



Illinois Department of Transportation

Memorandum

To: Ed Hassinger -- MoDOT Attn: Greg Horn
From: Mary Lamie By: Brooks Brestal
Subject: Final Re-Evaluation of the FEIS*
Date: October 23, 2008

*FAP 999 (New Mississippi River Crossing)
New I-70 Mississippi River Bridge Crossing
St. Clair County in Illinois
St. Louis City in Missouri

The Final Environmental Impact Statement (FEIS) for the above project was signed on March 26, 2001 and the subsequent Record of Decision was signed on June 13, 2001. The following information represents a re-evaluation of the document.

Proposed Action

The New Mississippi River Bridge Project received a Record of Decision (ROD), FEIS Approval and Design Approval in 2001. However, it was determined that funding for the entire project could not be secured to satisfy the Financial Plan requirements for a Major Project.

In May 2005, the two states initiated an effort to reduce the cost of the project. The proposed revision included following Relocated I-70 in Illinois, north of its current location (but avoiding the Cahokia Canal Relocation that was proposed in the FEIS), a new, 8-lane, I-70 Mississippi River Bridge with the mainspan reduced in length from 2,000 feet to 1,500 feet, reducing the scale of the interchange in Missouri with existing I-70, eliminating the reconstruction of the Tri-Level Interchange in East St. Louis, eliminating the connection between existing I-55/64/70 and the relocated I-70, and eliminating the proposed improvements to ramps at the west side of the existing I-55/64/70 Poplar Street Bridge.

Public meetings were held in the fall of 2005 announcing the I-70 Relocation. The estimated cost of the I-70 Relocation was \$910 million.

In August 2005, the two states received a total of \$239 million from the Safe, Accountable, Flexible, Efficient Transportation Equity Act-A Legacy for Users (SAFETEA-LU). However, the two states could not agree on the resources to fund the remaining \$671 million necessary to satisfy the Financial Plan requirements for a Major Project.

In 2006, Illinois made a determination that the combined value of funds available between both states to meet the Financial Plan requirements for Major Projects was in the range of \$550 to \$600 million. Illinois began searching other options to improve the river crossing capacity for that same value. One such option was the Martin Luther King (MLK) Bridge Coupler concept. The MLK Coupler could address the need for additional capacity on the downtown river crossings while also addressing the safety

concerns of the existing MLK Bridge geometrics. However, no formal environmental evaluation was made and no public meetings were held on this concept.

In January 2007, FHWA issued a Major Project Guidance based on SAFETEA-LU. This guidance provided direction to Section 1904 of SAFETEA-LU, which amended 23 U.S.C. 106 and made several significant changes to the requirements for Major Projects. One of the changes allows the scope of work described in the ROD to be divided into multiple projects for the purpose of applying Major Project requirements.

By dividing the scope of work described in the ROD into multiple projects that correspond to operationally independent phases of work, Missouri and Illinois can provide the financial means to satisfy the Major Projects requirements. An operationally independent phase of work is a portion of the work described in the ROD that can be built and function as a viable transportation facility even if the rest of the work described in the ROD is never built. This initial portion of work allows for subsequent portions of work (that make up the original scope of work in the ROD) to be constructed with minimal impact to the initial portion of work.

This initial phase is projected to cost approximately \$570 million. The estimated cost, based on 2007 prices, includes the cost of construction; preliminary design and construction engineering; land acquisition, utility adjustments; and contingencies. The following table summarizes the re-evaluation project costs.

Total Project Cost (000's)									
	MO Approach	IL Approach	Mainspan*	River Bridge Subtotal	I-70 Connector	Tri-Level	IL Roadways Subtotal	MO North Interchange	Summary Total
Construction Cost	\$15,000	\$38,000	\$158,000	\$211,000	\$53,000	\$121,000	\$174,000	\$38,000	\$423,000
Land Acquisition and Archaeology	\$3,000	\$3,000		\$6,000	\$8,000	\$12,000	\$20,000	\$12,000	\$38,000
Utility Relocation	\$1,000	\$9,000		\$10,000	\$1,000	\$10,000	\$11,000	\$3,000	\$24,000
Design Engineering	\$1,000	\$3,000	\$7,000	\$11,000	\$4,000	\$10,000	\$14,000	\$2,000	\$27,000
Construction Engineering	\$1,000	\$2,000		\$3,000					\$3,000
Utility and LA Engineering					\$1,000	\$3,500	\$4,500		\$4,500
Option Sub Total	\$21,000	\$55,000	\$165,000	\$241,000	\$67,000	\$156,500	\$223,500	\$55,000	\$519,500
Contingencies	\$2,000	\$5,000	\$17,000	\$24,000	\$4,500	\$14,000	\$18,500	\$8,000	\$50,500
Inflation	\$2,000	\$5,000	\$16,000	\$23,000	\$6,000	\$16,000	\$22,000	\$5,000	\$50,000
Option Total	\$25,000	\$65,000	\$198,000	\$288,000	\$77,500	\$186,500	\$264,000	\$68,000	\$620,000
Total Project Cost 2007 Dollars)=								\$570 million	
Total Project Cost (Projected)=								\$620 million	
<i>* Build one Cable Stayed (1,500-foot center span) Bridge (four 12-foot lanes; 10-foot outside and 6-foot inside shoulders)</i>									

This re-evaluation of the FEIS describes an operationally independent phase of the New Mississippi River Bridge Project that allows the states to satisfy the Major Projects requirements while providing components essential to meeting the main elements of the project's purpose and need. The proposed improvements are referred to as the "New I-70 Mississippi River Bridge Crossing" which includes:

- A new 4-lane Mississippi River Bridge and approaches in Illinois and Missouri;
- A 4-lane roadway, primarily following the original I-64 connector alignment, connecting the new bridge to both Interstate 55/70 (north and east) toward Collinsville and I-64 at the existing I-55/64/70 interchange in East St. Louis;
- Various ramp improvements and local street improvements at the I-55/64/70 Tri-Level Interchange in East St. Louis;
- A new interchange connecting the new bridge to I-70 (west) toward Lambert Airport in Missouri; and
- A new local street connection from the new bridge to Cass Avenue in St. Louis.

An overview of the various projects can be seen in Exhibit 1 on the following page.



- PHASE 1 IMPROVEMENTS
- FULL BUILD-OUT ALTERNATIVE



SCALE - 1" = 2000'

**NEW I-70
MISSISSIPPI RIVER
BRIDGE CROSSING
PHASE 1
IMPROVEMENTS
OF
FULL BUILD-OUT
ALTERNATIVE
EXHIBIT 1**

07-07-2008

Purpose and Need

Project Purpose

The purpose and need for the proposed New I-70 Mississippi River Bridge Crossing follows that originally stated in the Relocated I-70 and I-64 Connector FEIS, with modifications due to the project phasing. The proposed action will provide needed traffic capacity and travel efficiency, improve system linkages and community access, reduce traffic crashes, increase user benefits, including travel times, and enhance economic growth, which will help avoid economic stagnation.

The purpose of the proposed action is to provide transportation system reliability, transportation system sustainability, transportation system linkages; and community access. The proposed action will reduce traffic congestion and vehicular crashes on downtown St. Louis area Mississippi River crossings, especially the Poplar Street Bridge, which currently carries the combined traffic of I-55, I-64, and I-70. It is assumed that an overall reduction of traffic on the Poplar Street Bridge will reduce the potential for crashes. The proposed action will also help to sustain economic growth and development in the St. Louis metropolitan area, and by doing so avoiding economic stagnation for the economically depressed communities in Illinois such as East St. Louis, Brooklyn and Madison. Economically depressed communities exhibit no growth, have a low income base, job scarcity, and infrastructure in decline or disrepair.

Project Need

As the only Interstate crossing into and out of the City of St. Louis, the eight-lane Poplar Street Bridge is severely overburdened, and its now over 40-year old design is substandard.

The downtown area Interstate highway network does not provide adequate traffic distribution. Interstate 55, I-64, and I-70 share the same two-mile section from their East St. Louis interchange to the west Poplar Street Bridge approach in Missouri. Having all Interstate movements through the downtown area of St. Louis in one stretch of roadway contributes to peak-period congestion and decreased safety.

Even with the already programmed improvements in the region's highway network, the St. Louis area lacks adequate capacity across the Mississippi River in the vicinity of downtown St. Louis for efficient travel and system linkages and community access between the Interstates and the local transportation network. Traffic safety will not be adequately addressed with the programmed improvements as many of the safety problems are a result of the lack of capacity of the Poplar Street Bridge. Additionally, the programmed improvements have little or no ability to enhance economic growth and development.

River Crossings

No-build projections for design year 2030 estimate just over 217,000 vehicles crossing the four existing downtown bridges (McKinley, Martin Luther King [MLK], Eads and Poplar Street). Base year (2004) volumes are approximately 180,000 vehicles per day. The No-build projections represent an increase of about 22 percent. Total regional river crossings in 2030 are expected to be over 407,000 per day. Table 1 shows the projected 2030 traffic volumes for the No-build and Build alternatives.

Table 1. Mississippi River Daily Crossings, 2030 No-Build and 2030 Partial (Phase I) Build

Location	2030 No Build	2030 Partial (Phase I) Build
U.S. 67 (Clark) Bridge	40,366	41,201
I-270 Bridge	68,372	65,763
McKinley Bridge	18,515	19,018
New I-70 Bridge	NA	54,584
MLK Bridge	43,427	31,901
Eads Bridge	13,576	10,950
Poplar (I-55/64/70) Bridge	141,633	128,492
I-255 Bridge	57,560	55,858
Total All Bridges	383,449	407,767

Source: EWGCOG Travel Demand Model, November 2007.

The Poplar Street Bridge can handle an increase of less than 10 percent of its current volume before it will reach capacity during peak periods. The remainder of the 2030 No-build traffic will need to seek alternate river crossings, including the other downtown river bridges. As shown in Table 2, the 2030 demand for the other three downtown river bridges is 75,500 average daily traffic (ADT) compared to a capacity of 56,000 ADT.

Table 2. Downtown Mississippi River Bridge (Non-Interstate) Capacity – 2030 No-Build ADT

Location	Capacity (LOS E/F) ¹	2030 No-Build ADT*
McKinley	20,000	18,500
MLK	20,000	43,400
Eads	16,000	13,600
Total	56,000	75,500

* Source: EWGCOG Travel Demand Model, November 2007.

Table 3 represents a comparison of traffic projections for the downtown Mississippi River crossings with the New I-70 Mississippi River Bridge (MRB) Crossing improvements and with the FEIS Preferred Alternative improvements. A description of these improvements is included in Chapter 4 of the Design Report Addendum which is a companion report that documents the design changes recommended in the Re-Evaluation. The East-West Gateway Council of Governments (EWGCOG) model, described in Addendum Report Appendix A, is an updated model that generally shows lower traffic volumes crossing the River. However the trends clearly indicate congestion relief as compared to the No-build scenario shown in Table 3 for the downtown River crossings, especially the Poplar Street Bridge. The trend continues with the full build out of the Preferred Alternative.

