

A. SUMMARY OF COORDINATION

The development of the DEIS was preceded by a five-year screening process, involving a Stage I Study (May 1992 through November 1993) and a Stage II MIS (Fall 1994 through May 1997). Both parts of this screening process of alternatives included broad-based community involvement with good media coverage. Executive and technical/study management committees, public open-house meetings, and media briefings were used, as well as questionnaires, polling, and meetings with interested and affected public and private parties. DEIS Chapter 3, Alternatives Considered details these coordination efforts and their role in the selection and refinement of the alternatives evaluated.

During the three-year development of this DEIS, extensive coordination was undertaken to further refine the proposed build solution to minimize any adverse impacts. This effort concentrated on one-on-one meetings with affected and interested parties. These parties included: the City of St. Louis/Downtown Now; the National Park Service; the U.S. Coast Guard; NEPA/404 Merger Agreement participants; MDNR's Historic Preservation Program; and the North Broadway Business Association. It also included a fifth round of public meetings.

B. ILLINOIS CORRIDOR PROTECTION PUBLIC HEARING

IDOT held a corridor protection public hearing attended on November 19, 1997 at the Cahokia Mounds Interpretive Center near Collinsville, Illinois in accord with Illinois Compiled Statutes, Chapter 605, Act 5, Section 4-510. The meeting was held because of development pressures surrounding the Gateway International Raceway, and the limited opportunities for shifting the alignment in the area. IDOT subsequently approved the proposed corridor protection for relocated I-70 and the I-64 Connector on March 27, 1998, and filed the corridor protection map and the approval in the St. Clair County Office of the Recorder of Deeds in Belleville on June 12, 1998 in Book 100, pages 90-98. The filing requires the affected property owners to notify IDOT 60 days in advance of incurring development costs or improving the designated property so that the Department has the opportunity to acquire the land for the project.

C. PUBLIC INVOLVEMENT

In addition to the above-referenced Section A coordination efforts, numerous other meetings and discussions were held during the development of the DEIS to refine the project description and avoid or minimize project impacts. Some 40 additional meetings were held with community groups, social service agencies, major employers, utilities, railroads, and others potentially affected by the project.

A well-advertised fifth-round project public meeting series was held on October 5 and 6, 1999. The meeting series began with the briefing attended by some 88 elected officials and

media representatives at the Gateway International Raceway on IL Rt. 203 at I-55/70 in Madison, Illinois on October 5, 1999 at 10 a.m. The briefing was followed by the public open-house meeting held in St. Louis from 3 to 8 p.m. at the Patrick Henry Elementary School (1220 North Tenth Street at O'Fallon) on Tuesday, October 5, 1999 and by a public open-house meeting held in East St. Louis from 3 to 8 p.m. at the East St. Louis City Hall on Wednesday, October 6, 1999. These locations were chosen to provide ready access for low-income and minority persons to participate. A total of 109 persons attended the St. Louis session, and 74 attended the second meeting in East St. Louis. Comment forms (with an optional signature block) were made available to make it easy to provide input on changes in the project description, the desire for noise walls, and the preference for a signature bridge, or other comments. Of the nearly 300 persons participating in the meeting series, only five persons used the comment forms to express opposition to the project.

ADD: The public involvement effort continued following circulation of the DEIS through completion of the FEIS. Post DEIS-circulation coordination included a meeting with Near Northside Neighborhood Council representatives on May 8, 2000 to permit them to see the Missouri I-70 interchange model in advance of the public hearings. This session included representatives from Old North St. Louis, Carr Square, and Cochran Gardens; and directional traffic flow arrows were added to the model based on a suggestion made by a neighborhood representative at this meeting. A field trip was held on May 23 to answer questions from the SLDC business relocation specialist about partial right-of-way acquisitions and changes in business access in the Missouri I-70 interchange area. Coordination also continued with the Parish Committee of SS. Cyril & Methodius.

IDOT, with the consultant, participated in a public meeting called by the East St. Louis City Council on July 27 to discuss the project; this meeting held in the city hall council chambers drew about 30 residents. IDOT, with the consultant, participated in two follow-up City Council meetings (October 23 and November 9, 2000) to discuss the mitigation measures proposed in response to the issues raised at the July 27 meeting. Meetings were held with Illinois State Senator Clayborne on May 30 and on December 4, 2000 to discuss project effects in East St. Louis. A meeting was held on December 12, 2000 and a field trip was held on January 25, 2001 with Illinois State Representative Yvette Younge to review the project and discuss minority involvement in the project's design and construction. Meetings and field trips were held with the mayor, with individual East St. Louis Council members, and with other East St. Louis officials and community leaders on July 26, August 21, August 29, September 19, and November 9, 2000 and January 29, 2001 to review the project's effects on East St. Louis and to reach agreement on additional mitigation measures. A meeting was held to discuss the project with East St. Louis Community Action Network representatives on October 19, 2000.

Community involvement will continue during design phase activities. It will include a focus on engaging minority contractors and employees in the construction of the project.

