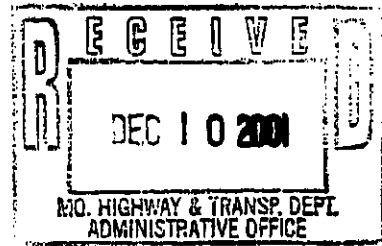




**ST. LOUIS COUNTY  
MUNICIPAL  
LEAGUE**



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December 7, 2001

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

**RE: I-70 First Tier Environmental Impact Statement**

Dear Mr. Keith:

I am writing on behalf of the Board of Directors of the St. Louis County Municipal League.

We understand that consultants have attempted to estimate the traffic volumes expected on I-70 across Missouri in the year 2030. Preferred strategies based on those estimates and other factors result in recommendations by the consultants that I-70 be entirely rebuilt as a six-lane freeway on a much wider right-of-way with 59 new super interchanges and a system of outer roads. The proposal is both financially irresponsible, underestimates traffic to be drawn to other alternative routes under construction, and too easily discards the option of simply rebuild six lanes virtually on the same footprint as the existing four-lane highway.

We believe volumes will increase, but will be moderated by several factors. When combined with long-term financial hurdles facing MoDOT and other state agencies, and the inability to reliably forecast 30 years ahead, we recommend that sections of existing I-70 be widened to six lanes in strategic locations in the upcoming decades, along with typical pavement replacement, as is done in other states. The new pavement should largely be located on the same footprint of the existing pavement without rebuilding 59 new, huge interchanges. Our recommended approach includes:

1. Better Analyze the Impact of Replacing 4 Freeway Lanes with up to 14 Freeway Lanes Across Missouri - Individual corridors cannot be evaluated without thorough examination of alternatives, both for vehicles and other modes. In order to make long-range decisions regarding I-70 across the state, one must also make a decision about Route 36 becoming a four-lane parallel freeway (I-72), and U.S. 50 becoming a four-lane expressway. These developments are on track to create 14 freeway lanes across Missouri, which implies a gross lack of comprehensive planning, especially when financial factors are considered.

It seems evident that Route 36 will continue to be upgraded to I-72 between Hannibal and St. Joseph, unless MoDOT clearly halts this effort. It is our opinion that I-72 will become a major alternative to I-70 for multi-state trips. Vehicles in the Chicago area and Indianapolis area originating from as far away as the east coast and traveling to and beyond Kansas City (and in reverse) will have I-72 as an alternative. It will offer a route that bypasses the congested areas of St. Louis and in some cases, Kansas City.

Furthermore, vehicles seeking access to Jefferson City, Lake of the Ozarks, or crossing the state from areas south of I-70, will find an expressway or Super 2 enhancement of U.S. 50 to be a competitive alternative to I-70 thereby reducing traffic on I-70, unless MoDOT prioritizes other investments precluding the upgrade to US-50.

Lastly, improvements to other state roads between I-44 and the Lake of the Ozarks will also relieve I-70 during some periods of high weekend usage between St. Louis and the Lake.

2. Improve Safety and Capacity by Aggressively Pursuing Freight Alternatives - Many also advocate greater capacity of railroads and perhaps barges for freight shipment to reduce truck traffic and associated serious interstate accidents and to lengthen the useful life of pavement. MoDOT officials must make a conscious decision to pursue these alternatives to freight movement before assuming truck volumes on I-70 thirty years from now.