Table 3. Mississippi River Downtown Crossings, 2030 ADT, I-70 Tri-Level Connection Comparison to FEIS Preferred Alternative

Location	New I-70 MRB Crossing	FEIS Preferred Alternative†
McKinley Bridge	19,000	20,000
New I-70 Bridge	55,000**	98,400‡
MLK Bridge	32,000	24,900
Eads Bridge	11,000	10,000
Poplar (I-55/64/70) Bridge	128,000	113,100
Total All Bridges	245,000	266,400

*Source: EWGCOG Travel Demand Model, Nov. 2007.† Source: HNTB Forecast for FEIS ** Two-way four-lane bridge ‡ Two-way eight-lane bridge

¹ Level of service is rated from A (completely unimpeded traffic flow) to F (unstable flow with frequent slow or stopped conditions).

Travel Delays

Under the No-build scenario, delays across the Poplar Street Bridge are projected to increase almost 75 percent by the design year of 2030 (up to 55 minutes per vehicle). Travel speeds across the Poplar Street Bridge are projected to decrease by about 25 percent by 2030. This is due to the fact that the Poplar Street Bridge is currently near capacity. Any slight increase in traffic volume has a profound effect on travel speeds. Delays across the other downtown bridges are projected to increase up to 86 percent, with speeds projected to decrease by 26 percent. As the delays increase on all of the downtown bridges, the length of the peak hours of AM and PM traffic will continue to increase. These increases in congestion and delays will have an adverse impact on safety in the corridor.

Safety

Crash data provided by the Illinois Department of Transportation (IDOT) and Missouri Department of Transportation (MoDOT) were reviewed to assess the impact of the New I-70 Mississippi River Bridge Crossing on traffic safety. Table 4 summarizes crash data provided by IDOT for I-55/I-70 and I-64 between the Poplar Street Bridge and IL 111. As shown in the table, the total fatal and disabling injury crashes between 2001 and 2003 was 91 or 4.4 percent of the total crashes. These crash types are the focus of the Illinois Comprehensive Highway Safety Plan (CHSP). The mission of the CHSP is to “develop, implement, and manage an integrated multi-stakeholder process to improve the attributes of roads, users and vehicles, to reduce traffic-related deaths and life-altering injuries in Illinois.”

Table 4. Poplar Street Bridge Approach (Illinois) Crash Summary (2001-2003)

Year	Fatal Crashes	Disabling Injury Crashes ²	Total Fatal and Disabling	Total Crashes
2001	4	27	31	718
2002	2	25	27	698
2003	2	31	33	635
Total	8	83	91	2051

Source: IDOT March 2006

Crash information from MoDOT for I-70, from the Poplar Street Bridge to approximately 9th Street, is summarized in Table 5. The fatal and disabling injury crashes are about 1.8 percent of the total crashes.

Table 5. Poplar Street Bridge Approach (Missouri I-70) Crash Summary (2001-2004)

Year	Fatal Crashes	Disabling Injury Crashes	Total Fatal and Disabling Injury Crashes	Total Crashes
2001	1	3	6	235
2002	0	3	7	253
2003	0	2	3	263
2004	0	1	3	281
Total	1	9	19	1032

Source: MoDOT 10-12-2005

The 2001-2004 crashes for the section of I-64 from Jefferson Avenue to the Poplar Street Bridge are shown in Table 6. Similar to Illinois’ CHSP, Missouri’s Blueprint for Safer Roadways (Blueprint) was established to reduce fatal and serious injuries on

² The terminology used by the Illinois CHSP is actually “life-altering injury” (Type A) and refers to an injury that results in physical or mental diminishment. The more common term “disabling” was used for consistency with MoDOT terminology. CHSP classifies a fatality as a Type K crash.

Missouri roadways. The fatal and disabling injury crashes are about 1.2 percent of the total crashes.

Table 6. Poplar Street Bridge Approach (Missouri I-64) Crash Summary (2001-2004)

Year	Fatal Crashes	Disabling Injury Crashes	Total Fatal and Disabling Injury Crashes	Total Crashes
2001	1	2	3	245
2002	1	3	4	252
2003	0	1	1	242
2004	0	4	4	246
Total	2	10	12	985
Source: MoDOT 10-12-2005				

Table 7 summarizes the data in Tables 4 through 6 for 2001-2003.

Table 7. Illinois and Missouri Fatal and Disabling and Total Crashes

Year	Total Fatal and Disabling Crashes	Total Crashes	Percent
2001	40	1198	3.3
2002	38	1203	3.2
2003	37	1140	3.2
Total	115	3541	3.2

The overall traffic patterns of the proposed New I-70 Mississippi River Bridge Crossing vary somewhat from those of the 2001 FEIS Preferred Alternative. The proposed Missouri north interchange no longer includes the ramps to and from the south. This movement can be made using the Poplar Street Bridge and its approaches. However, the variation does not adversely affect safety.

Guidelines from the IDOT Highway Safety Improvement Program (HSIP) give some crash reduction factors expected from safety improvements. These guidelines indicate that general improvements, realignment and reconstruction have the potential to reduce all crash types. A transportation improvement that meets current design standards and reduces traffic from a congested existing facility will likely reduce traffic crashes.

The New I-70 Mississippi River Bridge Crossing will reduce 2030 daily crossings of the Poplar Street Bridge from 142,000 (No-build) to 128,000 (Build). This reduction (9.3 percent) in traffic will improve traffic flow, similar to a capacity enhancement improvement. The New I-70 Mississippi River Bridge Crossing will be constructed to modern freeway standards with design speeds and design standards meeting or exceeding the existing facility. Therefore, it is anticipated that the proposed improvements will reduce the fatal and disabling injury crashes on the Poplar Street Bridge and its approaches.

Summary

The core of the St. Louis region needs a functional roadway infrastructure to be able to compete with other regional economies. With mounting congestion and with more crashes, downtown St. Louis and East St. Louis will not be able to sustain new growth and development.

The City of St. Louis has lost much of its resident population. The City of St. Louis' total population is now barely one-third of its post-World War II high. No new major private office space has been built in almost a decade in downtown St. Louis. Only seven of the nation's 35 largest regions are sprawling at a faster rate than St. Louis, and yet all but six of them are growing faster in population than St. Louis. This region's propensity to build at the fringes (where there is readily-available land for development) will be reinforced by the core-area disincentives resulting from inadequate river-crossing infrastructure. The

locally unacceptable levels of congestion resulting from inadequate infrastructure will stifle downtown-area development and may be expected to lead to an exodus of existing businesses. Without a new bridge, unmet traffic demand will move with new growth and development to the edge of the region, leaving the core in decline.

Affected Environment

In the FEIS, the Preferred Alternative included the following components:

- Relocated I-70 in Illinois, north of its current location (Illinois I-70 roadways);
- A new eight-lane I-70 Mississippi River Bridge (New River Bridge);
- An interchange in Missouri with existing I-70 (Missouri North I-70 Interchange);
- An improved Tri-Level Interchange (I-55/I-64/I-70) in East St. Louis, Illinois (Tri-Level Interchange);
- A connection between existing I-55/I-64/I-70 (Tri-Level Interchange) and the relocated I-70 (I-64 Connector);
- Improvements to ramps at the west side of the existing I-55/I-64/I-70 Poplar Street Bridge (Missouri South Interchange); and
- A parkway connection from the new bridge to 14th Street and Tucker Boulevard in St. Louis.

The New I-70 Mississippi River Bridge Crossing provides components essential to meeting the main elements of the project's purpose and need. The New I-70 Mississippi River Bridge Crossing includes:

- A new four-lane Mississippi River Bridge and approaches in Illinois and Missouri;
- A four-lane roadway, primarily following the original I-64 connector alignment, connecting the new bridge to both I-55/70 (north and east) toward Collinsville and I-64 at the existing I-55/64/70 interchange in East St. Louis (Figure B-2);
- Various ramp improvements and local street improvements at the I-55/64/70 Tri-Level Interchange in East St. Louis (Figure B-3);
- A new interchange connecting the new bridge to Interstate 70 (west) toward Lambert Airport in Missouri (Figure B-4); and
- A new local street connection from the new bridge to Cass Avenue in St. Louis (Figure B-4).

Whether or not the connection into the City remains at Cass Avenue as is being proposed under Phase I or is relocated to 14th Street as called for in the FEIS will depend upon traffic patterns in the City of St. Louis as well as funding at the time Phase II of the project is constructed.

To reduce costs and impacts, the Missouri North I-70 Interchange was condensed (the northbound to eastbound and westbound to southbound ramps were dropped from the initial phase of the project and the Parkway connection into St. Louis was revised to the planned connection to Cass Avenue), the New River Bridge was revised to a single two-way four-lane structure, and alignment and interchange revisions were made to/from existing I-55/70 on the Illinois side (previously referred to as the I-64 Connector). The Tri-Level Interchange has been configured to provide movements to Relocated I-70. Changes were made within the rights-of-way for the Preferred Alternative. Right-of-way requirements for the Preferred Alternative have been modified. While the overall right-of-way requirements have been greatly reduced, new right-of-way in some areas adjacent to the Tri-Level Interchange will be needed.

The components of the New I-70 Mississippi River Bridge Crossing are illustrated in Figures B-1 through B-4 in Appendix B.

Due to the potential for changes in the existing areas in which the proposed project will be located, environmental issues have been re-evaluated and updated. Components associated with other actions will be documented elsewhere.

A summary of the differences in impacts between the FEIS/ROD and the Re-Evaluation are presented in Table 8.

Table 8. Comparison of Impacts between the FEIS and Re-Evaluation

	FEIS (Fully Built Project)	Re-Evaluation (Phase I or Partial Build)
Socioeconomic/Land Use		
Number of Residential Displacements (Illinois)		
Illinois	13	6
Missouri	5	0
Number of Commercial/Industrial Business Displacements		
Illinois	3	2
Missouri	47	8
Right of Way for the Preferred Alternative, ac		
Illinois	264.9	102.9
Missouri	62.9	37.7
Natural Resources		
Area of Jurisdictional Wetland Impacted, ac	41.7	2.3
Area of Floodplains Impacted, ac	28.5	8.1
Number of <i>Boltonia decurrens</i> impacted	1,600-2,200	0
Cultural Resources		
Number of Properties Eligible for Listing on the National Register of Historic Places (NRHP)	4	3
Number of Sites Listed on the NRHP	1	0
Hazardous Materials		
Number of Potential Sites Affected	100	39
Noise		
Number of Receptors Exceeding Noise Abatement Criteria, Projected 2022*	9	24
Cost†	\$584,100,000	\$570,000,000
* Note: Different noise modeling software was used in the FEIS (Stamina 2.0) from what was used in the Re-Evaluation (Traffic Noise Model).		
† FEIS costs were based on 2001 dollars; the Re-Evaluation costs are based on 2007 dollars.		

