area 1

Map Area 2



Legend

- Matchlines
- Perennial Stream
- Intermittent Stream
- Municipal Boundary
- Freeway/Ramps
- One-Way Local/Connector Road
- Two-Way Local/Connector Road
- Bridge
- Wall
- 2 > One-Way - Number of Lanes
- < 3 > Two-Way - Number of Lanes
- Signalized Intersection
- Removal of Existing Pavement



0 300 600
Scale in Feet
Updated on 8/26/2016

I-270 NORTH ENVIRONMENTAL ASSESSMENT
PREFERRED ALTERNATIVE AND LANE CONFIGURATION
SHEET 4 OF 13

- Sheet Legend**
- 1: I-70/I-270 Interchange
 - 2: St. Charles Rock Road
 - 3: Route 370 interchange
 - 4: McDonnell Boulevard
 - 5: Lindbergh Boulevard
 - 6: I-170 Interchange
 - 7: S. New Florissant Road
 - 8: Washington/Elizabeth
 - 9: West Florissant Avenue
 - 10: New Halls Ferry Road
 - 11: Route 367 Interchange
 - 12: Lilac Avenue
 - 13: Chain of Rocks Bridge

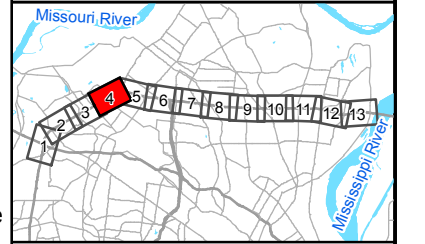
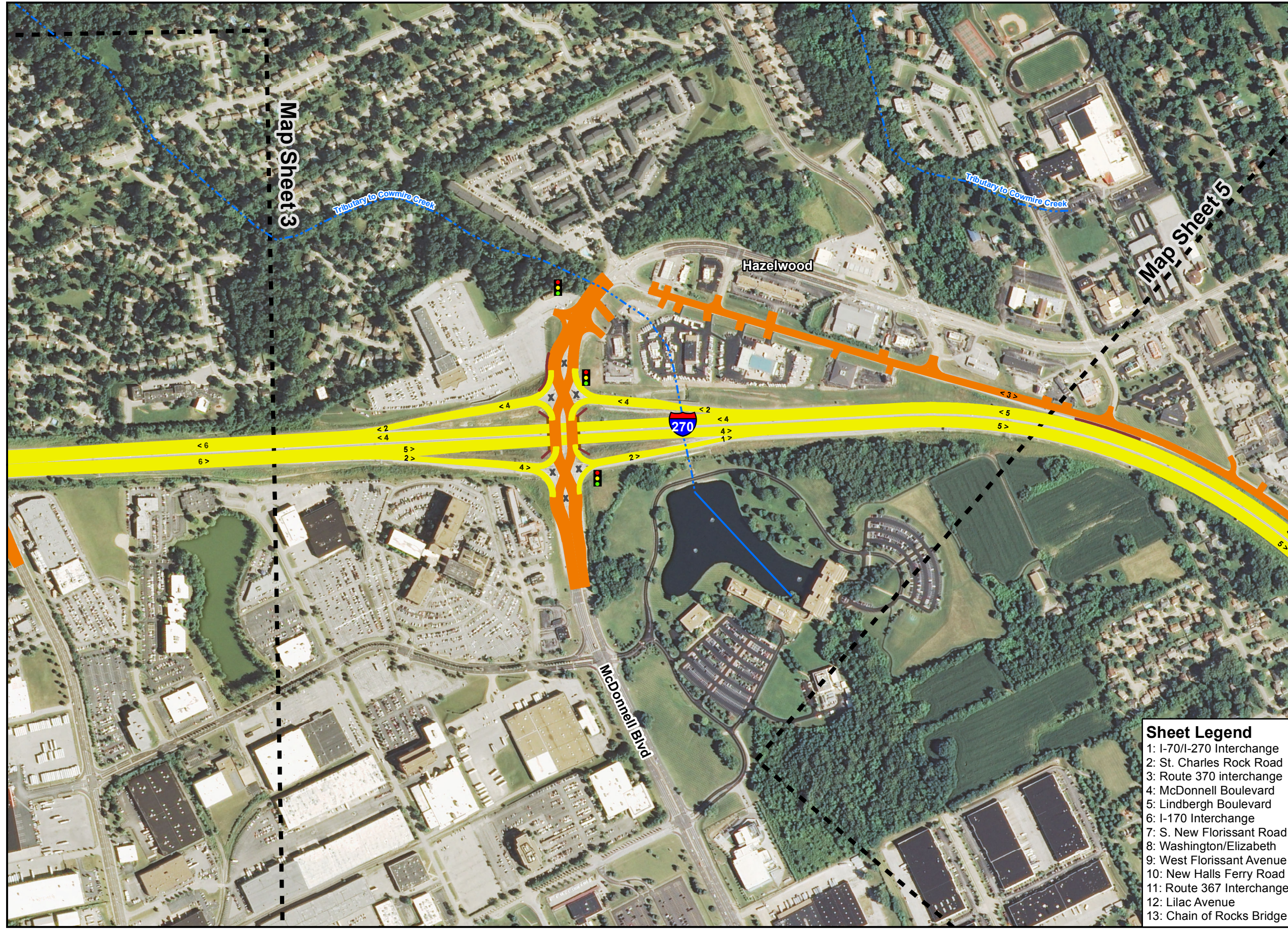


Exhibit 6



Map Area 2



Legend

- Matchlines
- Perennial Stream
- Intermittent Stream
- Municipal Boundary
- Freeway/Ramps
- One-Way Local/Connector Road
- Two-Way Local/Connector Road
- Bridge
- Wall
- 2 > One-Way - Number of Lanes
- < 3 > Two-Way - Number of Lanes
- Signalized Intersection
- X Removal of Existing Pavement



0 300 600
Scale in Feet
Updated on 8/26/2016

I-270 NORTH ENVIRONMENTAL ASSESSMENT
PREFERRED ALTERNATIVE AND LANE CONFIGURATION
SHEET 5 OF 13

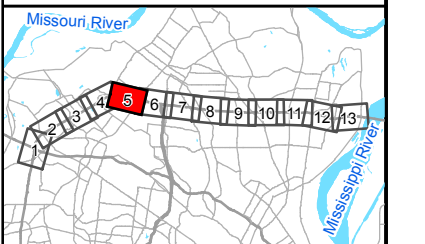
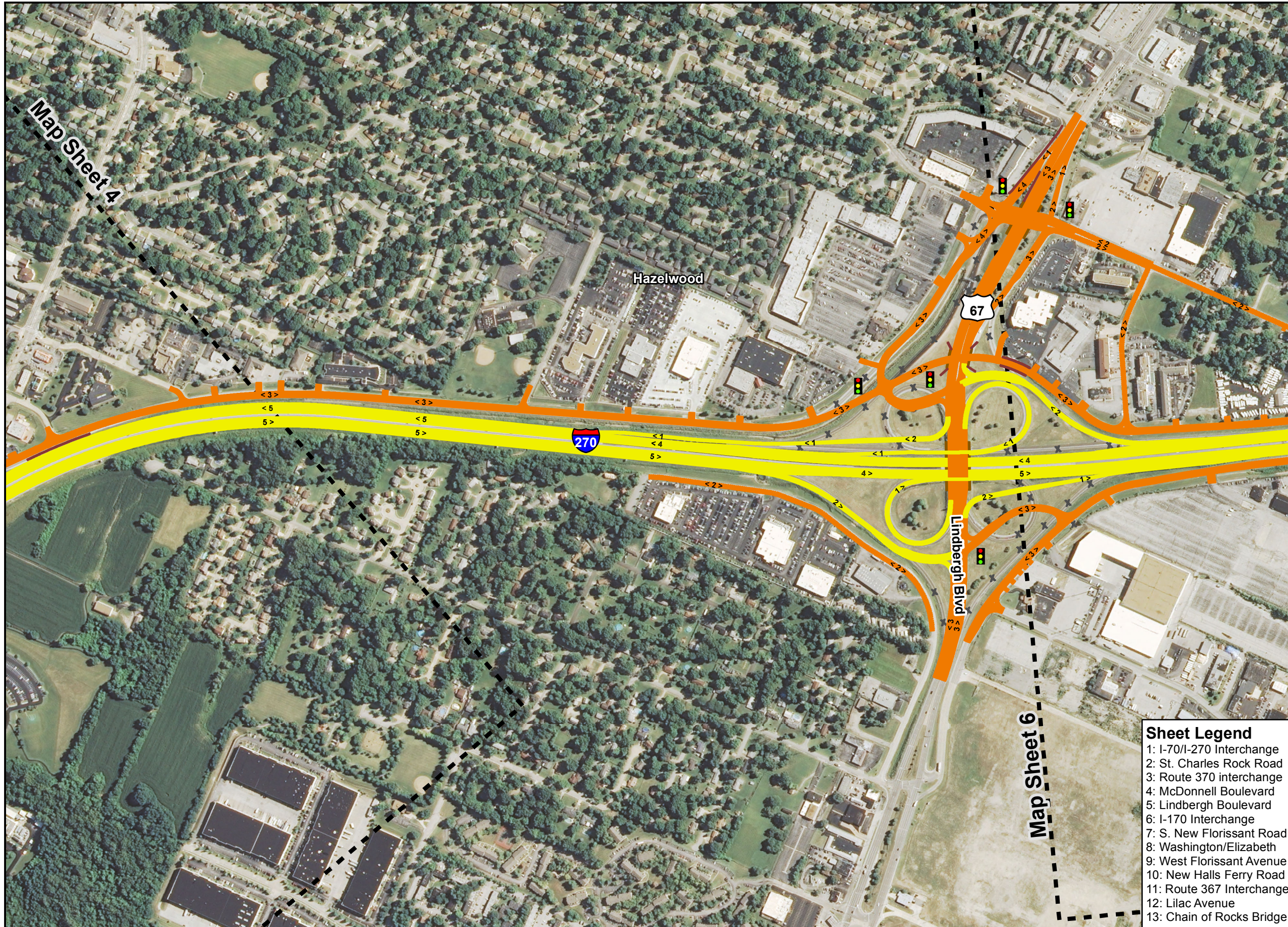


Exhibit 6



- Sheet Legend**
- 1: I-70/I-270 Interchange
 - 2: St. Charles Rock Road
 - 3: Route 370 interchange
 - 4: McDonnell Boulevard
 - 5: Lindbergh Boulevard
 - 6: I-170 Interchange
 - 7: S. New Florissant Road
 - 8: Washington/Elizabeth
 - 9: West Florissant Avenue
 - 10: New Halls Ferry Road
 - 11: Route 367 Interchange
 - 12: Lilac Avenue
 - 13: Chain of Rocks Bridge



Legend

- Matchlines
- Perennial Stream
- Intermittent Stream
- Municipal Boundary
- Freeway/Ramps
- One-Way Local/Connector Road
- Two-Way Local/Connector Road
- Bridge
- Wall
- 2 > One-Way - Number of Lanes
- < 3 > Two-Way - Number of Lanes
- Signalized Intersection
- X Removal of Existing Pavement



0 300 600

Scale in Feet

Updated on 8/26/2016

I-270 NORTH ENVIRONMENTAL ASSESSMENT
 PREFERRED ALTERNATIVE AND LANE CONFIGURATION
 SHEET 6 OF 13

Sheet Legend

- 1: I-70/I-270 Interchange
- 2: St. Charles Rock Road
- 3: Route 370 interchange
- 4: McDonnell Boulevard
- 5: Lindbergh Boulevard
- 6: I-170 Interchange
- 7: S. New Florissant Road
- 8: Washington/Elizabeth
- 9: West Florissant Avenue
- 10: New Halls Ferry Road
- 11: Route 367 Interchange
- 12: Lilac Avenue
- 13: Chain of Rocks Bridge

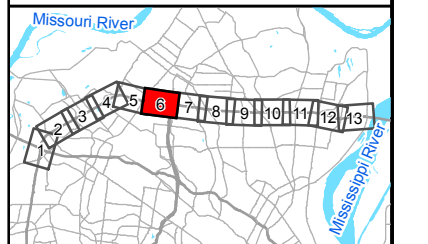
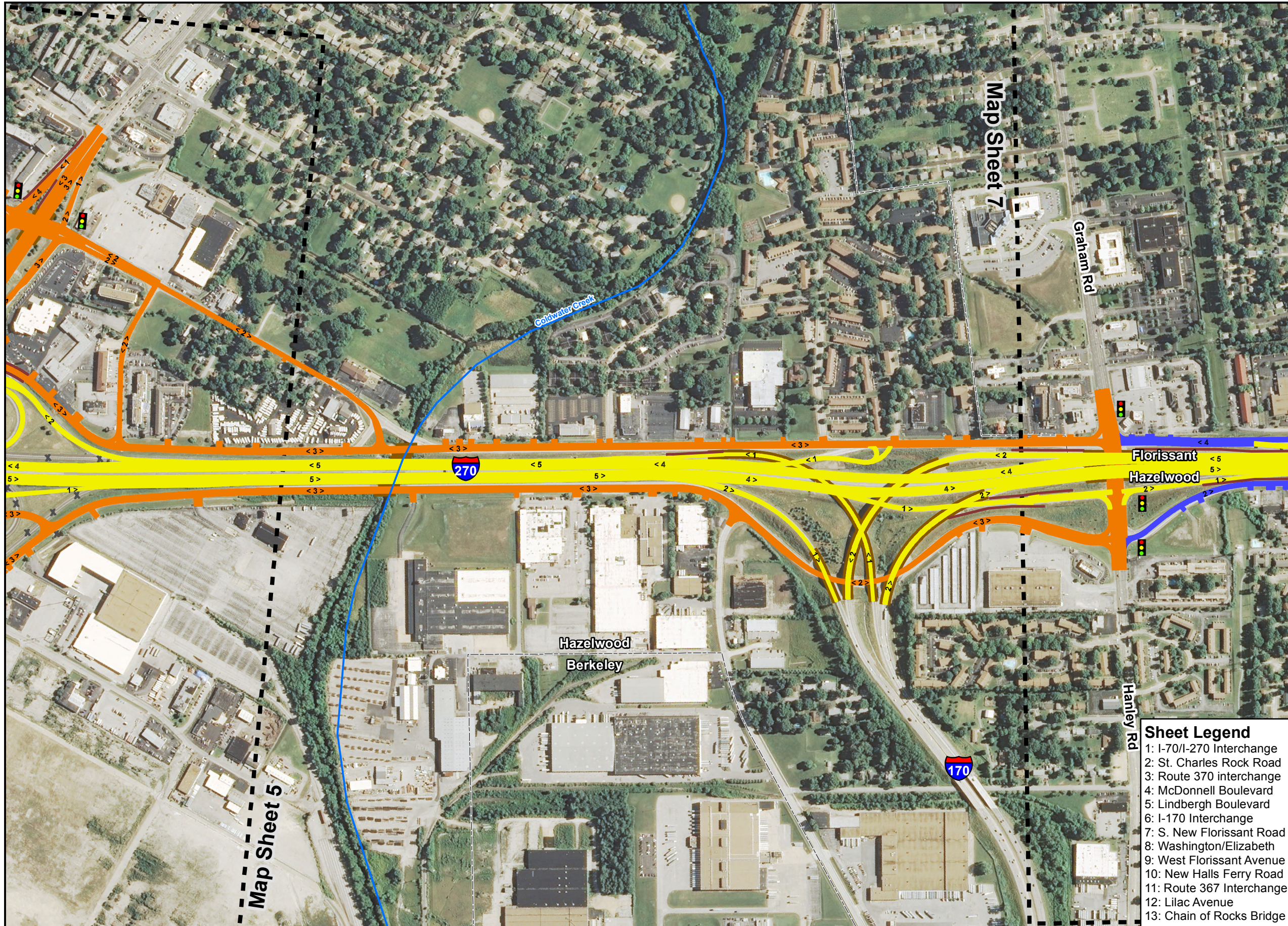
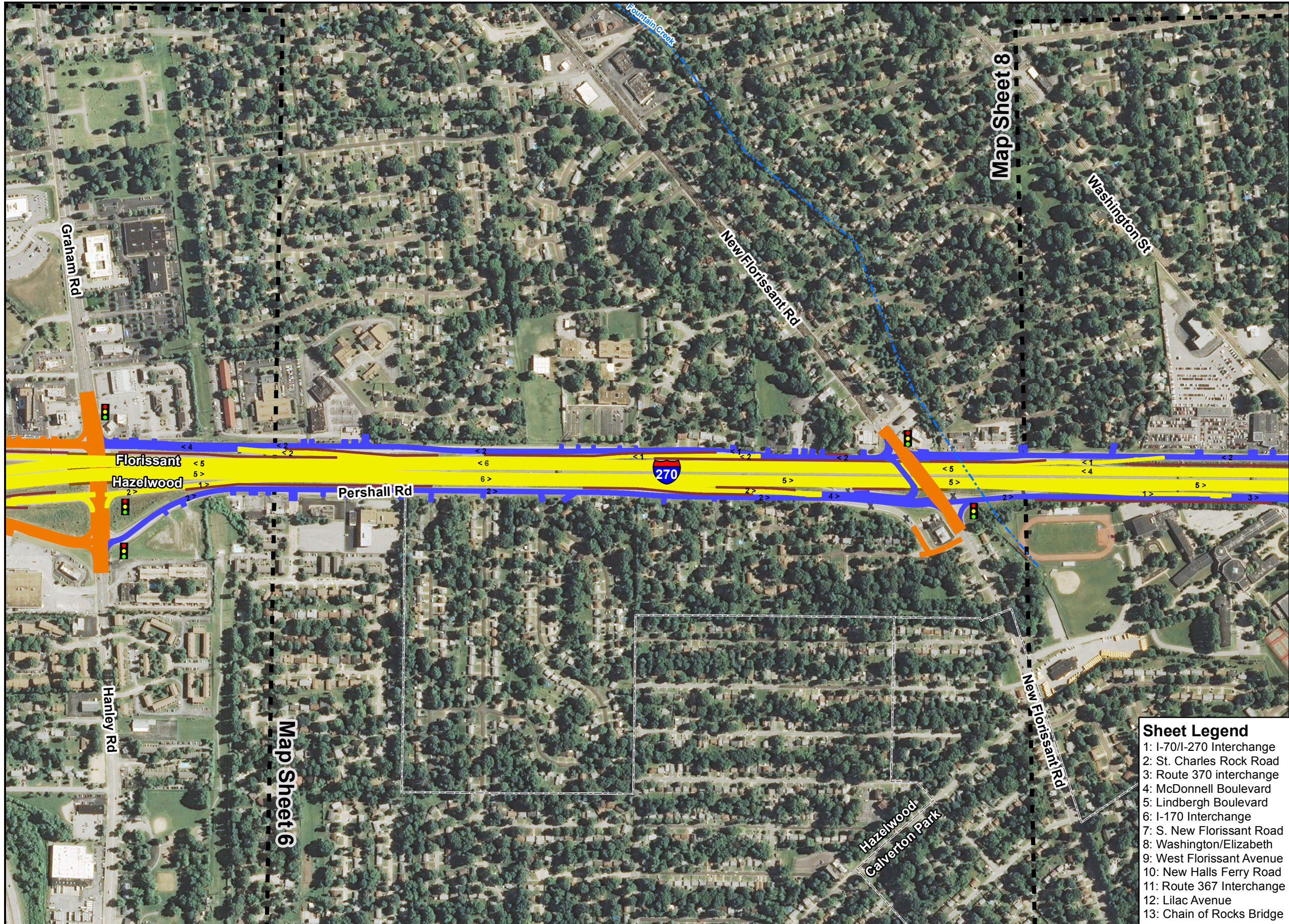


Exhibit 6



Map Area 3



Legend

- Matchlines
- Perennial Stream
- Intermittent Stream
- Municipal Boundary
- Freeway/Ramps
- One-Way Local/Connector Road
- Two-Way Local/Connector Road
- Bridge
- Wall
- 2 > One-Way - Number of Lanes
< 3 > Two-Way - Number of Lanes
- Signalized Intersection
- X Removal of Existing Pavement



0 300 600

Scale in Feet

Updated on 8/26/2016

I-270 NORTH ENVIRONMENTAL ASSESSMENT
PREFERRED ALTERNATIVE AND LANE CONFIGURATION
SHEET 7 OF 13

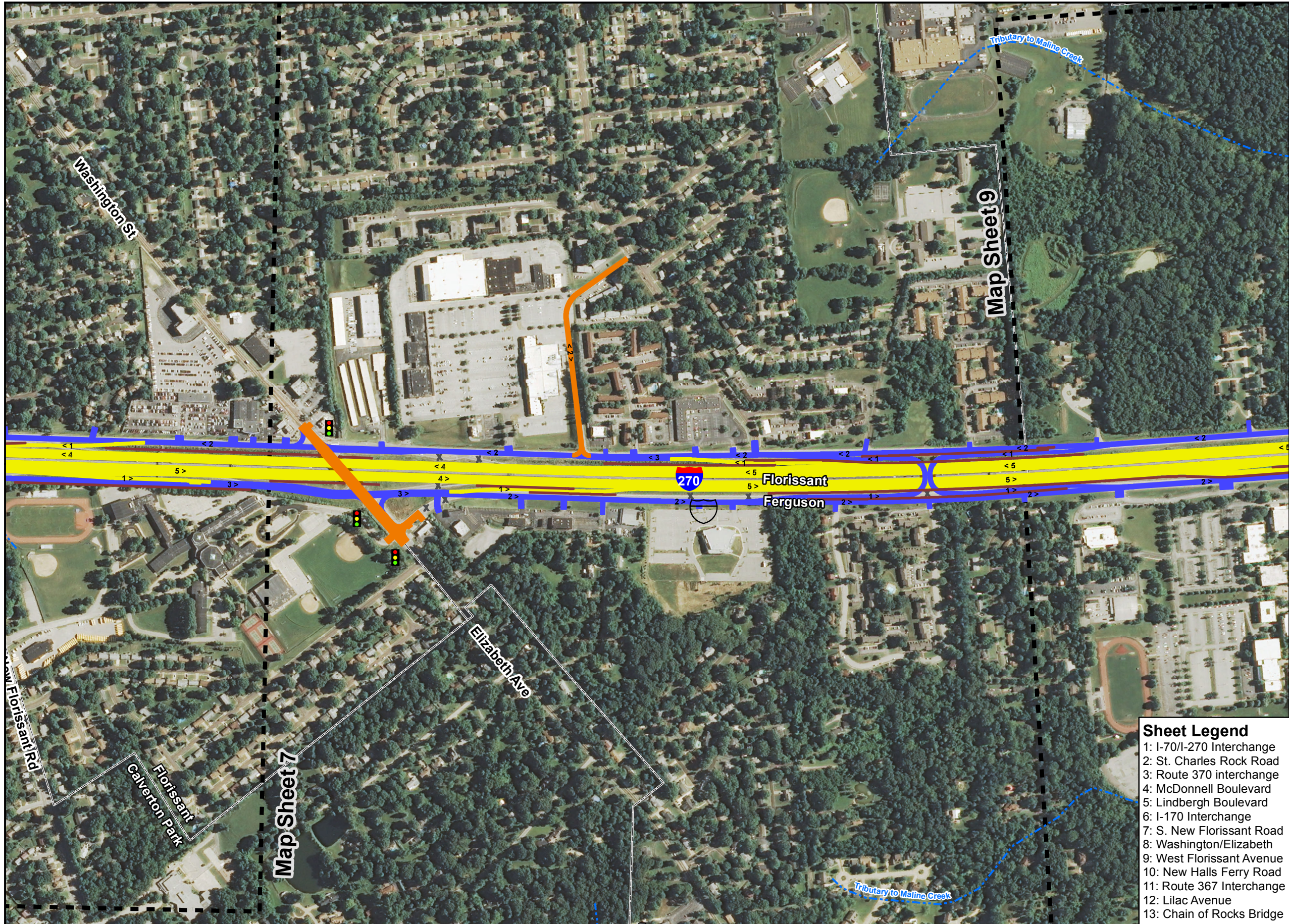
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- 2: St. Charles Rock Road
- 3: Route 370 interchange
- 4: McDonnell Boulevard
- 5: Lindbergh Boulevard
- 6: I-170 Interchange
- 7: S. New Florissant Road
- 8: Washington/Elizabeth
- 9: West Florissant Avenue
- 10: New Halls Ferry Road
- 11: Route 367 Interchange
- 12: Lilac Avenue
- 13: Chain of Rocks Bridge



