



RECORD OF DECISION

INTERSTATE 64 / U.S. ROUTE 40 CORRIDOR
From West of Spode Road in St. Louis County
To West of Sarah Street in the City of St. Louis, Missouri

FHWA-MO-EIS-02-04-F

(MoDOT Project Nos. J6I0978 and J6I1248)

Approving Official:



Division Administrator
Federal Highway Administration

Date:

7/18/05

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A. Decision

The Federal Highway Administration (FHWA) approves the selection of Alternative VII which includes the Build Alternative for the Greenway Subcorridor, the Flat South Alignment for the Thruway Subcorridor and the Build Alternative (no ramp to Oakland at McCausland) for the Parkway Subcorridor. The Selected Alternative begins on I-64 west of Spoede Road in St. Louis County and continues east to west of Sarah Street in the city of St. Louis, and on I-170 from south of Brentwood Boulevard to Eager Road. The project length on I-64 is 10.9 miles (17.5 kilometers) and on I-170 is 0.8 miles (1.3 kilometers). The Selected Alternative would reconstruct I-64 from west of Spoede Road in St. Louis County to west of Sarah Street in the city of St. Louis. The reconstruction includes actions to replace deteriorated pavement; replace structurally deficient and functionally obsolete bridges; improve traffic operations, geometrics, and safety; and to widen I-64 from six lanes to eight lanes between Spoede Road and I-170. Major improvements would be made to interchanges along I-64 and the Galleria Parkway interchange on I-170.

B. Alternatives Considered

The process used leading to a decision to select Alternative VII involved the consideration of a variety of initial strategies and refined alternatives. The initial concepts considered were:

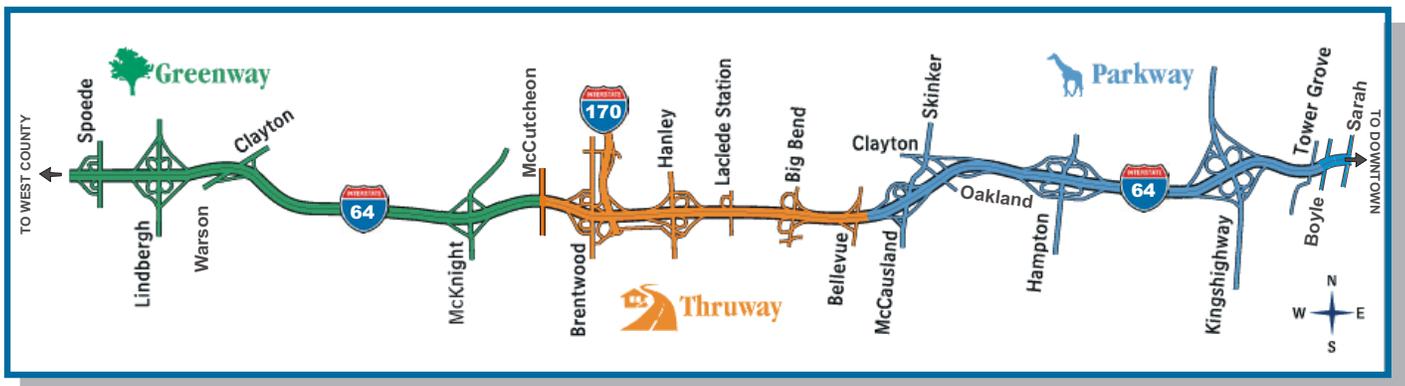
- **No-Build Concept** – The No-Build Concept includes minor short-term activities, including pavement overlays, routine maintenance and bridge repair. The bridges in the I-64 Corridor are 40 to 60 years old or more, and this concept would involve maintenance activities required to keep these bridges open for as long of a period as possible.
- **Reconstruction Concept** – The reconstruction concept includes reconstruction of pavement, replacement or rehabilitation of structurally deficient bridges, and minor modifications to interchanges. These improvements would preserve the system, but would not improve traffic operation.
- **Transportation System Management (TSM) / Travel Demand Management (TDM) Concept** – Transportation System Management (TSM) improvements are low cost system enhancements that improve the transportation system efficiency. These improvements include minor interchange improvements, ramp metering and ITS.
- **Transit Concepts** – Transit concepts were considered in the development of improvement concepts. Based upon the evaluation of an available corridor adjacent to I-64, the property constraints within the I-64 corridor itself and a comparison of this option with the purpose and need for action, the extension of rail was not further considered within or immediately adjacent to I-64. The preferred strategy adopted by the region's Metropolitan Planning Organization (MPO), the East-West Gateway Council of Governments (EWGCOG) is to construct a light rail transit facility north of I-64 outside

the study limits of the I-64 EIS. The extension of MetroLink is being pursued as part of a separate location and design study sponsored by the Bi-State Development Agency (Metro). Transit concepts alone do not fully address the project's purpose and need, and as such, a separate transit concept was not carried further in this EIS.

- **Build Concepts** – A full range of build concepts were considered in the I-64 Corridor from west of Spoeede Road to west of Sarah Street. Build concepts included the study of operational or capacity improvements to be made within or adjacent to the existing study corridor.

Following the initial concept screening, the concepts were further refined in order to develop a set of alternatives that were then carried forward into the detailed EIS evaluation process. The subcorridors are illustrated in Figure 1.

Figure 1 Subcorridor Definition



The Build Alternatives analyzed are summarized below:

Greenway Subcorridor (west of Spoeede Road to west of McCutcheon Road)

- **No-Build Alternative** – This alternative includes only minor short-term activities, including pavement overlays, routine maintenance and bridge repair. Many of the bridges in this subcorridor are 60 years old or more, and this concept would involve maintenance activities required to keep these bridges open for as long of a period as possible.
- **Build Alternative (Selected)** – The Greenway Alternative 1 includes reconstructing the existing I-64 mainline and interchanges, with a widening from six to eight through lanes from west of Spoeede Road to west of McCutcheon Road.

