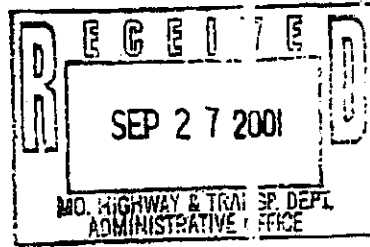


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September 25, 2001



COMMENTARY
MARC
Mid-America Regional Council

Mr. Don Neumann
Programs Coordinator
Federal Highway Administration
209 Adams Street
Jefferson City, MO 65102

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

Dear Sirs,

Pursuant to your request for public comment on the I-70 Improvement Study Draft First Tier Environmental Impact Statement (EIS), the Mid-America Regional Council (MARC) offers the following policy statement on the subject study.

In general, MARC supports the recommendation of the Draft EIS to improve I-70 on its existing alignment, however, MARC currently has insufficient information to endorse the additional lanes proposed for I-70 in Jackson County in the Draft EIS. MARC is also concerned about the financial feasibility of the proposal to widen I-70 across the State and the processes by which individual segments will be prioritized for improvement within the I-70 corridor.

Background

MARC serves as the Metropolitan Planning Organization for the greater Kansas City area, including Jackson County, Missouri, which contains a portion of the I-70 corridor discussed in the EIS.

Interstate 70 is a key element of the Kansas City region's transportation system and has been the focus of several recent regional and statewide planning initiatives. The downtown I-70 loop is the link between two current Major Investment Studies (MIS) in the Kansas City area, and has recently been the focus of detailed land use and traffic operational analyses as part of the Downtown-Northland MIS and I-70 MIS. The results of these studies will have important implications for the design and operation of I-70 throughout the region.

The Missouri Department of Transportation (MoDOT) has also been conducting an I-70 Improvement Study to identify strategies to improve the service, safety and efficiency of the interstate across Missouri. According to MoDOT, I-70 faces two long-term challenges. First the roadway is deteriorating. While I-70's roadbed and pavement were designed with a 20-year life, today the sections range in age from 34 to 43 years. Second, much of I-70 is carrying more traffic than it was designed to accommodate. MoDOT projects that without improvements, the entire length of I-70 will exceed capacity by 2020.

Although no funding has been identified for any of the recommendations of this study, MoDOT has recently positioned improvements to I-70 as a substantial part of a new state funding package, either as a stand-alone program or bundled with other transportation needs. However, since the design of I-70 will also impact the design of its interchanges and bridges, many of which are currently planned or programmed, this study will be significant even if no additional resources are immediately made available to implement its recommendations.

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Executive Director
David A. Warm

In August of 2000, MARC adopted a position to support efforts by MoDOT to improve travel across Missouri in the I-70, US-36 and US-50 corridors. Based on the information from the I-70 Improvement Study, MARC supports the strategy to improve I-70 on its current alignment, combined with proactive implementation of appropriate transportation demand management (TDM) and transportation systems management (TSM) strategies, and encourages MoDOT to continue with improvements to US-36 and US-50.

On July 30, 2001, MoDOT and the Federal Highway Administration (FHWA) released a Draft First Tier Environmental Impact Statement for the I-70 Corridor from Kansas City to St. Louis for public comment through September 25, 2001. Several public hearings were conducted on the Draft EIS in August of 2001, including one in Grain Valley on August 28, 2001.

While this document provides more detailed information on the corridor than has previously been available, its analysis and findings are consistent with the information provided by MoDOT during the course of the study. In summary, the Draft EIS recommends improving I-70 on its existing alignment by reconstructing and widening the facility to a minimum of six lanes from I-470 in Jackson County to US-40/US-61 in St. Charles County, with provisions for transportation management strategies along the corridor as well as provisions for future uses such as additional highway lanes or high speed rail service within the corridor.

Transportation 2020, MARC's adopted Long-Range Transportation Plan, identifies the I-70 corridor in Jackson County as a future need and calls for a Major Investment Study to develop a strategy for improving this corridor. Within the MARC metropolitan planning boundary, the Draft EIS recommends widening I-70 to six lanes from I-470 to the Lafayette County line. This segment is also included in the I-70 Major Investment Study, currently in progress.

Position

MARC recognizes the critical role that I-70 plays in serving both statewide and regional transportation needs. MARC also recognizes that this facility is in serious disrepair and that substantial improvements are needed for it to continue to fulfill its role as the primary transportation link between Missouri's two largest urban areas.

In general, MARC supports the recommendation of the Draft EIS to improve I-70 on its existing alignment. However, the proposal for a two hundred mile long, six-lane interstate facility is extraordinary and unprecedented in the United States. Given the magnitude of Missouri's other unmet transportation needs, MoDOT and the Missouri Highway and Transportation Commission should carefully review the financial impacts of pursuing this proposal before raising potentially unrealistic expectations with the public and legislature.

In order for this strategy to be financially feasible, a range of options for the design of each segment should be considered during subsequent environmental analyses and plan development activities. These should include potential smaller-scale improvements that may meet the needs of the overall corridor. In the event that funds are made available for major improvements to I-70, MARC strongly urges MoDOT to work proactively and cooperatively with each of the MPOs along I-70 to establish funding and implementation priorities and design concepts for the individual segments of the corridor.

At this time, MARC has insufficient information to endorse the additional lanes proposed for I-70 in Jackson County in the Draft EIS. The design concept and scope for the segment of I-70 within the MARC planning boundary, as well as the priority of improving this segment versus other segments in Jackson County, should be determined within the context of the MPO planning process, with close cooperation between the I-70 MIS and the Statewide I-70 Improvement Study processes.