D. PUBLIC HEARING

FHWA began circulation of the DEIS on May 5, 2000. The May 5 Federal Register listed the document under the USEPA's Notice of Availability. The close of comment period was originally scheduled for June 20, 2000, but was extended to July 31, 2000 following a final scheduling of the public hearings for late June. The extended comment period was published in the Federal Register on June 23, 2000 in the USEPA section under Amended Notices; and all DEIS recipients were sent written notification of the extension. (A list of DEIS recipients, including local libraries, is included in the following chapter of this document.) The result of the extension was to provide an 87-day review period, or about twice the normal length of review time provided for in FHWA and Council on Environmental Quality regulations, and was believed to provide sufficient time for review. As a result, requests for additional extensions made by the Missouri Coalition for the Environment, the Near Northside Neighborhood Council, the SS. Cyril & Methodius Church, and the Sierra Club's Eastern Missouri and Piasa Palisades Groups were declined.

The project public hearings were held on Tuesday, June 27, 2000 at the Old Courthouse Rotunda in downtown St. Louis and on Wednesday, June 28, 2000 at the Cahokia Mounds Interpretative Center between Fairmont City and Collinsville, Illinois. Both sessions were held in an informal, open-house format from 3 to 8 p.m., with the same information available at both locations. A 16-page handout, display boards, a model of the north I-70 Missouri interchange, and computer visualizations of the I-55/70/64 interchange in Illinois and the Poplar Street Bridge approach in Missouri were used to explain the project. Copies of the project's DEIS and Corridor Location Report were available at both sessions. Representatives from both IDOT and MoDOT, as well as the consultant, Sverdrup Civil, Inc., were present to discuss the project and answer questions at both sessions. Appropriate Department right-of-way/relocation experts were available on their respective sides of the river. A comment form was provided to facilitate making comments and a tape recorder was provided for those desiring to record their comments verbally. The sites were accessible to the disabled and provisions were made to accommodate those needing special arrangements.

The public hearings were preceded by a briefing for elected officials and the media at 10 a.m. June 27, 2000 at the Crown Hotel next to the Casino Queen on the East St. Louis riverfront across from the Gateway Arch.

A press release was sent to some 250 persons informing them of the project's public hearing, and a letter of invitation with the press release attached was sent to some 250 elected officials and media (print, radio, and TV) representatives inviting them to the project briefing. Legal notices of the public hearings were published in the Belleville News-Democrat (Sunday, May 28), the Granite City Journal (Wednesday, May 31), the East St. Louis Monitor Newspaper (Thursday, June 1), and the St. Louis Post-Dispatch (Sunday, June 11). In addition to the May 25 media release on the project, follow-up contacts were made on June 22 to each of the notified print media seeking additional coverage prior to the public hearing. Variable message signs were also used on the interstate highways

entering downtown on both sides of the river in advance and on the days of the public hearings.

Some 125 persons attended the briefing. The June 27 public hearing drew about 65 persons, and the June 28 public hearing drew about 114 persons.

E. DEIS COMMENT RESPONSES

Appendix B presents photocopies of the letters from 28 federal, state, and local governmental bodies and environmental/neighborhood organizations commenting on the DEIS and a listing of all other parties commenting on the DEIS. Some 300 responses were received. The greatest number of comments focuses on five topics: 1) floodplain compensation; 2) wetlands mitigation; 3) East St. Louis circulation, particularly in the Emerson Park area; 4) north St. Louis noise mitigation, construction, and traffic impacts, especially as they affect SS. Cyril & Methodius Church; and 5) project alternatives. Responses to these comments are grouped under these five headings, and all other comments are grouped under a general (6) category heading. This format is designed to provide for a consolidated response discussion addressing related comments. Comments that merely state a fact or an opinion, although helpful in defining and selecting a locally-preferred alternative, do not require a specific response and are not specifically called out in this section. Responses frequently cite more detailed discussions in the DEIS and in the FEIS, as appropriate. The Appendix B letters and commenting parties include annotations giving the applicable comment/response numbers assigned in this section.

1. Floodplain Compensation

1.1 COMMENT: The DEIS does not adequately discuss 100-year floodplain impacts in accord with Executive Order 11988 and FHWA requirements (23 CFR Part 650).

1.1 RESPONSE: Additional discussion has been added to address these requirements, see FEIS Chapter 4, Section G Floodplains.

1.2 COMMENT: The DEIS preparers are requested to use modified floodplain data that should be available in 2001 (preliminary data is currently available from USACE), if this data is more restrictive.

1.2 RESPONSE: FEMA and USACE were contacted to secure preliminary data, which has been reviewed, see FEIS Chapter 4, Section G Floodplains.

1.3 COMMENT: The project's goal of stimulating economic growth and development may be in conflict with the federal goal of discouraging floodplain development, in the American Bottoms.

1.3 RESPONSE: Economic growth and development is very important in meeting the local need for jobs in East St. Louis and the federal requirement for environmental justice. The focus on East side economic growth and development is on brownfields redevelopment, such as the stockyards area. No intent exists to circumvent federal,

state, and local safeguards that exist to protect floodplains, or for that matter, wetlands, threatened and endangered species, archeological sites, etc. Considerable land area remains in Madison and St. Clair Counties that lies outside 100-year floodplains and is suitable for development. Also, IDOT is working with EWGCC to have this regional planning body issue model floodplain protection ordinances to municipal and county governments to encourage suitable development patterns in the American Bottoms. Both Madison and St. Clair Counties are working to adopt ordinances by 2002 in response to Phase II of the Clean Water Act that will control stormwater and sediment released from a development site.

1.4 COMMENT: The DEIS should have a table showing how the project will comply with applicable federal and state statutes, regulations, and executive orders, including discussion of the Governor's Executive Order 4.