Thruway Subcorridor (west of McCutcheon Road to east of Bellevue Avenue)

- **No-Build Alternative** – This alternative includes only minor short-term activities, including pavement overlays, routine maintenance and bridge repair. Many of the bridges in this subcorridor are 45 years old or more, and this concept would involve maintenance activities required to keep these bridges open for as long of a period as possible.
- **Build Alternatives** – Within this subcorridor, the Build Alternatives include reconstructing the existing I-64 mainline and interchanges and widening a section of the

I-64 mainline in the Thruway from west of McCutcheon Road to I-170. There are four Build Alternatives for this subcorridor. These include:

- **Thruway Alternative 2** – A depressed collector-distributor (CD) system between Brentwood Boulevard and Hanley Road, with I-64 mainline lanes elevated, and the alignment west of I-170 partially located to the south of existing I-64 right-of-way. Eight mainline lanes are provided west of I-170, and six mainline lanes are provided east of I-170.
- **Thruway Alternative 2a** – A depressed CD system between Brentwood Boulevard and Hanley Road, with mainline lanes elevated, and the alignment west of I-170 partially located to the north of existing I-64 right-of-way. Eight mainline lanes are provided west of I-170, and six mainline lanes are provided east of I-170.
- **Thruway Alternative 3 (Selected)** – A CD system between Brentwood Boulevard and Hanley Road, located adjacent to the freeway mainlines, and the alignment west of I-170 partially located to the south of existing I-64 right-of-way. Eight mainline lanes are provided west of I-170, and six mainline lanes are provided east of I-170.
- **Thruway Alternative 3a** – A CD system between Hanley Road and west of Brentwood Boulevard located adjacent to the freeway mainlines, and the alignment west of I-170 partially located to the north of existing I-64 right-of-way. Eight mainline lanes are provided west of I-170, and six mainline lanes are provided east of I-170.

Parkway Subcorridor (east of Bellevue Avenue to west of Sarah Street)

- **No-Build Alternative** – This alternative includes only minor short-term activities, including pavement overlays, routine maintenance and bridge repair. Many of the bridges in this subcorridor are 40 years old or more, and this concept would involve maintenance activities required to keep these bridges open for as long of a period as possible.
- **Build Alternatives** – The Build Alternatives include reconstructing the I-64 mainline and interchanges through the entire Parkway Subcorridor. There are two Build Alternatives for this subcorridor. Parkway Alternative 1 in this subcorridor includes a ramp to Oakland Avenue from eastbound I-64 located just east of McCausland Avenue. In Parkway Alternative 2 (**Selected**), this ramp is omitted.

In order to evaluate and compare alternatives for the entire project length, the subcorridor alternatives were combined to create project alternatives. The combination of the alternatives within each subcorridor yielded eight distinct project alternatives. These refinements are reflected in the FEIS. These are defined in Table 1.

Following receipt of comments on the Draft I-64 Environmental Impact Statement, the Build Alternatives were refined in a number of locations in order to further minimize impacts. Based upon the refined analysis of engineering and traffic service considerations, and based on the evaluation of social, economic, environmental impacts and public and resource agency involvement, MoDOT identified Project Alternative VII – the combination of the Greenway Build Alternative, Thruway Alternative 3 and Parkway Alternative 2 as its Preferred Alternative.

Table 1 – Project Alternatives

Project Alternative	Subcorridor Alternative		
	Greenway	Thruway	Parkway
No-Build	No-Build	No-Build	No-Build
Alternative I	Build Alternative	Alternative 2: Stacked– South Alignment	Alternative 1: Ramp to Oakland at McCausland
Alternative II	Build Alternative	Alternative 2a: Stacked– North Alignment	Alternative 1: Ramp to Oakland at McCausland
Alternative III	Build Alternative	Alternative 3: Flat – South Alignment	Alternative 1: Ramp to Oakland at McCausland
Alternative IV	Build Alternative	Alternative 3a: Flat – North Alignment	Alternative 1: Ramp to Oakland at McCausland
Alternative V	Build Alternative	Alternative 2: Stacked– South Alignment	Alternative 2: No ramp to Oakland at McCausland
Alternative VI	Build Alternative	Alternative 2a: Stacked– North Alignment	Alternative 2: No ramp to Oakland at McCausland
Alternative VII (Selected)	Build Alternative	Alternative 3: Flat – South Alignment	Alternative 2: No ramp to Oakland at McCausland
Alternative VIII	Build Alternative	Alternative 3a: Flat – North Alignment	Alternative 2: No ramp to Oakland at McCausland

C. Impacts

Exhibits 1A and 1B provide an overall evaluation of the key factors that define and characterize the No-Build and Build Alternatives. Wherever possible, these issues have been defined using quantifiable measures. In other cases, more subjective assessments have been summarized using a rating scale. In the development of these alternatives and the determination of their respective impacts, all reasonable measures have been incorporated to avoid, minimize and mitigate their adverse impacts. In view of this, Selected Alternative VII is considered to be the “environmentally preferable alternative” in accordance with the Council on Environmental Quality Regulations.

