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Public Comment Summary

The following provides a summary of the public comments received on the Draft First Tier Environmental Impact Statement (FTEIS). The comments were received through the project blog, email, comment cards, and verbally at the public hearings. The Study Team has prepared a response for all substantive comments received.

Project Blog Comments

Comment:
I can't tell from the slide presentation which proposal addresses the issue in the loop, particularly on the north side, where there are too many on/off ramps that are too short. Also, they are at an awkward angle so that traffic coming off I70 and on to the surface roads have a hard time seeing on-coming traffic. To me that safety issue is more important than adding lanes.

Also, I would like to see a better map of environmental impact and where homes will be affected. Maybe it's on another slide deck?

Response:
All assessment of impacts at this point are high level estimates and may change as the study proceeds into more detailed Second Tier Studies. The Second Tier Studies will examine individual parts of the I-70 corridor in more detail. Slide M-33 of the on-line public hearing provides a summary of the estimated overall number of relocations for each of the strategies. The Build Strategies have been developed with broad footprints, thus the relocation counts should be considered an order of magnitude at a point in time. The Second Tier Studies will study the strategies in more detail, including more detailed engineering drawings, and the relocation estimates will likely change.

Chapter 2 of the **Draft FTEIS** provides detailed information on the Build Strategies. **Chapter 3** of the **Draft FTEIS** includes additional maps of the potential environmental impacts.

Comment:
Being a landscape architect student at Kansas State from Independence, MO I'm ashamed to think MoDOT is proposing to expand I-70 to 8 lanes. This will increase traffic more than anything instead of solving current problems. Noise will be greater no matter what solution is kept and I believe air quality will decrease because of more cars traveling on the I-70. I do agree that some interchanges could be better routed and visibility be added for increased safety.

With that being said, I encourage MoDOT to seek more environmentally sensitive ideas instead of adding lanes solely benefiting automobile traffic. MoDot should encourage biking, walking,

mass transit as society shifts to a more sustainable future. Long term ecologically sound goals need to be found to shift the Kansas City Metro Area from being such an oil dependent city. Perhaps, the light rail idea needs to be considered instead of extra lanes and span from the airport, to downtown, to East Lee's Summit.

Check out Denver's I-35 corridor with their light rail improvements and pedestrian bridges. This can be the future of Kansas City, and the time is NOW!

Response:
The Preferred Strategy does not propose to add lanes from the Downtown Loop to I-435 and leaves the decision on adding lanes east of I-435 to the Second Tier Studies. All of the Build Strategies are expected to increase noise levels for residents and businesses near I-70. In the Second Tier Studies, corridor improvements that require significant changes in horizontal or vertical or an increase in the number of through lanes, then MoDOT will conduct a noise study to provide a preliminary assessment of needed mitigation during the Second Tier Studies. However, the actual mitigation measures will not be determined until the formal design phase of the project in accordance with MoDOT's Noise Policy. Additional information on noise and its impacts is located in **Section 3.1.10** of the **Draft FTEIS**.

The Preferred Strategy is expected to improve air quality by removing existing bottlenecks which create congestion and stop and go traffic flows. The improved traffic flow will allow vehicles to travel more efficiently. The Second Tier Studies will further evaluate the effects that the Preferred Strategy will have on air quality and will include air quality modeling using Federal Highway Administration improved model and conformance analysis through Mid-America Regional Council. Additional information on air quality and its impacts is located in **Section 3.1.11** of the **Draft FTEIS**.

The Preferred Strategy includes coordination with the Smart Moves Regional Transit Vision, bus on shoulder, improving non-motorized access across I-70 and the downtown loop with Community Bridges, and investigating locations to add Park and Ride lots as necessary.

Comment:
8 lanes????!!!! WHAT? NO WAY!!!! I am an I-70 commuter, 10 hours per week, Blue Springs to Crown Center, 5 days a week. I know for a fact 8 lanes is no solution. It compounds the problem. 8 lanes of high speed traffic is not environmentally friendly –to people and wildlife, it is not safe, it is not quiet, it will not get you downtown any faster, and most importantly, expanding it to 8 lanes is NOT a very sensible way to spend the taxpayer's money in this economy, that is not a long term fix! There are more resources available now than ever before for problem solving, and I beg MoDot to USE these resources to find a better solution.

Response:
The Preferred Strategy does not propose to add lanes from the Downtown Loop to I-435 and leaves the decision on adding lanes east of I-435 to the Second Tier Studies. The reasons that the Study Team decided to leave this decision until the Second Tier Studies is discussed in **Section 2.5** of the **Draft FTEIS**. The Preferred Strategy is considering additional lanes or improvements at key congestion points, such as interchange ramps from I-435 to I-470. In addition, the Preferred Strategy includes coordination with the Smart Moves Regional Transit Vision, bus on shoulder, improving access across I-70 and the downtown loop for non-motorized travel, and investigating locations for additional Park and Ride lots.

Comment:
Expanding is just going to make the problem worse. Every day along 70 up to 435 headed east is a test of your braking system; from those that do not want to wait their turn. Cutting people off, and using the turning lane to 435 as a chance to cut more people off. Looking at the on and off ramps is a better way to spend money. Make those ramps more flowing with traffic and less accesible for those trying to cut in line.

Response:
In addition to the project currently programmed for the I-435 interchange area in the Statewide Transportation Improvement Plan (STIP), the Preferred Strategy includes improvements to the I-435 interchange area. Similar to the programmed STIP project, the proposed improvements include adding lanes to I-435; modifying ramps into a collector-distributor system on I-70 and I-435 and extending ramps at several locations for additional weave, merge and diverge area; reconstructing and relocating the fully directional ramps to eliminate left-side exits from the interstate. The Preferred Strategy would also evaluate the need to modify some interchange access.

Comment:
M-16 - I really hope you won't do bus on shoulder. It's over-sold. Besides, when traffic is slow enough to justify running on the shoulder the bus will probably make better time on a parallel arterial. Instead of bus on shoulder, focus on measures to reduce the congestion that would trigger bus on shoulder. Manage access to the freeway through a combination of strategies that discourage SOV travel -- ramp metering with HOV bypass, congestion pricing, or other form of access fees for SOVs. Do that and you'll get the freeway to work well for everybody.

Response:
The Initial Strategy Package 8: TSM/TDM plus Bus Rapid Transit Solutions in **Section 2** of the **Draft FTEIS** focused on a combination of improvement concepts specifically aimed at reducing vehicle emissions and automobile use in the I-70 corridor. This package included encouraging

Transportation System Management and Transportation Demand Management activities. Transportation System Management programs identified in Mid-America Regional Council's (MARC) Congestion Management System toolbox include traffic signal coordination, enhanced freeway incident detection and management, ramp metering, advance traveler information systems, and highway information systems. While this package was not carried forward, these types of measures could also be implemented as part of the No-Build Strategy or other Build Strategies.