1.4 RESPONSE: Text discussion is used in the DEIS Chapter 4, Section G Floodplains and Section L Permits to show how the project will meet applicable federal and state statutes, regulations, and executive orders, including the Governor's Executive Order 4; and a table is included in FEIS Chapter 4, Section L Permits.

1.5 COMMENT: Piers normal to the bridge on a skewed crossing of the Mississippi River should be modeled hydraulically and acquisition of flood easements on impacted properties or similar mitigation should be considered if a "no-rise" goal cannot be achieved in design. "No rise" alternatives should also be investigated for the waterway crossings in the American Bottoms. Appropriate hydraulic analyses should confirm that the slight lengthening of the Cahokia Canal will not significantly change water surface elevations, and a governmental agency should be designated to provide for its maintenance. Encroachment, navigation impacts, changes in the public's interests in the Mississippi River should be addressed in the permitting application for construction.

1.5 RESPONSE: Piers will now be normal to the bridge as discussed in Chapter 4, Section A. 3. b. Effects on Barge Operations and shown on Figure 4.G. The effects of this design condition will be evaluated. Other mitigation measures, as appropriate, can be considered in the event that a "no rise" condition cannot be achieved in final design for the Mississippi River crossing. American Bottoms streams/channels, such as the crossing of the Cahokia Canal, can be spanned so that "no rise" will occur in backwater. Hydraulic analyses will be prepared as a part of the Cahokia Canal redesign work; the Metro East Sanitary District will remain responsible for maintaining the Cahokia Canal. Permitting for the Mississippi River crossing construction will address all required issues.

1.6 COMMENT: The need for possible floodplain map revisions as a result of construction and mitigation work in Illinois should be noted.

1.6 RESPONSE: The possible need to revise the St. Clair County floodplain mapping has been added to the Chapter 4 discussion on floodplains (Section G).

1.7 COMMENT: The bridge should be designed to avoid causing adverse effects on river flow, scouring, sedimentation, 100-year flood backwater effects, etc.

1.7 RESPONSE: The bridge will be designed to minimize adverse effects on the river or its floodplain. USCG and permitting requirements will help assure that adverse effects are avoided.

1.8 COMMENT: Reconstructing the Cahokia Canal and triple box culvert will involve changes that will need to be carefully evaluated during project design.

1.8 RESPONSE: These changes will be carefully evaluated during design in coordination with the Metro East Sanitary District.

2. Wetlands Mitigation

2.1 COMMENT: Wetlands mitigation ratios in Table 4.15 for sites D, K, M, Q, and BB should be increased to 5.5:1 to reflect the presence of state-listed foraging birds.

2.1 RESPONSE: A new table with increased ratios is included in this FEIS.

2.2 COMMENT: Optional methods for preserving/protecting the remaining wetland resources adjacent to the project should be addressed in the FEIS.

2.2 RESPONSE: Wetland impacts have been carefully reestimated in this FEIS, resulting in the creation and protection of additional wetland acreage to compensate for the loss of wetlands within project rights-of-way, as well as for proximity impacts. The project's conceptual wetland compensation plan includes three sites, which will yield 88.53 ha (218.76 ac) of recreated wetlands and 9.4 ha (23.2 ac) of preserved wetlands to compensate for the project's displacement of 16.89 ha (41.74 ac) of wetlands. See FEIS Chapter 4 Section H Wetlands and Appendix C.

2.3 COMMENT: Wetlands should not be displaced in the study area and replacement sites may not provide adequate mitigation for wetlands functions, threatened and endangered habitat, etc.

2.3 RESPONSE: Wetlands are among the important resources in the study area. They are broadly distributed, such that developing a safe highway alignment missing all wetlands is not possible. Considerable effort has been expended to minimize wetlands impacts. In addition, coordination with USACE in its American Bottoms floodplain/wetlands replacement study has resulted in the selection of project replacement acreage at generally a 5.5 to 1 ratio that fits well with USACE restoration plans. The sites represent the best available locations for mitigating lost wetland functions and providing threatened and endangered habitat. Decurrent false aster (*Boltonia decurrens*) will be propagated at all suitable wetland compensation sites.

3. East St. Louis Circulation

3.1 COMMENT: The one-way pair of Ninth and Tenth Streets across I-64 provide circulation that the community desires to maintain in place.

3.1 RESPONSE: The relocated Collinsville Avenue alignment is designed to handle the through traffic that currently uses the Collinsville Avenue/Collinsville Road link over the one-way-pair Ninth and Tenth Street viaducts over I-64. An additional two-lane

two-directional Ninth Street connection with a sidewalk and staircases at St. Clair and Baugh Avenues has been included in the project description for local circulation along with a Bowman Avenue two-lane two-directional connection with a sidewalk over I-55, see FEIS Chapter 3 Section C **ADD** and Chapter 4 Section A discussions.

3.2 COMMENT: Highway improvements appear to inappropriately favor the Gateway International Racetrack at the expense of East St. Louis.

3.2 RESPONSE: Project improvements only favor the racetrack to the extent that the improvements are designed to accommodate traffic demand and avoid displacing large employers/tax revenue generators. The project was started well before the major investment was made in the racetrack. Additional I-70 ramps requested to and from eastbound IL Rt. 203 were not included in the project description because they would be unsafe to provide. Every effort has been made to work with East St. Louis elected officials to develop a project solution that meets the community's needs while accomplishing the project's purpose and need as described in DEIS Chapter 1.