D. Section 4(f)

Potential impacts to several parklands/recreation facilities have been identified. The Selected Alternative will impact two public parks/recreation facilities as there were no reasonable and prudent parkland avoidance alternatives. The total corridor impacts are shown in Exhibit 1 and are the summation of the following individual park and recreational facilities impacts: 0.51 acres (0.2 hectares) of impacts to parkland at A. B. Green Athletic Complex (city of Richmond Heights) which includes 0.43 acres (0.17 hectares) of property acquisition and 0.08 acres (0.03 hectares) of temporary construction easement; and 22.78 acres (9.21 hectares) of parkland in Forest Park (city of St. Louis) which includes 6.35 acres (2.57 hectares) of property acquisition, 5.40 acres (2.18 hectares) of permanent easements, 0.96 acres (0.39 hectares) of other permanent impacts converting park open space to another use within the park, and 10.07 acres (4.07 hectares) of temporary construction impacts which would be returned to park use following construction. The proposed action would also include a gain of 14.38 acres (5.82 hectares) of park open space, including a conversion of 13.93 acres (5.64 hectares) of highway right-of-way to Forest Park, and an additional conversion of 0.45 acres (0.18 hectares) of built park use or road use to park open space. A detailed discussion of park impacts, avoidance alternatives, and measures to minimize harm can be found in the Section 4(f) Evaluation section of the Final EIS.

FHWA and MoDOT have made sure that this project will not take any land dedicated to outdoor recreational use under Section 6(f) of the Land and Water Conservation Fund Act, 16 U.S.C. § 4601-8(f).

E. Measures to Minimize Harm

All practical measures to minimize harm have been incorporated into the identification of the Selected Alternative. FHWA and MoDOT are considering using a design-build contractual arrangement to have I-64 reconstructed in accordance with the FEIS and this Record of Decision. All such commitment measures that were considered in the identification of the Selected Alternative will be incorporated into all appropriate construction specifications and contracts. The following is a list of commitments for the Selected Alternative of the New I-64:

1. GENERAL

- **Future Coordination** – MoDOT will continue to work with the public, organizations and appropriate agencies to collaborate on urban design issues and address concerns during the final design of projects within the I-64 Corridor.
- **Property Impacts** – MoDOT is committed to examining ways to further minimize property impacts throughout the corridor, without compromising the safety of the proposed facility, during subsequent design phases.
- **Community Impacts** – Urban design elements will be used to minimize and mitigate impacts to neighborhood cohesion through improved pedestrian connections and aesthetic treatments.
- **Lighting** – In order to minimize lighting impacts, efficient lighting and equipment will be installed to optimize the use of light on the road surface while minimizing stray light intruding on adjacent properties.
- **Bicycle and Pedestrian Accommodations** – I-64 street crossings will incorporate bicycle and pedestrian accommodations, including wider sidewalks and pedestrian level lighting on bridges. Crossings will accommodate bicycles. Designated bike paths will be striped and signed.
- **Landscaping and Visual Impacts**
 - To address forest impacts, tree plantings will occur along the corridor wherever practicable.
 - Landscape plantings would seek to restore visual buffer areas through the use of evergreen and deciduous material and locating material where it would achieve the greatest level of visual screening.
- **Noise and Vibration**
 - Noise reduction activities will be conducted in accordance with 23 CFR Part 772. Possible noise abatement types and locations will be presented and discussed with the benefited residents during the preliminary design phase. Noise abatement measures will be considered that are deemed reasonable, feasible and cost effective.

- Construction zone strategies to address construction noise and vibration impacts will be used. Contractors will be required to build walls early in the construction sequence if possible, and monitor vibrations and effects to adjacent facilities due to construction activities.
- **Intelligent Transportation System (ITS)** – MoDOT will incorporate suitable and reasonable ITS elements into the Build Alternative.
- **Construction Traffic Management** – A detailed traffic management plan for the duration of construction will be prepared and coordinated with local jurisdictions.

2. A.B. GREEN ATHLETIC COMPLEX

A.B. Green Athletic Complex mitigation measures are highlighted below. MoDOT worked collaboratively with Richmond Heights to develop the list of mitigation measures. More information can be found in the Final Section 4(f) Evaluation, Section E.1 published within the Final EIS.

- **Acreage** – The total acreage impacted is 0.43 acres. Proposed total replacement acreage is 1.7 acres.
- **Tennis Courts Relocation** – New courts will be built where the existing loop ramp is located just north of I-64.
- **Parking** – There will be a net increase in parking.
- **Basketball Courts** – Sufficient play area will remain where the courts are currently located. The courts will be reconfigured at the existing complex as desired.
- **Cell Tower** – The communications cell tower will be relocated to a Richmond Heights desired location. However, if it is not necessary to move the cell tower, due to efforts to continue to minimize impacts, then the cell tower will not be moved.
- **Playground** – The playground will be replaced and relocated to a Richmond Heights desired location at the existing complex. A second playground area will be provided adjacent to the relocated tennis courts.
- **Two Pavilions** – The two park pavilions will be functionally replaced and relocated to a Richmond Heights desired location at the existing complex.
- **Cross walk** – A cross walk will be provided on Laclede Station Road south of I-64.

3. FOREST PARK

Forest Park mitigation measures are highlighted below. More information can be found in the Final Section 4(f) Evaluation, Section E.2, published within the Final EIS.

- **Open Space and Tree Removal** – Plant trees, shrubs and grass in disturbed areas as appropriate, and in other areas within Forest Park, as designated by and subject to approval by the City of St. Louis Department of Parks, Recreation, and Forestry.
- **Tamm Avenue Reconstruction** – Provide a longer replacement bridge with an underpass for the relocated recreational path.