Environmental impacts that may result from Phase II elements are not anticipated to be greater than those documented in the 2001 EIS. Specific environmental impacts associated with Phase II elements will be analyzed in subsequent re-evaluations to the original EIS, once these sections obtain funding. The initial phase of construction will not preclude the remaining work, as described in the 2001 EIS, from being implemented in the future as originally proposed.

Community Impacts

The New I-70 Mississippi River Bridge Crossing lies within an area that has seen intensive human settlement and varied land use for more than 100 years with a broad range of uses and activities normally associated with urbanized areas. The project area includes parts of the municipalities of Brooklyn, Madison, Fairmont City and East St. Louis in St. Clair County, Illinois and the City of St. Louis in Missouri. Parts of the project area in Illinois are in unincorporated portions of St. Clair County.

The FEIS indicates that major land use in Illinois includes undeveloped fields, highway and rail transportation facilities, and many abandoned sites. While land use has remained essentially the same since the FEIS, East-West Gateway Council of Governments (EWGCOG) shows the following land uses on the Illinois side:

commercial, industrial, agricultural, residential and transportation³. As shown in the Draft EIS (DEIS) Figure 2.A, features include the former St. Louis National Stockyards (currently undeveloped), railroads and yards, a salvage yard and other commercial/industrial operations, and some residences in East St. Louis. All these features are included in the New I-70 Mississippi River Bridge Crossing project area. Nearby land uses include Gateway International Raceway, Milam landfill, and Gateway National golf links. The Missouri side includes the parts of the primarily residential neighborhoods of Old North St. Louis, Carr Square, and Columbus Square (west of I-70) and the North Riverfront commercial/industrial district (east of I-70), same as in the DEIS (Figure 2.B). The downtown St. Louis central business district is no longer included in the project area. Industrial and commercial uses predominate east of I-70. The FEIS reported that abandoned and underutilized parcels are interspersed throughout the area. This condition appears to be the same: various structures that were apparently previously residences and businesses but are in a state of disrepair so as to be unusable, were observed through much of the area.

Trend of Declining Population Continues

The declining population trend noted in the FEIS within the project area has continued. Overall, the towns on the Illinois side within the project area lost about 4 percent of their population between 1990 and 2000. East St. Louis' population, though, decreased by 23 percent from 1990 to 2000, having 31,530 people in 2000. Fairmont City had a 2000 population of 2,425, which is a gain of 13 percent from 1990. The Village of Brooklyn, with 2000 population of 658, lost 42 percent of its population between 1990 and 2000.

On the Missouri side, the project area is entirely within the City of St. Louis. Only three census tracts are located within the project area: 1257, 1266, and 1267, with a total 2000 population of 7,888, a decline of 28 percent since 1990. For comparison, the City of St. Louis, with a 2000 population of 348,189, lost 12 percent of its population from 1990 to 2000.

Racial Composition

The FEIS reported that the FEIS study area was about three-fourths black residents with the rest mostly white residents. The racial composition of the project area is summarized below.

In the City of St. Louis, the vast majority of the 2000 population within the three census tracts in the project area classified themselves as either black/African-American (75 percent) or white (22 percent). The overall city 2000 population was about 51 percent black/African-American.⁴

East St. Louis was 98 percent black/African American and less than two percent white or Hispanic. Brooklyn was 99 percent black/African-American and less than one percent white or Hispanic. Fairmont City was 67 percent white, one percent black/African American, 28 percent "some other race" and four percent "two or more races." Hispanics or Latinos of any race accounted for 55 percent of the total population of Fairmont City.⁵

Income

In the three City of St. Louis census tracts in the project area, the 2000 census median family income was \$17,082, and 47 percent of the population was below the poverty level. The city-wide 2000 census median family income was \$32,585, and 25 percent of

³East-West Gateway Council of Governments, 2004. Map: Year 2000 Generalized Land Use.

⁴2000 Census data on City of St. Louis website: <http://stlouis.missouri.org/neighborhoods/index.html>

⁵U.S. Census Bureau 2000—<http://factfinder.census.gov>. The Census Bureau does not consider "Hispanic" a race, but it is a separate category. People who identify their origin as Hispanic or Latino may be of any race.

the population was below the poverty level.⁶ The 2000 census Missouri median family income was \$46,044.⁷

In Fairmont City, the 2000 census median family income was \$31,296, with 18 percent of the population below the poverty level. In Brooklyn, the 2000 census median family income was \$30,994, with 49 percent of the population below the poverty level. In East St. Louis, the 2000 census median family income was \$24,567, with 35 percent of the population below the poverty level. For comparison, the 2000 census Illinois median family income was \$55,545 and the national median was \$50,046.^{8,9}

The U.S. Department of Health and Human Services 2008 Poverty Guideline is \$21,200 for a family of four.

Public Facilities

No new public facilities have been constructed or established in the project area since the FEIS.

Public and Private Planning

The FEIS documented public and private planning within the FEIS study area. Within the project area on the Illinois side, the FEIS noted that the city of Madison and private developers were exploring development along IL 203 in the vicinity of the Gateway International Raceway; the owners of the St. Louis National Stockyards property were working to redevelop this site for commercial and industrial users; and the railroad companies entertained long-term prospects for the development of their land holdings. To date, the City of Madison and private developers are still exploring development options.

The FEIS indicated that in Missouri, work was underway with the *Downtown Now!* project to develop a new downtown plan involving private-sector participation in implementation.¹⁰ *Downtown Now!*'s Downtown Development Action Plan (Plan), officially adopted by the City of St. Louis, comprises \$1.5 billion in public/private investment.¹¹ The Plan identified the I-70 project as the “transportation project that will have the most significant impact on the Downtown and the region since the completion of the Arch.” The Plan expects the project to “provide new opportunities for the revitalization of the north side of Downtown” and “calls for ‘world class’ design excellence” for the bridge. It states that the “design should incorporate substantial landscaping to indicate a gateway to and from St. Louis.” The Plan “established the following basic criteria for the development of the bridge and interchange”:

- The interchange’s height should be minimized (reference to the Missouri North interchange).
- The interchange connection with Downtown should be designed as a freeway to arterial type connection.
- The design of the interchange and related off ramps should maintain to the highest degree the existing predominant street grid within the surrounding neighborhoods.
- A grand entrance to Downtown from the north should occur at Tucker Boulevard.

⁶ 2000 Census data on City of St. Louis website: <http://stlouis.missouri.org/neighborhoods/index.html>

⁷<http://factfinder.census.gov>

⁸Source U.S. Census Bureau: State and County QuickFacts. Data derived from Population Estimates, 2000 Census of Population and Housing.

⁹ U.S. Census Bureau 2000—<http://factfinder.census.gov>

¹⁰ *Downtown Now!* is a public/private partnership created in 1997 by then-mayor Clarence Harmon to develop a five-to-seven year action plan for revitalizing Downtown St. Louis, Missouri. The City Planning Commission adopted the Downtown Development Action Plan in December of 1999 (prior to the DEIS of April 2000 and the FEIS of March 2001). The 13-member Planning Commission, created during the reorganization of the City's development agencies, is the official planning commission for the City of St. Louis under state and local laws. Citywide and neighborhood plans adopted by the Commission become official City plans. (Information from 1999 press release, City of St. Louis Planning and Urban Design Agency: *City Planning Commission Adopts Downtown Development Action Plan*, Friday, December 17.)

¹¹ Available in Adobe Acrobat pdf format at <http://www.downtownnow.org/html/actionplan.asp>. Parts relevant to this project are in Volume 6.

- The design of the structures and other elements related to the project should be consistent with visual, urban design and maintenance requirements of an urban setting.

The New I-70 Mississippi River Bridge Crossing is consistent with these elements of the Plan, except that, because of the reduced scale of the interchange, the “grand entrance” at Tucker is no longer applicable. The City of St. Louis is in agreement with this reduced plan under the Phase I portion of the Re-Evaluation. The city has provided a letter stating their agreement with this Phase I reduction of scale (Appendix A, Item 10).

The FEIS noted that a planning study was under way to evaluate the City of St. Louis' Fifth Ward. Most of the project area is within the Fifth Ward. The Master Plan for the Fifth Ward was adopted, with revisions, by the City Planning Commission on March 6, 2002.¹² Parts of the Master Plan “are contingent upon Programmed Catalysts such as the new Mississippi River Bridge crossing” and the proposed expansion of MetroLink along North Florissant Avenue. A 2005 economic study in support of the Fifth Ward Master Plan concluded that there is support for residential development; and for manufacturing, business repair services, and wholesale trade industries, which currently employ a large share of Fifth Ward employees.¹³

Missouri North I-70 Interchange

As discussed in the FEIS, the Preferred Alternative Missouri North Interchange was located to avoid both residential concentrations and to avoid impacts to the social and institutional fabric of the Near North Side community. As with the Preferred Alternative, New I-70 Mississippi River Bridge Crossing will occur adjacent to the existing Interstate highways or in industrial districts removed from the residential neighborhoods. The Missouri North I-70 Interchange is located entirely within the Preferred Alternative right of way for the interchange. None of the four residential relocations required for the Preferred Alternative (M-1 through M-4) will be impacted by the Missouri North I-70 Interchange. Because of the reduced right-of-way requirements, land use impacts resulting from the Missouri North I-70 Interchange are less than those discussed in the FEIS for the Preferred Alternative. The total Preferred Alternative right of way required was 62.93 acres for the Missouri North I-70 Interchange. The total required right of way for the revised interchange layout is 37.7 acres, a reduction of 40 percent.

Carr Square/Columbus Square

Parts of the Preferred Alternative interchange complex bordered on Carr Square Park and Carr Square housing, as shown in Figure 4.A of the DEIS. The closest point of the Missouri I-70 North Interchange improvements is a block away from Carr Square housing and Carr Square Park. Preferred Alternative interchange improvements were adjacent to Columbus Square (which includes the Cochran Gardens residential complex) on both the north and west. The revised interchange improvements end at the north edge of Columbus Square. The relocation of North and South Cass Avenue, part of the Preferred Alternative, is not needed with the revised interchange layout and is not included. The Missouri I-70 North Interchange, as proposed in the ROD, was laid out in such a manner that Cass Avenue would need to be severed and relocated. The modified interchange configuration does not require this and instead, ties directly into Cass Avenue.

The EIS included a noise wall at Cochran Gardens, as requested by the City of St. Louis, and a noise wall near Webster School. Noise walls at these locations were included with the Preferred Alternative identified in the ROD. However, the updated

¹² St. Louis Planning Commission, 2002. Resolution No. PDA-001-02-NBD, March 6.

¹³ Development Strategies, 2005. Economic and Market Research in Support of a Comprehensive Plan for the Fifth Ward, St. Louis, Missouri, August 10.

noise analysis concluded that noise walls were not warranted (see Appendix C for details).