3.3 COMMENT: Loss of unsafe ramps to I-55/70/64 at St. Clair Avenue should be mitigated by additional I-64 ramps between the Fourth and Fifteenth Street ramps. Eliminating the Poplar Street Bridge approach ramps to and from existing I-70 in Missouri will make it harder for residents in the Rush City part of East St. Louis to access I-70 to and from the west.

3.3 RESPONSE: Insufficient distance is available in this stretch of interstate to add additional ramps safely, given the King Bridge and other access/design considerations. The project will provide additional access to and from eastbound I-64 and to and from east- and westbound relocated I-70 at the north edge of East St. Louis. The new East St. Louis street, the First Street extension, the Collinsville realignment, the Bowman crossing of the interstate, and related mitigation measures included in this FEIS plus relocated IL Rt. 3 will further enhance access and circulation in East St. Louis. See the FEIS Chapter 3 Section C **ADD** and Chapter 4 Section A discussions and drawings. Relocated IL Rt. 3 will provide a high-speed connection from Eighth Street and from Trendley Avenue in the Rush City area to and from I-70 across the new bridge.

3.4 COMMENT: Address pedestrian safety for students crossing Fifteenth Street to get to and from the Miles Davis Elementary School.

3.4 RESPONSE: The project will move the westbound I-64 on- and off-ramps to the far side of Fifteenth Street eliminating most ramp traffic from the intersections. In addition, the project will restore St. Clair and Baugh Avenues to two-way circulation on the same side of Fifteenth as the school, which will permit introducing islands providing safe refuge for painted crosswalks, where pedestrian crosswalk signals can be added. The project definition also has been amended to include a disabled-pedestrian and bicycle-accessible overpass along Fifteenth Street (see the FEIS Chapter 3 Section C **ADD** text and drawing).

3.5 COMMENT: Consider adding noise walls in East St. Louis along I-64.

3.5 RESPONSE: Noise walls in the Goose Hill area are not cost-effective because

of the high cost of building them on elevated structures and the low number of remaining residents who would be benefitted, see DEIS Chapter 4 Section D. Similarly, noise walls are not warranted along the MetroLink park-n-ride lot on the Baugh Avenue side of I-64; and residential density is very low adjacent to the St. Clair Avenue side of I-64 where intensified landscaping is proposed. The effectiveness of noise walls dissipates the farther a sensitive receptor is away from the noise source and the intervening noise barrier. The greatest benefit occurs in the first block. New housing being built along Baugh Avenue in the vicinity of Eighteenth Street is largely beyond the project construction limits at a curve in the elevated I-64 alignment where noise abatement within the project limits would be rendered worthless by the highway conditions beyond the project limits.

3.6 COMMENT: Consider moving the proposed relocated I-70 interchange with relocated IL Rt. 3 closer to the river, downgrading the I-64 Connector to be the relocated IL Rt. 3 expressway and shifting relocated I-70 north of the Gateway Golf Links and through the landfill to be able to provide directional interchanges with IL Rt. 203 and I-55/70. These measures could create larger blocks of developable acreage in and near East St. Louis. Consider realigning Collinsville Avenue from near Summit to the project's Ninth Street realignment over St. Clair Avenue and I-64 and cross the MetroLink park-n-ride lot to Thirteenth Street and then curve back to Ninth Street east of Exchange.

3.6 RESPONSE: Moving the relocated I-70/relocated IL Rt. 3 interchange closer to the river places it in conflict with the main rail approach to the MacArthur Bridge and the high-speed rail line between Chicago and St. Louis. Crossing through the landfill is not workable because of the unbuildable foundation conditions and the serious special waste issues. The relocated IL Rt. 3 alignment is designed to open the riverfront and stockyards areas up for redevelopment and provide the link to and from the interstate highway network. The visibility, access, and circulation provided by this roadway network will permit the area to redevelop with lower infrastructure costs than if all of the circulation and access roads needed to be funded by the redevelopment. The Collinsville Avenue realignment is intended to handle through traffic, while the Ninth Street realignment is designed to provide neighborhood circulation. While the Ninth Street realignment could be extended to Collinsville Avenue near Pennsylvania Avenue if such a link fits with the soon-to-be-started East St. Louis comprehensive plan study, extending to Thirteenth Street, rather than to the Ninth & Bowman intersection, would bring undesirable through-traffic through a neighborhood planned for residential construction.

3.7 COMMENT: The project should consider building a connector from IL Rt. 203 at I-55/70 to I-64 in the area between Fifteenth and 25th Streets because traffic congestion is a problem for weaving motorists.

3.7 RESPONSE: The weave will be eliminated with reconstruction of the interchange with the lightly-used southbound I-55 to eastbound I-64 movement shifted from the inside to the outside of the interchange.

4. North St. Louis Noise Mitigation, Construction, and Impacts

4.1 COMMENT: A noise wall should be incorporated into the project description along existing I-70 north of the new river crossing just as a noise wall and berm are incorporated into the project description along existing I-70 south of the project's major new interchange in Missouri. Also, I-70 should be lowered between St. Louis and Madison Streets to its elevation under these two streets and include depressed ramps at the I-70 Missouri interchange to decrease interference with views of downtown.