Exhibit 6

Map Area 3



Legend

- Matchlines
- Perennial Stream
- Intermittent Stream
- Municipal Boundary
- Freeway/Ramps
- One-Way Local/Connector Road
- Two-Way Local/Connector Road
- Bridge
- Wall
- 2 > One-Way - Number of Lanes
- < 3 > Two-Way - Number of Lanes
- Signalized Intersection
- X Removal of Existing Pavement



0 300 600

Scale in Feet

Updated on 8/26/2016

I-270 NORTH
ENVIRONMENTAL
ASSESSMENT
PREFERRED ALTERNATIVE
AND LANE CONFIGURATION
SHEET 8 OF 13

Sheet Legend

- 1: I-70/I-270 Interchange
- 2: St. Charles Rock Road
- 3: Route 370 interchange
- 4: McDonnell Boulevard
- 5: Lindbergh Boulevard
- 6: I-170 Interchange
- 7: S. New Florissant Road
- 8: Washington/Elizabeth
- 9: West Florissant Avenue
- 10: New Halls Ferry Road
- 11: Route 367 Interchange
- 12: Lilac Avenue
- 13: Chain of Rocks Bridge

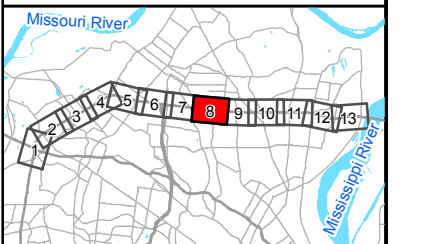
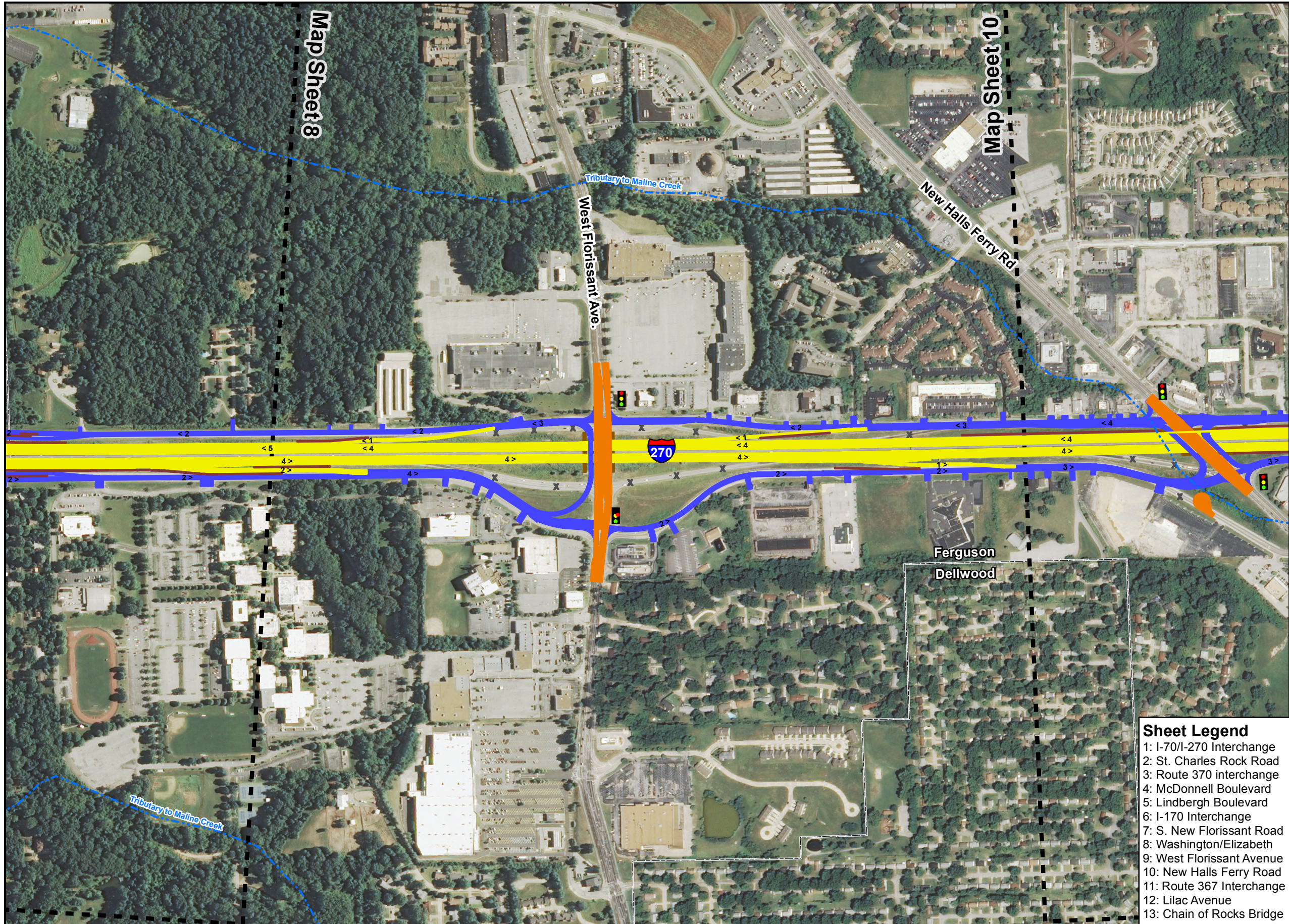


Exhibit 6

Map Area 3



Legend

- Matchlines
- Perennial Stream
- Intermittent Stream
- Municipal Boundary
- Freeway/Ramps
- One-Way Local/Connector Road
- Two-Way Local/Connector Road
- Bridge
- Wall
- $2 >$ One-Way - Number of Lanes
- $< 3 >$ Two-Way - Number of Lanes
- Signalized Intersection
- X Removal of Existing Pavement



0 300 600
Scale in Feet
Updated on 8/26/2016

I-270 NORTH ENVIRONMENTAL ASSESSMENT
PREFERRED ALTERNATIVE AND LANE CONFIGURATION
SHEET 9 OF 13

Sheet Legend

- 1: I-70/I-270 Interchange
- 2: St. Charles Rock Road
- 3: Route 370 interchange
- 4: McDonnell Boulevard
- 5: Lindbergh Boulevard
- 6: I-170 Interchange
- 7: S. New Florissant Road
- 8: Washington/Elizabeth
- 9: West Florissant Avenue
- 10: New Halls Ferry Road
- 11: Route 367 Interchange
- 12: Lilac Avenue
- 13: Chain of Rocks Bridge



Exhibit 6

Map Area 3

Map Area 4

Map Sheet 11

Map Sheet 9

Ferguson
Dellwood

Old Halls Ferry Rd

Tributary to Moline Creek

Unconsolidated St. Louis County
Bellefontaine Neighbors

Tributary to Moline Creek



Legend

- Matchlines
 - Perennial Stream
 - Intermittent Stream
 - Municipal Boundary
 - Freeway/Ramps
 - One-Way Local/Connector Road
 - Two-Way Local/Connector Road
 - Bridge
 - Wall
 - Signalized Intersection
 - Removal of Existing Pavement
- 2 > One-Way - Number of Lanes
 < 3 > Two-Way - Number of Lanes



0 300 600
Scale in Feet
Updated on 8/26/2016

**I-270 NORTH ENVIRONMENTAL ASSESSMENT
PREFERRED ALTERNATIVE AND LANE CONFIGURATION
SHEET 10 OF 13**

- Sheet Legend**
- 1: I-70/I-270 Interchange
 - 2: St. Charles Rock Road
 - 3: Route 370 interchange
 - 4: McDonnell Boulevard
 - 5: Lindbergh Boulevard
 - 6: I-170 Interchange
 - 7: S. New Florissant Road
 - 8: Washington/Elizabeth
 - 9: West Florissant Avenue
 - 10: New Halls Ferry Road
 - 11: Route 367 Interchange
 - 12: Lilac Avenue
 - 13: Chain of Rocks Bridge

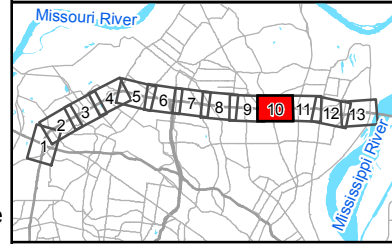


Exhibit 6

Map Area 4



Legend

- Matchlines
- Perennial Stream
- Intermittent Stream
- Municipal Boundary
- Freeway/Ramps
- One-Way Local/Connector Road
- Two-Way Local/Connector Road
- Bridge
- Wall
- 2 > One-Way - Number of Lanes
- < 3 > Two-Way - Number of Lanes
- Signalized Intersection
- X Removal of Existing Pavement



0 300 600
Scale in Feet
Updated on 8/26/2016

I-270 NORTH ENVIRONMENTAL ASSESSMENT
PREFERRED ALTERNATIVE AND LANE CONFIGURATION
SHEET 11 OF 13

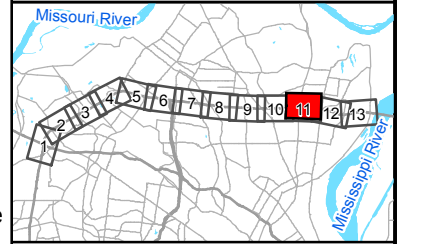


Exhibit 6

- Sheet Legend**
- 1: I-70/I-270 Interchange
 - 2: St. Charles Rock Road
 - 3: Route 370 interchange
 - 4: McDonnell Boulevard
 - 5: Lindbergh Boulevard
 - 6: I-170 Interchange
 - 7: S. New Florissant Road
 - 8: Washington/Elizabeth
 - 9: West Florissant Avenue
 - 10: New Halls Ferry Road
 - 11: Route 367 Interchange
 - 12: Lilac Avenue
 - 13: Chain of Rocks Bridge



Map Area 4



Legend

- Matchlines
- Perennial Stream
- Intermittent Stream
- Municipal Boundary
- Freeway/Ramps
- One-Way Local/Connector Road
- Two-Way Local/Connector Road
- Bridge
- Wall
- 2 > One-Way - Number of Lanes
- < 3 > Two-Way - Number of Lanes
- Signalized Intersection
- X Removal of Existing Pavement



0 300 600

Scale in Feet

Updated on 8/26/2016

I-270 NORTH ENVIRONMENTAL ASSESSMENT
PREFERRED ALTERNATIVE AND LANE CONFIGURATION
SHEET 12 OF 13

Sheet Legend

- 1: I-70/I-270 Interchange
- 2: St. Charles Rock Road
- 3: Route 370 interchange
- 4: McDonnell Boulevard
- 5: Lindbergh Boulevard
- 6: I-170 Interchange
- 7: S. New Florissant Road
- 8: Washington/Elizabeth
- 9: West Florissant Avenue
- 10: New Halls Ferry Road
- 11: Route 367 Interchange
- 12: Lilac Avenue
- 13: Chain of Rocks Bridge

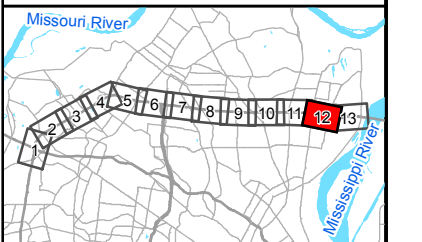
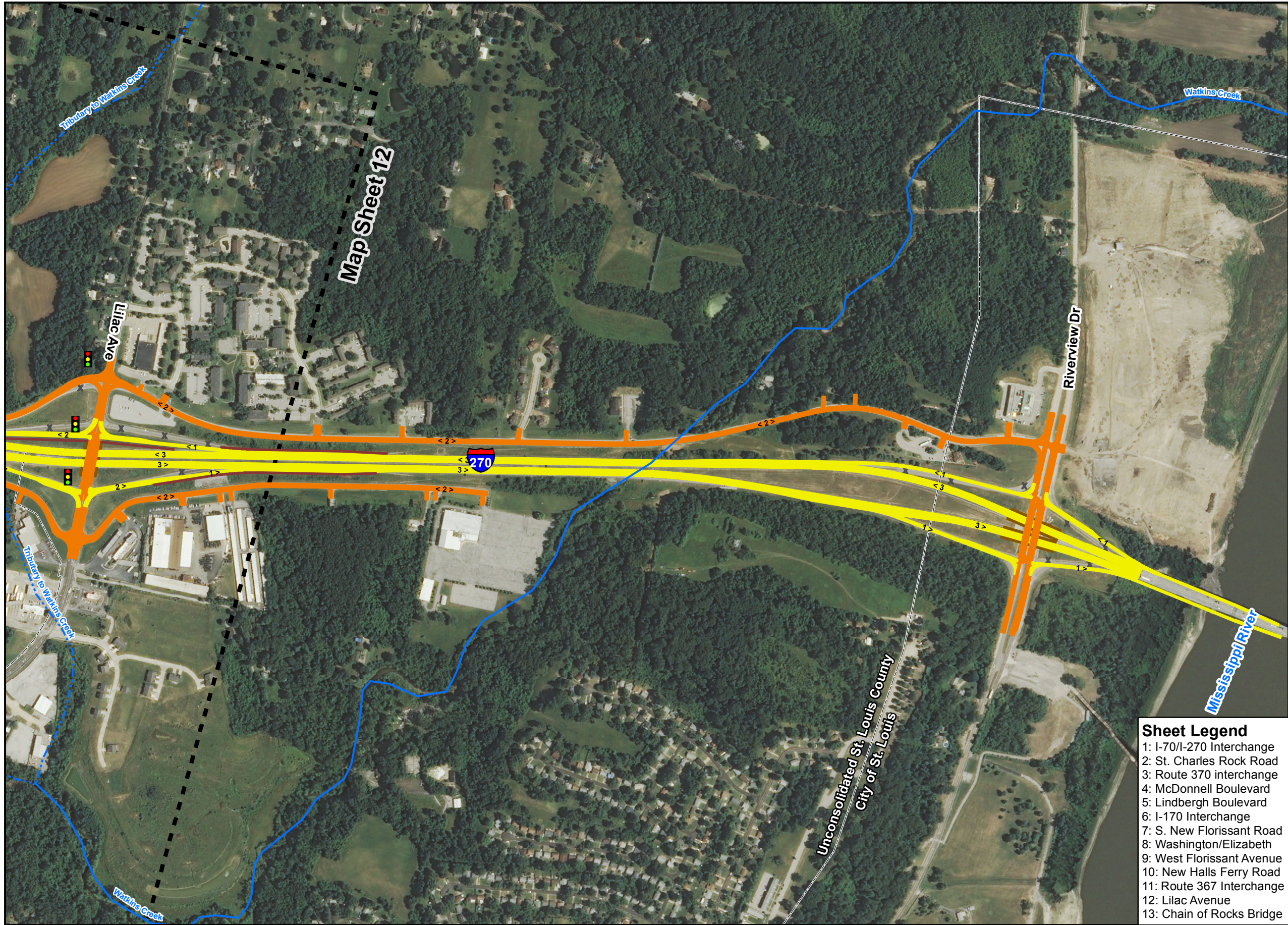


Exhibit 6



Map Area 4



Legend

- Matchlines
- Perennial Stream
- Intermittent Stream
- Municipal Boundary
- Freeway/Ramps
- One-Way Local/Connector Road
- Two-Way Local/Connector Road
- Bridge
- Wall
- 2 > One-Way - Number of Lanes
- < 3 > Two-Way - Number of Lanes
- Signalized Intersection
- X Removal of Existing Pavement



0 300 600
Scale in Feet
Updated on 8/26/2016

I-270 NORTH ENVIRONMENTAL ASSESSMENT
PREFERRED ALTERNATIVE AND LANE CONFIGURATION
SHEET 13 OF 13

Sheet Legend

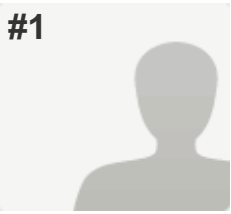
- 1: I-70/I-270 Interchange
- 2: St. Charles Rock Road
- 3: Route 370 interchange
- 4: McDonnell Boulevard
- 5: Lindbergh Boulevard
- 6: I-170 Interchange
- 7: S. New Florissant Road
- 8: Washington/Elizabeth
- 9: West Florissant Avenue
- 10: New Halls Ferry Road
- 11: Route 367 Interchange
- 12: Lilac Avenue
- 13: Chain of Rocks Bridge



Exhibit 6

Appendix C
Written Public Comments

#1



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, December 15, 2016 4:02:19 PM

Last Modified: Thursday, December 15, 2016 4:28:26 PM

Time Spent: 00:26:07

IP Address: 107.77.206.196

PAGE 1: Comment Form

Q1: Please provide your comments on the I-270 North Environmental Assessment in the space below. All comments received by January 6, 2017 will be included as part of the public hearing and EA.

Looks great!

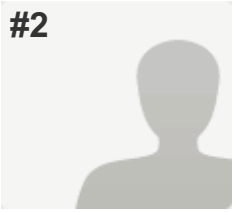
Q2: Contact Information (optional):

Respondent skipped this question

Q3: Written Comment Form #

Respondent skipped this question

#2



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, December 15, 2016 10:26:00 AM

Last Modified: Thursday, December 15, 2016 5:22:13 PM

Time Spent: 06:56:12

IP Address: 107.77.209.201

PAGE 1: Comment Form

Q1: Please provide your comments on the I-270 North Environmental Assessment in the space below. All comments received by January 6, 2017 will be included as part of the public hearing and EA.

Respondent skipped this question

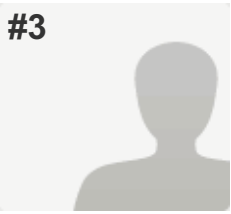
Q2: Contact Information (optional):

Name	Mark kuechenmeister
Address	2021hord ave
ZIP/Postal Code	63136
Email Address	markkstreamteam888@juno.com
Phone Number	314/388/1423

Q3: Written Comment Form #

Respondent skipped this question

#3



COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, December 15, 2016 5:22:17 PM
Last Modified: Thursday, December 15, 2016 5:26:57 PM
Time Spent: 00:04:40
IP Address: 107.77.209.201

PAGE 1: Comment Form

Q1: Please provide your comments on the I-270 North Environmental Assessment in the space below. All comments received by January 6, 2017 will be included as part of the public hearing and EA.

I think you are doing a great job with the 270corridore , the drawings look good and I hope it will illeviate the traffic congestion so nice w. Florissant re and halls ferry rds. Please keep me updated on this progress, thanks mark k.

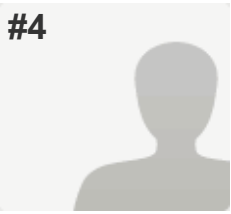
Q2: Contact Information (optional):

Name	Mark kuechenmeister
Address	2021hord ave.
ZIP/Postal Code	63136
Email Address	markkstreamteam888@juno.com
Phone Number	314/388/1423

Q3: Written Comment Form #

Respondent skipped this question

#4



COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, December 15, 2016 5:27:02 PM
Last Modified: Thursday, December 15, 2016 5:32:00 PM
Time Spent: 00:04:57
IP Address: 107.77.209.201

PAGE 1: Comment Form

Q1: Please provide your comments on the I-270 North Environmental Assessment in the space below. All comments received by January 6, 2017 will be included as part of the public hearing and EA.

A thorough review of fire dept and ems response to the community college from the west Florissant Ferguson fire house 2(by SAMs) needs to be reviewed, due to what looks like extended response time to handle emergencies

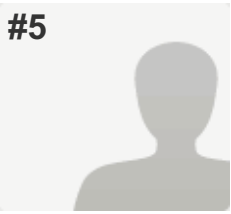
Q2: Contact Information (optional):

Name	Keith Kallstrom
Address	7455 Castro dr
ZIP/Postal Code	63135
Email Address	kkallstrom@fergusoncity.com
Phone Number	3145241720

Q3: Written Comment Form #

Respondent skipped this question

#5



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Thursday, December 15, 2016 4:28:34 PM

Last Modified: Thursday, December 15, 2016 5:45:29 PM

Time Spent: 01:16:54

IP Address: 107.77.206.196

PAGE 1: Comment Form

Q1: Please provide your comments on the I-270 North Environmental Assessment in the space below. All comments received by January 6, 2017 will be included as part of the public hearing and EA.

First thing that needs to be done is 270/367. Forget east of there (IDOT is likely going to leak a substandard plan of their own anyway that is still 2 lanes in each direction because they blew it on the canal bridge project) and what is west of 367 is not an priority either. There are at least two Facebook groups that inform friends when shit happens on 270 and/or 367 and a ton of Riverbend residents that will be much happier with that loop ramp from EB 270 to NB 367 goes bye bye.

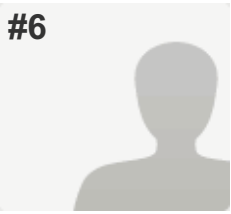
Q2: Contact Information (optional):

Respondent skipped this question

Q3: Written Comment Form #

Respondent skipped this question

#6



COMPLETE

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Started: Thursday, December 15, 2016 4:02:18 PM
Last Modified: Thursday, December 15, 2016 5:46:31 PM
Time Spent: 01:44:13
IP Address: 107.77.209.91

PAGE 1: Comment Form

Q1: Please provide your comments on the I-270 North Environmental Assessment in the space below. All comments received by January 6, 2017 will be included as part of the public hearing and EA.

I am concern that there is no further consideration for noise abatement alternatives for those of us living in residential properties north of 270 between Hwy 367 and Old Halls Ferry. I live in Sugartree Homes condos and the noise volume continues to increase as well as vibration. I understand that based on your studies of possible sound walls at this location, there would be no "significant impact" or at least that's what I was told. But why can't there be consideration of other noise abatement alternatives such as installing sound insulated Windows and doors and etc on our house. There could be federal funding allocated for such features in a program similar to the FAA Residential Sound Insulation Program. I am frustrated when I hear MODOT say "well that has not been done". Then why can't we make St. Louis a precedence and allocated what will realistically be a small amount of the dollars for improvements to the physical residential properties to abate the noise. Why are only churches and schools and other businesses approved for physical noise abatement upgrades but not residential properties. I am asking for further consideration and will advocate to my elected officials in Jeff City for such noise abatement improvements to residential properties.

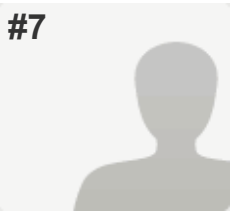
Q2: Contact Information (optional):

Name	Ivetta Williams
Address	11006 Thousand Oaks Dr
ZIP/Postal Code	63136
Email Address	ijwilliams@sbcglobal.net
Phone Number	314.741-0071

Q3: Written Comment Form #

Respondent skipped this question

#7



COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, December 15, 2016 5:32:11 PM
Last Modified: Thursday, December 15, 2016 6:12:57 PM
Time Spent: 00:40:45
IP Address: 107.77.209.201

PAGE 1: Comment Form

Q1: Please provide your comments on the I-270 North Environmental Assessment in the space below. All comments received by January 6, 2017 will be included as part of the public hearing and EA.

The improvements outlined in the preferred alternative are needed for North St. Louis County to improve traffic movement on I-270, the outer roads and in the area of the corridor. The infrastructure is aging and many of the bridges are due for replacement. The bridges should not be replaced without building the ultimate solution. Funding should not be a constraint since all of I-270 has been rebuilt since this section. These improvements have many trade-offs but the benefits will outweigh the negatives.

With the improvements that IDOT is studying for the Mississippi River Bridge should remove a bottleneck to the east of the corridor so I-270 through the northern part of the county needs to be able to accommodate traffic increases.

This stretch of I-270 has many underutilized and vacant properties that have been impacted by the poor traffic operations and the slip ramps that are hard to navigate and discourage motorists from using them. Bottom line the slip ramps need to be removed, and the one-way outer roads are the only feasible solution that will not have severe impacts to adjacent properties and businesses.