Comment:
M-17 - Add general traffic lanes only as a last resort. Freeway lanes are costly to build and maintain. Given that a lot of trips on urban freeways are relatively short distances, improve the capacity on parallel arterials and encourage people to use them instead of providing capacity for short trips on the freeway.

Response:
Comment acknowledged.

Comment:
M-20 - I don't understand the transportation improvement corridor concept -- but I don't think I'd like it if I did.

Response:
The Transportation Improvement Corridor Strategy builds upon the elements of the Improve Key Bottlenecks Strategy plus it adds a transportation improvement corridor between the downtown loop and east of Lee's Summit Road. The transportation improvement corridor could be located between the eastbound and westbound lanes or on one side of the I-70 corridor. As currently proposed, the transportation improvement corridor would be barrier separated from the regular traffic lanes. The transportation improvement corridor could be used for congestion managed lanes, reversible lanes, high occupant vehicle lanes, or bus lanes. Additional information on the Transportation Improvement Corridor Strategy is located in **Chapter 2** of the **Draft FTEIS**.

Comment:
M-25 - Good. Add general lanes only as a last resort.

Response:
Comment acknowledged. The Preferred Strategy does not propose to add lanes from the Downtown Loop to I-435 and leaves the decision on adding lanes east of I-435 to the Second

Tier Studies. The reasons that the Study Team decided to leave this decision until the Second Tier Studies is discussed in **Section 2.5** of the **Draft FTEIS**.

Comment:
M-28 - Noise is a major impact of any freeway. Rather than put up noise barriers, reduce noise levels by designing for and enforcing lower speeds, and by choosing pavements that have low noise characteristics.

Response:
In the Second Tier Studies, corridor improvements that require significant changes in horizontal or vertical or an increase in the number of through lanes, then MoDOT will conduct a noise study to provide a preliminary assessment of needed mitigation during the Second Tier Studies. However, the actual mitigation measures will not be determined until the formal design phase of the project in accordance with MoDOT's Noise Policy. Additional information on noise and its impacts is located in **Section 3.1.10** of the **Draft FTEIS**.

Emails

Comment:
I drive I-70 everyday for work from eastern Jackson County to downtown Kansas City. Your Preferred Strategy is a nice start and would have some minimal positive outcomes. However, I am disappointed there isn't some movement towards additional traffic flow alternatives during rush hours such as reversible lanes or express lanes.

In addition, the bus transportation from out east although available, is often full. More buses with more park and ride lots would be helpful.

Response:
The Study Team considered all of the options listed above. Initial Strategy Package 3, Package 4, Package 6, Package 7, Package 8, and Package 14 in **Section 2** of the **Draft FTEIS** included improvements such as high occupancy vehicle (HOV) lanes, bus rapid transit (BRT) on parallel arterial routes, reversible lanes, and bus only lanes. More information on these strategies can be found in **Chapter 2** of the **Draft FTEIS**. Package 3 and Package 6 in **Section 2** of the **Draft FTEIS** were not carried forward as a First Tier Strategy because the elements within these packages were very similar to Package 7 which was carried forward and became the Transportation Improvement Corridor Strategy. Package 4 was not carried forward because of the cost and other issues related to the tunnel. It is not an efficient or practical way to meet the purpose and need. Package 8 was not carried forward because it did not meet several purpose

and need goals. Package 14 was not carried forward due to not meeting the purpose and need goals as well as other packages and providing only limited improvement.

Package 7 Fix Key Bottlenecks plus Transportation Improvement Corridor in **Section 2** of the **Draft FTEIS** was carried forward as a First Tier Strategy, but was eliminated from consideration because even though it meets the purpose and need of the First Tier Strategies it has the most impacts and the highest cost. Other strategies met the key reasons for improvements with lower costs and impacts.

The Preferred Strategy does include coordination with the Smart Moves Regional Transit Vision, and investigating locations to add Park and Ride lots as necessary.

Comment:

I am wondering if increasing the bus service is an option that has been considered, either short-term during this project or long-term to reduce traffic on the I-70 run. I am fully aware that MODOT does not run the Kansas City public transit service. However, I am wondering if a partnership between the KCATA and MODOT could result in more buses serving Blue Springs and Lees Summit. I have worked downtown for more than 10 years. I have a management-level position and my schedule is not always 8-5. The last bus back to Blue Springs leaves downtown at 5:17. That is simply not reasonable for many working professionals. Additionally, the Express buses from Blue Springs and Lees Summit are dangerously crowded when I do ride them. It is not uncommon to have 20-25 people STANDING on these buses while they hurtle down I-70 at 65 mph. Over the years when I have been a bus rider, I have seen many bus patrons become frustrated with the overcrowding on buses and resume driving on I-70. I drive next to the bus I should be ON every morning on I-70. I simply cannot be on it because I cannot count on my work demands to get me to the bus stop by 5:17 p.m. to make it home in the evenings.

Response:

Currently the Kansas City Area Transportation Authority is solely responsible for setting the bus schedules in conjunction with local jurisdictions. Federal, state, and local entities fund the operation of transit routes. The Preferred Strategy anticipates expansion of express bus service along I-70 as well as coordination with other potential transit initiatives in the region. This is one of the reasons that the decision to add lanes east of I-435 has been left to the Second Tier Studies. Long term additions of transit services may lessen the need to add lanes.

Comment:

We have lived at this address for 44 yrs.and our back yard is adjacent to the I-70 corridor, and the noise level has increased 10 fold or more in this period. I have seen other metros such as Mls-St Paul, where noise barriers have lessened the problem. I realize that funds for

improvement have been less than ideal in past years, and I have been patient, but I feel strongly that the time to address this issue is NOW. Don't wait or it won't get done in my lifetime. Good luck and God speed.

Response:
In the Second Tier Studies, corridor improvements that require significant changes in horizontal or vertical or an increase in the number of through lanes, then MoDOT will conduct a noise study to provide a preliminary assessment of needed mitigation during the Second Tier Studies. However, the actual mitigation measures will not be determined until the formal design phase of the project in accordance with MoDOT's Noise Policy. Additional information on noise and its impacts is located in **Section 3.1.10** of the **Draft FTEIS**.

Comment:
Please use your considerable influence to pressure Missouri's Attorney General and the Missouri Department of Justice to enforce current state obscenity laws regarding pornography retailer signage along I-70. A well-traveled friend recently visited us from Pittsburgh. He couldn't believe the saturation of adult bookstore billboards along I-70. No matter what you do with the pavement, such constant visual assault across Missouri is offensive and disturbing, especially since Missouri law makes it possible to curb such an assault.