4.1 RESPONSE: A noise wall will be added to the project description in this stretch in response to changed public comment, see FEIS Chapter 4, Section D **ADD**. The wall will be built without a landscaped berm in the area south of Madison Street to retain all existing on-street parking at the SS. Cyril & Methodius Church as requested by the Parish Committee. Lowering I-70 between St. Louis and Madison Streets would preclude providing interstate access ramps to and from the south side of St. Louis Avenue and would involve considerable maintenance-of-traffic difficulties along with construction noise. The project's proposed noise walls should accomplish the same purpose with considerably less disruption and cost. The four-level stack of the I-70 interchange includes one level below grade, one level on grade, and two levels above groundline.

4.2 COMMENT: The project should not move I-70 closer to the residential neighborhoods on the west of the highway, especially near the 1857 SS. Cyril & Methodius Church and the Webster Middle School.

4.2 RESPONSE: The project will require rebuilding the existing retaining wall in the vicinity of the Madison Street viaduct (which will be rebuilt) about five feet west within the existing highway right-of-way. This change is not expected to require any permanent change in the location of the east curblin of Eleventh Street in this area. The reconstruction of the retaining wall will be accomplished in a manner so that it does not cause any structural damage to the historic SS. Cyril & Methodius Church structure or adjacent rectory. Measuring device(s) with an alarm can be placed in the church and rectory to confirm this condition and a photographic inventory of the structural condition of the buildings can be taken before construction begins, with the church's permission.

4.3 COMMENT: The project may adversely affect the utility of ramps used by Near Northside residents and businesses, or adversely increase traffic on Eleventh Street and St. Louis Avenue.

4.3 RESPONSE: DEIS Chapter 3, Section C 6. Traffic Projections discusses expected traffic conditions, for example the estimated LOS on interstate project ramps. A cul de sac at the east end of Palm Street at Hadley Street has been added to the project description, see FEIS Chapter 3, Section C **ADD**. This street modification should preclude through truck traffic from using Hadley in front of the Ames School once the Hebert to Eleventh Street link is eliminated to accommodate the added noise mitigation measures at the school included in the project description. The project will make Eleventh Street discontinuous north of St. Louis Avenue and south of Tyler

Street, which should severely limit its use as an alternate frontage road access for interstate motorists destined for downtown. St. Louis Avenue has adequate capacity to handle peak-period traffic under a build condition in the design year if two or three of its four-way stops west of Eleventh Street are converted to two-way stops favoring St. Louis Avenue during the peak period.

4.4 COMMENT: Construction will adversely affect the North St. Louis area and is not adequately addressed.

4.4 RESPONSE: DEIS Chapter 4, Section M discusses the project's construction impacts and mitigation measures. Noise, dust, and disruption of traffic flow will occur; appropriate construction mitigation measures will be employed to minimize the adverse effects of construction.

4.5 COMMENT: The project should not adversely affect the Schnucks store at 1030 Cass Avenue.

4.5 RESPONSE: The Schnucks store at 1030 Cass Avenue was closed on September 16, 2000 because the grocery company lost \$4.6 million at the store since 1995 and expected to lose another \$800,000 in 2000. Schnucks Markets Inc. considered moving to another location, but decided that the neighborhood does not have enough people to support a store anywhere in the area. Two other local Schnucks stores were similarly affected, although a six-month trial reprieve was put in place for one of the two. Chief Executive Craig Schnuck said he recognized that closing the Cass store would hurt the neighborhood. Schnucks is running a free shuttle from the store site to its store at 4171 Lindell Boulevard, about three miles away, Tuesday through Saturday leaving the Cass location at 10 a.m., noon, and 3 p.m. and has offered to do so as long as there is ridership.

4.6 COMMENT: The project should include funding for bicycle trails in other corridors and a bicycle promenade included in a Fifth Ward planning study. The project should reclaim brownfield sites near proposed improvements at Tucker.

4.6 RESPONSE: These projects fall outside this project's purpose and need.

5. Alternatives

5.1 COMMENT: Describe the capital and operating cost basis for transit pricing, the strategy for securing funding, and ensure that the project's travel demand modeling includes the St. Clair extension.

5.1 RESPONSE: DEIS Chapter 3, Section C (3. Transit Pricing) describes the transit pricing incentive, which was developed as a part of the project's MIS, discussed in Section B of Chapter 3. The basis for this option is to provide sufficient incentive to attract SOV users from their automobiles to transit. The incentive amount is predicated on reducing the peak-period transit trip cost to a nominal cost (35¢), which results in a 20 percent increase in transit trips. The annual capital cost is based on the projected number of peak-period trips times 25¢, the per-trip reduction amount programmed in the MIS. This transit pricing incentive will increase daily transit trips by 3,300, which

represents a 30 percent increase over the no-build. The strategy for securing the funding has not yet been detailed. The modeling includes the St. Clair MetroLink extension as stated in the DEIS.

5.2 COMMENT: Tolls would create a hardship for low/moderate income residents, trucking operations, etc. and should not be included in the project description.

5.2 RESPONSE: Tolls are not included in the preferred alternative definition.

5.3 COMMENT: Consideration should be given to restoring the two-lane-wide MacArthur Bridge roadway deck, developing HOV lanes, staggering employee hours, implementing traffic control measures immediately, building a new MetroLink line into Madison County using the former Illinois Terminal trestle and Tucker underpass in St. Louis, building a south bridge, putting a pedestrian/bicycle path on the new bridge etc.