- **Turtle Playground** – Landscape disturbed open space, re-grade disturbed area for a more usable surface, and replace a portion of the paved walking path.
- **Zoo Parking Area** – Expand and re-stripe the east end of the existing parking lot to result in no net loss of parking spaces.
- **Forest Park Recreational Path** – Relocate portions of the path to improve continuity and safety. Portions of the path would be grade-separated from the roads to travel under Tamm Avenue and Hampton Avenue. Connections to pedestrian crossings would be included.
- **Wells Drive/Hampton Intersection Improvements** – Construct a roundabout with a grade separated crossing under Hampton, south of Wells Drive, for the recreational path.
- **Employee Parking/Shuttle Bus Drop Off Area** – Coordinate the north terminus of the new pedestrian overpass east of Hampton with the drop off location of the existing Forest Park shuttle bus.
- **Pedestrian Crossings over I-64 (Shared with Vehicular Use)** – Replace and improve the pedestrian crossings. New bridges would accommodate pedestrians with design standards to improve accessibility and safety.
- **Pedestrian Crossings (Non-vehicular/Stand-alone Structures)** – Replace and improve the three existing pedestrian crossings in Forest Park (bridge over I-64 east of Hampton, tunnel under I-64 east of Hampton, bridge over I-64 east of Kingshighway including flatter grades on access to the structures and voice-activated crossing signals).
- **Aviation Field (Athletic Fields)** – As mitigation for noise impacts to the athletic fields, coordinate with the city of St. Louis Department of Parks, Recreation, and Forestry to determine whether noise walls are desired to mitigate traffic noise impacts. Also narrow the width of Oakland Avenue and add a raised median between Hampton Avenue and the Science Center to avoid impacts to the athletic fields.
- **Aesthetics** – Retaining walls and noise walls could provide the opportunity for typical urban landscape treatments or could display a special motif or characterize the city or park. Incorporate landscaping to restore and enhance the aesthetic quality of the park.
- **Cultural Resources** – If any NRHP-eligible archaeological resources are identified within Forest Park, and if the project would result in an adverse effect on an NRHP-eligible archaeological site, actions will be considered that could minimize or mitigate the adverse effects. If impacts to significant sites cannot be avoided, MoDOT will implement a plan to mitigate adverse effects through recovery of archaeological information by means of controlled excavation and other scientific recording methods.
- **Construction Impacts** – Stage construction at access points so that not all access to the park would be closed at the same time. Also, coordinate with zoo officials to determine measures to minimize the possible adverse effects of noise, dust, lights, and vibration on zoo animals during construction.

F. Monitoring and Enforcement

- Permits and related approvals required in subsequent project phases are identified in the Final EIS, in Chapter IV, Environmental Consequences. The proposed improvement

may require a Department of the Army Section 404 permit, issued contingent on water quality certification under Section 401 of the Clean Water Act, and a floodplain development permit from the State of Missouri Emergency Management Agency. During the design phase, MoDOT will apply for the permits needed to construct Alternative VII, the Selected Alternative.

- MoDOT in coordination with MDNR, has developed a Temporary Erosion and Sedimentation Control Program to protect the adjacent environment from sedimentation and construction material pollutants discharged from construction activities. These procedures and specifications will be used for the highway construction and MoDOT is committed to ensuring that the highway contractor follows best management practices. Enforcement of this agreement, in combination with MoDOT project design and construction supervision, will satisfy the conditions of MoDOT's NPDES permit, result in project compliance with Section 402 of the federal Clean Water Act (33 U.S.C. § 1342), and meet the regulatory standards of the Missouri Clean Water Law, Sections 644.006 et seq.
- In accordance with Missouri Department of Natural Resources' Historic Preservation Program standards, additional investigations of the Selected Alternative will be performed to identify archeological sites. Determinations of eligibility have been completed for the identified cultural resources and the State Historic Preservation Office has concurred.
- A Programmatic Agreement for Section 106 mitigation has been executed and MoDOT and FHWA will fulfill its stipulation.
- Mitigation for A.B. Green Athletic Complex has been identified and presented to the city of Richmond Heights and its residents. The City has provided a letter with a list of recommendations. The decision process with the city has been completed with details to be coordinated during final design.
- Mitigation for Forest Park has been identified and the decision process with the City and the St. Louis Zoo have been completed. Both entities have stated that they understand the impacts and mitigation as discussed over the course of the project.
- The City of Richmond Heights is opposing the construction of a half diamond at Bellevue Avenue if full access is provided at Big Bend. Their concerns relate to full and partial property impacts associated with the reconstruction of the two ramps at Bellevue. MoDOT is committed to examining ways to further minimize property impacts during subsequent design phases.
- Ongoing coordination with the public, stakeholders, organizations and resource agencies will continue to implement appropriate mitigation measures and commitments as well as project coordination into the future during project design and construction.

G. Agency and City Comments on the Final EIS

The Final EIS was approved for circulation on March 29, 2005. It was furnished to the agencies and to individuals who made substantive comments on the Draft EIS. The notice of availability was published in the Federal Register on April 15, 2005, and comments were requested by May 20, 2005. An extension of the comment period was granted, per Richmond Heights' request, so the period officially ended on June 20, 2005. Comments were received from the following entities and written responses follow. Copies of the letters received are attached as an Appendix to this Record of Decision.

1. U.S. ENVIRONMENTAL PROTECTION AGENCY

The EPA feels that the comments or concerns that the agency had on the Draft EIS were adequately addressed in the Final EIS. They also feel that the design work that eliminated the adverse effect on the Clayton Park Addition was a positive change between the Draft EIS and the Final EIS.

FHWA and MoDOT have taken note of and appreciate the comments from EPA on the Final EIS.

2. MISSOURI FEDERAL CLEARING HOUSE

There were no comments from the agencies reviewing the document, including the Clearinghouse.