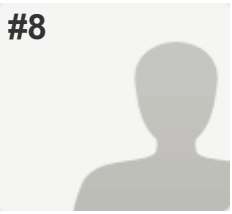
Q2: Contact Information (optional):

Name	Larry Welty
Address	1589 Saddlegate Court
ZIP/Postal Code	63033

Q3: Written Comment Form #

Respondent skipped this question

#8



COMPLETE

Answers Entered Manually

Collector: Web Link 1 (Web Link)

Started: Friday, December 16, 2016 11:01:18 AM

Last Modified: Friday, December 16, 2016 11:37:46 AM

Time Spent: 00:36:28

IP Address: 108.75.25.66

PAGE 1: Comment Form

Q1: Please provide your comments on the I-270 North Environmental Assessment in the space below. All comments received by January 6, 2017 will be included as part of the public hearing and EA.

With the limited allotted funds to start, I would definitely like to see at least the major intersections and bridges/overpasses to be the starting point for construction. E.g. 270 at 367 interchange, 270 at Lindbergh interchange, 270 at St. Charles Rock Rd, and 270 at Howdershell/McDonnell Blvd.

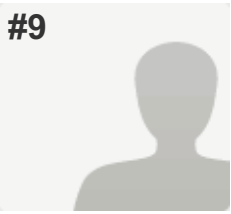
Q2: Contact Information (optional):

Name	Michael Ray
Address	420 Tiffin Ave
Email Address	michaelray91@yahoo.comm
Phone Number	314-219-9871

Q3: Written Comment Form #

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#9



COMPLETE

Answers Entered Manually

Collector: Web Link 1 (Web Link)

Started: Friday, December 16, 2016 11:37:49 AM

Last Modified: Friday, December 16, 2016 11:45:44 AM

Time Spent: 00:07:55

IP Address: 108.75.25.66

PAGE 1: Comment Form

Q1: Please provide your comments on the I-270 North Environmental Assessment in the space below. All comments received by January 6, 2017 will be included as part of the public hearing and EA.

These improvements are long overdue and very welcome. Issue of concern include disruption during construction - which can't be avoided but hopefully can be well managed. Also, workforce and W/MBE goals. A disparity study done by MSD indicated goals of 30% minority and 7% women. There is a C.B.A. with MSD insuring this. A CBA should also be created for this project. The area needs to the jobs.

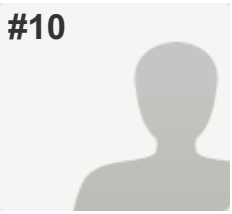
Q2: Contact Information (optional):

Name	Rev. Susan Sneed
Address	4501 Westminster Place
ZIP/Postal Code	63108
Email Address	susan@mcustl.com
Phone Number	314-367-3484

Q3: Written Comment Form #

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#10



COMPLETE

Answers Entered Manually

Collector: Web Link 1 (Web Link)

Started: Friday, December 16, 2016 11:49:34 AM

Last Modified: Friday, December 16, 2016 11:51:30 AM

Time Spent: 00:01:55

IP Address: 108.75.25.66

PAGE 1: Comment Form

Q1: Please provide your comments on the I-270 North Environmental Assessment in the space below. All comments received by January 6, 2017 will be included as part of the public hearing and EA.

After reviewing both exhibits, I would prefer exhibit 2. I have the pleasure of experiencing Maryland Heights news/Environmental Assessment. I have to travel both North 270 to Illinois and to Maryland Heights; this will reduce traffic flow and cut down on crime. This will increase more efficiency to the amount of traffic time for each driver each day.

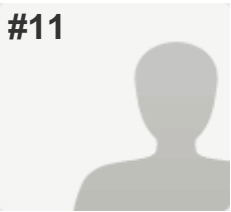
Q2: Contact Information (optional):

Respondent skipped this question

Q3: Written Comment Form #

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COMPLETE

Answers Entered Manually

Collector: Web Link 1 (Web Link)

Started: Friday, December 16, 2016 11:51:41 AM

Last Modified: Friday, December 16, 2016 11:54:06 AM

Time Spent: 00:02:25

IP Address: 108.75.25.66

PAGE 1: Comment Form

Q1: Please provide your comments on the I-270 North Environmental Assessment in the space below. All comments received by January 6, 2017 will be included as part of the public hearing and EA.

Representing the Florissant Fire District - The concerns of access from Florissant Road to 270 when we would have an accident between Florissant and Elizabeth/Washington.

We are losing 23 homes and 2 commercial properties. That is our assessment being lowered by at least one cent. Does not sound like a lot, but we have to fight for each tax increase from our citizens.

Extended travel distance relates to extended response times.

Q2: Contact Information (optional):

Name

Steve Gettemeier

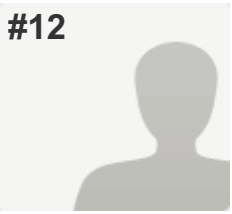
Email Address

sgettemeier@fvfpd.com

Q3: Written Comment Form #

Respondent skipped this question

#12



COMPLETE

Answers Entered Manually

Collector: Web Link 1 (Web Link)

Started: Friday, December 16, 2016 12:18:43 PM

Last Modified: Friday, December 16, 2016 12:20:28 PM

Time Spent: 00:01:45

IP Address: 108.75.25.66

PAGE 1: Comment Form

Q1: Please provide your comments on the I-270 North Environmental Assessment in the space below. All comments received by January 6, 2017 will be included as part of the public hearing and EA.

I-270 from Bellefontaine to Riverview designs look substandard and there is projected development on the NE side of Riverview/270 supposedly going up in the next few years.

270/367 needs to be done first then 270/Lindbergh. In between as you go. East of 367 should wait until IDOT gets their gears together because no matter what you plan what they do will be as substandard as you can imagine.

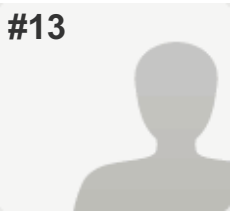
Q2: Contact Information (optional):

Respondent skipped this question

Q3: Written Comment Form #

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COMPLETE

Answers Entered Manually

Collector: Web Link 1 (Web Link)

Started: Friday, December 16, 2016 12:20:35 PM

Last Modified: Friday, December 16, 2016 12:39:32 PM

Time Spent: 00:18:56

IP Address: 108.75.25.66

PAGE 1: Comment Form

Q1: Please provide your comments on the I-270 North Environmental Assessment in the space below. All comments received by January 6, 2017 will be included as part of the public hearing and EA.

Great project highly needed as soon as possible. Phase 1 hopefully gets started soon. Don't change plans for Phase 1: Lindbergh Interchange.

Q2: Contact Information (optional):

Name	Earl Bradfield
Address	415 Elm Grove Lane, Hazelwood
ZIP/Postal Code	63042
Email Address	ejbradfield@hazelwoodmo.org
Phone Number	314-513-5013

Q3: Written Comment Form #

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Appendix D
Verbal Public Comments

Appendix D

Verbal Public Comments

Appendix Page 2: Shauna White Report (Open Microphone)

Appendix Page 10: Angie White Report (One-on-One Setting)

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MISSOURI DEPARTMENT OF TRANSPORTATION
I-270 NORTH CORRIDOR ENVIRONMENTAL ASSESSMENT
PUBLIC HEARING
DECEMBER 15, 2016

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Missouri Department of Transportation, I-270
North Corridor Environmental Assessment Public
Hearing, taken on the 15th day of December, 2016,
Between the hours of 4:00 p.m. and 7:00 p.m. of that
Day, at McCluer High School, Cafeteria/Commons Area,
1896 South New Florissant Road, Florissant, Missouri
63031, before ANGIE R. KELLY, a Certified Court
Reporter of the State of Missouri.

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INDEX OF SPEAKERS

Mary Hembree.....	4
Julie Griffith.....	4
Irvetta Williams.....	4

APPEARANCES

The Court Reporter:
 Ms. Angie R. Kelly, CCR
 Midwest Litigation Services
 711 North Eleventh Street
 St. Louis, Missouri 63101
 (314) 644-2191

1 P R O C E E D I N G S

2 (The public hearing commenced at 4:00 p.m.)

3 MS. HEMBREE: My name is Mary Hembree, my husband is
4 Jack and we're both 100 percent in agreement, it looks like a
5 great plan I think it will be good for the community.

6 MS. GRIFFITH: Julie Griffith, I think the basic idea
7 is good, I do like the idea that the outer roads are going to be
8 made one direction on either side of the interstate, and I like
9 is idea of the flyover ramp on 270 to 367.

10 MS. WILLIAMS: My name is Irvetta Williams and I am a
11 lifelong North County resident. I currently live at 11006
12 Thousand Oaks Drive, Sugar Tree Homes Condos, my actual unit
13 faces Highway 270. I am here at the public hearing today to
14 express my concern about the level of noise and vibration that
15 comes into our homes. I have just spoken with representatives
16 from MoDOT and they gave me a thorough understanding of the
17 highway proposed preferred plan with the outer roads changing to
18 one direction and U-turn ramps.

19 When I questioned them about noise abatement for
20 residential properties that adjoin the outer roads, specifically
21 the area where I live, I was told there will be no sound
22 abatement for our areas. That concerns me because as a 17 year
23 resident, I have to sleep with ear plugs. The noise and the
24 vibration into my home continues to increase and to say that
25 based on the impact study that the noise will not increase, and

1 that we in Sugar Tree Homes will need to live with the noise
2 generated from the highway concerns me. I did ask if sound
3 walls would be built in front of residential areas anywhere in
4 the impact study area and they did identify those areas which
5 are mostly on the south side of Highway 270, one area was
6 identified on the north side of 270, but once again I want to
7 express my strong concern about the noise being generated into
8 our homes on the north side of 270, specifically, in Sugar Tree
9 Homes.

10 When I question alternative ways to abate the noise, I
11 was told that it will not happen. I informed the MODOT staff
12 that I was involved with the airport residential sound
13 insulation program and that there are alternative ways to abate
14 noise into our homes, you can install sound insulated windows
15 and doors and other physical features to abate the noise into
16 residential properties. So while I do understand that the sound
17 walls were not feasible and based on the study, the sound will
18 basically jump over the wall and still come into our homes where
19 I live, I do want to strongly express my concern that
20 alternative ways of abating noise into our homes is not being
21 considered, and I would like for these alternative ways to be
22 discussed, and would like to see something happen to our homes
23 that will abate the noise.

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25 (The Public Hearing concluded at 7:00 p.m.)

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CERTIFICATE OF REPORTER

I, ANGIE R. KELLY, an Illinois Certified Shorthand Reporter (IL CSR# 084-004498) and Missouri Certified Court Reporter (MO CCR# 1010) do hereby certify that the witness whose testimony appears in the foregoing deposition transcript was duly sworn by me; that the testimony of said witness was taken by me to the best of my ability, and thereafter reduced to typewriting under my direction; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and further, that I am not a relative or employee of any attorney or counsel employed by the parties hereto; nor financially or otherwise interested in the outcome of this action.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this 17th day of December, 2016.

Notary Public

<p style="text-align: center;">A</p> <p>abate 5:10,13,15 5:23</p> <p>abatement 4:19 4:22</p> <p>abating 5:20</p> <p>ability 6:8</p> <p>action 6:11,15</p> <p>actual 4:12</p> <p>adjoin 4:20</p> <p>agreement 4:4</p> <p>airport 5:12</p> <p>alternative 5:10 5:13,20,21</p> <p>Angie 2:10 3:11 6:3</p> <p>APPEARANC... 3:9</p> <p>appears 6:6</p> <p>area 2:8 4:21 5:4 5:5</p> <p>areas 4:22 5:3,4</p> <p>Assessment 1:12 2:5</p> <p>attorney 6:13</p> <hr/> <p style="text-align: center;">B</p> <p>based 4:25 5:17</p> <p>basic 4:6</p> <p>basically 5:18</p> <p>best 6:8</p> <p>built 5:3</p> <hr/> <p style="text-align: center;">C</p> <p>C 4:1</p> <p>Cafeteria/Com... 2:8</p> <p>CCR 3:11 6:5</p> <p>CERTIFICATE 6:2</p> <p>Certified 2:10 6:3,4</p> <p>certify 6:5</p> <p>changing 4:17</p> <p>come 5:18</p> <p>comes 4:15</p> <p>commenced 4:2</p>	<p>community 4:5</p> <p>concern 4:14 5:7 5:19</p> <p>concerns 4:22 5:2</p> <p>concluded 5:25</p> <p>Condos 4:12</p> <p>considered 5:21</p> <p>continues 4:24</p> <p>Corridor 1:12 2:5</p> <p>counsel 6:10,13</p> <p>County 4:11</p> <p>Court 2:10 3:10 6:4</p> <p>CSR 6:4</p> <p>currently 4:11</p> <hr/> <p style="text-align: center;">D</p> <p>D 4:1</p> <p>day 2:6,8 6:17</p> <p>December 1:14 2:6 6:17</p> <p>Department 1:10 2:4</p> <p>deposition 6:6,11</p> <p>direction 4:8,18 6:9</p> <p>discussed 5:22</p> <p>doors 5:15</p> <p>Drive 4:12</p> <p>duly 6:7</p> <hr/> <p style="text-align: center;">E</p> <p>E 4:1,1</p> <p>ear 4:23</p> <p>either 4:8</p> <p>Eleventh 3:13</p> <p>employed 6:10 6:13</p> <p>employee 6:12</p> <p>Environmental 1:12 2:5</p> <p>express 4:14 5:7 5:19</p> <hr/> <p style="text-align: center;">F</p>	<p>faces 4:13</p> <p>feasible 5:17</p> <p>features 5:15</p> <p>financially 6:14</p> <p>Florissant 2:9,9</p> <p>flyover 4:9</p> <p>foregoing 6:6</p> <p>front 5:3</p> <p>further 6:12</p> <hr/> <p style="text-align: center;">G</p> <p>G 4:1</p> <p>generated 5:2,7</p> <p>going 4:7</p> <p>good 4:5,7</p> <p>great 4:5</p> <p>Griffith 3:4 4:6,6</p> <hr/> <p style="text-align: center;">H</p> <p>hand 6:16</p> <p>happen 5:11,22</p> <p>hearing 1:13 2:6 4:2,13 5:25</p> <p>Hembree 3:3 4:3 4:3</p> <p>hereto 6:13</p> <p>hereunto 6:16</p> <p>High 2:8</p> <p>highway 4:13,17 5:2,5</p> <p>home 4:24</p> <p>homes 4:12,15 5:1,8,9,14,18 5:20,22</p> <p>hours 2:7</p> <p>husband 4:3</p> <hr/> <p style="text-align: center;">I</p> <p>idea 4:6,7,9</p> <p>identified 5:6</p> <p>identify 5:4</p> <p>IL 6:4</p> <p>Illinois 6:3</p> <p>impact 4:25 5:4</p> <p>increase 4:24,25</p> <p>INDEX 3:1</p> <p>informed 5:11</p>	<p>install 5:14</p> <p>insulated 5:14</p> <p>insulation 5:13</p> <p>interested 6:14</p> <p>interstate 4:8</p> <p>involved 5:12</p> <p>Irvetta 3:5 4:10</p> <p>I-270 1:12 2:4</p> <hr/> <p style="text-align: center;">J</p> <p>Jack 4:4</p> <p>Julie 3:4 4:6</p> <p>jump 5:18</p> <hr/> <p style="text-align: center;">K</p> <p>Kelly 2:10 3:11 6:3</p> <hr/> <p style="text-align: center;">L</p> <p>level 4:14</p> <p>lifelong 4:11</p> <p>Litigation 3:12</p> <p>live 4:11,21 5:1 5:19</p> <p>looks 4:4</p> <p>Louis 3:14</p> <hr/> <p style="text-align: center;">M</p> <p>Mary 3:3 4:3</p> <p>McCluer 2:8</p> <p>Midwest 3:12</p> <p>Missouri 1:10 2:4,9,11 3:14 6:4</p> <p>MO 6:5</p> <p>MoDOT 4:16 5:11</p> <hr/> <p style="text-align: center;">N</p> <p>N 4:1</p> <p>name 4:3,10</p> <p>need 5:1</p> <p>neither 6:10</p> <p>New 2:9</p> <p>noise 4:14,19,23 4:25 5:1,7,10 5:14,15,20,23</p> <p>north 1:12 2:5</p>	<p>3:13 4:11 5:6,8</p> <p>Notary 6:22</p> <hr/> <p style="text-align: center;">O</p> <p>O 4:1</p> <p>Oaks 4:12</p> <p>once 5:6</p> <p>outcome 6:14</p> <p>outer 4:7,17,20</p> <hr/> <p style="text-align: center;">P</p> <p>P 4:1</p> <p>parties 6:11,13</p> <p>percent 4:4</p> <p>physical 5:15</p> <p>plan 4:5,17</p> <p>plugs 4:23</p> <p>preferred 4:17</p> <p>program 5:13</p> <p>properties 4:20 5:16</p> <p>proposed 4:17</p> <p>public 1:13 2:5 4:2,13 5:25 6:22</p> <p>p.m 2:7,7 4:2 5:25</p> <hr/> <p style="text-align: center;">Q</p> <p>question 5:10</p> <p>questioned 4:19</p> <hr/> <p style="text-align: center;">R</p> <p>R 2:10 3:11 4:1 6:3</p> <p>ramp 4:9</p> <p>ramps 4:18</p> <p>reduced 6:9</p> <p>related 6:10</p> <p>relative 6:12</p> <p>Reporter 2:11 3:10 6:2,4,5</p> <p>representatives 4:15</p> <p>resident 4:11,23</p> <p>residential 4:20 5:3,12,16</p> <p>Road 2:9</p>
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<p>roads 4:7,17,20</p> <hr/> <p style="text-align: center;">S</p> <hr/> <p>S 4:1 School 2:8 seal 6:17 see 5:22 Services 3:12 set 6:16 Shorthand 6:3 side 4:8 5:5,6,8 sleep 4:23 sound 4:21 5:2 5:12,14,16,17 south 2:9 5:5 SPEAKERS 3:1 specifically 4:20 5:8 spoken 4:15 St 3:14 staff 5:11 State 2:11 Street 3:13 strong 5:7 strongly 5:19 study 4:25 5:4,17 Sugar 4:12 5:1,8 sworn 6:7</p> <hr/> <p style="text-align: center;">T</p> <hr/> <p>taken 2:6 6:8,12 testimony 6:6,7 think 4:5,6 thorough 4:16 Thousand 4:12 today 4:13 told 4:21 5:11 transcript 6:7 Transportation 1:10 2:4 Tree 4:12 5:1,8 typewriting 6:9</p> <hr/> <p style="text-align: center;">U</p> <hr/> <p>understand 5:16 understanding 4:16</p>	<p>unit 4:12 U-turn 4:18</p> <hr/> <p style="text-align: center;">V</p> <hr/> <p>vibration 4:14,24</p> <hr/> <p style="text-align: center;">W</p> <hr/> <p>wall 5:18 walls 5:3,17 want 5:6,19 ways 5:10,13,20 5:21 we're 4:4 WHEREOF 6:16 Williams 3:5 4:10,10 windows 5:14 witness 6:5,8,16</p> <hr/> <p style="text-align: center;">Y</p> <hr/> <p>year 4:22</p> <hr/> <p style="text-align: center;">0</p> <hr/> <p>084-004498 6:4</p> <hr/> <p style="text-align: center;">1</p> <hr/> <p>100 4:4 1010 6:5 11006 4:11 15 1:14 15th 2:6 17 4:22 17th 6:17 1896 2:9</p> <hr/> <p style="text-align: center;">2</p> <hr/> <p>2016 1:14 2:6 6:17 270 4:9,13 5:5,6 5:8</p> <hr/> <p style="text-align: center;">3</p> <hr/> <p>314 3:15 367 4:9</p> <hr/> <p style="text-align: center;">4</p> <hr/> <p>4 3:3,4,5 4:00 2:7 4:2</p>	<hr/> <p style="text-align: center;">6</p> <hr/> <p>63031 2:10 63101 3:14 644-2191 3:15</p> <hr/> <p style="text-align: center;">7</p> <hr/> <p>7:00 2:7 5:25 711 3:13</p>		
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MISSOURI DEPARTMENT OF TRANSPORTATION
I-270 NORTH CORRIDOR ENVIRONMENTAL ASSESSMENT
PUBLIC HEARING
DECEMBER 15, 2016

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I N D E X

Comments by Mr. Bob Garrett

Page 5

E X H I B I T S

(No exhibits marked.)

1 Missouri Department of Transportation, I-270
2 North Corridor Environmental Assessment Public
3 Hearing, taken on the 15th day of December, 2016,
4 between the hours of 4:00 p.m. and 7:00 p.m. of that
5 day, at McCluer High School, Cafeteria/Commons Area,
6 1896 South New Florissant Road, Florissant, Missouri
7 63031, before AMANDA N. FARRAR, a Certified Court
8 Reporter of the State of Missouri.

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APPEARANCES

For the Missouri Department of
Transportation:

MS. SHAUNDA WHITE
Missouri Department of Transportation
St. Louis District
1590 Woodlake Drive
Chesterfield, Missouri 63017
shaunda.white@modot.mo.gov
(314) 453-1810

The Court Reporter:
MS. AMANDA N. FARRAR, CCR
Midwest Litigation Services
711 North Eleventh Street
St. Louis, Missouri 63101
(314) 644-2191

1 P R O C E E D I N G S

2 (The public hearing commenced at 4:00 p.m.)

3 MS. WHITE: So that you know, you will
4 have a two-minute limit.

5 MR. GARRETT: Two-minute limit.

6 MS. WHITE: And you state your name and
7 then you can begin.

8 MR. GARRETT: Do you need addresses or
9 any other info?

10 MS. WHITE: No.

11 MR. GARRETT: Hi, I'm Bob Garrett. I
12 grew up in this area. I've lived over 60 years out
13 here. I've been in my present home in Old Town
14 Florissant for about 35 years now.

15 During a lot of that time, during 18
16 years of that time, I was on Florissant City Council
17 and during that period I served as a member of
18 various St. Louis County municipal lead committees
19 and after that time I served as a member of the
20 St. Louis County Interstate 270/Highway 367 Corridor
21 Advisory Commission as well.

22 My comments about this today, in view of
23 the limited time, will be to state that while I
24 think most of the preferred alternative may be very
25 good, I think the portion of the project dealing

1 with the one-way traffic on Dunn and Pershall Roads
2 between Hanley and New Halls Ferry is a very bad
3 idea and will result in serious problems. The
4 intersections or the crossings which are limited
5 from north and south along that stretch are very
6 limited. This will increase traffic through those
7 crossings and create problems for that.

8 In addition, if anybody is looking for
9 counterflow alternatives to the north, there are
10 essentially none. The closest possible alternative
11 is St. Anthony, which is a residential street
12 through heavily residential areas, very narrow. If
13 you try to find the next available possible
14 alternative to the north, you're going through Old
15 Town Florissant and residential areas. Problems
16 also exist to the south where you would have to go
17 to Airport Road and Chambers to find anything near
18 viable.

19 In view of the limited time, I guess I
20 don't have much else I can say. I understand that
21 the City of Florissant is going to present some
22 information about this and I totally concur with
23 their recommendations and suggestions. Thank you.

24 (The public hearing concluded at 7:00 p.m.)

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CERTIFICATE OF REPORTER

I, Amanda N. Farrar, a Certified Court Reporter for the State of Missouri, do hereby certify that the foregoing transcript was taken by me to the best of my ability and thereafter reduced to typewriting by me; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this transcript was taken, and further that I am not a relative or employee of any attorney or counsel employed by the parties thereto, nor financially or otherwise interested in the outcome of the action.