Response:
Comment acknowledged.

Comment:
Will sound walls be included when adding lanes to I-70? Do you expect to need to buy homes in my Eastgate area backing up to I-70, close to Crysler, to be able to add lanes? and how far would you estimate buying them up since E 41st street currently backs up to I-70 and we are one street north of that? I don't want to end up with a sound wall or I-70 in my front yard so want to know how far you estimate going in to this area for expansion. This is important to us as homeowners and our future. I know you won't have exact info, but would appreciate your educated estimates. Thank you.

Response:
The assessment of impacts completed for this first tier study are high level estimates and may change as the study proceeds into more detailed Second Tier Studies. The Second Tier Studies will examine individual parts of the I-70 corridor in more detail. **Section 3.1.4** of the **Draft FTEIS** provides a summary of the estimated overall number of relocations for the Preferred Strategy. Since these strategies have been developed with broad footprints, the relocation counts should be considered an order of magnitude at a point in time. The Second Tier Studies

will study the strategies in more detail, including more detailed engineering drawings, and the relocation estimates will likely change.

Funding has been not identified to begin the Second Tier Studies and the subsequent phases which are design and construction. When the design phase of a project is funded and finished, MoDOT will be able to identify the properties it needs to purchase. Only after construction is funded, will the timeframe for property acquisition be known.

During the Second Tier Studies, MoDOT will conduct noise studies for improvements that require significant changes in horizontal or vertical alignment or an increase in the number of through lanes, to provide a preliminary assessment of needed mitigation. However, the actual mitigation measures will not be determined until the formal design phase of the project in accordance with MoDOT's Noise Policy.

Comment:
You should consider permanant closure of at least some of the exit/entrance ramps currently closed with the KC bridge project. My trip eastbound out of the city has never gone so smooth merging into 2 lanes just past Prospect. The ramp closures have improved traffic flow out of KC.

Response:
The downtown loop improvements in the Preferred Strategy would also consider interchange additions, consolidations, modifications, and/or eliminations at locations to improve traffic flow and safety. These will be decided in the Second Tier Studies.

Comment:
Make a bypass from oak grove, mo to lawrence, ks via southern 435/470 bypass. make current 70 thru a toll and allow triples trailers on bypass.

Response:
Comment acknowledged. While truck traffic is an important consideration on I-70, a bypass as described is out of the scope of this project.

Comment:
ES UN PROJECTO GENIAL,ASI MISSOURI PUEDE COMPARARSE CON LAS OTRAS GRANDES CIUDADES(METROPOLIS) YO APOYO EL PROJECTO Y AGO LA INVITACION A LA COMUNIDAD,EN MISSOURI SI SE PUEDE!!! (It's a brilliant project by which Missouri can compare itself to other Metropolitan cities. I support the project and the invitation to the community. In Missouri, yes we can.)

Response:
Comment acknowledged.

Comment:
Thank you for the opportunity to voice opinions and contribute to the I70 project. I have driven I70 from Independence/Grain Valley to downtown KC daily (weekday at least) for the last 17 years. The improvements that have been made in the last 5 years (especially to the WB I70 ramp to WB I670) have contributed a great deal to improving traffic flow. Well done!

I will not be able to attend the online meetings this week, but have reviewed the ideas (sorry, but I don't understand all of them clearly), for the most part I agree with the bottleneck areas, but not necessarily the proposed solutions.

Overall, inbound (WB I70 from Adams Dairy road in Blue Springs) is not too bad, but homebound traffic could use help (actually the construction last year and this year improve commuting times, I guess due to discoursing I 70 traffic and I am very familiar with alternative routes).

1- I 70 East Bound
Eastbound Traffic is much slower than westbound and provides the most challenges for commuting.
Issue 1 – The hill on I70 at 435 along with 435 on-ramp backs traffic up past Jackson curve, most days to 23rd street.

- Volume of south bound 435 traffic merging with east bound I70 is the root problem
- The hill is a contributing factor
- Merging 3 lanes to 2 lanes under I 435 is a contributing factor

Solution – Merge 435 traffic closer to (or after) Blue Ridge cut-off. To do this run the North and South I435 exit ramps onto I 70 south of I70 (and south of the hill so it would be near stadium drive) and then have the traffic merge onto I 70 further east of the current location. Preferably the exit ramp from I70 to blue ridge cut-off (see issue 4) could be changed so that merging this traffic further east would not impact that ramp. Depending on how the ramps are done the 3rd lane of I70 (far right lane) that currently turns into the NB I435 ramp could continue up the hill.

Issue 2 - double entry ramps at east 40 highway entrance and Blue Ridge blvd entrance
Solution – close blue ridge entry ramp

Issue 3 – short entry ramp from Truman rd to I670
Solution – extend ramp or close ramp.

Issue 4 – Baseball game traffic at start of games
Solution – this relates to the idea about having I 435 ramps onto I 70 go further south of the current location, run a exit ramp to blue ridge cut-off from I70 near the I435 overpass (maybe integrate with the same exit for NB I435) for Blue Ridge cut-off that would either mix with the new 435 exit ramp or run parallel on the south side, then the I435 traffic wanting to go to the stadium could use that same ramp. This idea would require changing the ramp from EB I70 to NB I435 and would give it more room to do the clover leaf loop as well (there are other options for the NB I435 ramp as well, but there is not a lot of traffic using that ramp so I won't dive into any detail on it)

2- I70 West Bound
With the changes to I670 several years back the commute in has improved greatly, there is a slow down around Noland rd, but after that it is smooth sailing!
Issue 1 – hill at Noland Road along with noland rd on-ramp
Solution 1 – only issue at rush hour, traffic light near end of on-ramp to control volume of merging traffic Solution 2 – create 4th lane to 40 highway so traffic has plenty of room to merge and traffic getting off at 40 hwy can get over early.