FHWA and MoDOT appreciate the response from the Clearinghouse on the Final EIS.

3. METRO, ST. LOUIS

A comment letter was received from Metro supporting the project staging approach for the major arterials. Keeping the streets open is important to Metro as MetroBus is a service provided on most of the arterial streets impacted by the project. Metro also supports design efforts aimed at accommodating pedestrians and bicycles.

FHWA and MoDOT have taken note of and appreciate the comments from Metro on the Final EIS.

4. CITY OF RICHMOND HEIGHTS

A comment letter was received from the City of Richmond Heights requesting an extension of the comment period on the Final EIS.

In response to this request the comment period on the Final EIS was extended for 31 days, to end on June 20, 2005.

5. SAINT LOUIS COUNTY – HIGHWAYS AND TRAFFIC

A comment letter was received from Saint Louis County supporting the I-64 improvements as documented in the Final EIS. The feeling is that the improvements are vital to Saint Louis County. There is a request to continue coordination with Saint Louis County throughout the rest of the project.

FHWA and MoDOT have taken note of and appreciate the comments from Saint Louis County on the Final EIS. MoDOT will continue to coordinate with Saint Louis County during the design phase of this project.

6. CITY OF RICHMOND HEIGHTS

The City of Richmond Heights submitted a comment letter expressing concerns over the decision to maintain the Bellevue ramps and the information that was used to arrive at this decision.

The following issues were raised and presented with a degree of specificity that requires a detailed response. The comment numbers correspond with those shown on the letter from Richmond Heights that appears in the Appendix to this Record of Decision.

- **Comment 6A** – FHWA and MoDOT considered many factors in evaluating improvement concepts for the Big Bend and Bellevue area, as it has done for all other areas of the corridor. These factors include design criteria, safety, traffic operation, access management, community access, impact to natural and built environment, impact to social environment, and cost. Through MoDOT’s extensive public involvement efforts, it has learned that it is important to St Mary’s to retain the access that they currently have, it is important to others in the neighborhood to have a solution that reduces congestion on Bellevue and nearby streets during peak hours, reduces the amount of commuter traffic through the neighborhood, and includes more safety measures for pedestrians; especially school children, and it is important to the city of Richmond Heights to find a solution that meets all of these needs while minimizing the loss of housing and loss of tax base. The subcorridor committee was opposed to options that brought more cars through the interchange, such as an outer road system with signals, but was not opposed to replacing access as it is today as long as their concerns regarding congestion, cut-through traffic, and pedestrian safety, were addressed. The Selected Alternative meets all the above-mentioned needs and desires of the community and works for traffic on the highway. FHWA and MoDOT have carefully weighed all of the factors noted above, and believe that the Bellevue ramps are necessary in order to provide the best balance of the needs of the traveling public and the community. The Selected Alternative includes full access at Big Bend and replacing the access to Bellevue in order to retain existing access, minimize the impacts to local streets, and provide the lowest travel access time to St. Mary’s hospital.
- **Comment 6B** – The Selected Alternative was chosen after carefully considering a number of factors, including design criteria, safety, traffic operation, access management, access, impact to natural and built environment, impact to social environment, and cost. Extensive planning efforts, including well over 50 meetings with Richmond Heights officials and residents, have been conducted in an effort to avoid and minimize impacts to historic properties. Of the 403 architectural resources recorded during the course of FHWA and MoDOT’s environmental study for this corridor, the Area of Potential Effect (APE) contains 28 individually eligible architectural resources, and 8 eligible districts. Four of these individually eligible resources and one eligible district are between Big Bend and Bellevue. Properties #195, #178, and #172 would be impacted by proposed highway improvements and access at Big Bend, regardless of whether the Bellevue ramps are built or not, and only #179 would be impacted solely by the proposed access to Bellevue. While FHWA and MoDOT have clearly taken great care to avoid and minimize impacts to these potentially historic properties, we are committed to examining ways to further avoid and minimize impacts to these historic properties during subsequent design phases.
- **Comment 6C** – The Selected Alternative includes replacing the access that is currently there. This concept ties the ramps into Bellevue so that traffic along Bellevue and at the ramp terminals would operate just as it does today. This access is equivalent to the access that is provided today. St Mary’s, while not a Trauma 1 center, has a Level II Emergency Department, and was recently named a Top 100 Heart Hospital by the Solucia Center for Healthcare Improvement. This hospital’s emergency care facilities service both ambulance and private citizen traffic.
- **Comment 6D** – FHWA and MoDOT believe the Bellevue ramps are necessary and the cost is reasonable in order to retain existing access, minimize the impacts to local streets, and provide the lowest travel access time to St. Mary’s hospital. Through

MoDOT's extensive public involvement efforts, it has learned that it is important to St. Mary's to retain the access that they currently have, it is important to others in the neighborhood to have a solution that reduces congestion on Bellevue and nearby streets during peak hours, reduces the amount of commuter traffic through the neighborhood, and includes safety measures for pedestrians; especially school children, and it is important to the city of Richmond Heights to find a solution that meets all of these needs while minimizing the loss of housing and loss of tax base within the city. The subcorridor committee was opposed to options that brought more cars through the interchange, such as an outer road system with signals; but was not opposed to replacing access as it is today as long as their concerns regarding congestion, cut-through traffic, and pedestrian safety, were addressed. The Selected Alternative meets all those needs/desires and works for traffic on the highway. Improvements to the Hampton and McCausland interchanges should make them more desirable to commuters, thus reducing the amount of cut-through traffic on Bellevue and nearby streets during peak hours. Replacing the Big Bend interchange with full access should make it more desirable to commuters, thus reducing the amount of commuter traffic using Bellevue to access westbound I-64. Providing pedestrian crosswalks in the appropriate locations should provide a safe walkway for pedestrians, including school children. The preferred option was evaluated with all others, and FHWA and MoDOT believe that the conceptual cost estimate is reasonable given all the competing needs/desires we are trying to address. However, MoDOT is committed to examining ways to reduce costs at this location and throughout the corridor while still addressing all the above-mentioned needs during subsequent design phases.