Certified Court Reporter

<p>A</p> <p>ability 7:6 action 7:9,13 addition 6:8 addresses 5:8 Advisory 5:21 Airport 6:17 alternative 5:24 6:10,14 alternatives 6:9 Amanda 3:7 4:10 7:3 Anthony 6:11 anybody 6:8 APPEARANC... 4:1 area 3:5 5:12 areas 6:12,15 Assessment 1:9 3:2 attorney 7:11 available 6:13</p>	<p>5:21 committees 5:18 concluded 6:24 concur 6:22 Corridor 1:9 3:2 5:20 Council 5:16 counsel 7:7,11 counterflow 6:9 County 5:18,20 Court 3:7 4:9 7:3 7:17 create 6:7 crossings 6:4,7</p>	<p>further 7:10</p> <p>G</p> <p>G 5:1 Garrett 2:3 5:5,8 5:11,11 go 6:16 going 6:14,21 good 5:25 grew 5:12 guess 6:19</p>	<p>M</p> <p>marked 2:8 McCluer 3:5 member 5:17,19 Midwest 4:10 Missouri 1:8 3:1 3:6,8 4:2,5,6,11 7:4 municipal 5:18</p>	<p>R 5:1 recommendati... 6:23 reduced 7:6 related 7:8 relative 7:10 Reporter 3:8 4:9 7:1,4,17 residential 6:11 6:12,15 result 6:3 Road 3:6 6:17 Roads 6:1</p>
<p>B</p> <p>B 2:6 bad 6:2 best 7:6 Bob 2:3 5:11</p>	<p>D</p> <p>D 2:1 5:1 day 3:3,5 dealing 5:25 December 1:12 3:3 Department 1:8 3:1 4:2,5 District 4:5 Drive 4:6 Dunn 6:1</p>	<p>H</p> <p>H 2:6 Halls 6:2 Hanley 6:2 hearing 1:10 3:3 5:2 6:24 heavily 6:12 Hi 5:11 High 3:5 home 5:13 hours 3:4</p>	<p>N</p> <p>N 2:1 3:7 4:10 5:1 7:3 name 5:6 narrow 6:12 near 6:17 need 5:8 neither 7:7 New 3:6 6:2 north 1:9 3:2 4:11 6:5,9,14</p>	<p>S</p> <p>S 2:6 5:1 School 3:5 serious 6:3 served 5:17,19 Services 4:10 SHAUNDA 4:4 shaunda.white... 4:7 south 3:6 6:5,16 St 4:5,11 5:18,20 6:11 state 3:8 5:6,23 7:4 street 4:11 6:11 stretch 6:5 suggestions 6:23</p>
<p>C</p> <p>C 5:1 Cafeteria/Com... 3:5 CCR 4:10 CERTIFICATE 7:1 Certified 3:7 7:3 7:17 certify 7:5 Chambers 6:17 Chesterfield 4:6 City 5:16 6:21 closest 6:10 commenced 5:2 comments 2:3 5:22 Commission</p>	<p>E</p> <p>E 2:1,6 5:1,1 Eleventh 4:11 employed 7:8,11 employee 7:10 Environmental 1:9 3:2 essentially 6:10 exhibits 2:8 exist 6:16</p> <p>F</p> <p>Farrar 3:7 4:10 7:3 Ferry 6:2 financially 7:12 find 6:13,17 Florissant 3:6,6 5:14,16 6:15,21 foregoing 7:5</p>	<p>I</p> <p>idea 6:3 increase 6:6 info 5:9 information 6:22 interested 7:12 intersections 6:4 Interstate 5:20 I-270 1:9 3:1</p>	<p>O</p> <p>O 5:1 Old 5:13 6:14 one-way 6:1 outcome 7:13</p>	<p>T</p> <p>T 2:6 taken 3:3 7:5,9 Thank 6:23 thereto 7:11 think 5:24,25 time 5:15,16,19 5:23 6:19 today 5:22 totally 6:22 Town 5:13 6:15 traffic 6:1,6 transcript 7:5,9 Transportation 1:8 3:1 4:3,5</p>
		<p>K</p> <p>know 5:3</p> <p>L</p> <p>lead 5:18 limit 5:4,5 limited 5:23 6:4 6:6,19 Litigation 4:10 lived 5:12 looking 6:8 lot 5:15 Louis 4:5,11 5:18 5:20</p>	<p>P</p> <p>P 5:1 Page 2:3 parties 7:8,11 period 5:17 Pershall 6:1 portion 5:25 possible 6:10,13 preferred 5:24 present 5:13 6:21 problems 6:3,7 6:15 project 5:25 public 1:10 3:2 5:2 6:24 p.m 3:4,4 5:2 6:24</p>	<p>R</p>

<p>try 6:13</p> <p>two-minute 5:4,5</p> <p>typewriting 7:7</p> <hr/> <p style="text-align: center;">U</p> <hr/> <p>understand 6:20</p> <hr/> <p style="text-align: center;">V</p> <hr/> <p>various 5:18</p> <p>viable 6:18</p> <p>view 5:22 6:19</p> <hr/> <p style="text-align: center;">W</p> <hr/> <p>WHITE 4:4 5:3 5:6,10</p> <p>Woodlake 4:6</p> <hr/> <p style="text-align: center;">X</p> <hr/> <p>X 2:1,6</p> <hr/> <p style="text-align: center;">Y</p> <hr/> <p>years 5:12,14,16</p> <hr/> <p style="text-align: center;">1</p> <hr/> <p>15 1:12</p> <p>15th 3:3</p> <p>1590 4:6</p> <p>18 5:15</p> <p>1896 3:6</p> <hr/> <p style="text-align: center;">2</p> <hr/> <p>2016 1:12 3:3</p> <p>270/Highway 5:20</p> <hr/> <p style="text-align: center;">3</p> <hr/> <p>314)453-1810 4:7</p> <p>314)644-2191 4:12</p> <p>35 5:14</p> <p>367 5:20</p> <hr/> <p style="text-align: center;">4</p> <hr/> <p>4:00 3:4 5:2</p> <hr/> <p style="text-align: center;">5</p> <hr/> <p>5 2:3</p> <hr/> <p style="text-align: center;">6</p> <hr/>	<p>60 5:12</p> <p>63017 4:6</p> <p>63031 3:7</p> <p>63101 4:11</p> <hr/> <p style="text-align: center;">7</p> <hr/> <p>7:00 3:4 6:24</p> <p>711 4:11</p>			
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Appendix E
Agency Comments

Appendix E

Agency Comments

Appendix Page 2: Metropolitan St. Louis Sewer District Letter

Appendix Page 4: Miami Tribe Correspondence

Appendix Page 5: USEPA Letter

Appendix Page 8: TrailNet Letter

Appendix Page 10: Osage Nation Letter

Appendix Page 11: Missouri Department of Natural Resources Letter

Appendix Page 20: USFWS Correspondence



**Metropolitan St. Louis
Sewer District**

2350 Market Street
St. Louis, MO 63103

January 4, 2017

Missouri Department of Transportation
Attn: Mr. Ed Hassinger, Chief Engineer
P.O. Box 270
Jefferson City, MO 65102

RE: Environmental Assessment
I-270 Corridor, I-70 to the Chain of Rocks Bridge
St. Louis County and St. Louis City, Missouri

Dear Mr. Hassinger:

The Metropolitan St. Louis Sewer District (MSD) has reviewed the Environmental Assessment for the I-270 North Corridor. As an agency and stakeholder, MSD is providing input as part of the project's public engagement process. The project corridor spans multiple watersheds for which MSD provides stormwater and wastewater services to customers, many of whom are the same stakeholders our respective agencies share.

Existing sanitary sewers cross the project corridor in numerous locations, some of which may be slated for improvement as part of MSD's ongoing Capital Improvement and Replacement Program and Project Clear. Provisions for their adjustment, relocation, or protection during construction phases may need to be incorporated into the project's construction plans depending on the nature of the project scope.

Some neighborhoods and streams downstream from the corridor's drainage outfalls are sensitive to recurring flooding and erosion. Scope involving pavement widening/additions or redirection of drainage will need to be carefully evaluated for potential downstream impacts. Controls may be necessary to attenuate, treat, and reduce the volume of excess runoff generated by the project in order to protect water quality and to prevent any known downstream problems from becoming worse as a result of the project.

Given these factors, MSD requests that MoDOT consult with MSD staff as early in the preliminary design phases as possible so that potential design issues and coordination opportunities can be identified and planned for. The MSD point of contact for phases located within the Maline, Watkins, and Riverview watersheds is John Alexander, and may be contacted at (314) 768-2707 or jcalex@stlmsd.com. I am the point of contact for project phases located within the Bonfils (Cowmire), Missouri River (MOSA) and Coldwater watersheds and may be reached at (314) 768-2773 or jtpete@stlmsd.com.

MSD appreciates the opportunity to provide input on the project as part of the public engagement process, and looks forward to working with MoDOT as the design moves forward. Please feel free to contact me if you or staff has any questions.

Sincerely,

A handwritten signature in blue ink, appearing to be 'JP', is centered below the text.

Jason Peterein, P.E.
Principal Engineer
Engineering/Planning-Development Review

Enclosure: Watershed Map

cc: Bruce Litzsinger, MSD
John Grimm, MSD
John Alexander, MSD
Phil Lum, City of Bellefontaine Neighbors
Debra Irvin, City of Berkeley
Vijay Bhasin, City of Black Jack
Craig George, City of Bridgeton
Jeanne Blanton, City of Calverton Park
Kelsie Holmes, City of Dellwood
Matthew Unrein, City of Ferguson
Tim Barrett, City of Florissant
Pat McSheehy, City of Hazelwood
Jim Knoll, St. Louis County

From: Matthew Burcham
To: [Desai, Buddy/STL](#); [WESLEY C. STEPHEN](#); [LISA L KUNTZ](#)
Cc: [Miller, Robert/COL](#); [Marks, Melissa/STL](#); [Ritter, James/STL](#)
Subject: FW: I-270 North Corridor, I-70 to the Chain of Rocks Bridge [EXTERNAL]
Date: Tuesday, January 03, 2017 5:21:26 PM

Thank you,

Matt Burcham

Senior Environmental Specialist
573-526-6679
601 W. Main Street
P.O. Box 270
Jefferson City, MO 65102

From: Diane Hunter [<mailto:dhunter@miamination.com>]
Sent: Tuesday, January 03, 2017 12:30 PM
To: SL270NorthEA
Cc: raegan.ball.dot.gov; Banerjee, Roopa (FHWA); Michael Meinkoth
Subject: I-270 North Corridor, I-70 to the Chain of Rocks Bridge

Dear Mr. Hassinger:

Aya, kikwehsitoole – I show you respect. My name is Diane Hunter, and I am the Tribal Historic Preservation Officer for the Federally Recognized Miami Tribe of Oklahoma. In this capacity, I am the Miami Tribe's point of contact for all Section 106 issues.

The Miami Tribe offers no objection to the above-mentioned project at this time, as we are not currently aware of existing documentation directly linking a specific Miami cultural or historic site to the project site. However, as this site is within the aboriginal homelands of the Miami Tribe, if any human remains or Native American cultural items falling under the Native American Graves Protection and Repatriation Act (NAGPRA) or archaeological evidence is discovered during any phase of this project, the Miami Tribe requests immediate consultation with the entity of jurisdiction for the location of discovery. In such a case, please contact me at 918-541-8966, or by email at dhunter@miamination.com to initiate consultation.

The Miami Tribe requests to serve as a consulting party to the proposed project. In my capacity as Tribal Historic Preservation Officer I am the point of contact for consultation.

Respectfully,

Diane Hunter
Tribal Historic Preservation Officer
Miami Tribe of Oklahoma
P.O. Box 1326
Miami, OK 74355

Summary of Issues/Responses



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

11201 Renner Boulevard
Lenexa, Kansas 66219

JAN 06 2017


Mr. Ed Hassinger
Chief Engineer
Missouri Department of Transportation
P.O. Box 270
Jefferson City, Missouri 65102

Dear Mr. Hassinger:

Thank you for the opportunity to review the environmental assessment for the I-270 North Corridor project in St. Louis County and St. Louis City, Missouri. The project would make improvements to I-270 from the I-70/I-270 interchange in Bridgeton, Missouri to the Mississippi River/Chain of Rocks bridge across six construction phases extending to 2045. The Missouri Department of Transportation identified its preferred alternative, an additional design alternative, and a 'no action' alternative in the environmental assessment. The project will be conducted largely within the existing footprint of the existing highway system.

We note that all elements of the Missouri Department of Transportation's preferred alternative for this project are included in the East-West Gateway Council of Government's updated long-range transportation plan and in the region's air quality conformity analysis. We offer additional detailed comments regarding other document components as an enclosure to this letter.

If you have any questions regarding these comments, please contact me at (913) 551-7606 or via email at tapp.joshua@epa.gov.

Sincerely,

Joshua Tapp
NEPA Program Manager

Enclosure



Summary of Issues/Responses

Detailed Comments on the I-270 North Project Environmental Assessment

The following comments are organized according to the typically recommended National Environmental Policy Act compliance document format.

Project Purpose

The purpose and need characterization, as presented in Appendix B, Section B.2, should have been incorporated into Section 2 of the main document. The discussion of project need and purpose in Section 2 is made unclear by its abbreviated treatment. The expanded treatment of project major elements in Section B.2 in Appendix B is complete and provides the foundation and context for the rest of the main body assessment.

Alternatives

In general, the environmental assessment does not evaluate the effectiveness of the action alternatives in specifically addressing the nine major elements discussed as part of the project purpose and need. The analysis of the impacts of multiple, complex highway design changes specific to sub-areas could have been simplified by contrasting their effectiveness in addressing the nine elements characterizing the need for the project.

There are nineteen interchanges within the sixteen-mile study area. The environmental assessment references that the Missouri Department of Transportation's Access Management Guidelines recommend a spacing of two to three miles between interchanges on major roadways in urban areas, and that current interchange spacing in the project corridor does not meet these guidelines. In reviewing the assessment, it did not appear that the Missouri Department of Transportation considered possible roadway design changes in its alternatives development, which would result in a reduction in the number of interchanges on I-270. The assessment does identify Major Element #3, Inconsistent Interchange Operations, as a transportation problem important to project purpose and need with reference to tight interchange spacing and closely spaced weaving sections, but the assessment does not appear to comparatively evaluate alternatives in the context of addressing the interchange density problem. It appears that a reduction in the density of interchanges in the project area was never considered as part of the alternatives development.

Affected Environment and Impacts

Air Quality

The reconstruction of I-270 is included in the area's most recent air quality conformity determination of the FY 2017-2020 Transportation Improvement Program, which is part of the Long-Range Transportation Plan for the St. Louis Region. The project is, therefore, not expected to contribute to regional air quality problems, and would maintain regional compliance with the requirements of the Clean Air Act.

The environmental assessment did not include an assessment of potential changes in greenhouse gas emissions resulting from project changes in highway design.

According to Federal Highway Administration guidance on project development and documentation (August 21, 1992) The body of the NEPA document "should be a succinct statement of all the information the decision maker and public need to make the decision". The document should summarize methodologies and conclusions. Lengthy technical discussions of modeling methodology, baseline studies, or other technical work should go into the appendix. That was the rationale behind the summary in Section 2 and the complete Purpose and Need Statement being contained in Appendix B. The reference to the Appendix B was relocated to the beginning of the section to prepare the reader for the brevity of the discussion regarding the transportation problems associated with I-270.

The project team continually endeavored to present to the pros and cons of complex alternatives in as clear a manner as possible. The techniques used in the NEPA document were honed through public involvement process and through the interaction with the Technical Advisory Committee (TAC) and the Community Advisory Group (CAG). The EA tables 3-2, 3-3, 4-4 and 3-5 are the distillation of those experiences. The rigidity of using the Purpose and Need criteria, was found to be counter-productive and confusing.

The density of interchanges is highest in the vicinity between I-170 and Old Halls Ferry Road. This 4 mile section has 7 crossroads with access to I-270. While it is true that the Selected Alternative does not completely eliminate access to any of these cross roads, it would be misleading to assume that it doesn't comply with MoDOT guidelines. The improvement of the outer road system will reduce crashes, eliminate conflict points and improve operation, while also maintaining access. The Selected Alternative addresses the specific transportation problems associated with the alternative (PN #3) - weaving operations, substandard operations along the crossroads and low operating speeds, while maintain access.

The nature of how Federal Agencies address GHG and climate changes is an evolving area of research.

In 2016, the CEQ issued Final Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews (Published in Federal Register on August 5, 2016). This guidance applies to all EAs and EISs that commence on or after August 5, 2016. For ongoing EAs and EISs, like the I-270N EA, the guidance suggests that "agencies should consider applying this guidance to projects in the EIS or EA preparation stage if this would inform the consideration of differences between alternatives or address comments raised through the public comment process...." The alternatives for this project are reconfigurations of the existing system intended to increase the efficiency rather than to increase the number of users. Relative to GHG, the differences among the alternatives is minor-focused on elements like interchange designs and outer road configurations. These elements are not expected to measurably affect the levels of GHG inputs, among the alternatives.

Summary of Issues/Responses

Community-based Impacts

The environmental assessment provides an inadequate assessment of the potential temporary and permanent impacts of construction activities on emergency response times, school transportation times, the safety of school pick-up and drop-off locations, pedestrian safety and the safety of public transportation pick-up and drop-off locations. The assessment appears to focus only on access to local community resources and provides very little assessment of either temporary or permanent impacts on resource performance and safety. The assessment also does not address whether the project, through acquisition of commercial property, could affect local community access to basic retail commodities, e.g., fuel, groceries, medications.

Of particular concern is the absence of any analysis of temporary, construction-related noise impacts to residential, school and hospital locations. Given the proximity of these community resources to the existing highway footprint, noise impacts could result in temporary conditions precluding continuing operations of these community resources during construction. The assessment currently only acknowledges the potential need for abatement and mitigation measures without providing a proper characterization of either the scope or magnitude of these temporary impacts on sensitive receptors.

Hazardous Materials

The environmental assessment identifies twenty sites of potential concern for hazardous materials and six of those sites are further characterized as a moderate to high risk for adversely affecting project construction activities. It is likely that all six sites will also have contaminated soils, in addition to groundwater contamination. The assessment notes that a Phase I Environmental Site Assessment will be conducted for properties to be acquired. We suggest that an assessment be conducted for all contaminated properties, including the other fourteen sites where ground will be disturbed, regardless of whether any property will be acquired. For those sites where contaminated soil will be disturbed, air monitoring should be conducted to determine whether there is a risk to surrounding public areas, residences and site workers from volatilizing petroleum or solvent components.

The environmental assessment describes two Superfund sites considered to constitute a moderate to high risk of adversely affecting project construction. It is our understanding that staff with CH2M Hill have had discussions with the U.S. Environmental Protection Agency, Region 7's Superfund Division. The environmental assessment also notes coordination with the U.S. Army Corps of Engineers on the St. Louis Airport/Hazelwood/Futura Coatings site. Given the long timeframe for the execution of all project phases, the EPA recommends continuing and frequent coordination with both the EPA and the U.S. Corps of Engineers as project design and construction continues through 2045. We also recommend the monitoring of water quality in Coldwater Creek upstream, downstream, and within project boundaries during construction in that watershed.

Noise Impacts

The environmental assessment noise impacts analysis appears to address only permanent noise-related impacts associated with future traffic noise. It does not appear that the assessment provides any analysis of temporary noise impacts associated with construction.

For the I-270N project, MoDOT will pursue techniques to reduce construction-related disruptions, minimize costs, and accelerate construction. In the decision making process, no discernible differences among the Reasonable Alternatives, relative to construction disruptions have been identified. Because this is different than the operational impacts discussed throughout the EA, a separate section (4.3) was included in the EA.

To address construction-related issues associated with response times and safety for pick-ups/drop-offs, bike/ped use and community access. Several environmental commitments were established (#s 1, 2, 3, 4, 10, 15 and 16). These commitments require a MoDOT-approved maintenance of traffic plan. Construction schedules, road closures, and detours will be coordinated with police forces, schools, Metro, Little Creek Nature Area and emergency services to reduce impact to response times of these agencies. Further, the design process will include consultation to ensure compatibility of the roadway design with continued service. Additionally, proper design, construction techniques, timing and technical assistance will be coordinated during construction.

The EA specifies that "All 20 facilities that pose a potential for environmental concern are close enough to the Reasonable Alternatives to assume to be affected by the construction of either alternative. Site-specific Phase I and Phase II testing would need to be conducted in the areas of planned construction to evaluate whether contamination was actually present, and at what concentrations."

Environmental Commitment #9 memorializes that MoDOT will coordinate with the USACE related to any required excavation or other land disturbance within the St. Louis Airport Sites FUSRAP Record of Decision boundary.

On January 3, 2017, the U.S. Environmental Protection Agency –Superfund Division (EPA) contacted the project's Environmental Lead to respond to the outreach submitted regarding the Westlake Landfill. The EPA representatives felt that the I-270N project would be unaffected by the Westlake Landfill. The project team is committed to continued coordination with the EPA representatives as the project begins construction.

Section 4.3 of the EA addresses construction impact, including construction noise. Noise from heavy construction equipment and haul trucks would result in unavoidable short-term impacts. Residents adjacent to the roadway would be most impacted by construction noise. Contractors may be required to equip and maintain muffling equipment for trucks and other machinery to minimize noise emissions. Operations with high temporary noise levels, such as pile driving, may require abatement restrictions placed upon it such as work hour controls and maintenance of muffler systems.

Summary of Issues/Responses



address : 411 North 10th St., Suite 202
St. Louis, MO 63101

office : 314.436.1324
email : info@trailnet.org
follow us : facebook.com/trailnet
twitter.com/trailnet

COMMENTS OF TRAILNET, INC. ON I-270 NORTH ENVIRONMENTAL ASSESSMENT REVIEW

- 1) A reconfiguration of Pershall Rd. and Dunn Rd. from two-way to one-way streets should not be encouraged.
 - a. Travel time was a main reason for the proposed conversion to one-way streets.
However, roadways of 50 mph or less, such as Dunn Rd. and Pershall Rd., should not be designed based on speed, but on the safety of all road users.
 - b. Pershall Rd. has a metro bus transit station and travel in both directions is necessary to support the accessibility of the metro bus.
 - c. One way streets are not accessible or safe for bicyclists unless additional infrastructure is installed.
 - i. Appropriate infrastructure for multi-modal transportation options should be installed if conversion to a one-way street is unavoidable.

- 2) Will sidewalks and improved bus stations along Dunn Rd. and Pershall Rd. be a part of the project scope? It was mentioned as a problem, but no solution or promise of improvement was identified.
- 3) Are bike lanes being considered for Dunn Rd. and Pershall Rd. for any of the design alternatives? They provides access to a number of institutional properties such as St. Louis Community College that could benefit from such improvements.
- 4) Ensure pedestrians and bicyclists are considered and designed for appropriately on new interchanges, especially for divergent diamond interchanges.

A One-Way Outer Road is Not Encouraged: The letter suggests that the design should be based on safety rather than speed, that the Metro bus transit station requires two-way traffic and that bicyclists have no safe access within a one-way system.

Response: Relative to safety, the one-way system is expected to reduce crashes by 25 percent. Relative to out-of-direction travel, total distance traveled can be higher under a one-way system, but overall travel time is less. This is true overall and for most important destinations/pathways. Additionally, when out of direction travel is necessary, it tends to total less than 3 miles. Relative to conflicts with other vehicles, they are minimized under the one-way system.

Does the Selected Alternative include Bike/Ped Amenities? The letter asked about sidewalks, improved bus stations and bike lanes. The letter also asked if the parcel acquisition took into account pedestrian and bicycles facilities.

Response: As an Environmental Commitment (see Section 8) MoDOT will upgrade existing pedestrian facilities to be ADA compliant and provide additional pedestrian and bicycle connectivity where reasonable

Additionally, consistent with public involvement and stakeholder coordination, where prudent and feasible, plans for appropriate pedestrian and bicycle access will be developed during the final design process. MoDOT coordination with interested parties during the final design process is an environmental commitment of this project. Pedestrian improvements included as a part of this project will comply with ADA requirements.




Summary of Issues/Responses

5) Encourage reasonable design alternatives that limit impacts to public transportation. This will help support effective Travel Demand Management (TDM) programs.

- a. McDonnell Blvd.: Encourage Alternative 2 to provide greater neighborhood connectivity and potential for increased bike/ped opportunities with a Park-and-Ride lot.
- b. Hanley/Graham Rd: Encourage a two-way road system to avoid causing price increases for public transit services; this will help support a TDM approach.
- c. Lilac Avenue: The Alternative 1 interchange should be supported. (Alternative 2 would eliminate a Park-and-Ride lot).

6) Does parcel acquisition take into account pedestrian and bicycle facilities?

Thank you for the opportunity to comment on improving active transportation access and safety in the I-270 corridor.