Local traffic patterns on the existing network are maintained with both the Preferred Alternative interchange and the revised interchange layout, but by different means, as discussed below.

The Preferred Alternative interchange included a new Broadway overpass of I-70 just to the north of the vacated Broadway overpass, and a new Cass Avenue connection to Broadway just north of the existing Cass Avenue connection (which was also proposed to be vacated with the Preferred Alternative interchange).

With the Preferred Alternative, the southbound Cass Avenue Bridge over I-70 would be reconstructed. With the current plan changes, access from the part of Broadway that is east of I-70 to the part that is west of I-70 will be accomplished via Cass Avenue, through the intersections of Broadway and Cass. The existing 9th Street/Howard Street and 7th Street/Cass Avenue bridges over I-70 will be removed to construct the interchange. With the Preferred Alternative, the circulation provided by these two bridges would be accomplished by major relocations of different parts of Cass Avenue. With the current proposed changes, this circulation is maintained by widening Cass Avenue from 13th Street to Broadway.

With the new interchange, there is much less disruption of the local network, compared with the FEIS Preferred Alternative, which included vacating portions of Carr, 14th, Biddle, Mullanphy, Hadley, 11th and Howard. With the proposed changes, no parts of Carr, 14th or Biddle will be vacated, and the vacating of the other streets will be substantially reduced.

With the proposed changes, one-way 7th Street will be converted to two-way and will terminate south of Cass Avenue. Ninth and 10th streets from Cole Street north to Cass Avenue will remain one-way and will no longer feed the Interstate mainline and reversible lanes, but will be used for local traffic. One-way 9th Street will terminate at Cass Avenue and will be two-way from Cass to one block north of Cass Avenue. Tenth Street will terminate at Cass Avenue and will be vacated north of Cass Avenue (the FEIS has it vacated north of relocated Cass). Hadley and 11th streets will lose their existing connections to Cass Avenue (Figure B-4).

There is no adverse effect on Cass Square and Columbus Square as a result of the proposed Phase I improvements in this Re-Evaluation.

Old North St. Louis

As with the FEIS Preferred Alternative, the Missouri North I-70 Interchange project improvements will skirt the edge of the Old North St. Louis neighborhood along existing I-70 and avoid disturbing the historic residential area to the west of I-70 (the S.S. Cyril and Methodius, Mullanphy, and Old North St. Louis Historic Districts). Industrial/commercial uses at the south tip of the Old North St. Louis planning district will be relocated, but there will be fewer relocations with the revised interchange layout compared with the FEIS Preferred Alternative. Existing structures over I-70 at Madison Avenue and St. Louis Avenue would be rebuilt with the revised interchange layout, just as it was proposed in the FEIS.

The Madison Street and St. Louis Avenue overpasses will include five-foot wide sidewalks on both sides, separated from traffic by a concrete safety barrier and will be constructed so that continuity to the neighborhood sidewalk network is provided. These sidewalks will eliminate the need for a separate pedestrian crossover at North Market. For the Re-Evaluation, the Phase I improvements on I-70 stop before reaching the

pedestrian bridge; therefore, the existing pedestrian bridge will not be removed during this phase of the project. The city of St. Louis is agreeable with not addressing the pedestrian bridge in the Phase I portion of the Re-Evaluation. This is something that could be addressed under the Phase II portion of the Re-Evaluation.

The FEIS concluded that the Preferred Alternative would have no adverse effect on the character of Old North St. Louis. This conclusion is still valid for the Re-Evaluation.

North Riverfront

The FEIS concluded that the Preferred Alternative will have no adverse effect on the character and viability of this largely commercial/industrial district between I-70 and the river. This conclusion is still valid for the revised interchange and river bridge approach configuration.

Environmental Justice

This project has been evaluated in accordance with Executive Order (EO) 12898, which requires each Federal agency to make environmental justice part of its mission “by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.”¹⁴

As discussed above in this document, the demographics of the project area have not changed since the FEIS and remain predominantly low-income and minority.

The FEIS concluded that low-income and minority populations in Missouri will not be disproportionately adversely affected by the FEIS Preferred Alternative. The majority of the business displacements identified in the FEIS were neither low-income nor minority-owned. The Missouri I-70 North Interchange has a smaller footprint than the Preferred Alternative Missouri North Interchange and is located almost entirely within the Preferred Alternative alignment. There are no residential displacements in the Missouri part of the project associated with the New I-70 Mississippi River Bridge Crossing. Therefore, the conclusion can be made that that low-income and minority populations in Missouri will not be disproportionately adversely affected by the New I-70 Mississippi River Bridge Crossing.

The FEIS identified disproportionately adverse impacts on low-income and minority populations for the Illinois part of the project area: a majority of the business and residential displacements resulting from the FEIS Preferred Alternative were low-income and minority-owned. There were no feasible alternatives, and the FEIS identified mitigation measures to address these impacts. The alignment changes in the New I-70 Mississippi River Bridge Crossing on the Illinois side did not result in changes in impacts to low-income and minority populations. Additionally, the New I-70 Mississippi River Bridge Crossing alignment in Illinois falls entirely within the footprint of what was proposed as the I-64 Connector in the FEIS. Therefore, based on the FEIS analysis and that the New I-70 Mississippi River Bridge Crossing falls within a footprint already cleared in the FEIS, there are no additional adverse impacts on low-income or minority populations in Illinois beyond those identified in the FEIS, due to the physical location of the New I-70 Mississippi River Bridge Crossing.

However, the FEIS also addressed a need to improve local circulation and access between East St. Louis and the interstates that cross the city. The Phase I components of the Re-Evaluation present a reduction in scale from the proposed circulation improvements listed in the FEIS. Figure F4.CC of the FEIS illustrates all of the

¹⁴ Executive Order 12898, *Federal Actions To Address Environmental Justice In Minority Populations And Low-Income Populations*, February 11, 1994. Paragraph 1-101.

improvements to traffic circulation and access at East St. Louis that would result from the construction of the entire ultimate regional transportation improvement including access points related to Relocated IL 3, which is covered by a separate FEIS. Within limits of the currently proposed initial plan, IDOT will continue to coordinate with the local agencies and provide as many of these enhancements as possible. The enhancements listed in the FEIS are:

- In place of the unsafe, substandard St. Clair avenue ramps, East St. Louis will gain new ramps at the edge of Goose Hill to and from the I-64 Connector and relocated I-70.
- In place of the undesirable Missouri Avenue crossing of the interstate and the MacArthur Bridge approach/high-speed rail tracks, East St. Louis can gain a prominent, new, high-profile East St. Louis street connection to the riverfront and a First Street extension to Goose Hill.
- In place of the existing Ninth/Tenth Street one-way pair of viaducts over I-64, East St. Louis will gain a two-way Ninth Street realignment, a Collinsville Avenue realignment, a Bowman Avenue interstate crossing, a pedestrian overpass at Fifteenth Street, and restoration of two-way traffic along stretches of both St. Clair and Baugh avenues.

These enhancements will continue to be investigated as part of the Phase II portion of the Re-Evaluation. Currently, as mentioned above, access at Relocated IL 3 is proposed under a separate FEIS and re-evaluation. The proposed New I-70 Mississippi Bridge Crossing is designed to accommodate this access at Relocated IL 3 by means of a grade-separated interchange.

Business Relocations

The FEIS Preferred Alternative had substantially larger right-of-way requirements than the New I-70 Mississippi River Bridge Crossing. The FEIS Preferred Alternative would have required relocating 47 businesses in Missouri, as well as involve partial takings from another 16 business operations, which were expected to be able to remain in operation at their present location. Approximately 424 jobs were impacted. The Missouri North I-70 Interchange portion of the New I-70 Mississippi River Bridge Crossing requires the relocation of 15 businesses and approximately 101 associated jobs.

The DEIS reported that the Preferred Alternative would require relocating three small businesses involving an estimated 14 jobs and a partial taking from one other active business near the Tri-Level Connection interchange. The proposed New I-70 Mississippi River Bridge Crossing would require the acquisition of eight businesses and 10 associated jobs. The changes in business displacements are provided in Table 9.

Table 9. Changes in Business Displacements

DEIS No.	Business	Address	DEIS Jobs	Re-Evaluation	
				Impacted	Jobs
Illinois					
I-1	Vacant	901 Baugh Avenue		No	
I-2	Double Deuce Liquor	903 9th Street	2-3	Yes	Vacant
I-3	Beckers Farm Supply	101 St. Clair Avenue	4	Yes	4
I-4	Vacant	911-912 North 1st Street		Yes	Vacant
I-5	Quality Rail Service	1 Front Street		Yes	6
I-6	Petra Chemicals		6-9	Yes	Vacant
I-7	Warehouse & Store Fixture Co.	301 St. Clair Avenue		Yes	Vacant
I-8	National Stockyards (closed)			Yes	Vacant
I-9	Vacant 2-Story Building	No address from DEIS		Unknown	Vacant
I-11	Vacant	St. Clair Avenue		Yes	Vacant

Table 9. Changes in Business Displacements, continued

DEIS No.	Business	Address	DEIS Jobs	Re-Evaluation	
				Impacted	Jobs
Missouri					
M-1	Sang Fah Wholesale	927 Tyler	20	No	
M-2	Door to Door & Edward Dietiker Moving & Storage Co.	918 LaBeaume	15	No	
M-3	Phillips 66/Naes Fuel & Wash	1815 North 9th	6	No	
M-4	Big L Super Service	1801 North Broadway	7-8	No	
M-5	Gateway Cold Storage	1800 North Broadway	17	Yes	Vacant
M-6	Archview Self-Storage	801 Howard	4	Yes	2
M-7	M&L Frozen Foods	1717 North Broadway	30	Yes	32
M-8	Crystal Transportation	801 Mound	8-10	Yes	Vacant
M-9	Pintura Corp.	711 Howard	2	Yes	Vacant
	Millikson Painting	715 Howard	6	Yes	Vacant
	John Benson Electric	1708 North 8th	6	Yes	3
M-10	Rethemeyer Indoor Storage	1711-13 North Broadway	1	No	
M-11	South County Fruit & Produce	1626 North 85th	10	Yes	5
M-12	Storage/Vacant	710 Howard		No	
M-13	Bud's Sales/Warehouse	1617 North 7th	12	No	
	Mid-State Produce	1621 North 7th	6	No	
	Advantage Decorating L/C	1601 North 7th	2	No	
M-14	Consolidated Brokerage Co. Inc.	1535 North 7th	12	No	
M-15	Smoki O's Barbeque	1545 North Broadway	12	No	
	Fifty One O Seven Corp.	1539 North Broadway	1	No	
	S&B Candy & Toy Co.	1535 North Broadway	13	No	
	Team Duke Racing	1529 North Broadway	6	No	
	Labor World-Staffing for Industry	1525 North Broadway	4-6	No	
	Pressure Patch Products, Inc.	1523 North Broadway	4	No	
	Automatic Sprinkler Training Center	1517-19 North Broadway	6	No	
	St. Louis Elevator Co.	1515 North Broadway	6	No	
	Steel Tech Corp. Metal Fabricators	1509 North Broadway	6	No	
M-16	HiTech Packaging (Quality Stamping, Inc.)	1512 North 7th	10	No	
M-17	Superior Express	1700 North 11th	4	Yes	50
M-18	Gared Sports Inc.	1107 Mullanphy	41	No	
M-19	Thomas Jones, Inc.	1611 North 10th	8-12	Yes	Vacant
M-20	Missouri Stainless Steel	9th & Howard	2	Yes	Vacant
	Hyvac Plastic	910 Howard	7-9	Yes	Vacant
	Gared Sports Inc. Storage	1554 North 10th	0	Yes	Vacant
	MO Metals Exporting	1615 North 9th	4	Yes	6
M-21	Formerly Bohn (Derrick Soap)	1550 North 9th	12	Yes	3
M-22	Industrial Metal Cleaning	801 Cass	6	No	
M-23	Wesco Machinery Hauling & Rigging	718 Cass	6	No	
M-24	Greyhound Lines Maintenance	1515 North 11th	61	No	
M-25	Alpers Jobbing	1201 Cass	2	No	
M-26	Office/Storage	1428 North 13th		No	
	Dominoes Pizza	1428 North 13th	10	No	
M-27	Cass Bank & Trust Co.	1420 North 13th	4	No	
M-28	Kunkel's Muffler Service	1408 North 13th	6	No	
M-29	If Looks Could Kill Beauty Shop	1408 Biddle	2	No	
M-30	Railroad Switching of Missouri	Railroad Trestle	1	No	
M-31	Massey Equipment Co.	915 St. Louis	10	No	