- **Comment 6E** – MoDOT has no data supporting Richmond Heights' suggestion that the St. Mary's letter is incorrect as to ambulance calls.
- **Comment 6F** – Richmond Heights mentions 'a designated staging area for ambulances could reduce runs' but MoDOT is not aware of any existing staging areas there.
- **Comment 6G** – The majority of the 1200+ people who submitted comments in favor of retaining access at Bellevue, were also in favor of full access at Big Bend, stating that they fully supported the plan as set out in the DEIS, which included retaining access at Bellevue and providing full access at Big Bend.
- **Comment 6H** – Although many of 1200+ people supporting the selected option do not live in the community, their opinions are important. FHWA and MoDOT's responsibility is to provide acceptable access and a good transportation system for all users of the highway, regardless of where they live.
- **Comment 6I** – FHWA and MoDOT have carefully weighed all of the factors noted in the response to Comment 6A, and believe that the Bellevue ramps are necessary in order to provide the best balance of the needs of the traveling public and the community. The Selected Alternative includes full access at Big Bend and replacing the access to Bellevue in order to retain existing access, minimize the impacts to local streets, and provide the lowest travel access time to St. Mary's hospital.
- **Comment 6J** – MoDOT is responsible for the state's transportation system at not just a municipal level, but also a regional, statewide and national level. FHWA and MoDOT welcome regional comments on any project.

- **Comment 6K** – At the time of the FEIS circulation, the project had not received the travel time study information Mr. Lukhard mentions in his letter from May 29, 2003. Mr. Lukhard's letter states he drove various routes and then provides data from a Hanley Road route as one example.

The FEIS compares simulated travel times exiting at Bellevue Avenue versus exiting at the proposed full access interchange at Big Bend Boulevard. The simulation lists times from two different origin points on I-64 (I-64 near Brentwood Boulevard and I-64 near Big Bend Boulevard) to include travel time impacts from I-64 traffic in addition to impacts from the interchange and streets expected when traveling to St. Mary's Health Center. The FEIS also lists separate findings provided by the City of Richmond Heights of a current (year 2003) travel time study of the need for ramps at Bellevue Avenue. The FEIS and Richmond Heights studies provide a range of potential travel time savings resulting from ramps at Bellevue Avenue: 18 to 40 seconds in the eastbound direction depending on the study, alternative and time of day.

After the NEPA process is completed, the project will continue to examine ways during final design and construction to further minimize property impacts while maintaining access at both the Big Bend Boulevard and Bellevue Avenue interchanges. More information can be found in the FEIS Chapter II, B.4.

- **Comment 6L** – The NEPA process is intended to give a balanced decision, minimizing historic, environmental and social impacts, while meeting the needs of the community and the traveling public.
- **Comment 6M** – The Selected Alternative is expected to improve travel safety, improve traffic operations and reduce congestion on the highway while still providing access to Big Bend Boulevard, Bellevue Avenue and McCausland Avenue. Entrance and exit ramps have been located, analyzed and designed to keep traffic moving safely and prevent delays. After the NEPA process is completed, the project will continue to examine ways during final design and construction to further minimize property impacts while maintaining access at the Big Bend Boulevard, Bellevue Avenue and McCausland Avenue interchanges. More information can be found in the FEIS Chapter II, B.4.
- **Comment 6N** – The Selected Alternative maintains existing access at Bellevue Avenue to best satisfy the purpose and need of the project. Richmond Heights and EIS studies have shown that travel times to St. Mary's Health Center would increase if Big Bend Boulevard interchange and local streets such as Ethel Avenue were used as routes when compared to Bellevue Avenue interchange. Additional impacts to local streets and residents would occur if the City designated Ethel Avenue as an emergency route.
- **Comment 6O** – St. Mary's has stated that they need to maintain current access, with travel times similar to today. This timely access is not only important for ambulances, but also for people bringing emergencies to the hospital in their cars. In this case they would not be receiving emergency care until they reached the hospital.
- **Comment 6P** – The Selected Alternative was chosen after carefully considering a number of factors, including design criteria, safety, traffic operation, access management, access, impact to natural and built environment, impact to social environment, and cost. Extensive planning efforts, including well over 50 meetings with Richmond Heights officials and residents, have been conducted in an effort to avoid and minimize impacts to historic properties. Richmond Heights has urged FHWA and

MoDOT throughout this effort to find a balance between the competing needs of the community while minimizing property impacts. The interstate highway system was created to move people, goods and services efficiently across the nation and to their destinations. FHWA and MoDOT are responsible for evaluating traffic safety and efficiency on the interstate system, while balancing these factors with access to and from communities. The Selected Alternative would not introduce an unsafe situation on the highway – entrance and exit ramps would be positioned to keep traffic moving safely on the highway.

7. SAINT LOUIS ZOO

A comment letter was received from the Saint Louis Zoo expressing support for the Final EIS, which describes the work to be done on I-64. This project will improve the corridor and accessibility to the Zoo and Forest Park. The sensitivity to the Zoo's visitors and animals is appreciated.

FHWA and MoDOT have taken note of and appreciate the comments from the Saint Louis Zoo on the Final EIS.