Ralph Pfremmer, Executive Director

Trailnet Supports Effective Travel Demand Management (TDM) Programs: This led to the following recommendations: Alternative 2 at McDonnell Boulevard, a two-way outer road system at Hanley/Graham and Alternative 1 at Lilac Avenue.

Response: The Selected Alternative includes a Diverging Diamond Interchange (DDI) at McDonnell Boulevard. This is Alternative 1. Trailnet suggests that Alternative 2 (a partial cloverleaf) will better provide “bike/ped opportunities with a Park and Ride lot.” The project team acknowledges the difficulties that DDI have for pedestrians, but ultimately chose it because its synchronized signals reduce delays and the lower number of conflict points.

The Selected Alternative utilizes a one-way outer road system. This configuration will cause general traffic to experience out-of-direction travel. That level of re-routing has been determined to be no a significant impact to the community. MoDOT is committed to public safety - It was a driver behind the project. The one-way system will improve traffic flow improving most travel times. Additionally it will reduce the likelihood of a crash, reducing the need for highway runs.

The Selected Alternative includes a diamond interchange at Lilac Avenue (Alternative 1) as suggested by Trailnet.



TRIBAL HISTORIC PRESERVATION OFFICE

Date: December 21, 2016

File: 1617-1591MO-12

RE: MoDOT Job# J6I3020 I-270 North Corridor, St. Louis County and St. Louis City, Missouri

Missouri Department of Transportation
Raegan Ball
3220 W. Edgewood, Suite H
Jefferson City, MO 65109

Dear Ms. Ball,

The Osage Nation Historic Preservation Office has received notification of the availability of the Environmental Assessment for the proposed project **MoDOT Job# J6I3020 I-270 North Corridor, St. Louis County and St. Louis City, Missouri**. The Osage Nation requests copies of the Environmental Assessment and cultural resources survey report for review and comment.

In accordance with the National Historic Preservation Act, (NHPA) [16 U.S.C. 470 §§ 470-470w-6] 1966, undertakings subject to the review process are referred to in S101 (d) (6) (A), which clarifies that historic properties may have religious and cultural significance to Indian tribes. Additionally, Section 106 of NHPA requires Federal agencies to consider the effects of their actions on historic properties (36 CFR Part 800) as does the National Environmental Policy Act (43 U.S.C. 4321 and 4331-35 and 40 CFR 1501.7(a) of 1969).

The Osage Nation has a vital interest in protecting its historic and ancestral cultural resources, which are protected under the NHPA, NEPA, the Native American Graves Protection and Repatriation Act, and Osage law, and appreciates your consideration of the enclosed avoidance areas in the planning process. **The Osage Nation anticipates reviewing and commenting on the Environmental Assessment and cultural resources survey report for the proposed MoDOT Job# J6I3020 I-270 North Corridor, St. Louis County and St. Louis City, Missouri.**

Should you have any questions or need any additional information, please feel free to contact me at the number listed below. Thank you for consulting with the Osage Nation on this matter.

Sincerely,


James Munkres
Archaeologist

Summary of Issues/Responses



Jeremiah W. (Jay) Nixon, Governor • Harry D. Bozian, Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

December 27, 2016

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



Dear Mr. Hassinger:

The Missouri Department of Natural Resources (department) appreciates the opportunity to review the materials for the proposed I-270 North Corridor, I-70 to the Chain of Rocks Bridge improvements. The department offers the following comments for consideration.

Project Location

The Environmental Assessment (EA) study area includes all area within one mile of each side of the I-270 corridor from the I-70/I-270 interchange to the Chain of Rocks Bridge. The following geographic descriptions apply to the endpoint locations of I-270 within the study area.

Geographic Coordinates:

722497 E, 4291982 N to 745697 E, 4294423 N

Public Land Survey System:

Land Grant 00729 to Land Grant 00114

8-Digit Hydrologic Unit Code:

Lower Missouri (10300200) and Cahokia-Joachim (07140101)

Ecological Drainage Unit:

Ozark/Moreau/Loutre and Ozark/Apple/Joachim

Hazardous Waste

Proposed Action in Area 2: McDonnell Boulevard to Hanley/Graham Road

There is known contamination in the banks of Coldwater Creek at the I-270 Bridge, in the floodplain of Coldwater Creek just north (downstream) of Dunn Road and there may be contamination of the banks and floodplain of Coldwater Creek at Dunn Road and at Pershall Road. Pershall Road (including below the roadway) and its entire right of way may have



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unknown levels of contamination between Lindbergh and Hanley. Work in any of these areas must trigger and require consultation with the U.S. Army Corps of Engineers (USACE) and potentially utility support as discussed in Section 4.10.2.3 under Superfund Sites. Please add this information, after coordinating with the USACE, to this EA.

4.10.2.2 / Saint Louis Airport/Hazelwood/Futura Coatings Co. Site/Coldwater Creek

This portion of the assessment describes historical information. It is recommended to also include the current status of the Formerly Utilized Sites Remedial Action Program (FUSRAP) project including, that the Hazelwood Interim Storage Site/Futura piles have been removed and remediated and that inaccessible areas contaminated above remediation goals still exist at VP-40A near Futura. Please coordinate with the USACE for current project status and incorporate this information into the EA.

The flyover radiological survey was not of sufficient sensitivity to make a determination about whether Coldwater Creek was/is contaminated above remedial goals (RGs) documented in the Record of Decision. Contamination above RGs has been found in the Coldwater Creek floodplain as far North as St. Denis Bridge. No conclusion may be drawn from the gamma flyover survey because thorium, a constituent of concern in the FUSRAP project, is difficult to detect with this type of equipment. If the flyover reference is retained in the report, please also include information about the USACE's sample results along and near the creek to ensure the current status of contamination is properly represented. Earthwork involving Coldwater Creek and its floodplain anywhere North of Banshee Road should be done only in close consultation with the USACE.

4.10.2.3 / Superfund Sites

The assessment lists two Superfund Sites that are in the vicinity of the I-270. The report does not state what will be done to address any possible concerns related to the Westlake Landfill site. We recommend immediately contacting and coordinating with the Environmental Protection Agency Region 7 Remedial Project Manager, Mr. Bradley Vann. Mr. Vann can be reached at (913) 551-7611 or by email at vann.bradley@epa.gov

In order for the USACE to assist and provide utility support as needed during the activities covered by this construction, it is highly recommended and encouraged that the Missouri Department of Transportation (MoDOT) contact USACE FUSRAP immediately in order to provide advanced notice before commencement of any excavation activities within the Record of Decision boundaries (including Pershall Road from Lindbergh to Hanley) or within the Coldwater Creek floodplain at Dunn, Pershall, or I-270. The USACE may need significant advanced notice and lead-time to ensure that radiologically contaminated areas are identified prior to the MoDOT work and to plan, coordinate, fund, and schedule radiological support for MoDOT activities. This information should be included in this EA. For reference, past projects of similar or less scope have required 12 months advanced notice.

The Formerly Utilized Sites Remedial Action Program (FUSRAP) was initiated to clean up sites that had become contaminated from the nation's early atomic programs. The program is administered by the U.S. Army Corps of Engineers (USACE). The St. Louis Airport Sites (SLAPS) is adjacent to the I-270N study area in the southwestern quadrant of the Lindbergh Boulevard interchange.

Coordination meetings with the utility support component of the FUSRUP regarding the SLAPS were conducted as part of the I-270N EA. The utility support component will remediate areas where the project will conduct earthwork within the FUSRAP ROD boundary (basically between Lindbergh and I 170). Coordination with the USACE will continue as the project progresses.

Prior to any earthwork within the St. Louis Airport Sites FUSRAP Record of Decision boundary (between Lindbergh and I-170) will be coordinated, by MoDOT, with the USACE (Department of the Army, St. Louis District, Corps of Engineers, 8945 Latty Avenue, Berkeley, Missouri 63134). Earthwork plans, volumes of materials, timing and construction limits are important elements needed for the utility support component of the 2005 Record of Decision.

Regarding the EPA radiological survey (2013) referenced in the EA identifying areas of elevated gamma radiation in the Coldwater Creek area, the project team accepts the MNDR contention that it is insufficient to make a determination about the presence/level of contamination. Testing by the USACE by FUSRAP provides superior information. Coordination with the USACE is an Environmental Commitment (#9) of the project.

Regarding the Westlake Landfill, coordination with the USEPA was conducted. This coordination is discussed in this FONSI in **Section 6A**. The EPA representatives felt that the I-270N project would be unaffected by the Westlake Landfill. The project team is committed to continued coordination with the EPA representatives as the project begins construction.

Regarding coordination USACE (Department of the Army, St. Louis District, Corps of Engineers, 8945 Latty Avenue, Berkeley, Missouri 63134), Section 4.10.3.2 identifies the specifics of coordination needs. Earthwork plans, volumes of materials, timing and construction limits are important elements needed for the utility support component of the 2005 Record of Decision.

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Solid Waste

The department's technical bulletin "Managing Solid Waste Encountered during Excavation Activities" has been developed to assist project planners. It will provide general disposal requirements for any solid waste encountered or that which may be discovered, as a result of road construction. The bulletin can be found on the department's web site at <http://dnr.mo.gov/pubs/pub2192.htm>.

Acknowledged

In the event the construction work involves any wood waste that is to be taken to a landfill, the following technical bulletin might also be helpful, "Yard Waste Composting Facility Guidelines" as it will provide information regarding wood waste related to what can be accepted by a landfill. The bulletin can be found on the department's web site at <http://dnr.mo.gov/pubs/pub927.htm>.

Acknowledged

If any scrap tires are encountered, the following technical bulletin can also be helpful, "Management of Scrap Tires." It will provide guidance and disposal information for scrap tires. The bulletin can be found on the department's web site at <http://dnr.mo.gov/pubs/pub2056.htm>.

Acknowledged

Water Protection

Geospatial Data

Geospatial data published by the department addressing designated uses, sensitive waters, geology, and other watershed information included in this review, is available on the Missouri Spatial Data Information Service website at <http://msdis.missouri.edu/>. Additional geospatial resources available from the department can be found at <http://dnr.mo.gov/gis/>.

Acknowledged

Permitting Obligations

Clean Water Act Sections 401 and 404:

Any project that has the potential to result in the discharge of fill or dredged material into a jurisdictional water of the United States may require Clean Water Act Section 404 Permit Authorization from the USACE, and Section 401 Water Quality Certification from the Department of Natural Resources. The 401 Certification is a certification by the state that the project will not violate water quality standards. More information about the Section 404 Permit Program, including Clean Water Act jurisdiction, is available at <https://www.epa.gov/cwa-404/section-404-permit-program>. More information about state 401 Water Quality Certification can be found at <http://dnr.mo.gov/env/wpp/401/>.

Acknowledged

If discharge into water has occurred, or will occur, MoDOT or its contractors should immediately contact the USACE Saint Louis District at (314) 331-8002, and the department's Operating Permits Section at (573) 522-4502 for more information. MoDOT and its contractors

Acknowledged

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may wish to consult with the department and the USACE prior to project initiation to ensure alternative plans are in place should such a discharge occur.

Mitigation

An alternatives analysis would need to be submitted prior to any impacts to jurisdictional waters as part of the avoidance and minimization measures that precede mitigating unavoidable impacts. Mitigation for wetlands should be in conformance with the *State of Missouri Aquatic Resources Mitigation Guidelines*, https://dnr.mo.gov/env/wpp/401/docs/mitigation_guidelines.pdf, while mitigation for streams should be in conformance with the *Missouri Stream Mitigation Method*, http://www.mym.usace.army.mil/Portals/51/docs/regulatory/May_2013_Missouri_Stream_Mitigation_Method.pdf.

Acknowledged

Any mitigation plans must be in conformance with the *Compensatory Mitigation for Losses of Aquatic Resources*, <https://www.epa.gov/cwa-404/compensatory-mitigation>. This rule establishes a hierarchy for mitigation, with the purchase of credits from a mitigation bank at the top of that hierarchy. The rule also emphasizes in-kind and in-watershed mitigation; to go outside the watershed may result in a higher credit purchase calculation. The applicant should receive mitigation plan approval from the department prior to certification.

Acknowledged

Land Disturbance

Acquisition of a Section 401 Certification should not be interpreted to mean that the requirements for other permits are replaced or superseded, including Clean Water Act Section 402 National Pollutant Discharge Elimination System Permits. Work disturbing an area of one acre or more requires issuance of a land disturbance permit prior to any earth work. Disturbance to valuable resource waters, including springs, sinkholes and losing streams, could require additional conditions or a site-specific permit. Information and application for online land disturbance permits are located at <http://www.dnr.mo.gov/env/wpp/epermit/help.htm>. Questions regarding permit requirements may be directed to the department's St. Louis Regional Office at (314) 416-2960.

Acknowledged

Best Management Practices (BMPs)

In all cases, BMPs should be utilized during project activities to limit the amount of sediment and other pollutants entering waters of the state, and to protect the water's chemical, physical, and biological characteristics. These practices include, but are not limited to, conducting work during low flow conditions whenever possible, keeping heavy equipment out of the water, and taking all necessary precautions to avoid the release of fuel or other waste products to streams and other waters. In addition, the department encourages the preservation of existing riparian or buffer areas around each water resource to limit the amount of sediments or other pollutants entering the water. Any stream banks, riparian corridors, lake shores, or wetlands denuded of vegetation should be stabilized and re-vegetated as soon as is practicable.

Acknowledged

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Designated Uses

Water Bodies with Specific Designated Uses:

Water bodies are assigned specific designated uses according to State of Missouri Water Quality regulations at 10 CSR 20-7.031(2). These waters are protected by numeric water quality criteria outlined in 10 CSR 20-7.031(5) and Table A, as well as general water quality criteria outlined at 10 CSR 20-7.031(4).

The project area passes through the watersheds of Cowmire Creek (WBID 3960) and Coldwater Creek (WBID 1706), which drain toward the Missouri River (WBID 1604), and Maline Creek (WBID 3839) and Watkins Creek (WBID 1708), which drain toward the Mississippi River (WBID 1707). These include Class C streams, which are defined as streams that may cease flow in dry periods, but maintain permanent pools which support aquatic life. The Missouri and Mississippi Rivers are Class P streams, which are defined as streams that maintain permanent flow even in drought periods. These streams are assigned the following specific designated uses in the Missouri Use Designation Dataset and at 10 CSR 20-7.031 Table II and specified in the following table:

- Protection and propagation of fish, shellfish and wildlife – warm water habitat (AQL)
- Drinking Water Supply (DWS)
- Human health protection (HHP)
- Industrial (IND)
- Irrigation (IRR)
- Livestock and wildlife watering (LWW)
- Secondary contact recreation (SCR)
- Whole body contact protection – Category B (WBC-B)

Acknowledged

Water Body	WBID	Class	AQL	DWS	HHP	IND	IRR	LWW	SCR	WBC-B
Cowmire Creek	3960	C	X		X		X	X	X	X
Coldwater Creek	1706	C	X		X	X	X	X	X	X
Maline Creek	3839	C	X		X		X	X	X	
Watkins Creek	1708	C	X		X		X	X	X	X
Missouri River	1604	P	X	X	X	X	X	X	X	X
Mississippi River	1707	P	X	X	X	X	X	X	X	X

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Water Bodies without Specific Designated Uses:

Water bodies that are not assigned specific designated uses are still protected at all times by general water quality criteria outlined at 10 CSR 20-7.031(4), and are subject to the acute toxicity criteria of Tables A and B, as well as whole effluent toxicity conditions. There are a number of tributaries and headwaters of the classified streams within the EA study areas that do not have specific designated uses.

Acknowledged

According to the National Wetlands Inventory, there are about a dozen ponds totaling about 40 acres, 15 acres of freshwater emergent wetlands, and 40 acres of forested/shrub wetland within the EA study area. As such, the potential exists for wetlands, ponds, and the aforementioned tributaries and headwaters to be impacted, depending on their proximity to land disturbance activities. In all cases, take care to avoid such impacts through alternatives analysis before compensatory mitigation is considered. If wetlands, ponds, headwaters, or tributaries are not directly impacted but are near any land disturbance, take care to protect water quality. While these water bodies are not assigned specific designated uses, they are protected by Missouri's general water quality criteria.

Acknowledged

Sensitive Waters

Table C, Waters Designated for Cold Water Habitat:

There are no known waters designated for Cold Water Habitat within the EA study area. Missouri's waters designated for Cold Water Habitat can be found at 10 CSR 20-7.031 Table C, with associated criteria at 10 CSR 20-7.031 Table A.

Acknowledged

Table D, Outstanding National Resource Waters:

There are no known Outstanding National Resource Waters within the EA study area. There shall be no lowered water quality in Outstanding National Resource Waters, as designated in 10 CSR 20-7.031 Table D.

Acknowledged

Table E, Outstanding State Resource Waters:

There are no known Outstanding State Resource Waters within the EA study area. There shall be no lowered water quality in Outstanding State Resource Waters, as designated in 10 CSR 20-7.031 Table E.

Acknowledged

Table F, Metropolitan No-Discharge Streams:

Within the EA study area, Coldwater Creek is a metropolitan no-discharge stream. Care should be taken to maintain compliance with 10 CSR 20-7.031(7) for any land disturbance activities that are within this stream's watershed. Discharge to metropolitan no-discharge streams is prohibited, except as specifically permitted at 10 CSR 20-7.031(7). These exceptions include uncontaminated cooling water, permitted stormwater discharges in compliance with permit conditions, and excess wet-weather bypasses not interfering with designated uses.

This is acknowledged and added to the FONSI (Section 5.F)

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Table I, Biocriteria Reference Locations:

There are no known biocriteria reference locations within the EA study area. Biocriteria reference locations are water body segments used in the development of water quality standards and the assessment of aquatic life protection due to their high degree of biological integrity. Reference water locations for some aquatic habitat types can be found in 10 CSR 20-7.031 Table I. These waters should be protected in order to maintain their reference status.

Acknowledged

Table J, Losing Streams:

There are no known losing streams within the EA study area. A losing stream is defined as a stream that distributes 30 percent or more of its flow during low flow periods through permeable geologic material into a bedrock aquifer. These features are associated with karst topography, which underlies much of the state, and can act as conduits of pollutants to groundwater resources.

Acknowledged

303(d) Impaired and 305(b) Threatened Waters:

The EA study includes two tributaries of Watkins Creek that have been listed as impaired due to E. coli. Downstream of the EA study area, the lower segment of Maline Creek is also listed as impaired due to E. coli, and Coldwater Creek is listed as impaired due to Chloride. Waters assessed by the department as threatened or impaired could potentially be impacted by this project. Project personnel should ensure that any activities related to the project do not cause an increase in the pollutants impairing these waters nor re-suspend any pollutants that might be bound to sediment. Additional information can be found at <http://dnr.mo.gov/env/wpp/waterquality/303d/303d.htm>, or by contacting the department's Water Protection Program at (573) 751-1300.

This is acknowledged and added to the FONSI (Section 5.F)

Waters with Approved Total Maximum Daily Loads (TMDL):

Within the EA study area, the lower segment of Watkins Creek has an approved TMDL for E. coli. Approximately 233 TMDLs or TMDL alternatives have been approved by the U.S. Environmental Protection Agency for streams, rivers, and lakes throughout the state of Missouri. Care should be taken to ensure that the impairments are not made worse by this project's activities. Department staff may require extra protections when developing permits or certifications in order to comply with TMDL load and wasteload allocations. Additional information can be found at <http://www.dnr.mo.gov/env/wpp/tmdl/index.html>, or by contacting the department's Water Protection Program at (573) 751-1300.

This is acknowledged and added to the FONSI (Section 5.F)

Watershed Conditions

Karst Topography – Springs, Sinkholes, and Caves:

According to existing data, there are no known karst features within the EA study area. Springs, sinkholes, and caves are features on the landscape associated with karst topography that can act as direct conduits of surface water and pollutants to groundwater. As such, extra precaution should be taken to minimize disturbance of land in or around these features, and to avoid the introduction of pollutants to sensitive groundwater resources.

Acknowledged

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Certified Wells:

There are more than 1,200 wells within the EA study area, of which about 700 are abandoned, and about 500 are monitoring wells. Wells can act as conduits of pollutants to groundwater resources. Abandoned wells should be plugged prior to any land disturbance, and care should be taken to utilize appropriate BMPs to protect any currently operating wells. For more information on locating and plugging wells, please visit the department's Wellhead Protection Section webpage at <https://dnr.mo.gov/geology/gcosrv/wellhd/>, or contact the department's Geological Survey Program directly at (800) 361-4827.

Acknowledged

Public Drinking Water:

All work associated with this project should take into consideration the protection of both surface and groundwater public drinking water supplies, implementing appropriate BMPs as necessary. In the event that public drinking water sources or infrastructure, such as reservoirs, water supply wells, surface water supply intakes, or treatment systems, have the potential to be impacted by suspended solids or other pollutants as a result of this project, the owners or operators of the affected drinking water system should be notified prior to the onset of work. For additional information regarding source water protection, please contact Mr. Ken Tomlin of the department's Public Drinking Water Branch at (573) 526-0269.

Acknowledged

Public Land:

The Bellefontaine Conservation Area is within the EA study area. Care should be taken to avoid or minimize impact from land disturbance activities on this area.

Acknowledged

Conservation Opportunity Areas (COAs):

There are two COAs that are close to the west side of the EA study area. The Confluence is a terrestrial COA in the Missouri River floodplain. It is listed as an Audubon Important Bird Area, with possible mitigation sites, heritage targets, and existing conservation lands. The Creve Coeur Creek COA is an aquatic area that includes Creve Coeur Lake. Both terrestrial and aquatic COAs are identified by the Missouri Department of Conservation and its conservation partners as priority areas that support and conserve viable populations of wildlife and the ecological systems on which they depend. Designated COAs are located statewide and may consist of a combination of public and private resources. Please contact the Missouri Department of Conservation at (573) 751-4115 for more information.

Acknowledged

Natural Areas:

There are no known designated Natural Areas in or near the EA study area. Missouri Natural Areas are designated by the interagency Missouri Natural Areas Committee with the goal to protect and manage sites that represent the character, diversity and ecological processes of the state's native landscapes. Designated Natural Areas are located statewide and may consist of a combination of public and private resources. Please contact the Missouri Department of Conservation at (573) 751-4115, or the Department of Natural Resources at (800) 361-4827 for more information.

Acknowledged

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We appreciate the opportunity to provide comments for the proposed action materials for the I-270 North Corridor, I-70 to the Chain of Rocks Bridge improvements. If you have any questions or need clarification, please contact me or Ms. Missy Newman at (573) 751-3195. The address for correspondence is Department of Natural Resources, P.O. Box 176, Jefferson City, MO 65102. Thank you.

Sincerely,

DEPARTMENT OF NATURAL RESOURCES



Robert D. Stout
Chief of Policy

RDS/man

300 Hunter Avenue, Suite 305
St. Louis, MO 63124
314.335.3011
buddy.desai@ch2m.com

From: Roberts, Andy [mailto:andy_roberts@fws.gov]
Sent: Friday, January 20, 2017 12:43 PM
To: Christopher D. Shulse <Christopher.Shulse@modot.mo.gov>
Cc: Desai, Buddy/STL <Buddy.Desai@CH2M.com>; Karen Herrington <karen_herrington@fws.gov>
Subject: I-270 North Environmental Assessment [EXTERNAL]

Dear Mr. Shulse,

The U.S. Fish and Wildlife Service (Service) has reviewed the information provided in your November 2016 Environmental Assessment (EA) for the I-270 North Improvement Project in St. Louis, Missouri. We offer the following comments pursuant to the Fish and Wildlife Coordination Act (16 U.S.C. 661 et seq.), National Environmental Policy Act of 1969 (42 U.S.C. 4321-4347), and the Endangered Species Act of 1973, as amended (16 U.S.C. 1531-1544).

We appreciate your coordination with our office prior to the completion of the EA regarding the presence of Indiana and Northern Long-ear bat habitat in the project area. During a conference call in October 2016, we agreed upon measures to reduce adverse affects to the bat species and address the future Section 7 consultation required for this multi-phase project. You have clearly outlined those measures in the Endangered Species section of the EA. Based on this approach and the your analysis in the EA, you have determined that the overall proposed project (including Phase I in 2017) is not likely to adversely affect the Indiana or Northern Long-eared bats. We concur with this determination. As stated in the EA, the status of bat habitat will be re-evaluated prior to the construction of future phases, as conditions may change over time. Consequently, additional coordination with the Service may be required in the future to ensure the validity of the "not likely to adversely affect" determination for this project.