3 - Reducing Volume on highway
The long term solution to traffic/environmental concerns is to provide alternative forms of transportation. I 70 is very fortunate to have the KCSouthern rail lines that go through each town (and relatively close to the interstate) that can be used for commuting. From the light rail discussion the last several years I believe KCSouthern is interested in contributing to public transportation (the hold up appears to be the politicians wanting to propose a complex and full solution for light rail, rather than addressing a straightforward commuter traffic solution.
Idea - Run commuter trains from Grain Valley to Union station along Kansas City Southern lines and then run buses from Union Station (or another convenient location) to multiple locations downtown. The union station option would also revive Union Station with foot traffic.
Proposed Stations along route (target arrival times 6:30, 7:00, 7:30, 8:00 at union station)

1. Grain Valley – choose one of these locations Main Street/sni valley rd/airport
2. Blue Springs – 40 hwy and 7 hwy (empty kmart parking lot)
3. Blue Springs – Woods Chapel (not much room there)
4. Blue Springs/Independence –Little Blue Parkway (undeveloped land in this area, the railroad actually travels North/South under I70 about 1 mile east of little blue pkwy)
5. Independence – Noland Road (further from I70, but at this point most of the commuters are North of I70)

Critical Success factors

1. Integrating with the Metro Bus system for management of schedules/crews
2. Run buses from downtown rail destination (union station) to down key streets to downtown.

3. Frequent trains with fewer stops (ultimate goad - instead of having 1 train with 5 stops at every location, have 2 trains with 2/3 stops
4. Railroad participation. KCSouthern lines operates most of the lines from KC east (this is not a heavily used rail line, KCSouthern is very active in the community and with a reasonable agreement getting exclusive use of the line during rush hour should be achievable.) However, I am not sure who operates the lines into Union Station.
5. Commuter/subway style cars/trains with bathrooms/vending machines on the commuter cars (many models I have looked at provide this option), I know it is overhead, but if you want people to use the system it has to be user friendly, one of the reasons I don't consider the bus a viable options is that it would take about an hour longer than my normal commute with no bathroom options. The fairy system in Seattle, WA is a good example.

Other Comments (things I don't drive everyday, but have some exposure too)

- I don't see the Benton or Jackson curves as a problem for causing traffic congestion at this point. The configuration changes in the downtown loop have helped tremendously for inbound traffic and I don't see congestion westbound after the Noland road slow down. Eastbound traffic also does not slow down around the curves, occasionally I see slow down at the end of the Benton curve but I think it is caused by the confusing on ramp where you have to merge going around a curve and on to a somewhat narrow bridge.
- I have major concerns about the benefit of a one-way counter clockwise downtown loop. The south side of the loop seems to function well, the 2 biggest problem I see is 1) the throughput for people traveling on NB I35 south of downtown that want to continue NB on 69 hwy that have to wait for the lights to turn onto Broadway. 2) the number of short exit ramps from EB I70 on the north side of the loop to downtown. The issue is the short ramp and the number of cars wanting to go from EB I70 to exit across the I35 traffic that is already in the right hand lanes and they want to continue SB on I35. Solution 1- break the loop for SB I 35 in the NW corner of the loop forcing SB I35 to travel down the East side of the loop (clockwise), this seems to be a very smooth flow not sure why more people don't use it.
- The tunnel/raised road ideas are good, but I don't think they are needed.
- I don't agree with bus lanes/multi-person lanes, in towns that have 5 or 6 lane highways it might make sense, but in KC it would mean excluding 33% of the lanes to common traffic, this seems excessive and not efficient.

Thank you for this opportunity to express my opinions for the future of I70, I am very interested in this project and would be willing to clarify any questions you might have about my comments. I would also be interested in participating further proposals for this project.

Response:
Comments acknowledged. Several of the issues discussed are design issues to be worked out during the Second Tier Studies. In addition to the project currently programmed for the I-435 interchange area in the Statewide Transportation Improvement Program (STIP), the Preferred Strategy includes improvements to the I-435 interchange area. Similar to the programmed STIP project, the proposed improvements include adding lanes to I-435; modifying ramps into a collector-distributor system on I-70 and I-435 and extending ramps at several locations for additional weave, merge and diverge area; reconstructing and relocating the fully directional ramps to eliminate left-side exits from the interstate. The Preferred Strategy would also evaluate the need to modify access at the Manchester Trafficway Interchange.

If the Improve Key Bottlenecks Strategy is selected as the Preferred Strategy, it would evaluate the need to modify, consolidate, or eliminate the series of Sterling Avenue, U.S. 40 east, and Blue Ridge Boulevard interchanges.

The Preferred Strategy would consider interchange additions, consolidations, modifications, and/or eliminations to improve traffic flow and safety throughout the downtown loop.

Initial Strategy Package 10: Rail Transit in **Section 2** of the **Draft FTEIS** focused on rail transit strategies within the I-70 corridor right of way. This package included an exclusive rail corridor which may be commuter rail or light rail and enhanced park and ride facilities. Package 10 was not carried forward because it did not meet the purpose and need goals; it potentially has higher human environmental and cultural impacts; the Jackson and Benton curves limit the practicality of light rail being able to negotiate the curves; and light rail is not specifically identified in any local or regional plans.

The Benton and Jackson curves were identified as locations that appear to be major corridor bottlenecks because they have poor interstate operations due to existing sight distance and geometrics of the roadway and are areas of higher than average crash rates. Westbound from the Benton curve to the downtown loop and eastbound from the Jackson curve to I-435 were identified as locations with high crash rates between 2003 and 2007.

Initial Strategy Package 9: Unique Capacity Design Alternatives in **Section 2** of the **Draft FTEIS**, which included the one-way loop option and the elevated/stacked highway lanes design option, was not carried forward because it did not meet all the goals of the purpose and need. The one-way loop would require all bridges to be rebuilt without center supports to allow lane changes. The one-way loop also did not receive support when analyzed as part of the downtown loop study. The elevated or stacked lanes would require extensive interchange revisions. Elevated or stacked lanes would also be expected to cost substantially more than other potential solutions.

Initial Strategy Packages 3: Improve Key Bottlenecks plus HOV lanes in **Section 2** of the **Draft FTEIS** was not carried forward because the elements within this package were very similar to Package 2 and Package 7, both of which were carried forward.

Initial Strategy Package 4: Fix Key Bottlenecks, High Occupancy Vehicle (HOV) Lanes, Unique Design Features (Tunnel) in **Section 2** of the **Draft FTEIS** was not carried forward because of the cost and other issues related to the tunnel. It is not an efficient or practical way to meet purpose and need.

Initial Strategy Packages 3 and 4, which each included HOV lanes, were not carried forward because the elements within these packages were very similar to Package 7: Transportation Improvement Corridor Strategy in **Section 2** of the **Draft FTEIS** which was carried forward. Package 7 was carried forward as a First Tier Strategy, but was eliminated from consideration because even though it meets the purpose and need of the First Tier Strategies it has the most impacts and the highest cost. Other strategies met the key reasons for improvements with lower costs and impacts.

Comment:
From what I've read, these are good ideas, but what about lighting on the freeway. I think, in terms of safety, if lighting projects - like what is seen in Kansas and in metro St. Louis - were implemented in eastern Jackson County, we would see a reduction of preventable night-time accidents as well as improved overall aesthetics of Interstate 70.