H. Public Comments on the Final EIS

1. PUBLIC COMMENT FORMS

A total of 48 public comment forms and letters were received during the comment period for the Final EIS. Comments were received on a number of different subjects.

Several comments were made about sound walls. Some wanted assurances that walls would be provided. Others wanted the walls build first before subsequent construction. The entire 12-mile corridor was shown to qualify for noise abatement. During preliminary design, MoDOT will be able to determine exact locations of walls and mitigation. MoDOT will also need to have a majority of the benefited residents agree that they want noise mitigation before it will be provided.

There were comments made related to leaving as many trees and as much green space as possible. This project will follow MoDOT's tree replacement policy and work will be done to preserve existing vegetation where possible. Residents are also concerned about keeping current pedestrian/bicycle access and others would like to see more of these connections added to provide more non-motorized options. The proposed action includes provisions for bicycle and pedestrian access. Bicycle lanes are shown to be provided at bridges that are connectors for existing or proposed bicycle corridors and trails as identified by local and regional government agencies.

A few comments were made in regards to the functionality of some of the interchange designs, more specifically the single-point and roundabout designs. These interchange types were evaluated and found to have the greatest benefit for traffic operation, fewer environmental impacts, and a greater potential to support the existing environment at their proposed locations. There were also comments reflecting a concern about access to emergency services during construction, specifically at Spoede, but this is an issue throughout the entire project. MoDOT will continue to coordinate with emergency service providers throughout construction of the project to ensure that access is maintained.

The following are comments that required more detailed responses:

- **Comment** – One resident is concerned about finding suitable replacement housing when their home has had a number of improvements and changes required by a disability. There is also a concern expressed about the timeframe for taking the property and allowing time to find a suitable replacement.

Response – FHWA and MoDOT will be reevaluating property needs. If property is needed, the property acquisition team will work to understand replacement housing needs and will make sure homeowners are moved into new homes before taking possession of the ones that have been purchased.

- **Comment** – One commenter is concerned that the wider highway will create a larger divide through the community for vehicles, bicyclists and pedestrians, particularly at the Highland Terrace bridge.

Response – MoDOT plans to rebuild overpasses, underpasses and interchanges including, the Highland Terrace bridge, to accommodate pedestrians and bicyclists.

- **Comment** – One commenter felt that planning was not being done for future rail transit west of I-170 and that this is short-sighted.

Response – The Daniel Boone Major Transportation Investment Analysis (MTIA), completed in 2000, examined the location of MetroLink west of I-170 including I-64 and the Rock Island/Page Avenue alignments as possible locations. The Rock Island/Page Avenue alignment is approximately four miles north of I-64. A study management group comprised of local, state and federal agencies conducted this MTIA, including MoDOT, EWGCOG and Bi-State. The final report and EWGCOG recommendation included locating future MetroLink expansions along the Rock Island/Page Avenue alignment. More information can be found in Chapter I, Section B., 4. Cross County MTIA or contacting Bi-State Development Agency (Metro).

- **Comment** – One commenter was concerned about the City of Richmond Heights' request that the Bellevue ramps be closed and wishes them to remain open.

Response – The Selected Alternative still includes replacing the ramps at Bellevue, but MoDOT will be reevaluating the footprint needed to provide good access to Bellevue.

- **Comment** – The commenters oppose the FEIS Preferred Alternative between Spoede and Lindbergh. Comments from the seven Lynnbrook residents on the Draft EIS suggested that MoDOT shift the alignment of I-64 entirely toward the north of its existing alignment between Lindbergh and Spoede, noting that the purpose of doing this was to eliminate the impact on the commercial real estate on the south side of the highway.

Response – The DEIS shows that each of these homes would be partially impacted by Preferred Alternative. The suggested new option would impact the above mentioned properties enough so that MoDOT would need to acquire the whole property. This option would also require the total acquisition of two additional properties that did not want their properties purchased.

Shifting the alignment either to the north or south was considered early in the process, but quickly discarded due to the severe impacts to residential property. When suggested during the DEIS comment period, it was given further consideration as Option C, along with MoDOT's option to only shift far enough north to miss the commercial buildings (Option B), and the DEIS Preferred Alternative (Option A).

These options were evaluated using the same methodology used for all other alternatives along the corridor. While the preferred option does not include needing to totally acquire these properties, it does accomplish this group's stated goal of saving the commercial property on the south. The costs and benefits were weighed for each option, and MoDOT recommended the option that was the best balance of all factors. See Chapter II, page 29.

2. WEBSITE COMMENTS

There were 50 comments received via the comment form that appears on the website. Comments were received on a number of different subjects.

Several comments were received related to the timing of the project and the dates for starting and completing the work. MoDOT is programming I-170, Kingshighway and Hampton to start construction in 2007. These areas are anticipated to be complete in three to four years. MoDOT is working to secure financing for the rest of the corridor. If financing is not approved, the rest of the corridor is expected to be started in 2011 and complete in 2019.

A number of website comments were received regarding the placement of sound walls and whether they will be in place prior to construction on the project. The entire 12-mile corridor has been approved for sound mitigation. During preliminary design, MoDOT will be able to determine exact locations of walls and mitigation. MoDOT also will need to have a majority of the benefited residents agree that they want noise mitigation before it will be provided.

Comments were received on the type of interchanges being used, for example, the single-point and roundabout types. These interchange types were evaluated and found to have the greatest benefit for traffic operation, fewer environmental impacts, and a greater potential to support the existing environment at their proposed locations.

The following are comments that required more detailed responses:

- ***Changes are not needed, except for I-170*** – The proposed changes are costly and provide little benefit for the residents and commuters.