Thank you for your interest in conserving our trust resources. We look forward to working with you on the remaining phases of this project.

Sincerely,

Andy Roberts

Andy Roberts
U.S. Fish and Wildlife Service
Ecological Services
101 Park DeVille Drive, Suite A
Columbia, Missouri 65203

573-234-2132 x 110
573-234-2181 (fax)

Appendix F
Other Study-Related
Outreach Materials

Appendix F

Other Project-Related Out-Reach Materials

Appendix Page 2: USEPA Superfund Division Correspondence

Appendix Page 5: City of Florissant Comment Letter

Appendix Page 8: Florissant Coordination Meeting Summary

Appendix Page 12: USACE FUSRAP Correspondence

Appendix Page 34: Greater Grace Church Correspondence

From: Vann, Bradley
To: [Miller, Robert/COI](#)
Cc: [Barker, Justin](#); [Jump, Christine](#); [Mahler, Tom](#)
Subject: FW: I-270N EA and Westlake Land fill [EXTERNAL]
Date: Tuesday, January 03, 2017 6:03:01 PM
Attachments: [image001.png](#)

Robert,

Here is my email contact and I am copying other members on the EPA site team for their awareness. If you have questions, please contact us if you have any further questions or once discussions progress with the public for the pending work.

Regards,

Bradley Vann - Remedial Project Manager
U.S. Environmental Protection Agency
Superfund Division
Missouri/Kansas Remedial Branch
11201 Renner Blvd.
Lenexa, KS 66219
Phone: 913-551-7611
Fax: 913-551-9611
Cell: 816-714-0331

From: Seabaugh, Ryan [mailto:ryan.seabaugh@dnr.mo.gov]
Sent: Monday, December 19, 2016 2:24 PM
To: Vann, Bradley <Vann.Bradley@epa.gov>
Cc: Mahler, Tom <mahler.tom@epa.gov>
Subject: FW: I-270N EA and Westlake Land fill

Brad,

Were you able to get in contact with Robert Miller of CH2M regarding the below mentioned project? Their Environmental Assessment is currently out for public comment with WLL being mentioned primarily in .pdf pages 119 through 121.

http://modot.mo.gov/stlouis/documents/_I-270_North_Environmental_Assessment-Nov2016.pdf

Ryan Seabaugh, P.E.
Federal Facilities Section
Hazardous Waste Program
Missouri Department of Natural Resources
Phone: (573) 751-8628

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From: Robert.Miller@CH2M.com [mailto:Robert.Miller@CH2M.com]

Sent: Friday, September 02, 2016 7:04 AM
To: Stout, Robert
Subject: RE: I-270N EA and Westlake Land fill

Hi Mr. Stout:

I'm assisting MoDOT with the Environmental Assessment for the I-270N project. This is a rehabilitation/upgrade to the 15 mile section of I-270 , from I-70 to the Missouri River. It traverses through St. Louis County, including in the vicinity of the Westlake Landfill. The relationship between the 2 facilities is visible below.



In 2014, you provided us with some information about the Westlake Landfill. The project was put on hold, due to state-wide budgeting issues in 2015. Re-started, one of the things we've been doing has been to reestablish contact with our stakeholders. You may have seen the project resumption letter that we sent to the Missouri Department of Natural Resources last month.

During our communications with our TAC (Technical Advisory Committee) and CAG (Community Advisory Group) we heard concerns about historic and current material hauling in the vicinity of the project, and how the construction of the I-270 project could alter those movements. We were asked to conduct specific consultation of the staff responsible for the facility relative to any concerns for potential construction impacts. Would you have a contact person that we could coordinate with?

Thanks for your help.

Rob Miller, AICP
CH2MHILL
Two Easton Oval
Columbus, Ohio 43219

Phone: (614) 825-6703
Cell: (614) 634-2022

Summary of Issues/Responses



CITY OF FLORISSANT

Honorable Thomas P. Schneider, Mayor

December 14, 2016

To the I-270 North CAG Members,

Mayor Schneider and the Florissant City Council express our appreciation for the renewed study to increase traffic capacity and infrastructure integrity in the I-270 corridor between I-70 and the Mississippi river.

However, the City of Florissant Administration and City Council have great concern and serious reservations about the one way traffic proposed for Dunn Rd. and Pershall Rd contained in the Preferred Alternative for improving the I-270 North corridor in St. Louis County, MO, from I-70 on the west to the Chain of Rocks Bridge on the east.

The Administration and the City Council are concerned about the Environmental Assessment (EA) that has been completed for such Preferred Alternative and which has been reported as having been approved by the Missouri Department of Transportation (MODOT) and the Federal Highway Administration (FHWA). In particular we are opposed to portions of such Preferred Alternative that lie in or closely adjacent to the City of Florissant.

Such reservations and opposition result, at least in part, from the following:

The Preferred Alternative for upgrading I-270 in North St. Louis County, from the I-70 interchange on the west to the Chain of Rocks Bridge on the east which is presented in detail at <http://modot.mo.gov/stlouis/I-270NorthEnvironmentalAssessmentDocuments.htm> with the various roadways and planned improvements shown on maps accessible therefrom.

The maps contained in the above web site indicate that between Hanley Rd. and New Halls Ferry Road in North County both **Dunn Rd., along the north side of I-270, and Pershall Rd., along the south side of I-270, would become one-way only** roadways while such roads would remain two-way roadways at most other locations along I-270 in North County.

Based upon the maps presented with the Preferred Alternative and the EA that has been completed for such Preferred Alternative, the constructed alternative would introduce **SERIOUS problems for Florissant and other North County residents due to the plans to make Dunn Rd. one-way westbound only between Hanley Rd. and New Halls Ferry Road and Pershall Rd. one-way eastbound only in the same noted area.**

Such one-way traffic patterns would, necessarily, significantly increase traffic passing below or above I-270 on the only access routes between the north and south sides of I-270 that are in or closely adjacent to I-270 as it passes through the City of Florissant.

Increased Traffic on I-270 Crossroads as the Result of U-Turns Required by One-Way Traffic Patterns: The letter suggests that many of the access routes between the north and south sides of I-270 pass through the City of Florissant. The specifically identified North Hanley Road, New Florissant Road, Elizabeth Avenue/Washington Street, West Florissant Avenue, and New Halls Ferry Road. In their view, "these are already heavily traveled and, especially during rush hours, very heavily congested".

Response: For the outer road travelers needing to cross I-270 to travel in the other direction, the movement will primarily be made using U-turn ramps. These ramps will be at the overpasses, as well at freestanding turnarounds. U-turns at the crossroads are expected at New Florissant, West Florissant and New Halls Ferry. A stand-alone U-Turn is proposed at Washington/Elizabeth and West Florissant. These ramps will allow for turnarounds without accessing the crossroads. Because the U-Turns are expected to operate a near free flow conditions, it is expected that drivers will migrate to the U-turns, even if it represents a longer trip. The U-turns will minimize the impacts on the crossroads.

CITY HALL 955 Rue St. Francois Florissant, MO 63031 314 / 921-5700 Fax: 314 / 921-7111 TDD: 314 / 839-5142	POLICE DEPARTMENT 1700 North Highway 67 Florissant, MO 63033 314 / 831-7000 Fax: 314 / 830-6045	PARKS DEPARTMENT #1 James J. Eagan Drive Florissant, MO 63033 314 / 921-4466 Fax: 314 / 839-7672	HEALTH DEPARTMENT #1 St. Ferdinand Drive Florissant, MO 63031 314 / 839-7654 Fax: 314 / 839-7656	MUNICIPAL COURT 1055 Rue St. Francois Florissant, MO 63031 314 / 921-3322 Fax: 314 / 839-7663
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Summary of Issues/Responses

Such access routes (N. Hanley Rd., New Florissant Rd., Elizabeth Ave./Washington St., West Florissant Ave., and New Halls Ferry Rd.) are already heavily traveled and, especially during rush hours, very heavily congested.

Such one-way traffic patterns would, for many locations, result in increased traffic delays and in the danger of increased response time for emergency responders from the City of Florissant and/or the Florissant Valley Fire Protection District.

The one-way traffic patterns would also pose significant problems for Saint Louis Community College-Florissant Valley (STLCC-FV) students and for bus riders utilizing or passing through the North County Metro transit transfer station, as well as posing routing difficulties for St. Louis Metro.

STLCC-FV's principal entrances would then be on a one-way eastbound roadway (with many students coming from east of the school), as would be the new North Co. Metro transit transfer station just west of New Halls Ferry on Pershall Rd).

Various other educational facilities including St. Louis Christian College, North County Christian School, Little Creek Wildlife area of Ferguson-Florissant School District, Greater Grace Church on Pershall Rd., a new Ferguson Florissant School District Science and Technology special school would also be impacted by having their only access from one of the one-way roadways.

Grandview Plaza shopping center and the stores therein would be detrimentally impacted because the shopping center's principal entrance would then be on a one-way westbound-only roadway. This after the recent tremendous news of an exciting new owner of that plaza

A number of other businesses located on or near to such one-way roadways, including such businesses as Johnny Londoff Chevrolet, the newly renovated Jewel Banquet Center (formerly Yac's), Joe's Auto Mart and the adjacent neighborhood shopping center, and Rizzo's Plaza will be seriously impacted by the one-way traffic and by increased difficulties in their patrons accessing their businesses.

There are NO acceptable or convenient, nearby alternative counter flow routes north or south of the immediate area that are designed to handle the anticipated traffic that will be rerouted as a result of the planned one-way roadways. The only alternative routes available would confound visitors and congest residential neighborhood streets that are not designed to handle that much traffic.

For example if motorists try to stay north of I-270 and travel east it could be expected that St. Anthony Lane, a relatively narrow street designed for residential traffic would become the closest, mostly-through (but not totally-through), generally preferred, cut-through alternative. This would significantly increase traffic on that residential roadway and impact all the intersections of that roadway with all of Hanley, Florissant, Washington St., Waterford and Derhake traffic. This route would then, with difficulty, presumably continue eastwardly on Pohlman to reach New Halls Ferry and points further east.

Increased Response Times for Emergency Service Responders and Other Specific Delays and Out of Direction Travel: The letter suggests that one-way traffic patterns would increase traffic delays and increased response times for emergency responders and delays for other specified landuses.

Response: Relative to out-of-direction travel, total distance traveled can be higher under a one-way system, but overall travel time is expected to be lower. This is true overall and for most important destinations/pathways. Additionally, when out of direction travel is necessary, it tends to total less than 3 miles. Relative to conflicts with other vehicles, they are minimized under the one-way system. Overall, the two-way system will operate equivalent to a no-build scenario in the design year.

Availability of "Counter Flow" Routes: The letter says that there are no acceptable or convenient, counter flow routes in the immediate area. By counter flow the letter means routes of either side of I-270 intended to handle the anticipated traffic in the opposite direction of the outer roads. The letter suggests, that motorists will want to stay on the side of I 270 that they are on to travel in the direction opposite of the corresponding one-way frontage road is going. For example, they expect motorists to use St. Anthony Lane to travel east-bound for their trips north of I-270. This would significantly increase traffic on that roadway.

Response: Traffic modeling suggests that this type of redistribution of pathways is limited and local. Overall, travel times are expected to be lower under the Selected Alternative, even with some instances of out-of-direction travel. The improved conditions will limit the benefits of using local roads to avoid the out-of-direction travel. Only local users will have the knowledge for these detours. Local land use mechanisms (speed humps, enforcement, chicanes) should be adequate to limit increased cut-through traffic. Because it will be practiced by local users, these measures are not expected to be necessary or widely desired.

Summary of Issues/Responses

The next relatively through routes (other than St. Anthony) north of I-270 are not available until Hanley Rd becomes St. Ferdinand St. in Old Town Florissant with even narrower roads dating back two centuries. Further still one would find an already congested N Hwy 67 (Lindburgh). The alternatives for traffic seeking alternatives on the South side of I-270 wanting to travel west are even more daunting.

On behalf of the residents of the Historic City of Florissant we their elected officials hereby protest the burden that one way traffic on Dunn and Pershall will place upon our community.

If Dunn and Pershall are designated one way then many thousands of motorists and unfortunate Florissant residents will then have to deal with increased traffic on the above noted roadways and the City of Florissant would be faced with an unfunded massive traffic problems caused by the proposed one way traffic proposal on Dunn and Pershall.

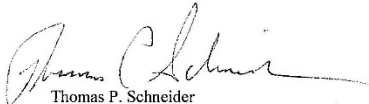
No indications have been provided that either the Federal Highway Administration (FHWA) or MODOT will provide any improvements or funding for any counter flow residential street alternatives to the planned one-way roadways.

The City of Florissant will thus be forced to expend manpower and find funds to deal with the problems arising from the conversion of both Dunn Rd. and Pershall Rd. to one-way only roadways in the affected area!

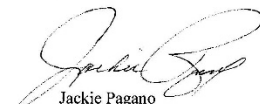
The taxpayers of Florissant and many additional thousands of nearby residents will be seriously impacted by the Preferred Alternative, and they will be forced to absorb increased financial costs, not only as financial costs as taxpayers of the City of Florissant, but also personal financial costs, as well as delays and inconveniences in order to deal with the problems arising from the conversion of both Dunn Rd. and Pershall Rd. to one-way only roadways in the affected area!

We encourage MODOT to focus primarily on updating the roadbed and increasing the traffic capacity of I-270 and replacing the outdated and deteriorated overpass and underpass bridges and ramps. Adequate width for additional lanes exists in the existing right of way for the lanes needed. We feel that it is essential to retain the two way aspect of Dunn and Pershall roads.

Thank you for taking our concerns into serious consideration,



Thomas P. Schneider
Mayor



Jackie Pagano
Council President

The enumerated impacts represent an Unfunded Mandate to Florissant: The letter suggests that the one-way system force the citizens of Florissant to deal with increased traffic without funding to remediate specific problems.

Response: According to the cost estimates used in the long-range transportation plan (Connected2045), the I-270N project is expected to cost nearly one billion dollars. As discussed in the Purpose and Need, the intent of the project is to solve many of the substantive transportation that the local communities have with the I-270 corridor. Additionally, construction projects of this magnitude have multiplier effects that benefit the local community. Improved operations along the I-270 corridor can improve property values, spur development and reinvigorate communities. Merchants generally benefit from increased sales to construction crews. Additionally, this type of project requires many types of equipment and services that are cost effective when supplied locally.

Relative to funding for local projects, MoDOT has a Local Public Agency (LPA) intended to be used by cities and counties to sponsor projects utilizing federal transportation funds provided under the current transportation bill, the Moving Ahead for Progress in the 21st Century (MAP-21).

Limiting the Scope of the Project: The letter encouraged MODOT to focus primarily on updating the capacity of I-270 and eliminating consideration of changes to the outer road system.

Response: The purpose and Need Statement of the project identified the interrelated nature of the outer roads with I-270. It would be impossible to create an acceptable facility without addressing all of the elements of the system.

Missouri Department of Transportation

1590 Woodlake Drive
Chesterfield, Missouri 63017-5712
314.275.1500
Fax: 573.522.6475
1.888.ASK MODOT (275.6636)

Mayor Tom Schneider
City of Florissant
955 Rue St. Francois
Florissant, MO 63031

Thursday, January 26, 2017

Subject: City of Florissant Comments on the I-270 North Environmental Assessment

Dear Mayor Schneider and Council President Pagano:

The Missouri Department of Transportation (MoDOT) appreciates receiving your letter of December 14, 2016 providing comments on the I-270 North Environmental Assessment (EA). We would like to take this opportunity to respond to the issues you raised. A formal response to the substantive comments in your letter will be included in the project's final environmental document.

Specifically, your comments focused on issues related to the proposed one-way outer roads, between Hanley/Graham and Old Halls Ferry. As you know, the one-way outer roads is one component of the EA's Preferred Alternative (PA) comprehensive approach to addressing the future needs of the corridor. Your comments can be summarized in the following areas: increased traffic on crossroads traveling over or under I-270; increased traffic on neighborhood streets; increased delays to emergency responders; and access impacts to businesses, residents, and institutions. We address each of these below.

Increased Traffic on Crossroads Traveling Over or Under I-270

Concerns were noted that the one-way outer roads would result in additional traffic and delays on already congested routes that travel over or under I-270.

Crossroads will benefit from the following:

- Improved capacity and efficiency with additional turn lanes and increased turn lane length
- Reduction in number of intersections because of one-way outer road configuration



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www.modot.org

- Increased efficiency of intersections because of one-way outer road configuration

The EA included a detailed traffic analysis and traffic modeling to evaluate future traffic operations for the PA. This analysis confirmed that the crossroad and intersection improvements included in the PA would adequately accommodate future projected traffic volumes. Further, modeling results show that crossroad and intersection configuration improvements, combined with proposed U-Turn lanes, will improve operations. These improved operations combined with the reduction of conflict points will improve safety at intersections and along the crossroads.

Increased Traffic on Neighborhood Streets

Concern was noted that converting Dunn and Pershall to one-way outer roads would cause drivers to avoid the one-way outer roads and therefore increase traffic on neighborhood streets. The traffic model and analysis for the configuration identified in the PA show that traffic on Dunn and Pershall will be accommodated at an appropriate level of service consistent with MoDOT's guidelines. The combined improvements to the one-way outer roads, intersection improvements, and U-Turn lanes will allow Dunn and Pershall to operate efficiently and with less congestion during peak traffic periods. This should encourage travelers to use the one-way outer roads instead of neighborhood streets.

Increased Response Time for Emergency Responders

The study team acknowledges that configuration in the Preferred Alternative will result in changes in access to and from I-270 and therefore will affect how emergency responders get to incidents on the outer roads and on I-270. The I-270 study team met with emergency responders a number of times during the study to discuss what effects the Preferred Alternative configuration will have on their ability to respond to incidents. Discussions revolved around how emergency responders currently travel to incidents, especially when neighboring units are asked to assist with emergencies. One of the key discussion items was that any reconstruction of the I-270 corridor would significantly alter the existing roadway and interstate access/ramp configurations, regardless of the outer road configuration.

The emergency responders serving the area between Hanley/Graham and Old Halls Ferry currently have a plan on how they access incidents. We discussed that once the Preferred Alternative and the eventual design is completed, the emergency responders would develop a new plan for accessing incidents in North St. Louis County. While the Preferred Alternative configuration will change how emergency responders travel to incidents, a new plan based on the final design of the improvements will allow emergency responders to continue to efficiently access and address incidents. In addition, as mentioned above, traffic analysis and modeling show that improvements to the crossroads and intersections, and the inclusion of U-Turn lanes, will improve safety and reduce the number of incidents emergency responders will be required to respond to. Additionally, the study team performed a safety analysis of the

Preferred Alternative and the existing system using the Highway Safety Manual. This analysis showed that across the entire project length (between I-70 and the Chain of Rocks Bridge), the Preferred Alternative would reduce crashes by almost 20% compared to retaining the existing configuration. In the portion of I-270 between Hanley/Graham and Old Halls Ferry, the Preferred Alternative would reduce crashes by more than 25% compared to retaining the existing configuration.

Access Impacts to Businesses, Residents, and Institutions

The Preferred Alternative and, specifically, the one-way outer roads as proposed, will change access to the corridor for all users. Detailed traffic analysis performed during the study show that, on average, future trips to and from some destinations would require traveling a longer distance. However, these trips will take a shorter time to complete. Crossroad and one-way outer roads improvements, intersection improvements (including fewer signals), and appropriately spaced U-Turn lanes will all enhance travel times to the benefit of all users. For example, travelers from St. Louis Community College – Florissant Valley desiring to travel westbound on I-270 currently make a left turn onto Pershall, followed by right turn on Washington/Elizabeth, a left turn onto Dunn, travel through the New Florissant intersection, and then finally onto I-270 at the slip ramp just west of New Florissant. These movements require traveling through three signalized intersections (two at Washington/Elizabeth and one at New Florissant). This decreases safety because of the number of conflict points and it adds traffic to all three intersections. Under the Preferred Alternative configuration, travelers would turn right onto Pershall, travel through the U-Turn lane at West Florissant, and use the slip ramp just west of West Florissant to get onto westbound I-270. This trip reduces traffic on Washington/Elizabeth and the New Florissant intersection, and would not require traveling through any signalized intersections resulting in a quicker and safer trip.

A video showing how vehicles would navigate the Preferred Alternative configuration was presented at the Public Hearing. The video can be viewed at https://youtu.be/NoNNHMO_DGA. Please contact me if you'd like a copy of the video.

Closing

We trust that the meeting held on January 12, 2017 and our responses contained herein adequately address the concerns outlined in the City's letter. We encourage you to contact us should you have additional comments or questions. In addition, we would be happy to arrange one-on-one meeting(s) with any Council member who would desire one.

Very Truly Yours,

A handwritten signature in black ink, appearing to read 'W.C.S.', with a long, sweeping horizontal stroke extending to the right.

Wesley C. Stephen
MoDOT St. Louis District Planning Manager

From: Prebianca, Jacob MVS
To: [Miller, Robert/COL](mailto:Miller.Robert@CH2M.com)
Cc: [Wade, Josephine A MVS](mailto:Wade.Josephine.A@usace.army.mil); [Rankins, Jonathan E MVS](mailto:Rankins.Jonathan.E@usace.army.mil)
Subject: RE: I-270N EA and SLAPS VP FUSRAP (UNCLASSIFIED) [EXTERNAL]
Date: Wednesday, September 07, 2016 8:29:03 AM

Rob,

Will you please set up the conference call that you requested for Wednesday 09SEP2016 between 0900 and 1600? Please invite myself and the recipients that are Cc'd on this email.

Thanks,

Jacob Prebianca
Project Engineer
USACE FUSRAP
O 314-895-2266
C 314-422-8954

-----Original Message-----

From: Prebianca, Jacob MVS
Sent: Tuesday, September 06, 2016 4:19 PM
To: 'Robert.Miller@CH2M.com' <Robert.Miller@CH2M.com>
Subject: FW: I-270N EA and SLAPS VP FUSRAP (UNCLASSIFIED)

-----Original Message-----

From: Wade, Josephine A MVS
Sent: Friday, September 02, 2016 11:15 AM
To: Prebianca, Jacob MVS <Jacob.A.Prebianca@usace.army.mil>
Subject: FW: I-270N EA and SLAPS VP FUSRAP (UNCLASSIFIED)

CLASSIFICATION: UNCLASSIFIED

fyi

-----Original Message-----

From: Robert.Miller@CH2M.com [<mailto:Robert.Miller@CH2M.com>]
Sent: Friday, September 02, 2016 8:21 AM
To: Wade, Josephine A MVS <Josephine.A.Wade@usace.army.mil>
Subject: [EXTERNAL] I-270N EA and SLAPS VP FUSRAP

Hi Ms. Wade:

I'm assisting MoDOT with the Environmental Assessment for the I-270N project. This is a rehabilitation/upgrade to the 15 mile section of I-270 , from I-70 to the Missouri River. It traverses through St. Louis County, in the vicinity of the SLAPS VP FUSRAP. For example there is an existing crossing of the Clear Creek. The footprint of the project, in the vicinity of the Clear Creek, is shown below.

There has been coordination between the two projects. Attached is an early coordination letter. The project was put on hold, due to state-wide budgeting issues in 2015. Re-started, one of the things we've been doing has been to reestablish contact with our stakeholders. You may have seen the project resumption letter that we sent to the U.S. Army Corps of Engineers -St. Louis District office (Keith McMullen) last month.

During our communications with our TAC (Technical Advisory Committee) and CAG (Community Advisory Group) we heard concerns about historic and current material hauling in the vicinity of the project, and how the construction of the I-270 project could alter those movements. There were concerns about potential construction impacts to radioactive contamination previous left in place along haul routes. We were asked to conduct specific consultation of the staff responsible for the facility relative to any concerns for potential construction impacts. Would you have a contact person that we could coordinate with?

Thanks for your help.