Response:
The Second Tier Studies will further evaluate and refine the proposed improvements to I-70. During the Second Tier Studies there will be greater analysis and discussion of safety, aesthetic, and visual improvements in the corridor such as landscaping, walls, bridges, lighting, signing, and other aesthetic features. MoDOT will work with the local community and neighborhood groups regarding the long-term visual effects of any improvement.

Comment:
I'm very happy about the plan to widen I-70 at 435. I've seen and almost had a very bad accident within this intersection. I've seen a car fall off one of the over passes and fall directly onto the exit going to 435 south from I-70 westbound. This is the worst bottleneck in the city and it's been ignored for way too long.

With that I sure hope some ramp metering is on the way for this section of interstate. the Noland road on ramp to get on I-70 east bound is just as bad of a bottleneck as 435. The ramp needs to be made longer as well it needs to be metered. People in general do not know how to

merge or let people merge with traffic. That ramp slows down the entire highway for an hour and half every day. We saw what a difference it made when the bridge was shut down for a summer. It made for very nice driving into work. The same problem exists from 40 highway getting on at 70 eastbound, not to the extent of the problem at Noland road.

From my experience the enhancing the current bus system does not do much for many people. The bus drops you off downtown, and this city has as many jobs or more outside the city center than it has in it. You then have to make several transfers taking you more than 2 hours to get to work, that is if you can manage to figure out what busses you need to transfer to. You can't ride a bike from downtown, to many people get killed riding bikes in this city. I'd say save the money spent on busses to hopefully get a light rail implemented in the future. WE already voted it in and it was ignored.

The bus sytems are not used by anyone I work with that live outside of the city. There are more than 100k commuters each day from the east side, what do you see about 500-1000 of those ride the bus? That's probably overblown as a lot of people who park at commuter lots are carpooling also.

After 10 years of driving this stretch, the inability to get anything meaningful done in respect to mass transportation, has me at a point where it's one large factor in deciding to relocate to another city in a different state.

Thanks for taking in all of our concerns.

Response:
Comments acknowledged. The Strategy Package 8: TSM/TDM plus BRT Solutions in **Section 2** of the **Draft FTEIS** focused on a combination of improvement concepts specifically aimed at reducing vehicle emissions and automobile use in the I-70 corridor. This package included encouraging Transportation System Management and Transportation Demand Management activities. Transportation System Management programs identified in MARC's Congestion Management System toolbox include traffic signal coordination, enhanced freeway incident detection and management, ramp metering, advance traveler information systems, and highway information systems. While this package was not carried forward, these types of measures could also be implemented as part of the No-Build Strategy or other Build Strategies.

Initial Strategy Package 10: Rail Transit in **Section 2** of the **Draft FTEIS** focused on rail transit strategies within the I-70 corridor right of way. This package included an exclusive rail corridor which may be commuter rail or light rail and enhanced park and ride facilities. Package 10 was not carried forward because it did not meet the purpose and need goals; it potentially has higher human environmental and cultural impacts; the Jackson and Benton curves limit the practicality of light rail being able to negotiate the curves; and light rail is not specifically identified in any local or regional plans.

Comment:
The "no build" strategies of the past decade contributed to the mess we face now, so don't waste time or money applying another bandaid to cure cancer.

Response:
As a requirement of the National Environmental Policy Act a No-Build Strategy was evaluated and carried forward. However, the Preferred Strategy is not the No-Build Strategy and includes numerous improvements to the I-70 corridor. Additional information on what improvements are included in the Preferred Strategy is included in **Chapter 2** of the **Draft FTEIS**.

Comment:
Improvements east of I-435 don't seem to make sense when the problem for the backups exists west of 435. And please don't fall into the same community "impact" (no pun intended) trap which created the Bruce Watkins nightmare, i.e., a residential freeway & probably the most dangerous highway in the area.

Response:
Commuter traffic in the study corridor is highly directional with the majority of traffic destined towards the Kansas City downtown loop during the morning and away from the downtown loop during the afternoon peak periods. While many of the key bottlenecks to traffic flow are located west of I-435, the existing congestion levels east of I-435 are either undesirable or approaching undesirable conditions. The traffic modeling results indicate that the Improve Key Bottlenecks Strategy will improve the level of service to acceptable levels west of I-435 with some additional design considerations. However, east of I-435 the Improve Key Bottlenecks Strategy leaves 5.7 miles of the 8.0 miles at an unacceptable level of service F. The traffic model results that the Add General Lanes Strategy will improve the level of service to acceptable levels east of I-435. East of I-435 there are interchanges with short on and off ramps. In the Sterling Avenue, U.S. 40, and Blue Ridge Boulevard area the on and off ramps are short and closely spaced which creates slow downs on I-70. The complete discussion regarding the traffic modeling results and corresponding level of service for each strategy is in **Section 2.4** of the **Draft FTEIS**.

Comment:
Since 1987, I've travelled the I-70 route from my home(s) in Eastern Jackson Co. to work in downtown KC. Unlike many, I prefer to come to work late rather than early, to miss the rush.
During the past 23 years, I have pondered the multiple curves, exits and reduced lanes on I-70 from I-435, west to the downtown loop. I believe that, at least one more lane in each direction is

a minimal remedy, considering the sharp curves, bottlenecks, super elevation (winter driving) that exist in the "snake" through the urban corridor. I also believe that some provisions should be made for future rail/light rail to the suburbs.

Therefore, I prefer adding a combination of the "General Lanes" and "Transportation Improvement Corridor" strategies. Although this is the most expensive and environmentally impacting approach, major improvements need to be made to an antiquated, restricted route that was designed and built 50+ years ago. In fact, I-70 is overloaded from KC to St. Louis, at only two lanes in each direction. Increased traffic is making this route dangerous. I'm sure you have traffic studies to debate this, but, over the last 10 - 15 years, look at the vast increase in lanes on I-470, from Lee's Summit to Kansas, including rebuilding the Grandview Triangle. Surely, the traffic density on I-70, from Eastern Jackson Co. to downtown has grown enough to justify at least four lanes in each direction. The route needs to be straightened as much as possible, i.e., Benton curve, and, yes, I agree that some exits in the downtown area need to be closed. I realize this is the most expensive approach, but, with the revitalization of downtown KC, and considering the age and design of this section of I-70, I believe that some major overhauls are warranted. It is a shame for those of us that live in the suburbs, that there is not rail available to encourage coming downtown to enjoy the major entertainment improvements.

This has proven to be a boon for other cities. KC is way overdue. So, reiterating, besides adding lanes, provisions need to be considered for future light rail service.