Displaced businesses will be paid fair market value for their property and assisted in relocating, according to the requirements of the 1970 Uniform Relocation Assistance and Real Property Acquisition Policies Act. Every effort will be made to help the businesses find suitable replacement sites within their present taxing jurisdictions. Additionally, the St. Louis Development Corporation (SLDC) provides assistance to businesses that need

or want to relocate by providing lists of properties for sale, including agency-owned¹⁵ properties.¹⁶ Partial takings will be valued and the affected owners will be paid the fair market value of the damages.

Residential Relocations

The DEIS indicated that the Preferred Alternative would displace 13 occupied dwelling units in Illinois. The proposed New I-70 Mississippi River Bridge Crossing displaces five dwellings in the Goose Hill neighborhood just north of the Tri-Level Interchange and one dwelling in the southeast quadrant of the Tri-Level Interchange. This represents a reduction of seven residential displacements from what was indicated in the DEIS.

The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, as well as Missouri and Illinois state laws, requires that just compensation be paid to the owner of private property taken for public use. The appraisal of fair market value is the basis of determining just compensation to be offered the owner for the property to be acquired.

An appraisal is defined in the Uniform Act as a written statement independently and impartially prepared by a qualified appraiser setting forth an opinion of defined value of an adequately described property as of a specific date, supported by the presentation and analysis of relevant market information.

The MoDOT's and IDOT's relocation program is designed to provide uniform and equitable treatment for those persons who are displaced from their residences, businesses, or farms. The relocation advisory assistance program satisfies the requirements of Title VI of the Civil Rights Act of 1964. The program provides advisory assistance to:

1. Owners and tenants who are displaced
2. Persons occupying real property adjacent to that being acquired who are caused substantial economic injury by the acquisition
3. Persons who, as a result of the project, move personal property from real property not being acquired for the project.
4. Persons who move into property after acquisition and are aware that they will have to move due to the project.

The Uniform Act requires that comparable, decent, safe, and sanitary replacement housing within a person's financial means be made available before that person may be displaced. Should this project include persons who cannot readily be moved using the regular relocation program benefits and/or procedures, i.e., when there is a unique housing need or when the cost of available comparable housing would result in payments in excess of statutory payment limits (\$22,500 or \$5,250), the MoDOT's and IDOT's relocation policy commits to utilizing housing of last resort. Housing of last resort involves the use of payments in excess of statutory maximums or the use of other unusual methods of providing comparable housing.

Air Quality

A Pre-Screen analysis was completed for the proposed project at the St. Clair Avenue entrance ramp near 16th Street to I-64 in Illinois and at the Missouri Interchange at Cass Avenue in Missouri. The results from this proposed roadway improvement indicate that a Carbon Monoxide Screen for Intersection Modeling (COSIM) air quality analysis is not required, as the results for the worst-case receptor are below the 8-hour average

¹⁵ Agency properties are acquired in the name of the Land Reutilization Authority (LRA).

¹⁶ Telephone conversation with Patrick Hanlon, SLDC, December 2, 2005.

National Ambient Air Quality Standard for CO of 9.0 parts per million which is necessary to protect the public health and welfare.

This project is included in the 2035 Long-Range Transportation Plan and in the FY08 to 2011 Transportation Improvement Program (TIP) endorsed by the East-West Gateway, the Metropolitan Planning Organization (MPO) for the region in which the project is located.

On December 1, 2004, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) determined that the Long-Range Transportation Plan conforms with the transportation-related provisions of the Clean Air Act Amendments of 1990. These findings were in accordance with 40 CFR Part 93, "Criteria and Procedures for Determining Conformity to State and Federal Implementation Plans, Programs and Projects funded or Approved Under Title 23 USC or the Federal Transit Act."

The projects design concept and scope are consistent with the project information used for the TIP conformity analysis. Therefore, this project conforms to the existing State Implementation Plan and the transportation-related requirements of the 1990 Clean Air Act Amendments.

This project does not meet the definition of a project of air quality concern as defined in 40 CFR 93.123(b)(1). The average daily traffic and the percentage of diesel vehicles are below the required limit for performing Mobile Source Air Toxics (MSAT) analyses. It has been determined that the project will not cause or contribute to any new localized PM2.5 violations or increase the frequency or severity of any PM2.5 violations. The U.S. Environmental Protection Agency (USEPA) has determined that such projects meet the Clean Air Act's requirements without any further Hot-Spot analysis. In accordance with BDE Procedure Memorandum 52-06 Mobile Source Air Toxics (MSAT), this project was analyzed for potential mobile toxins. The project has projected 2030 traffic volumes of less than 140,000 ADT. This type of project has low potential MSAT effects. The qualitative MSAT analysis is included in Appendix C.

Traffic Noise

The proposed New I-70 Mississippi River Bridge Crossing was evaluated for potential traffic noise impacts using the FHWA approved Traffic Noise Model (TNM). Twenty-four representative receptor locations were used to evaluate the identified sensitive receptors within the project limits, including 12 locations in Missouri and 12 locations in Illinois. These are summarized in Table 10. As both IDOT and MoDOT have developed separate traffic noise policies, each state's policy was used to evaluate receptors within the respective state.

Existing traffic noise levels range from 58 dBA to 72 dBA. All but seven receptors meet or exceed the FHWA noise abatement criteria (NAC) in the existing condition.

Projected No-build traffic noise levels range from 58.0 dBA to 73.0 dBA. Projected No-build noise levels either remain unchanged or increase one to two dBA from the existing levels. The increase in traffic noise levels is due to the increase in traffic volumes. All but five receptors meet or exceed the FHWA NAC for the projected No-build condition.

Projected Build traffic noise levels range from 63 dBA to 75 dBA. Projected Build noise levels either do not change or increase up to 5 dBA over the projected No-build noise levels. All but three receptors approach, meet or exceed the FHWA NAC for the projected Build condition. Noise abatement was, therefore, evaluated for all but three receptors and is summarized in Table 11.

Table 10. Summary of Noise Receptors

Receptor No.	Noise Sensitive Area (NSA)	Type	Side of I-70, I-64 or I-55	Distance from Centerline (feet)	Measured From	Location
Missouri Side						
R1	1	School	West	183	I-70	2900 Hadley Street
R2	2	Single Family Residence	West	159	I-70	North 11 th Street
R3	3	Church	West	165	I-70	2501 North 11 th Street
R4	4	Park	West	153	I-70	Jackson Place Park
R5	5	School	West	243	I-70	2127 North 11 th Street
R6	6	Multi-Family Residence	West	235	I-70	North 11 th Street
R7	7	Church	West	160	I-70	2011 North 11 th Street
R8	8	Single Family Residence	West	150	I-70	North 11 Street
R9	9	Multi-Family Residence	West	600	I-70	Cass Avenue
R10	10	Day Care Center	West	265	I-70	818 Cass Avenue
R11	11	Multi-Family Residence	West	196	I-70	New Haven Court
R12	12	Multi-Family Residence	West	314	I-70	North 7 th Street
Illinois Side						
R13	13	Single Family Residence	West	450'	i-70	Saint Clair Avenue
R14	14	Single Family Residence	East	115*	I-70	North 3 rd Street
R15	15	Single Family Residence	West	235*	I-64	Saint Clair Avenue
R16	16	Single Family Residence	East	170*	I-55	Saint Clair Avenue
R17	17	Single Family Residence	East	224	I-64	Baugh Avenue
R18	18	School	West	510	I-64	715 North 15 th Street
R19	19	Church	East	221	I-64	1435 Baugh Avenue
R20	20	Church	East	208	I-64	1509 Baugh Avenue
R21	21	Multi-Family Residence	East	166	I-64	Baugh Avenue
R22	22	Church	East	209	I-64	1751 Baugh Avenue
R23	23	Multi-Family Residence	East	252	I-64	Baugh Avenue
R24	24	Single Family Residence	West	201	I-64	Saint Clair Avenue
* Distance to centerline of ramp.						
Source: Noise Technical Report, Huff and Huff, Inc., march 2008.						

Table 11. Noise Abatement Evaluation Summary

Barrier ID	Noise Reductions Achieved	Feasible	Noise Wall Cost	Number of Benefited Receptors	Cost Per Benefited Receptor	Economically Reasonable
R1	4 dBA	No	NA	NA	NA	Na
R2-R3	2 dBA	No	NA	NA	NA	Na
R4-R5	2 to 6 dBA*	No	NA	NA	NA	Na
R6-R7-R8	2 to 5 dBA†	No	NA	NA	NA	Na
R9-R10	0 dBA	No	NA	NA	NA	Na
R11-R12	0 to 1 dBA	No	NA	NA	NA	Na
R15	8 dBA	Yes	\$761,750	10	\$76,175	No
R16	8 dBA	Yes	\$450,000	5	\$90,000	No
R17	8 dBA	Yes	\$1,125,000	1	\$1,125,000	No
* A 6 dBA reduction is achieved at R5 but not at all primary receptors.						
† A 5 dBA reduction is achieved at R7 but not at all primary receptors.						
Source: Huff and Huff, 2008.						