Rob Miller, AICP

CH2MHILL

Two Easton Oval

Columbus, Ohio 43219

Phone: (614) 825-6703

Cell: (614) 634-2022

CLASSIFICATION: UNCLASSIFIED

From: [Ritter, James/STL](#)
To: "[WESLEY C STEPHEN](#)"; [Lisa Kuntz](#); "[Laura.Ellen@modot.mo.gov](#)"; [Matthew.Burcham@modot.mo.gov](#); [James.Smith@modot.mo.gov](#); [Miller, Robert/COL](#); [Joe Blasi](#); [Desai, Buddy/STL](#); [Marks, Melissa/STL](#); [Andrew Potthast \(apotthast@HNTB.com\)](#)
Subject: 270N - USACOE FUSRAP
Date: Monday, September 12, 2016 11:49:15 AM
Attachments: [FUSRAP Utility Policy REV 2.pdf](#)

Team,

Related to our discussion of the pending discussion with the Army Corps on the FUSRAP sites in North County:

- Jacob Prebianca is the PM for the Utility Support group. They monitor and clean up during utility work. Attached is the overview of that process.
- St. Louis District, FUSRAP
 - <http://www.mvs.usace.army.mil/Missions/Centers-of-Expertise/Formerly-Utilized-Sites-Remedial-Action-Program/>
 - The SLAPS VP site (ST. Louis Airport Site Vicinity Properties) includes the haul roads among other transportation lines and properties
 - From the website: The SLAPS VPs are located in the cities of Hazelwood and Berkeley, Missouri. These properties (totaling approximately 80 vicinity properties) include Coldwater Creek and its vicinity properties to the west; adjacent ball fields to the north and east; Norfolk and Western Railroad properties adjacent to Coldwater Creek; Banshee Road to the south; ditches to the north and south; and St. Louis Airport Authority property to the south. Also included are the transportation routes (haul roads) at the following locations: Latty Avenue, McDonnell Boulevard, Pershall Road, Hazelwood Avenue, Eva Avenue, Frost Avenue, and other miscellaneous vicinity properties.

Thank you,

James Ritter, P.E.

CH2M

300 Hunter Avenue, Suite 305

Saint Louis, MO, 63124

D 1 314 335 3056

www.ch2m.com

*Professional Engineer: MO



I-270 Environmental Assessment Coordination Meeting: FUSRAP

This form is to be used by team members to monitor public input and communications during the I-270 Environmental Assessment. It must be completed after each interaction with citizens or other stakeholders that occur outside of study sponsored public events.

Attendees: Buddy Desai (CH2M), Wesley Stephen (MoDOT), James Ritter (CH2M),
Jacob Prebianca (USACE), Rob Miller (CH2M)

Date: September 14, 2016

Location: Teleconference

Agenda

1. Introductions (MoDOT)
2. Big picture overview of I-270N EA (CH2M)
3. Detailed summary of Preferred Alternative between Lindbergh and I-170 (CH2M)
4. Schedule of this work (CH2M)
5. FUSRUP overview/current issues/hauls roads (USACE)
6. Review of ACE Utility Program (USACE)
7. TAC/CAG issues and appropriate responses (All)
8. Continued Coordination/Environmental Commitments (All)

Summary of Discussions

- The USACE has the responsibility to remediate Formerly Utilized Sites Remedial Action Program (FUSRAP) sites.
- These sites may have residual radioactive contamination that resulted from former weapons production.
- The North County Record of Decision lays out the process used by the Utility Support section of the USACE. The North County Record of Decision and Supporting Documents is located at: <http://www.mvs.usace.army.mil/Missions/Centers-of-Expertise/Formerly-Utilized-Sites-Remedial-Action-Program/>
- During utility or earthwork the Utility Support section will monitor activities and provide support relative to worker radiological safety and protection.
- Should soil be found to contain radioactivity concentrations high enough to require off-site disposal, the USACE will:
 - Make recommendations on personal protective equipment
 - Make recommendations on contamination control measures
 - Monitor personnel and equipment for radioactive contamination, and
 - Decontaminate as necessary
 - Provide proper management (including disposal) of contaminated soils
- Early coordination with the Utility Support section is key. The Contact Person is: Jacob Prebianca 8945 Latty Avenue, Berkeley, MO 63134 - Office phone number 314-895-2266, Cell phone number 314-422-8954, email Jacob.A.Prebianca@usace.army.mil.
- Important coordination materials include: earthwork plans, volumes of materials, timing, construction limits and associated utility work.

MEMORANDUM FOR RECORD

DATE: 11 February 2015

SUBJECT : Formerly Utilized Sites Remedial Action Program (FUSRAP)
Utility Policy Revision 2 dated 11 February 2015

This policy outlines the methods used by the U.S. Army Corps of Engineers (USACE) to ensure the radiological safety and protection of utility personnel and property owners at the FUSRAP St. Louis Sites (SLS) during all intrusive, repair, etc. work activities in areas suspected or known to be contaminated with Manhattan Engineer District/Atomic Energy Commission (MED/AEC) residual radiological contamination. Utility personnel are defined as workers who must perform work activities at the SLS, i.e. utility workers, road crews, construction workers, etc.

The USACE includes personnel who work for the U.S. Army Corps of Engineers and the duly appointed representative under contract with the USACE at the SLS.

To ensure worker safety at the SLS, the USACE will perform monitoring that may include but is not limited to some or all of the following measures:

- Contamination control measures
- Air monitoring
- Selection of PPE
- Radiological surveys (personnel, area, and equipment)
- Collection of soil samples
- Management of contaminated soils
- Decontamination of personnel and equipment

The framework set forth in this policy is effective immediately and should be followed for all related work activities performed by the USACE in conjunction with private and public service organizations/companies that perform work activities at the SLS. This policy is intended to promote site wide consistency and to delineate the responsibilities and measures to be followed by the USACE and by utility personnel during planned and unplanned activities at the SLS.

Gerald Allen
FUSRAP Program Manager

**FORMERLY UTILIZED SITES REMEDIAL
ACTION PROGRAM (FUSRAP)
UTILITY POLICY**

The United States Army Corps of Engineers, St. Louis District (USACE) has the responsibility to remediate several sites in the St. Louis, Missouri area that have residual radioactive contamination that resulted from former Manhattan Engineer District (MED) and Atomic Energy Commission (AEC) activities. During remediation of the MED/AEC contaminated areas at the St. Louis FUSRAP Sites (SLS), private and/or public service companies (known as "utility personnel") and property owners may need to perform improvements, repairs, or other work activities on properties that are included in the SLS. The SLS are those properties that are part of the St. Louis Downtown Site (SLDS) (see figure 1), and the North St. Louis County (see figure 2) FUSRAP Sites. This policy has been prepared to protect the utility personnel who perform work activities at the SLS.

This policy delineates the responsibilities and measures to be followed by the USACE and utility personnel during planned and unplanned work activities at the SLS. A planned activity is work that has been scheduled in advance (i.e., preventative or scheduled maintenance, scheduled utility line construction or repairs, etc.). An unplanned activity is any event that prior knowledge of the need for the work or repairs is not known (i.e., water or gas line rupture, accidents involving utility lines or poles, etc.). It is advisable that private and/or public service companies establish a Point-of-Contact (POC) with the USACE before performing any work at the SLS.

Figures 3 and 4 illustrate the process that the USACE follows to ensure an appropriate response to work requests or notifications. This process ensures that utility personnel are monitored during work activities at the SLS suspected of being contaminated with residual MED/AEC radioactive contamination. Should the work conditions become unsafe due to the presence of MED/AEC contamination above release criteria; the USACE will notify the POC of the private and/or public service company that radiological contaminants are present and recommend that work activities be stopped until appropriate precautions have been put in place to minimize exposure to utility personnel.

The basic limit for the annual radiation exposure (excluding radon) received by an individual member of the general public is 100 millirem/year (mrem/yr) (NRC regulation 10 CFR 20 Subpart D). In implementing this limit, USACE applies As Low As Reasonably Achievable (ALARA) principles to set site-specific guidelines. The USACE performs sampling, surveying, and monitoring activities to obtain an exposure for utility personnel working at the SLS. The results and dose are sent to the private and/or public service company of the utility personnel.

This policy provides control methods to ensure radiological safety and protection during all work activities at the SLS. This policy also applies to all contractors responsible for providing support to a participating private and/or public service company conducting maintenance at the SLS.

This policy includes requirements for radiological monitoring of utility personnel, equipment and vehicles prior to starting, during, and at the completion of any work activities in areas suspected or known to be contaminated with MED/AEC radiological contamination at the SLS.

The monitoring may include, but is not limited to:

1. Contamination control measures
2. Air Monitoring (Only when USACE involvement requires excavation or hauling)
3. Selection of Personal Protective Equipment (PPE)
4. Radiological surveys (personnel, area, and equipment)
5. Collection of soil samples
6. Management of contaminated soils
7. Decontamination of personnel and equipment

I. The Responsibilities of USACE:

1. Determine if the utility work requires FUSRAP support. Provide qualified health physics (HP) technician to monitor activities and provide support at the job site when necessary.
2. Perform radiological surveys and collect soil samples as appropriate to determine the levels of radioactive MED/AEC contamination encountered by non-radiological workers.
3. Make recommendations on, and provide PPE as needed.
4. Make recommendations on contamination control measures to be utilized during work activities.
5. Survey and decontaminate equipment as necessary, and provide survey results to the private and/or public service company within a reasonable amount of time of the release survey.
6. Provide a utility support summary report that contains monitoring/sampling data to the private and/or public service company within 90 days from the end of the activity. Provide monitoring/sampling results and dose received by each utility personnel to the private and/or public service company to enable the utility to ensure that the worker has not exceeded 100 mrem/yr (NRC regulation 10 CFR 20 Subpart D). Figures 3 and 4 are flowcharts that indicate how the USACE will respond during planned and unplanned activities.
7. For planned events where advance notice has been given, coordinate with the private and/or public service company/utility personnel at an agreed time and place. For unplanned activities, respond as soon as reasonably possible of notification from the private and/or public service company/utility personnel.
8. Be available on a 24-hour basis to respond to unplanned activities within the SLS boundaries that are defined in figure 1 and figure 2.
9. Provide upon request, a radiation awareness briefing at the USACE facility for non-radiological workers/utility personnel.
10. Provide proper management (including disposal) of MED/AEC contaminated soils and media generated on or near the SLS sites during work activities.
11. Provide appropriate equipment and material to support monitoring, sampling,

decontamination, and disposal.

II. The Responsibilities of the Private and/or Public Service Company/Utility Personnel:

1. Provide approximately 1 week lead-time for planned work at or near the SLS in order for the USACE to provide a more thorough analysis of site characterization data to determine if it is safe for utility personnel.
2. Coordinate all work at the SLS with property owners.
3. Provide qualified personnel, equipment, and materials necessary to conduct work within the SLS MED/AEC contaminated properties, including excavation equipment, transportation for the excavation equipment, tools, repair materials, backfill, a truck to stage/transport potentially contaminated soils, etc. At no cost to the company, the USACE will survey, and decontaminate as necessary, the equipment for release after it has been used on the contaminated sites. USACE will not compensate for loss of use during decontamination and release.

Note: Historical data, composite soil samples, and direct reading instruments will be used to prevent private and/or public service company/utility personnel from transporting DOT Class 7 or Class 9 materials.

III. Notification

Before beginning work site excavations in the areas outlined in Figure 3 and Figure 4, the company/utility personnel must contact the USACE from the list provided on page 9 of this document. The contacted person will ensure that the appropriate qualified HP technician responds to the work site and provide additional information on the site conditions associated with the proposed work. If the first person on the contact list cannot be reached, proceed down the list until contact is made. As personnel changes occur, the attachment will be revised and reissued to all companies subject to this policy.

IV. Response Times

For planned events where advance notice has been given, the USACE will coordinate with the company/utility personnel at an agreed to time and place. For unplanned activities, an HP technician will respond as soon as reasonably possible.

V. Planned Work Procedures

1. The utility company will provide the location or a detailed plan in advance if possible.
2. The USACE Health Physicist will assess the relative risk associated with each planned work activity prior to responding to the request for the USACE support. A preliminary radiological survey will be conducted to determine if evidence of elevated activity exists in the work area.
3. In the event that MED/AEC radiological contamination exists in the work area prior to start of work or during the activity, work activities will stop and the USACE will

mobilize to further assess the suspected areas, as appropriate. The work activity may start (or continue) upon approval of the USACE Health Physicist.

VI. Unplanned Situations

In the event that an unplanned situation exists (e.g., a gas leak) that requires immediate response by the participating company/utility personnel prior to the arrival of the USACE, the following provisions are recommended to ensure radiological protection.

1. The participating company/utility personnel should only perform immediate response actions (i.e., isolating the source of an emergency) prior to the arrival of the USACE. Further activity in a potentially MED/AEC contaminated area, beyond the immediate response actions, should follow the flowchart as outlined in Figure 4.
2. Recommended PPE during the immediate response actions are a Modified Level D with taped interfaces at the gloves and boots until the USACE arrive to evaluate radiological conditions in the work area. See Section X .Personal Protective Equipment (PPE) for a description of Modified Level D Protection.
3. All other provisions (i.e., surveying, contamination controls, decontamination of equipment, soils management, soil sampling, soil misting etc.) set forth in this policy for work activities at the SLS shall be followed (Figure 4) upon arrival of the USACE.
4. The USACE will attempt to coordinate with the company/utility personnel to ensure that any materials required, for radiological protection in an unplanned situation, is available upon the arrival of the USACE. These materials may include, but are not limited to, clean plastic, Tyvek coveralls, PVC or nitrile gloves, appropriate outer work gloves, and chemical resistant pull-on outer boots.

VII. Pre-Job Briefing

A pre-job briefing shall be conducted upon USACE arrival, with all utility personnel involved with the work activity. The briefing may include, but is not limited to, the following information:

1. Utility Support Informational Handout (see page 13) is distributed to utility personnel by the USACE provided HP technician.
2. USACE establish the name of the company and the workers present.
3. Potential radiological hazards of the area and methods of controlling such hazards.
4. Appropriate work controls and precautions to be taken during the performance of work, including PPE requirements.

VIII. Radiological Monitoring

In work areas that the USACE knows or suspects are contaminated with MED/AEC contaminated materials:

1. The USACE will provide a qualified HP Technician to monitor activities as needed at the job site.
2. The USACE will monitor activities and recommend work practices that are in compliance with all applicable regulatory requirements pertinent to radiological safety.

IX. Contamination Control

During planned and unplanned activities, some contamination control measures may be implemented to protect USACE and utility personnel. In general, because the radioactive contamination tends to adhere to soil particles, contamination can be controlled by implementing some or all of the following practices as determined by the USACE.

The USACE will recommend contamination control measures to be implemented for the protection of the utility personnel (i.e., PPE).

Contamination control measures will also be used to prevent/minimize equipment and tool contamination, and thus minimize/eliminate the need for decontamination. The USACE may line excavated work areas with plastic to minimize personal contact with contaminated soils. The USACE may tape or cover tools to minimize contact with contaminated soils.

Excavation activities shall be performed by the utility company. Once excavated, work areas in wet soil can be lined with plastic. The USACE will determine the proper disposal for radioactive wastes generated during work activities and manage the wastes generated as appropriate (See Section XV Contaminated Soils Management).

Decontamination of contaminated worker-owned tools and equipment is the responsibility of the USACE. Tools and equipment will be surveyed, and decontaminated as appropriate, by the USACE (See Section XIII Decontamination).

X. Personal Protective Equipment (PPE)

The USACE will determine if utility personnel require PPE above Level D to be worn inside the work area. It is the responsibility of the non-radiological worker/company supervisor to ensure that non-radiological workers wear the PPE recommended by the USACE. The USACE will supply the additional PPE required above Level D protection (i.e. Tyvek coveralls, gloves and boot covers), where applicable. Level D protection includes the following:

Level D Protection:

Steel toe/shank work shoes, safety glasses, hard hat, work gloves, and coveralls.

Modified Level D Protection:

Level D protection with the addition of Tyvek coveralls, PVC or inner gloves, appropriate outer work gloves, and chemical resistant pull-on outer boots or boot covers.

Modified Level D PPE will be required if initial surveys and /or historical data indicate that

there is MED/AEC radioactive contamination. The USACE will monitor conditions such that the utility personnel will never require more than Modified Level D protection. Should the USACE determine that a higher level of protection is required; the USACE will inform the company/utility personnel that work should not be permitted to start or should be stopped until the suspect area has been further assessed and/or remediated, as appropriate.

XI. Soil Sampling

1. During excavation activities, the removed soil and bottom of the excavation (when no evidence of a situation that could result in possible cave-ins, slides, hazardous atmospheres, or other hazardous condition is identified) will be surveyed for radiological contaminants. A composite soil sample may be collected from the removed soil, and analyzed. A biased soil sample may be collected from the excavation at the location with the most elevated readings from the survey. The results of these informational samples will be included in the utility support report.
2. Contamination control measures may also be used to prevent/minimize equipment and tool contamination, and thus minimize/eliminate the need for decontamination. The USACE may line excavated work areas with plastic to minimize personal contact with contaminated soils. The USACE may tape or cover tools to minimize contact with contaminated soils
3. The USACE may request the assistance of the company/utility personnel to stage the soils that are suspected to be MED/AEC contaminated to allow sampling prior to shipment to a licensed disposal facility.
4. Soil samples collected will be analyzed by the St. Louis FUSRAP Analytical Laboratory for the contaminants-of-concern for the SLS.
5. The soil sampling analytical data may be utilized to modify and prescribe controls for on-site activities.

XII. Radiological Surveys

1. Personnel coming into contact with contaminated soils will be surveyed for radioactive contamination prior to exiting the area of concern. The survey will be conducted by an HP technician
2. Prior to being released for unrestricted use, equipment that may have contacted removable contamination shall be surveyed.
3. The appropriate radiological survey will be performed on all available equipment. The survey results will be included with the summary report (see section XV).
4. The HP technician monitoring the activity will notify utility personnel if radioactive contamination is found or suspected during any radiological survey. Potentially contaminated personnel or equipment should remain at their location until released by

the HP technician to avoid contamination spread to non-contaminated surfaces/personnel.

5. HP technicians shall follow applicable monitoring, decontamination, notification, and documentation requirements when responding to suspect personnel or equipment contamination incidents.

XIII. Decontamination

1. Contamination Control/prevention is preferred over decontamination. If possible, use contamination control measures (See Section XI) to minimize/eliminate the need for decontamination.
2. Decontamination of contaminated utility worker-owned tools and equipment is the responsibility of the USACE. Tools and equipment will be radiologically surveyed, and decontaminated as appropriate by the USACE. Radiological surveys for unrestricted release may be delayed if extensive decontamination efforts are necessary.

XIV. Contaminated Soils Management

1. The USACE is responsible for the proper management (including disposal) of MED/AEC contaminated soils and materials generated during work activities on the SLS.
2. In cases where the soil cannot be put back into the excavated area, the soil will be staged in the vicinity of the excavated area, or in a location designated by the USACE, and covered/managed by the USACE. This may include staging soil in trucks supplied by the utility company until the soil has been analyzed to determine soil management options.

XV. Utility Support Summary Report

A utility support summary report of the USACE activities and the field survey/soil sample data will be provided to the company of the utility personnel within 90 days from the end of the work activity. The USACE will include as part of the summary report, a dose assessment for the workers involved with the work activity at the SLS.

A utility support summary report shall not be submitted when USACE is notified of underground utility activities and determines no support is needed.

A utility support summary report may be submitted when no soil samples are collected, but a radiological survey was performed. Report submittal shall be determined by the USACE on a case by case basis.

A utility support summary report shall be submitted when soil samples are collected.

XVI. Training

Utility workers on the SLS properties are not required by 29 CFR 1926.65 (e) to have the Hazardous Waste Operations Training. Utility workers are not expected to experience exposure above 100 millirem per year. Therefore, utility workers are not Radiation Workers as described by the Nuclear Regulatory Commission (NRC) 10 CFR Part 19.

Upon arrival at a planned or unplanned work activity area, an HP technician will give a briefing along with a copy of the Utility Support Informational Handout (see Attachment 1) to the utility personnel on radiological safety/protection concerns specific to the work area and recommendations related to health physics and radiological safety/protection. Provisions for Unplanned Situations (Section VI) with regard to radiological safety/protection should be employed in the event that the participating utility personnel require immediate response to the emergency situation prior to the USACE arrival. Recommendations may include soil misting to eliminate fugitive dust and the use of PPE such as Tyvek coveralls to minimize potentially contaminating personnel clothing.

Upon request the USACE will conduct a radiation awareness briefing at the USACE facility at the Latty Avenue Project Management trailers or SLDS Project Trailers. This briefing covers the basic principles of radiation, radioactive contamination, and remedial activities at the SLS. The briefing will be provided at no cost. However, worker/utility personnel salaries during the time required to attend the briefing will be the responsibility of the respective company. More extensive training can be provided as requested or required.

XVII. Amendments

This policy represents the best efforts by the USACE to protect human health and the environment at the SLS. As new information is made available or new requirements are established that could impact this policy, amendments may be offered by the USACE or by the participating private and/or public service companies for discussion and possible inclusion.

XVIII. The USACE Limit of Responsibility

This policy and any internal procedures adopted for policy implementation is intended solely as guidance for employees of the USACE. This policy does not constitute rule making or final action by the USACE and may not be relied upon to create a right or a benefit, substantial or procedural, enforceable by law or in equity, by any person. This policy does not affect the rights or liabilities of the named private and/or public service companies under applicable law.