Response:
The Preferred Strategy includes adding lanes east of I-435 as one of two options that will be further evaluated in the Second Tier Studies. From east of I-435 to I-470, the Preferred Strategy is either the Improve Key Bottlenecks Strategy or the Add General Lanes Strategy. The reasons that the Study Team decided to leave this decision until the Second Tier Studies is discussed in **Section 2.5** of the **Draft FTEIS**. The Transportation Improvement Corridor Strategy has not been carried forward. The Initial Strategy Package 10: Rail Transit was not carried forward due to not meeting purpose and need of the project, potentially higher human environmental and cultural impacts, rail lines negotiating the upgraded curves, and light rail specifically is not identified in local and regional plans.

Comment:
In order for the KC metro area to be considered in the top tier of US metro areas, it must provide improved mass transit in the form of commuter rail. Any improvements, or god forbid, additions to highway lanes should take into account the need for a commuter rail into downtown KC along the Rt 70 corridor.

Response:
Comment acknowledged, however, the Initial Strategy Package 10: Rail Transit in **Section 2** of the **Draft FTEIS** was not carried forward because it did not meet the purpose and need goals; it potentially has higher human environmental and cultural impacts; the Jackson and Benton curves limit the practicality of light rail being able to negotiate the curves; and light rail is not specifically identified in any local or regional plans.

Currently the Kansas City Area Transit Authority (KCATA) is solely responsible for setting the bus schedules in conjunction with local jurisdictions. Federal, state, and local entities fund the operation of transit routes. The Preferred Strategy anticipates expansion of express bus service along I-70 as well as coordination with other potential transit initiatives in the region. This is one of the reasons that the decision to add lanes east of I-435 has been left to the Second Tier Studies. Long term additions of transit services may lessen the need to add lanes.

Comment:
I'm very supportive of any enhancements to I-70 as I travel daily from Blue Springs to downtown. I like the 'preferred strategy' and the 'add general lane strategey'. We definitely need more lanes by Noland Rd and i70/I435 interchange. I do worry about a dedicated lane in terms of stalled cars/trucks - would be hard to clear?

Response:
Comment acknowledged.

Comment:
I think additional lanes for I-70 should extend from KC-St Louis. This is such a major thoroughfare for truck traffic across the State that provisions should be made for at minimum 3 lanes, two for truck and passenger with the left most lane for passenger cars only. Between Independence and Downtown KC additional lanes should be made for car pooling, etc. thank you.

Response:
The Study Team considered the Transportation Improvement Corridor Strategy for those purposes; however it was eliminated from consideration because even though it meets the purpose and need of the First Tier Strategies it has the most impacts and the highest cost. The Preferred Strategy will investigate locations to add Park and Ride lots as necessary. A separate study, I-70 Statewide Supplemental EIS, was completed in 2009 and it concluded that truck-only lanes (minimum of truck-only lanes on the inside and two general purpose lanes on the outside in both directions) were a preferred option between Kansas City and St. Louis.

Comment:
As a frequent driver in California and Arizona I would like to see an HOV lane from Jackson curve out to Woods Chapel Rd,(EAST AND WEST) add One/Two lanes, Limit on ramp access with metered lights. Shoulders on bothsides extended. Do Not do short shoulders and blade dirt up to the new concrete. I'am a truck driver and I see this all the time, it looks good but if a truck runs a wheel off of the shoulder it pulls the truck or any vehicle right down the bank. This has become very common and is very, very, dangerous to all vehicles. When it rains this is an accident waiting to happen.

Response:
Comment acknowledged. The Transportation Improvement Corridor Strategy was carried forward as a First Tier Strategy, but was eliminated from consideration because even though it meets the purpose and need of the First Tier Strategies it has the most impacts and the highest cost.

The Strategy Package 8: TSM/TDM plus BRT Solutions in **Section 2** of the **Draft FTEIS** focused on a combination of improvement concepts specifically aimed at reducing vehicle emissions and automobile use in the I-70 corridor. This package included encouraging Transportation System Management and Transportation Demand Management activities. Transportation System Management programs identified in MARC's Congestion Management System toolbox include traffic signal coordination, enhanced freeway incident detection and management, ramp metering, advance traveler information systems, and highway information systems. While this package was not carried forward, these types of measures could also be implemented as part of the No-Build Strategy or other Build Strategies. The Preferred Strategy does include rebuilding I-70 to provide for bus transit on the shoulder, as well as shoulder improvements throughout the corridor.

Comment:
I don't want more traffic lanes...I WANT LIGHT RAIL/METRO system!!!!

Response:
Comment acknowledged, however, the Initial Strategy Package 10: Rail Transit in **Section 2** of the **Draft FTEIS** was not carried forward because it did not meet the purpose and need goals; it potentially has higher human environmental and cultural impacts; the Jackson and Benton curves limit the practicality of light rail being able to negotiate the curves; and light rail is not specifically identified in any local or regional plans.

Comment:
Regarding the forums about fixing I70 from KC to Independence - I can't attend the meetings in person. My comment is: There is NOTHING wrong with the highway, it's the DRIVERS!!! They're talking on the cell phone, not paying attention, tailgating, and in the last few days while we and other drivers are driving with the speed limit, there are cars speeding by in the middle lane. Then there are truckers who still don't understand that they are NOT supposed to drive in the 3rd left side lane. We drive back and forth and the roadways are in good shape. On 435 south trying to go east on I70, cars and trucks continue to go over the double lines, yet there are no police to give out tickets. It's NOT the roads, it's the drivers who cause the problems.

Response:
Comment acknowledged.

Comment:
For the forum on fixing I70 from KC to Independence - I forgot to add - something needs to be FIXED at the 291 cloverleaf. Drivers out here DO NOT know what a YIELD sign means!!! I can't tell you how many times we have to use our brakes while on 291 to prevent an accident because someone is flying onto 291. This is the spot that either needs to be fixed, or put up signals that show when it is safe for drivers to get onto 291 highway. I hate driving at this location because I fear for my life!!!

Response:
The Preferred Strategy will evaluate interchange improvements to address ramp lengths, merge areas, and weave sections at all interchanges. It will address short ramps and merging issues at the I-470 Interchange between the two freeways. Interchange improvements would include either a collector-distributor road system or improvements to the interchange ramps to eliminate some of the interchange weaving areas. I-470 would require interchange improvements at U.S. 40 and 39th Street to maintain access if there are new ramps and I-470 mainline improvements to join the new ramps with I-470 traffic.