5.3 RESPONSE: These options were fully evaluated during the project's five-year screening process and were found to be inadequate to address the project's purpose and need, see DEIS Chapter 3 Sections A and B and the project's MIS. The privately-owned MacArthur Bridge is substandard, is not for sale, and is only two lanes wide; it would not be cost-effective to try to rebuild this bridge and build a new bridge to accommodate the rest of the traffic demand. Madison County rated very low in EWGCC's review of MetroLink corridor priorities because of low ridership potential, the County voters rejected funding for MetroLink, and the city of St. Louis determined that the River crossing project parkway should go under Tucker. Since the rail right-of-way dies at the Globe building without a connection to MetroLink, since EWGCC decided that the North city/county MetroLink line should use Fourteenth Street, and since the capacity of the Eads Bridge will be adequate for East side MetroLink connections over the long term and more cost-effective than building a second MetroLink crossing over the river, preserving the potential for MetroLink to use the rail trestle and Tucker underpass connecting with the McKinley Bridge is of questionable value. MoDOT and IDOT are working to implement traffic control measures and are not waiting for the completion of the proposed new bridge to put them in operation. The new bridge was determined to be less effective at addressing pedestrian/bicycle needs than other river crossings that are assigned these functions as discussed in DEIS Chapter 3. Bicyclists and pedestrians have access across the river on the Old Chain of Rocks Bridge and on the historic Eads Bridge via MetroLink or on the soon-to-reopen roadway deck. In addition, the city of St. Louis, MoDOT, and IDOT have agreed to allow the city to close lanes of Eads Bridge for special events and weekends when traffic demand is reduced.

5.4 COMMENT: Consider connecting the Missouri project terminus with Martin Luther King Drive and improve this street to a six-lane thoroughfare with signalized intersections to I-170 and I-270. Consider eliminating trucks on the King Bridge and the soon-to-reopen Eads Bridge and add lanes to the Poplar Street Bridge exit ramps to increase the capacity of these bridges.

5.4 RESPONSE: Extending the project terminus westward to I-170 or I-270 is well beyond the project limits needed to address the project's purpose and need.

Eliminating trucks on the Eads Bridge would not likely add much capacity to the Eads Bridge because this bridge may be expected to carry very few trucks, since it does not connect directly with the interstate highway network. Eliminating trucks on the King Bridge may be difficult to implement since this bridge is connected directly with the interstate network to pull traffic off the Poplar Street Bridge. Project improvements call for relocating I-70 movements from the Poplar Street Bridge's Missouri approach interchange to increase this bridge's capacity. Project improvements also call for making the I-55 movements to and from the Poplar Street Bridge two-lane and flaring the new exit to the Fourth & Spruce intersection to two lanes to increase the capacity of the Poplar Street Bridge.

5.5 COMMENT: Provide a Missouri link between I-70 and I-64 to and from the west and between I-55 and I-64 to and from the west.

5.5 RESPONSE: These movements are missing links in the originally planned downtown St. Louis interstate network that the city of St. Louis rejected many years ago when the controversial "North-South Distributor" project was dropped. Motorists will be able to use the city arterial of Fourteenth Street to get between I-70 (at the end of the parkway) and I-64 to and from the west. Also, the city of St. Louis proposes to convert Delmar and King into a one-way pair between Tucker and the proposed 22nd Street parkway, which will link I-70 and I-64 to and from the west. The I-55 connection was considered as part of a recent MIS undertaken by EWGCC. Both links are beyond the limits of the new Mississippi River crossing project.

5.6 COMMENT: Direct access should be provided to and from eastbound I-70 (the new bridge) and Broadway/Fourth Street so that Memorial Drive and its Pine and Chestnut Street connections are not overworked.

5.6 RESPONSE: All of the available interstate frontage between the new bridge and downtown will be used to accommodate existing/revised ramps to and from the King Bridge, to and from the reversible lanes, and to and from westbound I-70. Squeezing in substandard access between the new bridge and Broadway/Fourth Street would hurt traffic flow on the interstate and not benefit downtown. Alternate routes, such as Tucker and Fourteenth Street, will distribute traffic around downtown so that Memorial Drive with Pine and Chestnut Streets will not need to accommodate all the traffic in and out of downtown.

5.7 COMMENT: The project should consider building a new three-lane bridge alongside the King Bridge which should be converted to three lanes. Or what about widening the Poplar Street Bridge?

5.7 RESPONSE: The first option would not satisfy the project purpose and need. It would only provide three lanes in each direction where four are needed, and this location on top of the Trans World dome would not provide adequate linkages to move traffic in and out of downtown St. Louis, which is where the greatest need is in the peak period and during special events. The Poplar Street Bridge structure does not lend itself to widening and no room is available to handle added traffic at this congested part of downtown.

5.8 COMMENT: The project should include redesign of the existing depressed I-70 section between the Old Courthouse and the Gateway Arch to provide for safe pedestrian crossings.

5.8 RESPONSE: While the project limits do not extend past Walnut Street to this location, the project will reduce traffic pressure through the four depressed lanes eliminating a need for their widening that a south build alternative may have ultimately required. While the interstate is depressed at this location, it is the Memorial Drive frontage road, which feeds traffic on and off the interstate, that is the problem for pedestrian flow in this area. A concept for depressing the frontage road traffic under Market and Chestnut (called the Arch Connector) was developed in discussions with NPS on this project. Its funding is outside the scope of this project's purpose and need.