In addition to these comments on the Draft EIS, MARC reiterates the following comments which were offered earlier on the I-70 Improvement Study:

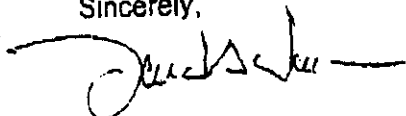
Design Options – Missouri should continue to approach the improvements to I-70 on a statewide basis, and should consider using design-build and other construction management techniques (such as enlarging the size and scope of individual improvement projects) to reduce both the time and cost to provide the improvements. Designs should be flexible to minimize right-of-way requirements and disruptions to existing communities along I-70. Flexible design options to be considered should include single point diamond interchange designs and reduced median widths at developed locations. Additionally, the use of frontage roads in the final design should be limited to reduce their unintended consequence of promoting less compact development patterns.

Goods Movement – MARC believes the safety of motorists, the efficient movement of goods and services and the long-term economic benefits for the State may require an emphasis on segregating truck and passenger car traffic. Because of this belief, MARC supports an in-depth review and analysis to determine whether separate, high-speed traffic lanes should be constructed along the existing alignment. MARC further supports the construction of such traffic lanes to be operated as toll facilities, if necessary, to ensure adequate maintenance and repair for the benefit of the shipping and transport industries.

High Speed Rail – the strategy to improve I-70 on its current alignment, and the strategies for a parallel facility all include preservation of space for future high speed rail between Kansas City and St. Louis. MoDOT should preserve this future option for the I-70 corridor, even as flexible designs are considered. MARC also recommends that MoDOT determine, as a part of the I-70 Improvement Study, the most efficient method to link/improve existing rail systems in the State to support the utilization of a high speed rail line between Kansas City and St. Louis for the movement of passengers and freight.

MARC looks forward to working with MoDOT and FHWA to address these issues and to continue our cooperative relationship to plan appropriate strategies to address the needs of this critical statewide corridor. If you have further questions about MARC's comments on this EIS, please call me or Mell Henderson, MARC's Director of Transportation, at (816) 474-4240.

Sincerely,



David A. Warm
Executive Director

cc Linda Clark-MoDOT



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Regional Office of Administration
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Missouri Department of
Commerce and Community Affairs

October 22, 2001

Mr. Henry Hungerbeeler
Director
Missouri Department of Transportation
105 W. Capitol Avenue
P.O. Box 270
Jefferson City, MO 65102

Dear Mr. Hungerbeeler:

We appreciate the opportunity to review the *Interstate 70 Corridor Draft First Tier Environmental Impact Statement* and offer the following staff comments.

First, I-70 is of vital importance to the effective movement of people and goods within and through Missouri, and we recognize the critical need to physically rehabilitate the I-70 corridor, as well as making improvements, at specific locations, to enhance roadway safety and maintain acceptable operating conditions. We do not, however, believe that the proposal to add lanes to I-70 from Kansas City to St. Louis is either strategic or reasonable.

The recommendation to significantly expand the capacity of I-70 across the entire state is evidently based on a year 2030 traffic forecast. While we are advocates of long-range planning, developing a facility-specific investment strategy based on a thirty year horizon is unrealistic and inconsistent with priority setting processes used for all other projects on the state system. Emerging technologies, indications that travel growth rates may be moderating, uncertainties about fuel supplies and prices, and potential changes in the freight industry all point to a future that will be different than what might be expected from an extrapolation of past trends. The only certainty in a thirty year forecast is that it will be wrong. A more reasonable approach would be to identify existing and mid-term needs in the corridor, evaluate and recommend investment strategies to meet those needs, and then use longer range forecasts to identify potential future deficiencies, not for the purpose of developing investment recommendations, but to create a broader framework within which the short- and mid-term investments can be made without compromising the ability to make future improvements, as needs arise.

The present recommendation is contrary to the growing awareness of MoDOT's long-term fiscal constraint. Because of that constraint, there should be increased emphasis on efforts to manage existing facilities more effectively rather than simply falling back on traditional and costly methods to increase roadway capacity and improve efficiency. While MoDOT's fiscal constraint and the need to better manage facilities should not, of themselves, necessarily deter the state from pursuing the study's investment recommendation, they should, when

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Henry Hungerbeeler
October 22, 2001
Page Two

coupled with the already great demand for resources to rehabilitate and enhance safety on the existing state system, cause the state to pause and take a more comprehensive look at the issue.

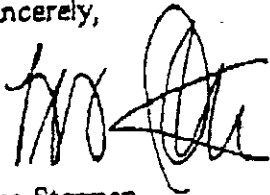
Second, we do not support any proposal to relocate I-70 on an entirely new alignment within western portion of the St. Louis metropolitan area. Although the study does examine the direct impacts of the three realignment alternatives in Warren and western St. Charles counties, it does not critically evaluate the more crucial secondary development and fiscal impacts of those new alignments. If lessons learned from the construction of the Interstate system remain valid, we can anticipate that any major realignment would significantly alter growth and development patterns in the areas traversed by both existing I-70 and the new facility. This would create a collateral demand for more land conversion and more infrastructure, increase the burden on state and local fiscal resources, and change the character of existing communities.

Third, a project of this importance and financial magnitude should be discussed within the context of state's social and economic health. While the study analyzes the direct travel benefits of the improvement, it does not address that statewide context. Although the issue of whether this major investment produces real social and economic benefits to the state of Missouri (a strategic assessment that goes beyond the summation of direct travel benefits) commensurate with its costs is, perhaps, beyond the scope of a traditional NEPA document, the need for that larger discussion remains.

Fourth, future consideration of improvements to I-70 in the St. Louis region should be done within the context of the metropolitan planning process.

We will be taking these comments to our Board of Directors for their consideration later this month. Again, we appreciate the opportunity to comment on this very important study.

Sincerely,



Les Sterman
Executive Director