Based on the noise abatement analysis, noise walls evaluated at all the receptor locations were either considered not feasible to construct (a substantial traffic noise reduction was not achieved) or the noise walls were not economically reasonable (the cost per benefited receptor exceeded the abatement cost criteria -- \$24,000 in Illinois, \$30,000 in Missouri). Therefore, no walls are proposed for this project. See Appendix C for more detailed analysis.

Cultural Resources

Illinois

Phase I archaeology was cleared in previous work done on the project. The Illinois Transportation Archaeological Research Program (ITARP) has reviewed records and has field checked the alignment. This project has been coordinated with Illinois Historic Preservation Agency (IHPA) (see Appendix A). A bi-state Section 106 Programmatic Agreement will be processed to describe the procedures that will be undertaken for archaeological work that may be necessary in the future.

None of the area within the construction areas of the New I-70 Mississippi River Bridge Crossing has been tested archeologically since the area typically is in private ownership and densely covered by historic fill and urban construction. However, excavations have been conducted in the immediate vicinity and have revealed intact and buried prehistoric resources. Moreover, mounds have been identified within the general project areas. Limited geomorphic coring has also been conducted in areas adjacent to the New I-70 Mississippi River Bridge Crossing corridor. A number of man-made soils have been identified of probable prehistoric construction. Assessment of these areas will require further trenching and coring.

The East St. Louis Mound Group is the largest Mississippian center in the United States. Because it is mostly buried under historic debris, its full extent is not known, but the New I-70 Mississippi River Bridge Crossing area falls within the heart of the center. Much of the area has been leveled and paved, but previous work in nearby areas has revealed that cultural resources can be found beneath modern features. The area within the proposed New I-70 Mississippi River Bridge Crossing is largely unknown. It is an artificial man-made surface (National City Stockyards and rail yards) covering portions of the Horseshoe Lake meander that in turn contains a point bar complex and buried sand island. This area is poorly understood geomorphologically and has never been archeologically investigated. Its close proximity to the East St. Louis Mound Group is noted.

Finally, the greatest potential for buried resources lies in the old Stockyard area between St. Clair and Exchange avenues. Nearby mound locations are known. Habitation resources can be expected between mound areas.

For further detail on impacts to archeology in Illinois, reference the report in Appendix C "Summary of Potential Historic Resources Impact in the Proposed IDOT I-64/I-55/70 Tri-Level and I-64 Connector Areas of the New Mississippi River Bridge Crossing Project, East St. Louis, St. Clair County, No. 2" prepared by the ITARP.

Missouri

Cultural resource investigations for the original New Mississippi River Bridge project are summarized in the report "Archival Search and Architectural Survey within the Area of Potential Effect (APE) for a New Mississippi River Bridge, St. Louis, Missouri (Archaeological Center of St. Louis, Inc., 1999). The architectural survey identified three buildings listed on the National Register of Historic Places, and 17 eligible for listing. The currently proposed down-scaled project involves three NRHP-eligible industrial properties. One building will be demolished and the other two will most probably be adversely impacted, depending on the final location of the proposed right-of-way. MoDOT has coordinated this project with the Missouri State Historic Preservation Office (see Appendix A).

The original cultural resources evaluations for the project date to 2001. That survey identified four architectural resources that would most probably be adversely affected by the project as it was identified at that time. All four resources were included in a section 4(f) evaluation and MOA prepared at that time. During a revisit of the project earlier this

year, it was determined that one of the original four resources was demolished by others. The other three architectural resources remain. One of the buildings will most likely be demolished by the project. Depending on the final location of the edges of the right of way, the other two buildings may or may not be adversely affected by the project. One of the buildings most likely will be indirectly affected. All three buildings were covered by the original 4(f) evaluation and MOA and they are also covered in the new MOA that is under current review.

No NRHP-eligible prehistoric or historic archaeological resources have been identified in the New I-70 Mississippi River Bridge Crossing APE but surveys and studies acknowledge that significant prehistoric and historic archaeological deposits associated with the St. Louis Mound Group (23SL4) and Big Mound (23SL3) could be preserved beneath the current built environment.

Further archaeological investigations in the project area or monitoring of construction activities will be outlined in a bi-state Section 106 Programmatic Agreement. If any intact prehistoric remains are encountered, FHWA, MoDOT and IDOT will consult with the State Historic Preservation Office (SHPO) and appropriate Native American Tribes to evaluate the significance of the remains and their mitigation if necessary. FHWA has conducted initial consultation with the Peoria and Osage tribes and their responses are included in Appendix A.

Natural Resources

Geology and Soils

Bedrock Geology – There are no changes in impacts to bedrock geology from what was reflected in the FEIS.

Surficial Deposits – The FEIS indicates that a total of 5,246,000 cu yd of fill material (1,062,000 cu yd in Missouri; 4,184,000 cu yd in Illinois) is estimated to be required for the proposed roadway construction. New I-70 Mississippi River Bridge Crossing project results in approximately half of impact to the surficial deposits that were listed.

Soils – There are no changes in impacts to soils from what was reflected in the FEIS.

Seismicity – There are no fundamental changes in how the proposed New I-70 Mississippi River Bridge Crossing is to be designed as compared to what was stated in the FEIS. However, there is a reduction in the number of structures. In particular, the following structures are not included as part of the New I-70 Mississippi River Bridge Crossing : the proposed interchange of I-70 and I-55 east of the Gateway International Raceway; the proposed interchange of relocated I-70 and IL 203; and the proposed interchange at the former I-64 Connector and Relocated IL 3. Additionally, there is a reduction in the number of ramps at the Tri-Level (I-55/64/70 Interchange and at the Missouri North I-70 Interchange.

Groundwater Resources

There are no changes in impacts to groundwater resources from what was reflected in the FEIS.

Vegetation and Cover Types

Construction Impacts – The FEIS indicates that, in Missouri, 63.68 acres are affected by the Preferred Alternative. All of this land use is urban. The New I-70 Mississippi River Bridge Crossing project affects only 38.31 acres, a reduction of 39.8 percent.

The FEIS indicates that, in Illinois, 264.88 acres are affected by the Preferred Alternative. This acreage is widely distributed across a variety of land uses. The New I-70 Mississippi River Bridge Crossing project affects only 102.93 acres, or only 38.9 percent of the original impact.

Landscape Restoration – There is no change in impacts to landscape restoration from what was reflected in the FEIS.

Wildlife Impacts

Migratory Birds

It has been determined that 15 species of migratory birds (such as willow flycatcher, Bell's vireo, yellow warbler, yellow-breasted chat, orchard oriole) are known to breed in the area. These species are considered to be in decline in Illinois but are not sensitive to fragmented habitats. The majority of the project corridor currently consists of urban, disturbed or previously developed land. The New I-70 Mississippi River Bridge Crossing will result in the loss of some wooded and shrubland areas and 2.30 acres of wetlands. However, the loss of is no change in wildlife impacts to reptiles and amphibians from what was reflected in the FEIS.

Threatened and Endangered Species

The FEIS indicates that the Preferred Alternative impacts locations supporting populations of the decurrent false aster (*Boltonia decurrens*) resulting in displacement of about 1,600 to 2,200 plants. The New I-70 Mississippi River Bridge Crossing project avoids these locations; therefore, there are no impacts to known locations of populations of the decurrent false aster. As indicated in the FEIS for the Preferred Alternative, the New I-70 Mississippi River Bridge Crossing is not expected to have any adverse effects on any other threatened or endangered species (or their habitat.) The wetland boundaries in the New I-70 Mississippi River Bridge Crossing project area were updated in a wetland survey conducted in August and September 2007. During this field work, no specimens of decurrent false aster were found.

Indiana Bat – The federally-endangered Indiana bat prefers habitats that contain wooded riparian corridors. Maternity colonies are found in old or dead trees with exfoliating bark. Winter hibernation takes place in caves. Suitable habitat for the Indiana bat is not present in the project area. There are no caves in the project area. IDNR confirmed that there are no new records of this species occurring in the area since the approval of the FEIS.

Pallid Sturgeon – This federally-endangered fish species is adapted to swift waters of large, turbid, free-flowing rivers. Six sites in the Mississippi River in the area of the proposed new bridge were sampled by IDNR between 1970 and 1999. No federally listed endangered or threatened fish species were identified during these surveys. As of 2006, no new records of this species have been established in the IDNR data base. However, due to the potential for the sturgeon to pass through or occur in the project area, MoDOT will complete a habitat assessment once pier locations have been established and in-river work associated with bridge construction can be described. The assessment will be coordinated with Illinois and Missouri state and federal resource agencies.

Currently, potential impacts to pallid sturgeon or their habitat in the project area are unknown. Further assessment, along with continued consultation with resource agencies, indicate that mussel surveys are necessary, MoDOT will arrange for a preliminary survey one year prior to bridge construction. If listed species are found during that survey, the mussel beds would be relocated before commencement of bridge construction.

Surface Water Resources/Water Quality

The changes associated with the New I-70 Mississippi River Bridge Crossing are not expected to result in water quality impacts greater than those identified in the FEIS.

In the discussion of the new bridge, the FEIS states that the bridge, "...which is programmed to have a maximum of only one pier in the river, may permanently displace an estimated 5,400 square feet (500 square meters). An additional 11,800 square feet may be temporarily displaced by a cofferdam that will be removed after construction." The current concept for the New I-70 Mississippi River Bridge Crossing bridge indicates that there will be four permanent circular foundation elements each 70 feet in diameter. This amounts to a total permanent displacement of 15,400 square feet. However, this is still subject to change during design. Temporary work will include a total displacement will be about 20,900 square feet, as follows:

- Four 80-foot diameter sheet pile cofferdams (20,100 square feet);
- Forty 4-foot diameter pile piles for trestles (500 square feet); and
- Twelve – 6-foot diameter shaft for temporary wind tiedowns (340 square feet).

In the FEIS, the Preferred Alternative resulted in the need to relocate a portion of the Cahokia Canal near the Relocated IL 3/Relocated I-70 interchange. The initial New I-70 Mississippi River Bridge Crossing project does not include this interchange during this initial stage of construction; thus, there is no need to relocate the canal.

In the FEIS, the Preferred Alternative resulted in impacts to an old oxbow of the original Cahokia Creek, located at the edge of Gateway Golf Links north of the Cahokia Canal. This impact is not included in the initial construction of the New I-70 Mississippi River Bridge Crossing project.

In the FEIS, the Preferred Alternative also resulted in impacts to part of an excavated lake, located on the landfill property north of I-55/70 and east of Route 203. This Impact is not included in the initial construction of the New I-70 Mississippi River Bridge Crossing project.