5.9 COMMENT: Consider vacating Poplar Street between Seventh and Broadway, consider narrowing north- and southbound Memorial Drive, consider acquiring and removing the Powell Square building, and consider acquiring the McKinley Bridge and eliminating the tolls.

5.9 RESPONSE: Vacating Poplar Street will be at the discretion of the adjacent property owner and most likely will be addressed as plans for a new stadium move forward. Memorial Drive lanes are generally all needed to accommodate existing and planned access requirements. Removal of the Powell Square building would not help the turning radius of the northbound I-55 movement onto the Poplar Street Bridge because the railroad trestles and the proximity of the Poplar Street Bridge abutment limit the ramp radius that can be used. Acquisition of the McKinley Bridge and removal of its tolls are under consideration (see DEIS Chapter 3, Section C).

6. General

a. Poverty, Environmental Justice, Housing, and Related Issues

6.1 COMMENT: The DEIS may severely underestimate the number and percentage of low income persons affected by the project in Missouri and Illinois because of the poverty level definition used; HUD's definition is recommended to be used.

6.1 RESPONSE: The definition used corresponds with FHWA's guidelines. Regardless, a majority of the project's 18 residential displacees are low income as is the study-area considered in the environmental justice discussion. Redefining the poverty threshold would not change the fact that a majority of the limited number of residential displacees is low income and that the study area is defined as low income and therefore qualifies for consideration of the mitigation measures proposed.

6.2 COMMENT: The environmental justice section may be insufficiently addressed in the DEIS with respect to a description of the analysis undertaken and alternatives and mitigation measures considered, including how these concerns factored into the decision.

6.2 RESPONSE: Chapter 3 Sections A and B, as well as Section C with Chapter 7 (which are referenced in the environmental justice section) describe the process used over the last eight years to determine the best possible project solution, including

consideration of environmental justice concerns. The seven-page environmental justice section is organized to respond to the adverse impacts or concerns that FHWA requires be evaluated. It is heavily cross referenced to other sections of the report such as peak air quality impacts, noise mitigation, special waste, visual and esthetic impacts, land use changes, employment, transit effects, construction impacts, business relocations, etc. Additional mitigation measures have been added to the project following the public hearings to respond to changed community response in favor of a noise wall along I-70 in Missouri and to include additional local circulation across the interstate routes in Illinois.

6.3 COMMENT: The 400 existing jobs being relocated by the project may adversely affect city earnings tax revenues if they are lost to the city of St. Louis, and this potential loss is not taken into consideration in the DEIS estimate of jobs resulting from the project.

6.3 RESPONSE: Even in a highly unlikely worst-case scenario in which the city of St. Louis would be unable to keep any of the displaced businesses, the total job loss would represent 0.2 percent of the jobs in the city of St. Louis. This loss would not substantively affect the city's earnings tax revenue. The designated North Riverfront Initiatives Area and the first-contact position being given to the city of St. Louis should assure that the city retains all of the businesses that may be expected to stay in the city through the normal course of business. In fact, discussions with business owners suggest they are interested to remain in the city for business market reasons. Thus, the estimates of jobs created by the project, which are based on formulas used to estimate jobs that are given by FHWA and Department of Labor research, and which are listed as rounded numbers when presented in the text (e.g., 6,000 and 15,000), do not lend themselves to factoring for the small, indeterminate number of existing jobs which may leave the city at the time of project acquisition (say ten percent, or 40 jobs).

6.4 COMMENT: Missouri Housing Development Commission assisted units may be affected by the project and should be considered.

6.4 RESPONSE: None of the isolated five dwelling units to be displaced in Missouri is a Missouri Housing Development Corporation Commission assisted unit. Impacts such as noise and changes in local traffic circulation may affect residential units in North St. Louis, depending on their proximity to the existing interstate and the proposed Tucker/Fourteenth Street access. The project and its mitigation measures have been reviewed with the city of St. Louis, housing developers and operators, and multiple neighborhood groups to minimize adverse effects.

6.5 COMMENT: Owners of property to be acquired should be compensated at replacement value rather than assessed value.

6.5 RESPONSE: Property acquisition will be accomplished meeting all federal requirements of the Uniform Relocation and Real Property Acquisition Policies Act. No resident will be displaced until safe, decent, and sanitary replacement housing has been found.

6.6 COMMENT: "With a commute that isn't as congested, why live in the city?" The project's reduction of traffic congestion will lead to "urban sprawl" and a less pedestrian-friendly downtown as a result of increased auto parking.

