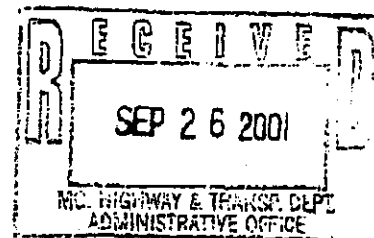


MISSOURI COALITION FOR THE ENVIRONMENT

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VIA EMAIL & U.S. MAIL

Don Neumann
 Programs Coordinator
 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: **Draft EIS/I-70 Corridor Improvement Study**

Dear Messrs. Neumann and Keith:

The Missouri Coalition for the Environment ("Coalition") submits the following comments on the draft First Tier Environmental Impact Statement for the Interstate 70 Corridor Improvement Study ("DEIS").

Purpose and Need

Personal observation by Coalition staff indicates that much of the I-70 corridor is not heavily congested at the present time. Rarely, if ever, is traffic slowed due to excess volume between St. Louis and Columbia. As expected, however, traffic in and around the metropolitan areas at each end of the study area can become heavy, but this alone does not indicate a need to widen the entire length of the highway. Projections of increased future use need to be better substantiated before such a major commitment of resources is undertaken. The significant increases in automobile travel that have occurred over the past decade may not continue. It is unclear whether MoDOT has accounted for a slowing in the growth of vehicle miles traveled due to changes in economic and environmental constraints.

There is clearly a need for better maintenance along much of the I-70 route, but this is no reason for a major highway expansion. The significant maintenance needs militate in favor of scaling back or canceling expansion projects until the current system

is in good working order. MoDOT should spend less time and money on new large highway projects and focus instead on maintaining the existing system.

Alternatives

The DEIS presents a number of good alternatives if increased capacity is needed, but also some that entail too many economic and environmental costs. Unfortunately, MoDOT has already proposed rejecting the most viable and least environmentally damaging alternatives in favor of laying more concrete. The preliminary decision to abandon the options of traffic management (Strategy 2), high occupancy vehicle lanes (Strategy 6) and high speed rail (Strategy 7) is without not supported by the analysis in the DEIS. There does not appear to have been any consideration of the long term viability, costs and benefits of these alternatives before they were rejected.

Instead of building more highways, a combination of Strategies 1 and 2 should be chosen. The current highway clearly needs rehabilitation and maintenance in some places. Increased traffic pressure should be handled through transportation system and demand management such as park-and-ride lots, variable message signs and other intelligent transportation systems. MoDOT should look first to conservation and efficiency before spending millions of dollars on highway expansion.

If these methods are still inadequate to address the demand, then Strategies 6 and 7 should be considered. High occupancy vehicle lanes reward conservation and reduce the number of automobiles competing for space on the highway. This strategy seems highly appropriate for the Kansas City and St. Louis metropolitan areas. One large flaw in the DEIS is that it allows for the entire project to be segmented when considering environmental impacts (see discussion below), but when selecting alternatives only focuses on the entire alignment. Using HOV lanes near Kansas City and St. Louis may be very beneficial. Nevertheless, the alternative is rejected because it is deemed inadequate for more rural stretches of I-70.

A high speed rail system would serve to eliminate much of the traffic on I-70. Missouri policy makers need to consider what is in the long term best interests of the state when spending money on our transportation system. Integrated planning of mass transit and land use will provide the greatest long term benefits by freeing up financial resources currently spent on transportation for more important endeavors. A high speed rail system serving compact city centers would be much more efficient than current sprawling patterns of development. If MoDOT had spent as much time and money in the past developing a comprehensive mass transit policy as it has planning for new highway construction, there is little doubt that Missouri would be in a much stronger economic position than it is today.

The discussion and subsequent rejection of the high speed rail alternative is woefully inadequate. The DEIS encompasses well over 300 pages of analysis and yet less than one page is devoted to the analysis and subsequent rejection of the high speed rail alternative. Moreover, this brief discussion is founded upon assumptions about future

traffic demand that fail to account for fluctuations in energy costs, regulation of greenhouse gases and traveler preferences. The 1990s were perhaps the greatest decade for personal auto travel, characterized by extremely low fuel costs and large increases in personal wealth. It seems far from certain that these trends will continue in the future. This flaw infects not just the high speed rail discussion but also the entire purpose and need upon which MoDOT bases the project. Mass transit such as high speed rail will become much more competitive as fossil fuel costs rise and environmental constraints are fully realized. MoDOT's rejection of high speed rail does not account for these considerations and this alternative demands further study.