USACE Contact List

North County Sites

Primary

Jacob Prebianca
Work: (314) 895-2266
Cell: (314) 422-8954
Jacob.A.Prebianca@usace.army.mil

Secondary

Vick James
Work: (314) 260-3930
Cell: (314) 560-3557
Vick.L.James@usace.army.mil

St. Louis Downtown Sites

Primary

Robin Parks
Work: (314) 436-7390 x238
Cell: (314)-703-6315
Robin.D.Parks@usace.army.mil

Secondary

Susan Adams
Cell: (314) 422-7205
Susan.L.Adams@usace.army.mil

Company Contact List

Missouri American Water Co

Timothy Steinbrenner
Work: (314) 996-2336
Fax: (314) 996-2255
Cell: (314) 619-9995
Email: timothy.steinbrenner@amwater.com

Metropolitan St. Louis Sewer District

St. Louis Downtown Site

Jim Derby
Work: (314) 768-2789
Email: jcderby@stlmsd.com

St. Louis Airport Site

John Welch
Title: Operations Division Manager
Work: (314) 646-2040
Email: jwelch@stlmsd.com

Alternate (SLAPS)

Siti Wilson
Work: (314) 335-2018
Email: swilson@stlmsd.com

Dispatcher

24 HR Emergency: (314) 768-6262

City of St. Louis, Water Division

Robin Suda-Hill
Work: (314) 633-9014
Fax: (314) 664-6786
Email: rsudahill@stlwater.com
24 HR Emergency: (314) 771-4880 Ext. 132

Ameren UE

Brian Holderness
Work: (314) 554-3574
Fax: (314) 554-4182
Email: bholderness@ameren.com

St. Louis Downtown Site (24 Hr)

Jonathan Schmidt
Title: Supervising Eng, Underground

Division

Work: (314) 554-2257
Cell: (636) 584-4420
Email: JSCHMIDT3@ameren.com

Alternate SLDS (24 Hr)

Russell Robertson
Title: Supervising Eng, Archview Division
Work: (314) 992-9712
Cell: (314) 541-3367
Email: RRobertson2@ameren.com

St. Louis Airport Site (24 Hr)

Robert Schnell
Title: Supervising Eng, Gateway Division
Work: (314) 344-9504
Cell: (314) 805-8046
Email: rschnell@ameren.com

Dispatcher

24 Hr Emergency: (314) 342-1000

Laclede Gas

Joseph Weir
Work: (314) 768-7782
Cell: (314) 575-0102
Email: joseph.weir@lacledegrouip.com

Dispatcher

24 HR Emergency: (314) 342-0800

AT&T

St. Louis Downtown Site

Tony McCrory, Manager I&M
Work: (314) 963-4941
Fax: (314) 691-3565
Email: tm3812@att.com

St. Louis Airport Site

John Malone, Sr. Safety Specialist
Work: (314) 505-1461
Cell: (314) 606-5313
Email: jm7842@att.com

Alternate Contact (SLAPS)

Maurice Person, Manager I&M
Work: (636) 949-1358
Cell: (314) 570-0241
Email: mp5215@att.com

Alternate Contact (Either Site)

John Malone, Sr. Safety Specialist
Work: (314) 505-1461
Cell: (314) 606-5313
Email: jm7842@att.com

Customer Service Bureau

24 Hr Emergency: 1-800-870-8390

Lambert St. Louis Airport

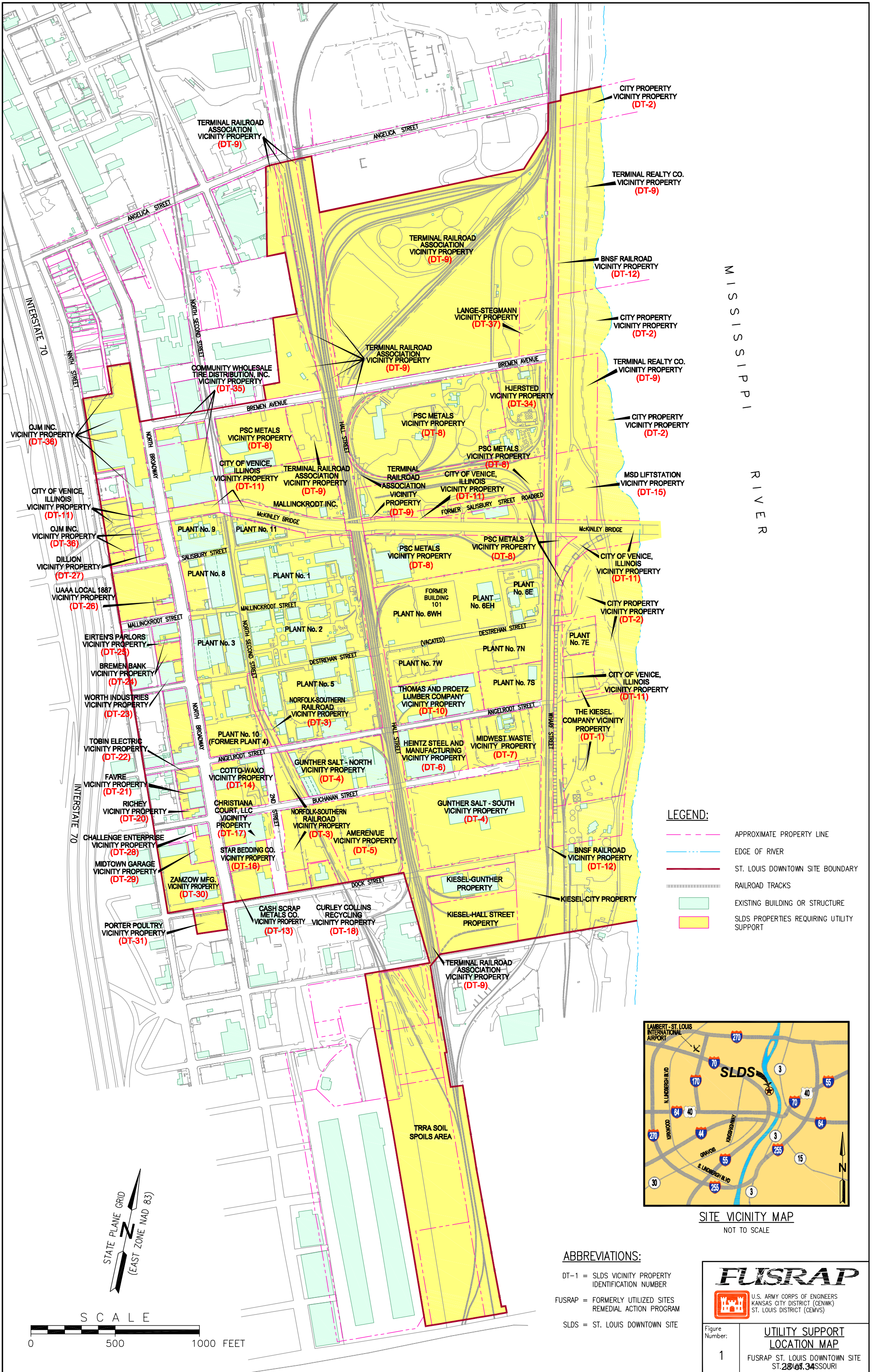
Jon Strobel,
Title: Env./Health & Safety Mgr.
Work: (314) 551-5035
Cell: (314) 258-4345
Fax: (314) 551-5013
Email: JMStrobel@flystl.com

Operations Center

24 Hr. Emergency: (314) 426-8041

Verizon

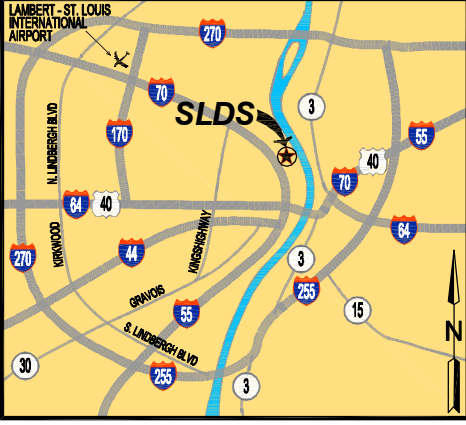
Jason Weller
Work: (972) 729-5143
Cell: (972) 841-0799
Email: Jason.weller@verizonbusiness.com



MISSISSIPPI RIVER

LEGEND:

- APPROXIMATE PROPERTY LINE
- EDGE OF RIVER
- ST. LOUIS DOWNTOWN SITE BOUNDARY
- RAILROAD TRACKS
- EXISTING BUILDING OR STRUCTURE
- SLDS PROPERTIES REQUIRING UTILITY SUPPORT



SITE VICINITY MAP
NOT TO SCALE

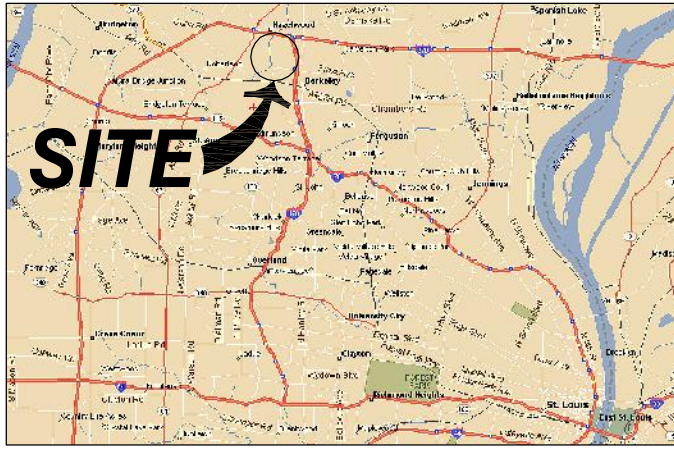
ABBREVIATIONS:

- DT-1 = SLDS VICINITY PROPERTY IDENTIFICATION NUMBER
- FUSRAP = FORMERLY UTILIZED SITES REMEDIAL ACTION PROGRAM
- SLDS = ST. LOUIS DOWNTOWN SITE

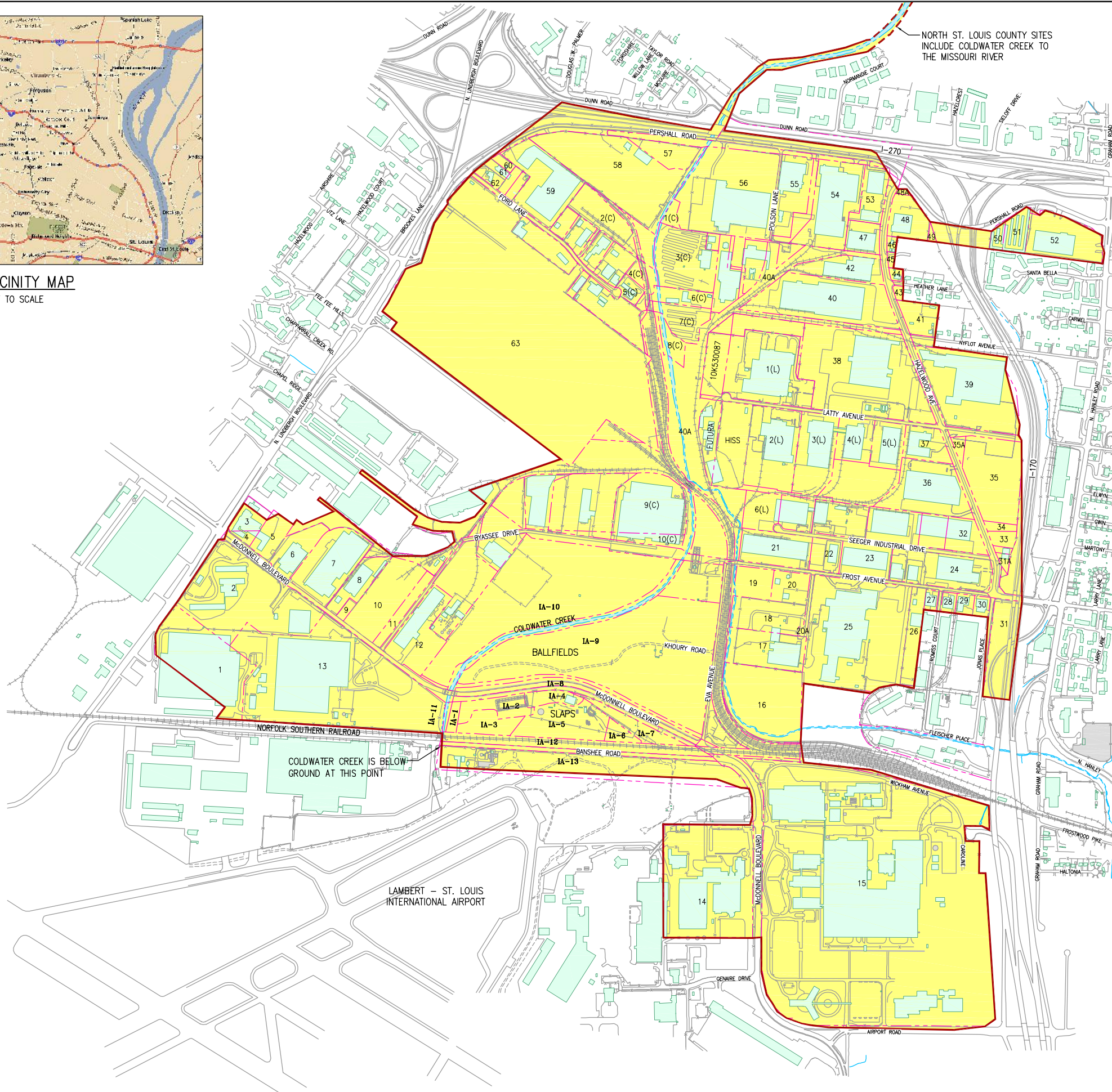


U.S. ARMY CORPS OF ENGINEERS
KANSAS CITY DISTRICT (CENWK)
ST. LOUIS DISTRICT (CEMVS)

Figure Number: 1
UTILITY SUPPORT LOCATION MAP
FUSRAP ST. LOUIS DOWNTOWN SITE
ST. LOUIS, MISSOURI



SITE VICINITY MAP
NOT TO SCALE



LEGEND:

- NORTH ST. LOUIS COUNTY SITES BOUNDARY
- APPROXIMATE PROPERTY LINE
- RAILROAD TRACKS
- EXISTING BUILDING OR STRUCTURE
- 63 VICINITY PROPERTY ID
- IA-3 INVESTIGATION AREA ID
- NORTH ST. LOUIS COUNTY SITES PROPERTIES REQUIRING UTILITY SUPPORT

ABBREVIATIONS:

- FUSRAP = FORMERLY UTILIZED SITES REMEDIAL ACTION PROGRAM
- SLAPS = ST. LOUIS AIRPORT SITE

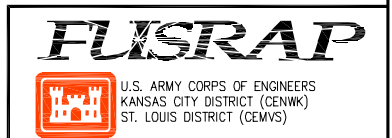


Figure Number: **2**
UTILITY SUPPORT LOCATION MAP
FUSRAP NORTH ST. LOUIS COUNTY SITES ST. LOUIS, MISSOURI

Figure 3
Planned Utility Activities

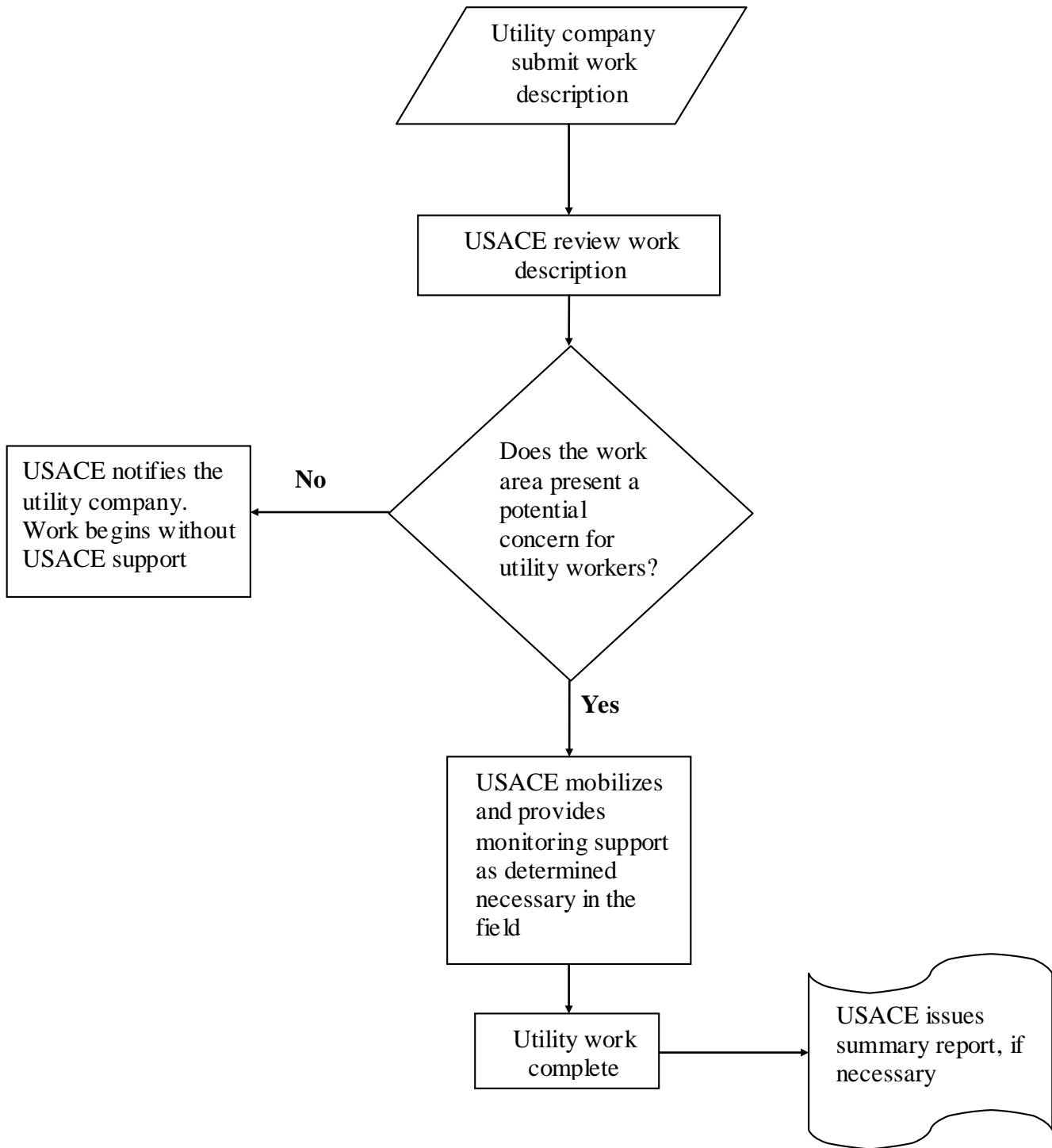
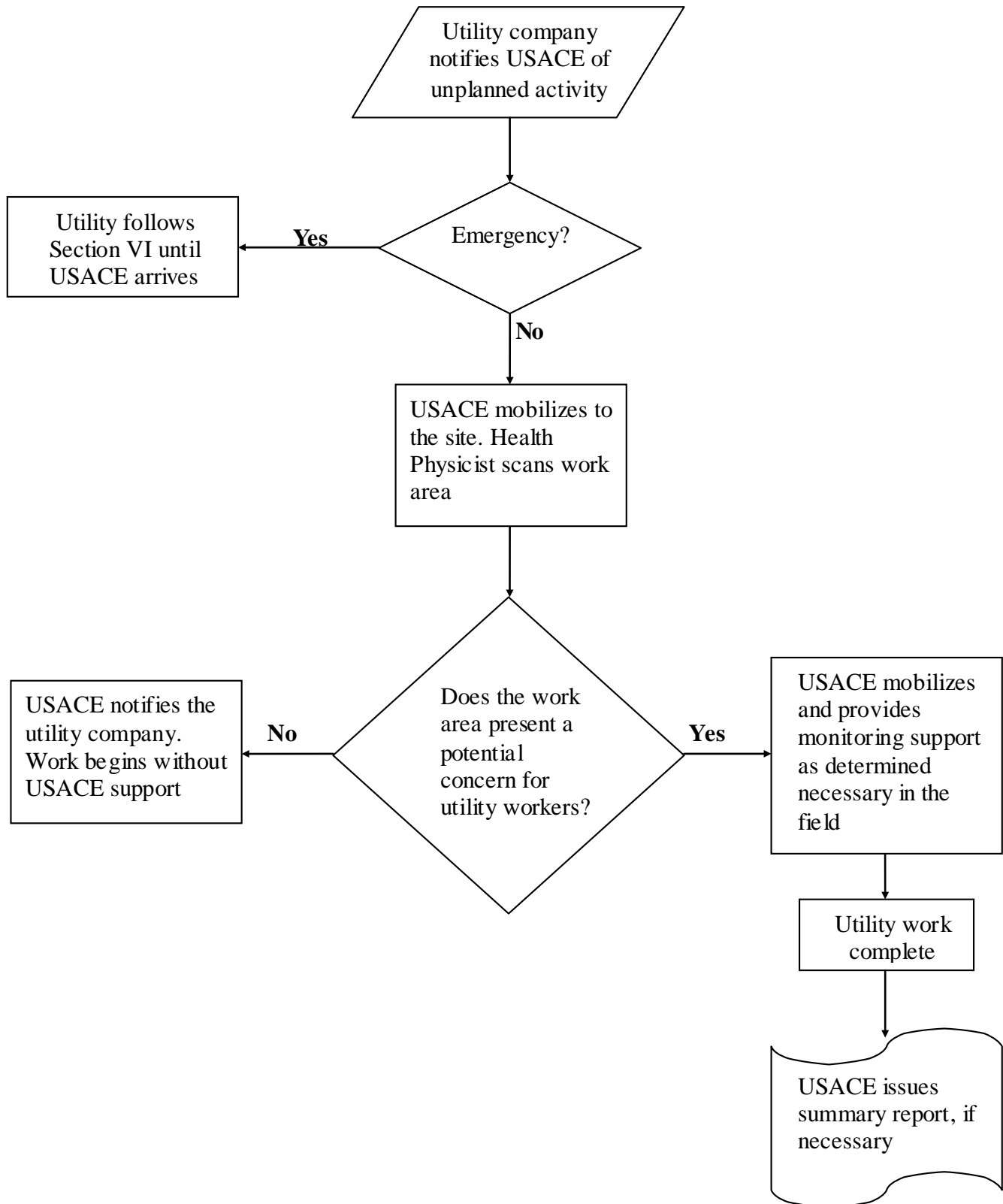


Figure 4
Unplanned Utility Activities



Attachment 1



FUSRAP Utility Support Informational Handout

The United States Army Corps of Engineers, St. Louis District (USACE) has the responsibility to remediate several Formerly Utilized Sites Remedial Action Program (FUSRAP) sites in the St. Louis, Missouri area that have residual radioactive contamination that resulted from former Manhattan Engineer District (MED) and Atomic Energy Commission (AEC) activities. During remediation of the MED/AEC contaminated areas at the St. Louis Sites (SLS), private and/or public service companies may need to perform improvements, repairs, or other work activities on properties that are included in the SLS.

During the utility work a qualified health physics technician will monitor activities and provide support at the job site as needed for worker radiological safety and protection. The health physics technician will perform radiological monitoring and collect soil samples as appropriate to determine the levels of radioactive MED/AEC contamination present in the excavation and in the excavated soil.

In most utility excavations the soil is found to either be at background radioactivity concentrations, or is below the concentrations requiring transfer to the USACE for off-site disposal. In these cases contamination control practices and radiological monitoring are not needed.

Should soil be found to contain radioactivity concentrations high enough to require off-site disposal, the USACE will:

- Make recommendations on, and provide personal protective equipment (PPE) as needed
- Make recommendations on contamination control measures
- Monitor personnel and equipment for radioactive contamination, and decontaminate as necessary
- Provide proper management (including disposal) of MED/AEC contaminated soils and media generated during work activities

Emergency Contacts:	North St. Louis County -	Jacob Prebianca: (314) -422-8954 Vick James: (314) – 560-3557
	Downtown St. Louis -	Robin Parks: (314)-703-6315 Susan Adams: (314)-422-7205

From: LISA L KUNTZ
To: [Miller, Robert/COL](#)
Subject: FW: 270 EA [EXTERNAL]
Date: Tuesday, January 10, 2017 10:20:09 AM

FYI

Lisa Kuntz, P.E.
Missouri Department of Transportation
Area Engineer – North St. Louis County
314-568-7252

From: Larry Jones [mailto:bishop@ggcstl.org]
Sent: Monday, January 09, 2017 6:52 PM
To: LISA L KUNTZ
Cc: 'Chana Wooden'
Subject: RE: 270 EA

Dear Lisa,

The concerns I have with the redesign of the 270 –N corridor is the probability of walls being erected that will block the view of our church from those driving down 270. I believe the corridor and bridges do need improvement but the designer must absolutely consider and protect the businesses along the path to ensure after the improvements are completed that the businesses still can be seen from 270 and the drivers can still have easy access to us. If not the improvement to 270 will kill the businesses , churches and other entity whom sometime ago made a decision to locate along 270 for visibility purposes so their place of businesses and churches can be successful.

Greater Grace Church built a new church along 270 in 2008 spending 6,000,000.00 a large invest for a church which is paying a large monthly mortgage. Any obstruction to the view of our church will be devastating to the growth of GGC. At least from our records 65% of our visitor come from drive by. A wall would be a death blow to attracting people by visibility from 270.

Also the idea of changing Pershall Rd. and Dunn Rd. to become one way traffic versus presently two ways is not a good idea at all. We saw the death of business along 367 improvement several years ago and it is not wise to repeat such destruction to people lives.

Also before we moved to Pershall Rd. our church lacked visiblilby off the main Rd. being Chambers. Our church a 9,800 sq. ft. structure was on Gardner dr. in Moline Acres behind a Taco Bell which was located on Chamber Rd. even though we were only 50 ft. from Chamber Rd., driver could not see the church from Chamber Rd.

We had a hard time explaining to people where we were located and every time we would explain our location they would say” there is not a church over there.”

We purchase land and built a beautiful church on Pershall Rd. so we would not have that problem anymore.

I will be glad to discuss this matter with whomever .You may contact me 314.482.5057.

Sign,

Bishop Larry O. Jones, pastor

Greater Grace Church

From: LISA L KUNTZ [<mailto:Lisa.Kuntz@modot.mo.gov>]

Sent: Monday, January 09, 2017 9:38 AMe deva

To: bishop@ggcstl.org

Cc: WESLEY C STEPHEN

Subject: 270 EA

Bishop Jones-

Per our discussion, please send any comments you have on the I-270 EA today. You can send them directly to me & I will forward to the study team.

Thank you!!

Lisa Kuntz, P.E.

Missouri Department of Transportation

Area Engineer – North St. Louis County

314-568-7252