Floodplains

New I-70 Mississippi River Bridge Crossing

The Preferred Alternative was evaluated using 1981 Flood Insurance Study for St. Clair County. In 2003 the FEMA maps were updated for two reasons. The first reason was to digitize the maps. The second reason was to reflect better topographic mapping on the land side of the levee. The flood elevations shown on the 2003 maps are the same as shown on the 1981 maps that were utilized in the Mississippi River Project Drainage Studies. No new hydraulic study was performed to develop the 2003 maps. Since the Drainage Studies were prepared based on the flood elevations, no changes are necessary due to the issuing of the 2003 maps. In response to Hurricane Katrina both the 1981 maps and 2003 maps have been determined to be invalid due to decertification of the levees, however the Levee District is actively working with the Corps of Engineers to have the levees recertified. Recertification is expected within the next couple of years. Any changes in the flood frequency elevations of the Mississippi River between the Illinois levees and the Missouri floodwalls will be reflected in the revised Hydraulic Report. Therefore, for this Re-Evaluation, the 1981 Flood Insurance Study is used as it was in the FEIS.

Using the 1981 FEMA flood mapping, the New I-70 Mississippi River Bridge Crossing impacts 7.43 acres of floodplain in Illinois and 0.65 acre in Missouri for a total of 8.08 acres. The FEIS estimated 28.5 acres of impact for the Preferred Alternative. The New I-70 Mississippi River Bridge Crossing project results in a decrease of 20.42 acres, or a 72 percent reduction from the original total from the FEIS.

Storage

Surface water storage is required to compensate for filling in flood zones and for extra runoff from impervious surfaces such as roadways. In the FEIS, two types of storage basins were identified on the project: compensatory storage and differential storage.

The FEIS indicated that compensatory storage would be accomplished by using roadside ditches along the affected areas (Page 32, Section G, first paragraph). This does not change for the New I-70 Mississippi River Bridge Crossing.

The FEIS also states that “the project’s compensatory flood storage areas will be designed to ensure no rise in the Base Flood Elevation (100-year flood), or one or more Conditional Letters of Map Revisions will be obtained in accordance with federal and state guidelines” (page 39, Section G, last paragraph). This has not changed for the New I-70 Mississippi River Bridge Crossing.

Differential storage is a design feature. The FEIS stated this on page 34 (Section G, first paragraph). This has not changed for the New I-70 Mississippi River Bridge Crossing.

Wetlands

The area of impacted wetland for the Preferred Alternative was estimated to total 41.7 acres in the FEIS. Table 4F.23 of the FEIS presented the wetland impact at each site, the relevant compensation ratio, and the resulting compensation requirement for each affected wetland area. The total required compensation area was 222.7 acres for the Preferred Alternative. Figure F4.S of the FEIS shows the locations of the wetlands. Approximately 33.61 acres of wetland impacts from the Preferred Alternative were associated with the portion of relocated I-70 north of Gateway International Raceway through the American Bottoms.

The New I-70 Mississippi River Bridge Crossing results in a reduction to wetland impacts compared with the Relocated I-70 for the Preferred Alternative. The original wetland impacts from the FEIS at the IL 3 interchange and at IL 203 are no longer applicable.

The total wetland acres impacted in the American Bottoms for the New I-70 Mississippi River Bridge Crossing project is estimated at 2.30 acres, 39.4 acres less than the amount for the originally planned project. These impacts are roughly associated with the locations of Wetlands A and BB in the FEIS; however, the wetland boundaries were updated in a wetland survey conducted in August and September 2007. This survey depicts the impacted wetlands as Site 3 (formerly Site BB in the FEIS) having 2.20 acres of impact; and Site 5 (near Site A in the FEIS) having 0.10 acres of impact. Wetlands at Sites 3 and 5 are emergent.

The mitigation ratio in the FEIS for these sites was 5.5:1 due to the presence of a threatened and endangered species, decurrent false aster. During the 2007 wetland survey, all areas that appeared to be suitable habitat for this species were thoroughly searched, but decurrent false aster was not found. The species does not appear to be anywhere within the project corridor. Therefore, the mitigation ratio for Wetland Sites 3 and 5 is 1.5:1. Using a mitigation ratio of 1.5:1 for these sites, the total mitigation requirement is 3.45 acres.

Mitigation in the amount of 3.45 acres will be accomplished at the 65.99-acre Fairmont City site purchased by IDOT in 1999.

Special Lands

The FEIS reported that eight Section 4(f) public parks/recreation facilities are in the immediate project vicinity of the Preferred Alternative, and that none are expected to be adversely affected by the proposed action. None of the changes included in the New I-70 Mississippi River Bridge Crossing result in new impacts to any of these facilities.

Aesthetic and Visual Impacts

The only change associated with New I-70 Mississippi River Bridge Crossing and the Preferred Alternative is the reduced visual impact of the Missouri North I-70 Interchange due to its smaller scale. The Missouri South Interchange (at the west end of the Poplar Street Bridge) is not included in the initial construction of the New I-70 Mississippi River Bridge Crossing.

Special Waste

The Special Waste discussion in the DEIS and FEIS is still valid. However, the impacts listed in the FEIS have been revised to reflect the New I-70 Mississippi River Bridge Crossing project. In the original FEIS, the Preferred Alternative impacted three Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) sites (where no prudent or feasible alternative is available for avoidance): IL-13, the SCA/Milam Landfill; MO-48, Greyhound Bus Lines and Vulcan Metals Co.; and MO-50, a vacant lot. None of these CERCLIS sites are impacted by the New I-70 Mississippi River Bridge Crossing project.

In the DEIS, eleven underground storage tank (UST) sites were listed to be acquired (in whole or part) in Illinois and 20 were to be acquired (in whole or part) in Missouri. Under the New I-70 Mississippi River Bridge Crossing project, only three UST sites are impacted in Illinois: IL-25, IL-27 and IL-46. In Missouri, only eight UST sites are impacted: MO-9, MO-11, MO-19, MO-29, MO-30, MO-32, MO-36 and MO-84.

The DEIS also lists impacts to miscellaneous contamination sites: 12 sites were listed to be acquired in Illinois; and 54 sites were to be acquired in Missouri. Under the New I-70 Mississippi River Bridge Crossing project, only four sites are impacted in Illinois and 24 sites are impacted in Missouri. The Illinois sites include: IL-17, IL-18, IL-33 and IL-47. The Missouri sites include: MO-1, MO-2, MO-3, MO-5, MO-6, MO-7, MO-12, MO-13, MO-17, MO-20, MO-22, MO-23, MO-24, MO-25, MO-33, MO-34, MO-35, MO-37, MO-38, MO-40, MO-54, MO-70, MO-77 and MO-78.

One site, referred to as the "Siddle property" is located northeast of St. Clair Avenue between the Gateway Eastern Railway and the CSX Railway, just north of the Tri-Level Interchange. This entire site will be capped with three feet of soil, tapering down at the right of way lines. Any roadway improvements associated with the initial phase New I-70 Mississippi River Bridge Crossing or future improvements described in the FEIS will bridge over this property. The structure is to be designed so that no existing soil will be displaced on the Siddle property.

It should be noted that numerous parcels identified in the Preliminary Environmental Site Assessment (PESA), dated November 6, 2007, are already owned by MoDOT.

There is also potential to have a large number of asbestos abatement projects and painted concrete that will likely need to be disposed of in a special landfill.

A Special Waste Waiver has been granted and is included in Appendix A of this Re-Evaluation. This Waiver will allow design work to proceed concurrently with the Preliminary Site Assessments for Special Waste.

Secondary and Cumulative Impacts

The secondary and cumulative impacts discussed in the FEIS for the Preferred Alternative are still relevant to the New I-70 Mississippi River Bridge Crossing.

Construction Impacts

The discussion of construction impacts in the FEIS for the Preferred Alternative is still relevant to the New I-70 Mississippi River Bridge Crossing.

The proposed project will require a U.S. Coast Guard Section 9 Bridge Permit, a U.S. Army Corps of Engineers Section 10 permit, a floodplain development permit from the Missouri State Emergency Management Agency, and a Department of the Army Section 404 permit, issued contingent on water quality certification under Section 401 of the Clean Water Act.

Proposed Mitigation Measures

The mitigation measures included with the FEIS for the Preferred Alternative are applicable to New I-70 Mississippi River Bridge Crossing project to the extent that they apply to the initial phase portion of the project. Mitigation measures for Phase II of the project will be committed to at such time that Phase II work begins.

Boltonia decurrens

As part of the IDOT's commitment to the USFWS, the IDOT began implementing the mitigation measures stated in the September 7, 2000, Biological Opinion on the threatened decurrent false aster (*Boltonia decurrens*). The IDOT's effort began in 2002 and continued through 2006. Mitigation measures included attempting to reestablish populations of *B. decurrens* at the Cahokia Site, implementing a monitoring plan for at least five years to determine if the established populations were stable or expanding, implementing a monitoring program for the colonies of *B. decurrens* occurring in the project area, but which will not be affected by construction activities to determine if these populations are stable or expanding, and obtain conservation easements on properties containing the largest concentrations of *B. decurrens*.

Despite attempts, no populations of *B. decurrens* were successfully established at the Cahokia Site. It was also determined that no *B. decurrens* colonies present in the project area were stable or expanding. The data suggested that populations of *B. decurrens* are inherently unstable and that their size and number decline in the absence of disturbance, such as flooding. In addition, the largest known concentration of *B. decurrens* within the project area was located at the Fairmont City Illinois Natural Areas Inventory Site. This site is already protected, as the Illinois Natural History Survey reported that it is posed with wording to indicate this at the site. The Fairmont City Wetland Site contains *B. decurrens* which could be reaching the site by being transported along Old Cahokia Creek from the adjacent Fairmont City Illinois Natural Areas Inventory Site.

On December 5, 2007, the IDOT met with the USFWS and it was agreed that the IDOT had put forth a good faith attempt to implement the conservation recommendations. The subsequent December 20, 2007 letter from the IDOT to the USFWS served as document closure of the *B. decurrens* effort.

Wetlands

The IDOT purchased the 65.99-acre Fairmont City Site on November 10, 1999. The Fairmont City Site has been monitored by the Illinois State Geological Survey (ISGS) since 2001, and the site has been reverting back into a wetland. In 2005, maintenance was conducted at the Fairmont City Site which consisted of the removal of invasive trees and minimal mowing. Also, the Illinois Natural History Survey has been monitoring this site since the purchase.

Public Meetings

Public information meetings were held on Monday, May 19th and Tuesday May 20th, 2008. The May 19th meeting was held at the Clay Elementary School, 3820 North 14th Street in St. Louis, Missouri and the May 20th meeting was held at the Clyde C. Jordan Senior Center, 6755 State Street, East St. Louis, Illinois.

The purpose of these meetings was to present to the public the proposed Phase I Improvements for the New Mississippi River Bridge Crossing. The Phase I Improvements were presented as part of the original 2001 Final EIS Selected Alternative. Exhibits were displayed showing the proposed interchange at I-70 and the bridge approaches on the Missouri side; the proposed alignment of I-70 from the Mississippi River through the old National Stockyards property on the Illinois side; and the proposed layout of the Tri-Level Interchange at I-55/70/64 on the Illinois side. Right-of-way representatives from the Missouri and Illinois Departments of Transportation were present at each meeting to address questions and comments from affected property owners. A movie showing a computer-generated animated fly-over of the proposed river bridge was also on display. Attendees were also provided a two-page information sheet on the project along with maps of the proposed Phase I Improvements.