Under no circumstances should MoDOT consider constructing a new east-west interstate across the state (Strategies 4 and 5). Widening the current highway is also an unappealing option (Strategy 3), but would be preferable to creating an entirely new highway corridor. Past experience has amply demonstrated that large highway projects encourage more sprawl and are soon as congested as the highways they replaced. A parallel I-70 highway would directly destroy thousands of acres of open space and wildlife habitat and secondarily impact many thousands of acres because of increased development pressure. The DEIS acknowledges that a new corridor would destroy seven times the amount of forest, five times the amount of wetlands and two to three times the amount of farmland as the alternative of widening the existing route to three lanes. In addition, creating a new corridor would add about \$22 million per year in operations and maintenance costs to an already overspending state agency. A second corridor is neither economically or environmentally sound.

Similarly, if MoDOT moves forward with Strategy 3 and widens the existing corridor, it should be kept in the same location unless this proves absolutely impossible. Realigning segments around existing cities and towns will directly impact natural resources, encourage sprawl and possibly redirect economic development away from already developed areas.

Segmentation and Tiering

The DEIS states that seven "sections of independent utility" have been identified to guide second tier studies. This segmentation of the overall project is not sanctioned by NEPA. MoDOT must account for all of the environmental impacts of the project when considering whether the project should go forward and whether preferable alternatives exist. It is not until the design of the modifications are developed that the full range of environmental impacts will be known. These impacts must be considered as a whole for the entire project.

The preliminary decision to prepare only two EISs in second tier studies is inadequate and a result of the segmentation referenced above. Moreover, allowing a categorical exclusion for the 64 mile stretch from Odessa to Booneville fails to meet the demands of NEPA. All of these SIUs, whether segmented as in the DEIS or combined to match the full scope of the project, demand the preparation of an EIS. They are certainly not appropriate for a categorical exclusion.

Environmental Impacts

The discussion of environmental consequences associated with widening I-70 is flawed because it assumes that some action will take place. For example, instead of discussing the impact of a new bridge on endangered species, the DEIS simply states that the impact will be the same whether the new bridge is built upstream or downstream of the existing bridge. The same flawed approach is used repeatedly. The purpose of an EIS is to describe environmental impacts against a preexisting baseline, not merely to point out that one alternative is less harmful than another.

The DEIS also improperly narrows the discussion of secondary and cumulative impacts. MoDOT does not seem willing to acknowledge the profound environmental effects of its efforts to continually expand the highway system in Missouri. Concurrently with this proposal to expand I-70, MoDOT is proposing to widen Highways 50 and 36 across the entire state. There is no discussion of the cumulative impacts of these projects in the DEIS. Criss-crossing the state with four-lane highways will have enormous impacts on both the environment and the state's budget. What will be the cumulative impacts on air quality, water quality and natural habitats? Moreover, MoDOT is apparently strapped for cash at the present time, so why does it continually propose expanding the state's already expansive highway system? (Missouri has more than twice as many miles of state highways as any neighboring state and currently spends far less than neighboring states on maintenance). The DEIS must give a much more thorough accounting of these cumulative impacts.

It is unclear from the discussion in the DEIS how many public lands protected by section 4(f) are in the study area. We are concerned by the assertion in the DEIS that state conservation areas may not be subject to section 4(f). This is inconsistent with the FHWA policy paper referenced in the DEIS.

Many state and federal agencies have invested millions of dollars in the past decade restoring wetlands along the Missouri River, including an extensive restoration project at Overton Bottoms. There should be no loss of these habitats as a result of work on I-70. The existing corridor should be maintained and any new lanes should be constructed on the existing embankment. The DEIS gives an inadequate description of the baseline condition of this area and the project impacts. The discussion focuses on expanding the bridge crossing the river, but neglects to mention the sensitive habitats found in Overton Bottoms and ways of avoiding environmental damage. The fact that the Corps of Engineers has reserved a 300 foot corridor on each side of the existing route for MoDOT's use does not lessen the environmental impacts. Creating a new encroachment 300 feet on either side of the embankment is an unacceptable impact on this outstanding example of wetland and floodplain restoration. MoDOT must investigate less intrusive methods of accommodating a new lane through this area.


MoDOT should give a more detailed account of the impacts on wildlife migration in the DEIS and accommodate these movements in the ultimate design. Heavily traveled

highway corridors that are several hundred feet in width effectively isolate one part of the state from the other for many species of wildlife. As four lane highways are built throughout the state, the blocks of habitat become even more fragmented, possibly isolating populations of a species from each other. This could prevent the natural expansion or reintroduction of native species into new areas, and may have more subtle impacts on the genetic makeup of the species. MoDOT should consider methods of accommodating wildlife migration, such as wildlife underpasses or overpasses, especially in sensitive areas such as Overton Bottoms.

Thank you for considering these comments.

Very truly yours,


Bea Covington
Executive Director


Edward J. Heisel
Senior Law & Policy Coordinator

cc: Governor Bob Holden