3. Understand the Unique Opportunity for Cost-Effective Higher Speed Rail - Passenger rail, if more reliable and somewhat faster, would seem to have great potential for east-west travel in Missouri for several reasons:

- a) An alignment through Jefferson City could generate far more trips by state workers as an alternative to vehicle travel if service were reliable.
- b) As the population ages, travel by train becomes more attractive than by car, and at times, than by bus or plane, especially for trips of a few hundred miles or less.
- c) Passenger train service is generally less polluting, a factor that should be considered in states that fail to meet EPA standards.
- d) Enhanced passenger train service is typically faster and safer than driving, especially for younger drivers such as college students and some elderly.
- e) Development of faster, modern service in Illinois and other Midwest states provides Missouri with an opportunity to capitalize on passenger rail service that would not exist but for the connectivity to the other states.
- f) Upgrading to higher speed rail across the state is a real bargain at about \$350 million. Buying and reserving right-of-way along I-70 for much higher cost and uncertain rail service seems much less cost-effective.

MoDOT's senior staff has made it quite clear that the current highway system is not sustainable with today's revenue if expansion continues unabated. The equivalent of a 45-cent gasoline tax increase would be required to generate another \$1 billion annually based on the targets of completing many expansion projects while only bringing the major state highways up to 75% of federal standards. These claims that Missouri has lost its ability to sustain the highway system are overstated in our opinion when suggesting an annual need for another billion dollars but they do provide some clear testimony to the improvident decisions of the past. A more specific statistic recently released by the East-West Gateway Coordinating Council and based on MoDOT figures now indicates that a staggering 75% of MoDOT principal arterial roads in the City of St. Louis and four surrounding counties fall in the "Poor" category. This compares to the "less than 1%" figure for similar roads in the Illinois portion of the region. Even if the grandiose plans to rebuild I-70 according to the consultant's recommendations were justified, funds are clearly not available now or in the future given the state of Missouri's transportation system, to build a

completely new I-70, without abandoning other highways. 2001 estimates in the \$2.5 - \$3 billion range will increase dramatically in the year of construction.

After several years of meetings and studies, it is clear to us that the root cause of our unsustainable system is over-expansion. The postponement of preservation activities has greatly increased the deferred maintenance costs on too many highways. This financial dilemma must influence decisions such as how to meet future transportation demands on I-70 and cross-state parallel roads. Simply put, very expensive alternatives need to be approached more conservatively.

Forecasts regarding road usage 30 years into the future are not reliable so we must make decisions based on approaches that do not put all our eggs in one basket based on those forecasts. Other factors will play a major role, such as the expansion of parallel roads.

Therefore, we conclude that too much capacity will likely result along major east-west routes across Missouri and the costs of producing this capacity will weaken Missouri overall. This is precisely the type of decision made all too frequently in the past that now haunts us and it must not be repeated. We must begin to dig ourselves out of the hole we are in, not make it deeper by adopting alternatives that are not cost-effective.

Our recommendations are as follows:

1. Adopt a long-range plan for I-70 that focuses on pavement preservation and replacement and safety. Add lanes to the existing lanes as needed in certain areas year by year. Close observation indicates that six lanes can be located under almost every overpass (without shoulders for that 100 feet or so distance under the overpass). Commit to more freight movement by other modes. Promote passenger rail with a small portion of the money saved from the more expensive I-70 relocation and reconstruction plan now recommended.
2. Do not build a completely new, six-lane I-70 on a much larger right-of-way with all new overpasses and outer roads. It is not affordable even if it were clearly needed. It is viewed as a "Rolls-Royce" plan, based on unreliable 30-year forecasts that fail to adequately consider the volume to be reduced by improvements to other cross-state routes. The new interstate, overpasses and outer roads are not only very expensive to build, but also to maintain once built. MoDOT officials are very actively reminding us how past decisions have become liabilities. We must learn from our mistakes and not repeat them.
3. Because of the costs facing MoDOT to rebuild all our interstates in the upcoming decades, we believe tolls should be considered as part of the resources needed for new or completely rebuilt interstates. We would envision that tolls would be infrequent and not apply to short trips of less than 25 or 30 miles. This would continue to place the cost of roadway use on the user many of which are non-residents. Roads should not be supported by a sales tax paid by Missourians when purchasing clothing, furniture, or other items. The freight costs are already built into the price of the products. If the highways are essential, users will agree to pay for them.
4. We also strongly urge that equity, by vehicle type, prevail as state policy. Various modes, that include cars, small trucks, busses, large trucks, et cetera, should clearly pay their fair share of user fees that underwrite our highways.