A total of 126 people attended the May 19th meeting at the Clay Elementary School and 109 people attended the May 20th meeting at the Clyde C. Jordan Center. The overall responses to the New Mississippi River Bridge project were generally favorable with isolated concerns from specific property owners. Copies of all comment forms received by the study team can be made available upon request.

Deferred Components

The deferred components represent portions of the original FEIS project that are not included in the New I-70 Mississippi River Bridge Crossing. The following components are expected to comprise future Phase II stages of project construction:

- Relocated I-70 in Illinois, roughly between existing IL 3 (St. Clair Avenue easterly to existing I-55/70 east of IL 203);
- Improvements to the ramps at the west side of the existing I-55/I-64/I-70 Poplar Street Bridge (Missouri South Interchange);
- A second 4-lane Mississippi River Bridge and 8-laning the entire relocated I-70 corridor;
- Additional ramps and interchange improvements on the Missouri I-70 North Interchange; and
- Local street improvements at the I-55/64 interchange in Illinois.

These components are part of the overall plan as stated in the FEIS and were evaluated during the processing of the original EIS. There have been no changes to the affected environment from the FEIS in relation to the National Register of Historic Places, geology and soils, surface water resources, groundwater, terrestrial and vegetation, and wildlife habitat. In addition, there have been no new federal, Missouri, or Illinois threatened and endangered species listed for counties within the study area since the FEIS was signed. Also, a records search indicated that no new CERCLIS sites were present within the project corridor.

Deferred Components Air

There have been a number of new air quality regulations and guidance issued since the FEIS was signed. A few include the PM_{2.5} non-attainment designation, and PM_{2.5} and PM₁₀ Hot-Spot Analyses in Project-Level Transportation Conformity Determinations. When the deferred components are funded for Phase I Preliminary engineering, they will be re-evaluated for all appropriate air quality issues including performing a carbon monoxide analysis, documenting PM_{2.5} Hot-Spot requirements, and will be included in a future TIP and Long Range Transportation Plan, as appropriate.

Deferred Components Archaeology

Since the FEIS was signed, the Illinois Transportation Archaeological Research Program (ITARP) has completed an archaeological and geomorphological study of the deferred

components in Illinois. For the purposes of the study, the I-70 corridor was evaluated in three sections: an east section from the east end of the project to IL 203, a center section from IL 203 to IL 3, and a west section from IL 3 to the Mississippi River. The following was determined:

1. The eastern section – Geomorphic investigations have indicated that this section is situated in a low-lying portion of the old Horseshoe Lake Paleomeander and the potential for deeply buried resources is extremely low. The entire section represents an area of extremely low potential for significant surficial or buried cultural resources.
2. The center section – The study concluded that any potential resources in this section have been destroyed by human activities. Therefore, this section has little to no potential for producing significant archaeological resources. Geomorphic investigations have indicated a low-lying environment with little to no potential for buried or surficial resources.
3. The western section – The study concluded that any archaeological resources in this area have been buried or probably destroyed by earlier erosional activities of the Mississippi River and that the western section would have extremely low potential for cultural resources.

Deferred Components Floodplains

The total 100-year floodplain encroachment for the deferred components was estimated at 40 acres, compared to the FEIS estimate of 25.4 acres. The increase is due to the 2003 FEMA flood maps being expanded the areas within the American Bottoms that are classified as 100-year flood zones.

Deferred Components Wildlife

Migratory Birds

Executive Order 13186, *Responsibilities of Federal Agencies to Protect Migratory Birds*, was signed January 10, 2001, shortly before the FEIS was signed. This Executive Order was not addressed in the FEIS. It has been determined that 15 species of neotropical migrants (such as willow flycatcher, Bell's vireo, yellow warbler, yellow-breasted chat, orchard oriole) are known to breed in the area. These species are considered to be in decline in Illinois but are not sensitive to fragmented habitats.

Deferred Components Endangered Species

Federally Listed Species

The Deferred Components occur within St. Clair County, Illinois and St. Louis County, Missouri. The USFWS (Columbia, Missouri) lists (July 2005) the gray bat, Indiana bat, pallid sturgeon, pink mucket, scaleshell, and running buffalo clover as occurring in St. Louis County, Missouri. Except for the scaleshell, the remaining listed species were discussed in the DEIS. The City of St. Louis project component has no affect on the scaleshell (a species of mussel) because the proposed work does not occur within the Mississippi River.

The USFWS (Rock Island, Illinois) lists (September 2007) the Indiana bat, eastern prairie fringed orchid, prairie bush clover, decurrent false aster, pallid sturgeon, and Illinois cave amphipod as occurring in St. Clair County, Illinois. All of these species were discussed in the DEIS. Except for the decurrent false aster, none of these species occur within the Deferred Components project area. The I-70 connector project area contains a total of 22 areas (mostly wetland sites) of the decurrent false aster. The numbers of plants within these areas ranged from 5 to 100,000 (Table 2.20, DEIS). Because of the projects impact on the decurrent false aster, a biological assessment was prepared and coordinated with the USFWS (Marion, Illinois). A biological opinion from the Service was received on March 14, 2000 and was included in Appendix A of the FEIS. The Service concluded that the proposed action is not likely to jeopardize the continued existence of the species (decurrent false aster).

Within the biological opinion, the USFWS provided four conservation recommendations for this species: (1) reestablish populations of decurrent false aster on all suitable wetland mitigation sites; (2) implement a monitoring plan for a minimum of 5 years to determine if the established populations are stable or expanding; (3) implement a monitoring program for colonies of decurrent false aster occurring in the project area, but which will not be affected by construction activities to determine if these populations are stable or expanding; and (4) obtain conservation easements on properties containing the largest concentrations of decurrent false aster to protect these colonies from future development.

The IDOT began a five-year effort to implement the conservation recommendations in 2002. This effort concluded in 2006. The summary of the results of the five-year effort are as follows: Attempts to establish new colonies within wetland mitigation sites failed (recommendations 1 and 2), it was concluded that none of the existing 22 colonies could be considered stable or expanding (recommendation 3), and one of the larger populations, the 80-acre IDOT-owned Fairmont City wetland mitigation site, will be planned to conserve the decurrent false aster. The decurrent false aster on this site will be monitored annually until 2012. The closure letter (December 20, 2007) to the USFWS is attached (Appendix A).

State Listed Species

The only Missouri listed species in the projects urbanized area are aquatic and potentially occur within the Mississippi River. The DEIS considered Missouri listed species. The City of St. Louis Deferred Component occurs within an urbanized area and will not affect these species.

A total of 19 Illinois listed species were identified in the DEIS. Five of these species, loggerhead shrike, black-crowned night heron, snowy egret, little blue heron, and common moorhen, were observed foraging in and around the project area (Figure F4.S, FEIS). None of these species were observed nesting within the project area. The Illinois DNR Natural Heritage Database (March 28, 2008) has no records of these or any other state listed species as occurring within or adjacent to the I-70 Connector or the other Deferred Components.

Deferred Components Noise

Since the FEIS was signed, STAMINA 2.0, the noise model used for the FEIS has been superseded by the FHWA Traffic Noise Model (TNM) 2.5. In April 2004, FHWA required the use of TNM 2.5 for all federal-aid highway projects beginning May 2, 2005 or later. TNM 2.5 was used as the traffic model for the deferred components. It was determined that noise walls were not warranted in Illinois or Missouri for the deferred components.

Although the preliminary sound study done in 2008 indicates that no sound walls are needed for the deferred components in Missouri, a new sound study will need to be done in the future for the Phase II components in Missouri to determine if sound walls are required.

Deferred Components Social/Economic

The FEIS indicated that major land use includes undeveloped fields, highway and rail transportation facilities, and many abandoned sites. While land use has remained mostly the same since the FEIS, EWGCOG shows the following land uses on the Illinois side: commercial, industrial, agricultural, residential, and transportation. On the Missouri side, the land use has not changed from what is stated in the FEIS.

Deferred Components Special Lands

The FEIS identified three Missouri parks, Carr Square Park, Jackson Place Park, and Cochran Gardens Ballfields, and one publicly owned recreation area adjacent to the

project, the Jefferson National Expansion Memorial. No Illinois parks within or adjacent to the FEIS study area were identified in the FEIS, and there are no new Illinois parks within or adjacent to the project area. The design of the Missouri South Interchange and associated impacts to the three parks have not changed since the FEIS. The anticipated impacts to the Jefferson National Expansion Memorial have not changed since the FEIS. Therefore, the Memorandum of Agreement (MOA) between the FHWA and the National Park Service (September 2000) concerning impacts to the Jefferson National Expansion Memorial is still valid.

Deferred Components Wetlands

The FEIS identified the loss of 41.74 acres of wetlands from 21 sites requiring the compensation of 222.72 acres. The Illinois I-70 connector would cause the loss of 38.04 acres from nineteen sites requiring compensation of 208.26 acres. The extension of Collinsville Avenue will cause the loss of 1.19 acres from two sites requiring 6.53 acres of compensation. The two deferred components will cause a total loss of 39.23 acres of wetlands. There are no wetlands associated with the I-55/I-64/I-70 interchange improvements west of the Poplar Street Bridge within the City of St. Louis.

Wetland compensation has been pursued. Currently, IDOT has purchased three mitigation sites that could generate 110 acres of wetlands. These sites have been coordinated with the U.S. Army Corps of Engineers, USFWS, and the Illinois Department of Natural Resources.

Deferred Components Water Resources/Quality

The I-70 Deferred Component will involve bridging over an eastern segment of the Canal. This Deferred Component will also affect an old oxbow of the original Cahokia Creek and an excavated lake located on the landfill property north of I-55/70 and east of IL Route 203 (Figure F4.S, FEIS depicts these features). These water resources were discussed in the FEIS.

The water quality for the Cahokia Canal is in nonsupport of its aquatic life designated use. The nonsupport is due to iron, phosphorus (total), sedimentation/siltation and total suspended solids. Water quality data for Old Cahokia Creek and the landfill lake are not available. Water quality was discussed in the DEIS. Since the FEIS, the Illinois EPA is currently preparing a Total Maximum Daily Load (TMDL) assessment for the Cahokia Canal. The TMDL will determine the greatest amount of a given pollutant that the Canal can receive without violating the water quality standards and designated uses. The affect of the TMDL on the proposed Canal relocation is currently unknown.

Conclusion

It is therefore concluded that based on the changes presented in the preceding paragraphs, the preparation of a formal Supplemental or new EIS is not necessary. The impacts associated with the New I-70 Mississippi River Bridge Crossing project are less than those associated with the Preferred Alternative in the FEIS.