Comment:
I no longer have to use that stretch of I-70, but any improvement that doesn't straighten out the incredibly dangerous Benton and Jackson curves would be a complete travesty, and a big waste of money... the turns are too sharp, and winter is terrible to drive through them. Any improvement that widens ahead of them will serve only to cause even bigger bottleneck getting through them... Thanks for listening.

Response:
The Preferred Strategy includes improving the curves at Benton Boulevard and Jackson Avenue within the existing right of way to the extent possible.

Comment:
I'm not sure I understand the point of assigning the busses to the shoulder lane. It's not like they are picking up passengers along the freeway and they run nearly as fast as the rest of the traffic when there are no bottlenecks. The biggest problem are trucks in the left lane, slow drivers in the left lane, short merge paths along the corridor from the Jackson curve on in to downtown and the lack of enough lanes. Key improvements to bottle neck areas could fix the lane problem. I have not seen in the proposal that trucks should be restricted from the left lane, but they definitely should be. If another lane is added, then restrict the trucks from the left two lanes. Require a minimum speed in the left lane(s) and enforce it. The cell phone users in the left lane account for most of the problems because they are oblivious to anyone except themselves. They slow down to talk and it forces people to pass them on the right. Ban cell phone use and enforce it. Ban slow driving in the left lane, period. Meanwhile, I would like to see a light rail from Odessa in to downtown, but I know I'm only dreaming. I used to park my car at the Blue Ridge park and ride, and then take the bus in to work, until someone took a saw and removed my catalytic converter. These are way too expensive to lose. I have to commute a long way to downtown and I would love to see a viable alternative.

Response:
Comment acknowledged. In lieu of a dedicated corridor for buses to travel in, allowing buses to drive on the shoulder during congested periods of the day accomplishes travel time benefits for bus transit which may attract more riders. The Initial Strategy Package 10: Rail Transit in **Section 2** of the **Draft FTEIS** was not carried forward because it did not meet the purpose and need goals; it potentially has higher human environmental and cultural impacts; the Jackson and Benton curves limit the practicality of light rail being able to negotiate the curves; and light rail is not specifically identified in any local or regional plans.

Currently, trucks are restricted from the left lane on three or more lanes of urban interstates in Missouri, including I-70. MoDOT is responsible for setting the posted speed limits and speed minimums on I-70. Enforcement of these speed limits are a responsibility of the Missouri Highway Patrol.

Comment:
The future of I-70 should be light rail and/or a combination of HOV lanes and BRT facilities. No expansion of capacity for SOV should be considered. I prefer strategy 8 or 10.

Response:
Comment acknowledged, the Initial Strategy Package 8: TSM/TDM plus BRT Solutions in **Section 2** of the **Draft FTEIS** was not carried forward because it did not meet several purpose and need goals. These measures could be incorporated as part of the Preferred Strategy. The Initial Strategy Package 10: Rail Transit in **Section 2** of the **Draft FTEIS** was not carried forward because it did not meet the purpose and need goals; it potentially has higher human environmental and cultural impacts; the Jackson and Benton curves limit the practicality of light rail being able to negotiate the curves; and light rail is not specifically identified in any local or regional plans.

Comment:
I would like to know what will happen to our houses, on 40th Terrace we are close to I70, the noise is terrible now, what would another lane or two of traffic do to us?

Response:
Section 3.1.10 in the **Draft FTEIS** discusses at a high level the potential effects of the Preferred Strategy on noise levels in the Study Area.

The Second Tier Studies will further evaluate the noise impacts in accordance with MoDOT's Noise Policy. If the strategy proposes corridor wide improvements that require significant changes in horizontal or vertical alignment or an increase in the number of through lanes, then MoDOT will conduct a noise study to provide a preliminary assessment of needed mitigation. However, the actual mitigation measures will not be determined until the formal design phase of the project in accordance with MoDOT's Noise Policy.

Comment:
I live in the River Market and my main concern is the highway access ramps along the downtown loop. I often am trying to get onto I-35 south from Independence Avenue. The access ramp west of Delaware is dangerous. It is hard to merge onto the highway there and you often have to come to a complete stop on the ramp as you wait to merge, which means you have to look out for those cars behind you as well. I often skip this ramp and get on west of Broadway. I would rather see 1 functional access in this area as opposed to multiple unsafe and non-functional access points. Thanks for your efforts on this study.

Response:
The downtown loop improvements in the Preferred Strategy include lane balance and improvements in the northeast corner of the downtown loop as part of the kcICON project. This strategy would also consider interchange additions, consolidations, modifications, and/or eliminations to improve traffic flow and safety.

The Preferred Strategy would consider the South Loop Link Study to evaluate the possibility of enclosing the south leg of the downtown loop. The Second Tier Studies will coordinate with that planning effort and consider the recommended improvements from that study. In addition, the Wyandotte on-ramp to westbound I-670 was removed during the Bartle Hall expansion. There was a commitment by the City of Kansas City, Missouri to replace this ramp at a future date. The need to replace this connection or not and where the ramp would be located are issues that will be evaluated in the Second Tier Studies.

Comment:
I-70: I want to put input into the Future I-70:

1. Make a staging yard at Exit 28 allow for triples and turnpike doubles along new I-70 bypass in Missouri. It will attract big companies, like Fedex, UPS, Old Dominion, Saia, etc.

2. Make a bypass starting a Exit 28 (around Mile 27) south over Lake Jacomo (North of NE Colbert Rd.) link it up with I-470> Continue it I-435 to Hwy 10 in Kansas through Weaver,KS; across the river and meet back with I-70 at US-59/Hwy-24/Hwy-40 Kansas Turnpike Exit 204

3. Rename Highways call this bypass I-70; traveller will use it because it is easy to follow; name the current I-70: Independence Pkwy and make it a toll road at Mile 26 both ways to discourage use don't sign it for Kansas City, but sign and warn of toll.

4. Make the road have to exit to old I-70 (Independence Pkwy) and the main lane continue to the bypass.

5. Put a truck restriction like Atlanta, between mile 26 and exit 15; restricting trucks 6 wheels and more, vehicles 3 axles and more, all through buses, campers, trailers and RVs. requiring entrance to Kansas through I-470 and I-435

6. ****Make the bypass the shortest distance****, and the route of less resistance. This attracts map routing companies and trucking companies looking for shortcuts. Less miles equal less cost, i.e. less wear and tear, less fuel consumption.

Thank you for this opportunity to express my thoughts

Response:
Comments acknowledged.

Comment:
I am interested in the adding of lanes near i-470 as my home backs up to i-70. I am ok with moving just curious of how possible this is of happening and when. I have recently updated my home in a major way and look forward to knowing the facts.