Also, the report provides data on accidents and deaths on I-70. We encourage MoDOT to more aggressively pursue localized improvements and other strategies to reduce deaths and accidents

on I-70 and for that matter, on all roads, in a cost effective manner. Third lanes to accommodate trucks on grades, longer entrance ramps, median cables, elimination of hazardous curves, simple warning signs or flashing yellow lights at difficult locations, electronic signage warning of accidents ahead, (and perhaps promoting use of outer roads or other alternatives) are a few strategies that could be considered by a caring and enlightened department.

In conclusion, we urge MoDOT to first complete its planning by determining its commitment to build higher capacity corridors along Highways 36 and 50 that will reduce the need for new lanes along I-70. If I-70 is a higher priority, and we assume it must be given its position in the national system, then logic would require that Highway 36 and 50 not be built as alternatives to I-70. To improve I-70, simply plan to begin to replace the most functionally obsolete or structurally deficient four lane sections, typically with six lanes where justified, in the location of the existing pavement utilizing existing right-of-way, outer roads, and overpasses. The new six-lane freeway will function well and be built at a realistic, cost effective price and serve users well.

Thank you for the opportunity to comment.

Sincerely,

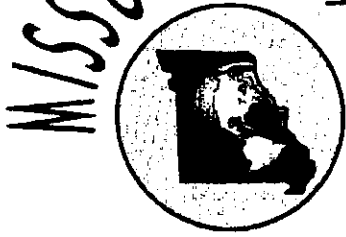


Tim Fischesser  
Executive Director

cc: MoDOT Commissioners  
State Representatives and Senators in St. Louis City and County via e-mail  
League Board of Directors and Transportation Committee  
East-West Gateway Coordinating Council

# MISSOURI COALITION FOR THE ENVIRONMENT

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December 10, 2001

Allen Masuda  
Division Administrator  
Federal Highway Administration  
209 Adams Street  
Jefferson City, MO 65102

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

**Re: Final FTEIS I-70 Corridor Improvement Study**

Dear Messrs. Masuda and Keith:

These comments are submitted jointly by the Missouri Coalition for the Environment and Ozark Chapter of the Sierra Club. We have reviewed the Final FTEIS and found that it contains the same deficiencies identified in our earlier comments and the comments of other agencies. Therefore, we have attached our previous comments, along with the comments of the Mid-America Regional Council and the East-West Gateway Coordinating Council, to reiterate the significant outstanding issues.

The failure of the Final FTEIS to address these issues renders it incomplete and in violation of NEPA. Neither of our two organizations' prior comments were identified as "substantive comments" in the Final FTEIS, nor were the concerns expressed in our previous submittals addressed by your agencies. Preparers of the Final FTEIS have acknowledged in telephone conversations in recent weeks, however, that our comments were substantive and should have been addressed.

We are also concerned that, while the Draft and Final FTEIS documents incorporate and address the formal comments submitted by government agencies, none of the 298 comments received from citizens and from non-governmental organizations have been made available for public review. Citizens have effectively been denied access to what other citizens have had to say.

MoDOT and the FHWA should make another attempt at preparing an adequate

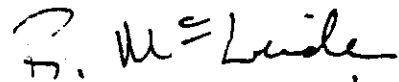
Final FTEIS that addresses all substantive issues and complies with the requirements found in 23 C.F.R. § 771.125.

Thank you for considering the above comments. Please call if you have questions.

Very truly yours,



Bea Covington  
Missouri Coalition for the Environment



Ron McLinden  
Ozark Chapter, Sierra Club

by EIH

Encls.

cc: Jerry Mugg (HNTB)(via facsimile)