Response – The entire 12-mile corridor is in need of repair. While rebuilding the corridor to replace deteriorating infrastructure, MoDOT is taking the opportunity to address operational problems.

- ***Not happy with the elevated I-64 at Hanley Road.***

Response – In response to previous comments, MoDOT looked at this again and was able to bring I-64 back under Hanley as it is today. This is what is shown in the Final EIS.

- ***Add lanes East of I-170.***

Response – One of the project goals has been to save as much property as possible, but not at the expense of good, safe traffic movement. The MTIA recommended not adding lanes because it would take too much property. In doing more in-depth traffic studies, larger volumes of traffic occur in between I-270 and I-170, then some traffic continues on to and from the north. East of I-170, traffic is at about 78 percent of the capacity available with the traffic lanes that currently exist. It appears that I-64 needs to be wider since traffic is often at a standstill, but by fixing operational problems, such as steep hills, short on- and off-ramps and no shoulders for maintenance operations or

incident management, capacity can be increased by approximately 20 percent without adding more lanes. FHWA and MoDOT will also be incorporating ITS (dynamic message boards, pavement sensors, cameras, etc.) so that traffic can be monitored and travelers alerted to incidents and expected travel times.

- ***Instead of replacing the bridges at the Clayton/Oakland/McCausland interchange area, construct I-64 underground. This would help with traffic at several intersections and alleviate noise for homes near the interstate.***

Response - The I-64 project team looked at many different options to create more typical interchanges and intersections in this area. What MoDOT found is that there is so much traffic on the local streets as well as the interchange, that by combining any of the movements, the remaining ones would be overloaded. It was also very important to the neighborhood to keep the local street system just as it is now. For these reasons it was decided to keep the street system as it is today. The McCausland interchange is planned for some minor upgrades to help traffic flow better. The idea of putting I-64 underground was also considered, but screened out early in the process due to excessive cost and additional property needs.

I. Conclusion

The Selected Alternative was arrived at following a collaborative decision-making process that included a thorough consideration of all social, economic and environmental factors with an extensive outreach of resource agency coordination and public involvement. The environmental consequences associated with its selection are accurately presented in the Final EIS.

EVALUATION FACTORS

UNITS

PROJECT ALTERNATIVES

	NB No-Build No-Build	I		II		III		IV		V		VI		VII ¹		VIII	
		Build Alt. 1	Build Alt. 2	Build Alt. 1	Build Alt. 2a	Build Alt. 3	Build Alt. 1	Build Alt. 3a	Build Alt. 1	Build Alt. 2	Build Alt. 2	Build Alt. 2a	Build Alt. 2	Build Alt. 3	Build Alt. 2	Build Alt. 3a	Build Alt. 2
ENVIRONMENTAL CONSIDERATIONS																	
PARKLAND – Section 4(f)(6)(f)																	
Gross Area of Park Open Space Gained	0	14.38	14.38	14.38	14.38	14.38	14.38	14.38	14.38	14.38	14.38	14.38	14.38	14.38	14.38	14.38	14.38
Total Permanent Impacts	0	13.24	13.24	13.14	13.24	13.14	13.14	13.14	13.24	13.24	13.14	13.24	13.14	13.14	13.14	13.14	13.14
Total Temporary Impacts	0	10.15	10.15	10.15	10.15	10.15	10.15	10.15	10.15	10.15	10.15	10.15	10.15	10.15	10.15	10.15	10.15
AIR QUALITY																	
CO Exceedences	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
IMPACTED NOISE RECEPTORS																	
Dwelling Units	0	315	315	315	315	315	315	315	315	315	315	315	315	315	315	315	315
WATER RESOURCES																	
Streams	0	9	10	10	11	11	11	11	9	10	10	10	10	10	10	11	11
Linear Feet	0	3,650	3,800	3,800	3,800	3,800	3,800	3,940	3,650	3,650	3,800	3,800	3,800	3,800	3,940	3,940	3,940
Wetlands	0	0	0.06	0	0.06	0	0.06	0	0	0	0	0.06	0	0	0	0.06	0.06
Ponds	0	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01
FLOODPLAINS																	
Linear Feet	0	1,405	2,205	2,205	2,355	2,355	2,355	2,355	1,405	1,405	2,205	2,205	2,205	1,555	2,205	2,355	2,355
Acreage	0	0.94	0.94	1.3	1.3	1.3	1.3	1.3	0.94	0.94	1.3	1.3	1.3	1.3	1.3	1.3	1.3
NATURAL COMMUNITIES																	
Upland Forests	0	19	17.8	19.3	18.1	18.1	18.1	18.1	18.9	17.7	19.2	19.2	18	18	18	18	18
Riparian Forests	0	1.9	2.6	2	2.7	2.7	2.7	2.7	1.9	2.6	2	2.6	2.7	2	2.7	2.7	2.7
THREATENED & ENDANGERED SPECIES																	
Number	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
CULTURAL RESOURCES																	
NRHP Eligible Architectural Resources	0	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6
No Adverse Effect	0	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5
NRHP Eligible Architectural Resources ²	0	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4
Adverse Effect – 4(f)	0	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2
NRHP Eligible Bridges Adverse Effect – 4(f)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
NRHP Eligible NR Historic Districts	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Adverse Effect – 4(f)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
HAZARDOUS WASTE SITES (CERCLA etc.)																	
Number	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
VISUAL QUALITY																	
Views From I-64	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Views Toward I-64	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Impact Rating Scale: ○ – Low Impact, ◐ – Low/Moderate Negative Impact, ◑ – Moderate Impact, ◒ – Moderate/High Impact, ◓ – High Impact

¹ Preferred Alternative

² Recommended NRHP Eligible Individual Architectural Resources