6.6 RESPONSE: Land and infrastructure are readily available outside downtown St. Louis, and the demand for downtown office space has been stagnant for decades. If downtown businesses cannot get their employees and customers to their place of business, then they will relocate the businesses outside the core taking the jobs with them. New businesses will not be attracted to move into downtown. Hopefully, people will choose to live in the city because of its amenities, not because they feel trapped by its traffic congestion. The preferred project alternative includes a transit pricing incentive to encourage SOV users to take transit and downtown traffic control measures to better handle those SOV users who are not attracted to transit. The Downtown Now plan includes measures for addressing the provision of downtown parking.

b. DEIS Formatting/Content Items

6.7 COMMENT: Expand the Summary to address endangered species impacts and mitigation measures and environmental justice mitigation measures in more detail, as well as clarify the choices among alternatives. Clarify the purpose or relocate the traffic projections section of Chapter 3. Provide additional detail on Air Quality in Chapter 4. Cite additional data sources, for example for Chapter 1 numbers, and include more appendices with reference material

6.7 RESPONSE: Information on affected endangered species and related mitigation measures is given under the heading "Natural Resources" in the Summary. Specific environmental justice mitigation measures have been added to the discussion in the Summary. Relevant information from the traffic projections discussion is included in the Purpose and Need discussion. The information given in Chapter 3 is intended to provide a basis for the build alternative. The number of lanes and related project improvement features are based on the traffic projections. An understanding of these numbers is important to understanding the basis for the project improvements. The Chapter 4 Air Quality discussion is felt to be adequate to summarize the study analysis and the results of the project's transportation effects on air quality. It also follows USEPA guidelines for choosing intersection receptors; however, some additional clarification has been added. Chapter 1 numbers and data were generated for this project and are published for the first time in the DEIS, so they do not have an antecedent source. Chapter 3, Section C describes the EWGCC regional transportation model that was used. Chapter 3, Sections A and B include extensive detailed discussion on the Phase 1 Study and the MIS so that a reviewer need not refer to a secondary source, because this information is considered important to the development of the project definition.

6.8 COMMENT: Historic resources in Missouri as listed in Table 2.11 do not give National Register, National Register eligible, and criteria for significance "as was done for the Illinois properties listed in Table 2.10," and should. JNEM receives inadequate or no discussion with respect to its National Historic Landmark and Section 6(f) status,

the effects on JNEM's historic character, and viewsheds. Rethink the revised grade for the southwest corner of the Arch grounds. NPS should be a signatory to the historic properties MOA.

6.8 RESPONSE: All of the properties in both Tables 2.10 and 2.11 are potentially eligible for the National Register, except for the last three listed in the Missouri Table 2.11, which are identified as National Register listed. Neither table gives criteria for significance, which are discussed in DEIS Chapter 4, Section B. More information is actually given in the Missouri Table 2.11 because the enumerated properties are buildings, whereas most of the properties in the Illinois Table 2.10 are archeological sites, which have not been excavated. JNEM, according to NPS, which is the keeper of the National Historic Landmark listing, is not a National Historic Landmark, although the Gateway Arch itself is so listed. The project will have no adverse effect on the Gateway Arch. Similarly, NPS states that Section 6(f) funding was not used at JNEM, and hence, no mention of Section 6(f) is included. Views are discussed with respect to a relocated I-70 on a new bridge structure over the Mississippi River about a mile away from JNEM and with respect to changes at the Poplar Street Bridge approach adjacent to and within JNEM, see DEIS Chapter 4, Section K Visual and Aesthetic Impacts and DEIS Chapter 6, Section B Parkland Section 4(f) Evaluation. The revised elevation of the Arch grounds at the southwest corner of the park will block views to more of the interchange than today's lower elevation and is necessary to fit with the roadway connections leading to the south side of downtown and revised interstate access. A separate, executed MOA for JNEM parkland effects with mitigation measures is included in this FEIS Appendix A. NPS is not a party the historic industrial buildings MOA.

6.9 COMMENT: The DEIS should consider the cumulative impact of JNEM maintenance facility construction in 2002 or 2003 with the project improvements.

6.9 RESPONSE: Construction of project improvements at the Poplar Street Bridge approach in Missouri will not take place until the end of the anticipated seven-year project construction schedule, probably in 2008 or later, well after the maintenance facility improvements are completed.

6.10 COMMENT: The DEIS makes no mention of the need to obtain state and local permits for this project.

6.10 RESPONSE: Permits are addressed in Chapter 4, Section L Permits. Local permits will not be required. Local jurisdictions receive their authority from the state, and the state has not placed its construction activities subservient to the local jurisdictions.

6.11 COMMENT: The DEIS should reflect that the bridge approach in Missouri will encounter Ste. Genevieve Formation Limestone and potentially isolated patches of Pennsylvanian strata. The possibility of karst topography and abandoned quarries could affect construction.

6.11 RESPONSE: This information has been added to FEIS Chapter 2, Section E.

6.12 COMMENT: The DEIS does not address main span construction impacts affecting remobilization of contaminated river bottom material in the Mississippi River.

6.12 RESPONSE: The DEIS notes in Chapter 4, Section M Construction Impacts (1. Main Span) that excavated material and water removed during dewatering a cofferdam can be collected by the contractor and disposed of in an approved manner offsite, if appropriate to maintain water quality. USCG changes in the project's minimum span length now mean that a maximum of only one pier will be placed in the river, thereby reducing potential remobilized materials.

6.13 COMMENT: MDNR databases on hazardous waste should be reviewed.

6.13 RESPONSE: MDNR databases were reviewed, and potentially affected sites are included in the DEIS.

6.14 COMMENT: The project should accommodate the Riverfront Trail physically and aesthetically.

6.14 RESPONSE: The project will span the North Riverfront Trail as shown on DEIS Figure 4.G, the project's concern for the main span bridge aesthetics in the vicinity of the trail is discussed in DEIS Chapter 4, Section K.