Response:
The I-70 FTEIS is a high-level study looking at potential strategies to improve conditions throughout the I-70 corridor. All assessment of impacts are high level estimates and may change as the study proceeds into more detailed Second Tier Studies. Specific properties that would need to be relocated are not known. The Second Tier Studies will examine individual parts of the I-70 corridor in more detail, including more detailed engineering drawings, and the relocation estimates will likely change. Funding has not been identified to begin the Second Tier Studies and the subsequent phases which are design and construction.

When the design phase of a project is funded and finished, MoDOT will be able to identify the properties it needs to purchase. Only after construction is funded, will the timeframe for property acquisition be known.

Comment:
I strongly support enhancement of the express bus service concept including providing for bus transit on the shoulder and exploring locations to add park and ride lots. I am a commuter on the 152-Raytown/Lee's Summit Express.

Response:
Comment acknowledged.

Comment:
Most of my comments would be the same as others. My main comment is simple: Design the on/off ramps to be user friendly. A bad on/off ramp is the one at M-291 & 40 Highway. With the increase of traffic, we do need wider lanes to accomodate the masses. Thank you.

Response:
The Preferred Strategy will evaluate interchange improvements to address ramp lengths, merge areas, and weave sections at all interchanges. It will address short ramps and merging issues at the I-470 Interchange between the two freeways. Interchange improvements would include either a collector distributor road system or improvements to the interchange ramps to eliminate some of the interchange weaving areas. I-470 would require interchange improvements at U.S. 40 and 39th Street to maintain access if there are new ramps and I-470 mainline improvements to join the new ramps with I-470 traffic.

Comment:
I live in the 4000 block of Blue Ridge Blvd. Bottom line, how does the I-70 improvement project affect me? Are we talking about re-locating homes?

Response:
All assessment of impacts at this point are high level estimates and may change as the study proceeds into more detailed Second Tier Studies. The Second Tier Studies will examine individual parts of the I-70 corridor in more detail. **Section 3.1.4** in the **Draft FTEIS** provides a summary of the estimated overall number of relocations for the Preferred Strategy. Since these strategies have been developed with broad footprints, the relocation counts should be considered an order of magnitude at a point in time. The Second Tier Studies will study the strategies in more detail, including more detailed engineering drawings, and the relocation estimates will likely change.

Comment:
You need to get rid of all the curves from 31st street to Prospect. Make I-70 a straight drive from 31st to Prospect.

Response:
The Preferred Strategy includes improving the curves at Benton Boulevard and Jackson Avenue within the existing right of way to the extent possible. It will not entirely eliminate the curves.

Comment:
Getting through downtown is the worst part of i-70. i think, first, 670 and 70 need to be switched...OR it would be nice to make a whole new road that's only purpose was for travelers to be able to stay on i-70...and then have those people that need to get off somewhere downtown have a different road altogether.

Response:
The downtown loop improvements in the Preferred Strategy include lane balance and improvements in the northeast corner of the downtown loop as part of the kcICON project. This strategy would also consider interchange additions, consolidations, modifications, and/or eliminations to improve traffic flow and safety.

The Preferred Strategy would consider the South Loop Link Study to evaluate the possibility of enclosing the south leg of the downtown loop. The Second Tier Studies will coordinate with that planning effort and consider the recommended improvements from that study. In addition, the Wyandotte on-ramp to westbound I-670 was removed during the Bartle Hall expansion.

There was a commitment by the City of Kansas City, Missouri to replace this ramp at a future date. The need to replace this connection or not and where the ramp would be located are issues that will be evaluated in the Second Tier Studies.

Comment:
I just heard your commercial and thought I would comment. I think our roads are great!! I grew up in Kansas and when we moved to Missouri 15 yrs. ago everyone would always make the comment how MO's roads suck. Well, I am here to tell you they have never been better and I didn't think they were all that bad to begin with. Sure you have your stretch of roads that are a little worse than others but you can't be everywhere at once, right? So keep up the good work and I am proud to say "I live in Missouri and I am proud of it!!" So, Thank-you for taking care of our roads. :)

Response:
Comment acknowledged.

Comment:
When are they going to start widening I70 from 435 to 470 and when will they start buying the right of was

Response:
MoDOT is currently conducting the first step of the environmental phase for the future I-70 in the Kansas City metropolitan area. This step is called the First Tier Environmental Impact Statement (FTEIS) and it will recommend a preferred improvement strategy for addressing issues and opportunities in the I-70 corridor. Strategies are combinations of ideas for improving I-70 such as adding lanes at certain locations, improvements at specific interchanges, improvements in transit service, etc. The second step will further study and define the improvements for I-70 such that more detailed analyses of the environmental impacts can be performed to more precisely evaluate the impacts of the project. MoDOT has currently no available funding to begin the second step of the environmental phase and the following two phases, design and construction.

When the design phase of the future I-70 project is funded and finished, MoDOT will be able to identify the properties it needs to purchase. Only after construction is funded, will the timeframe for property acquisition be known.

Comment Cards

Comment:
Concerned about noise abatement and air quality with increased traffic. Noise is bad enough as it is. Prefer making use of existing shoulders as much as possible (for cost control), esp since tax dollars are needed to fund it all.

Response:
In the Second Tier Studies, corridor improvements that require significant changes in horizontal or vertical or an increase in the number of through lanes, then MoDOT will conduct a noise study to provide a preliminary assessment of needed mitigation during the Second Tier Studies. However, the actual mitigation measures will not be determined until the formal design phase of the project in accordance with MoDOT's Noise Policy. Additional information on noise and its impacts is located in **Section 3.1.10** of the **Draft FTEIS**.

The Preferred Strategy is expected to improve air quality by removing existing bottlenecks which create congestion and stop and go traffic flows. The improved traffic flow will allow vehicles to travel more efficiently. The Second Tier Studies will further evaluate the impacts the Preferred Strategy will have on air quality and will include air quality modeling using FHWA improved model and conformance analysis through MARC. Additional information on air quality and its impacts is located in **Section 3.1.11** of the **Draft FTEIS**.

Comment:
Thanks for all the energy from Mo-DOT to keep us informed.

Response:
Comment acknowledged.

Comment:
Suggestion for construction zone signage. "Maintain 5 car spacing, and drive exactly 40 mph" Rarely do you see any authority mention proper following distance. And young women seem (to me) to be the worse offenders of following too close.

Response:
Comment acknowledged.

Comment:
A big concern of mine is the noise, should the decision to widen the road to 8 lanes – how much dirt (space) would have to be taken into the existing embankment. That would make the road

even closer to my house, than it is now. The noise (now) makes it impossible to carry on a conversation unless you are standing close. Thanks.

Response:
All of the Build Strategies are expected to increase noise levels for residents and businesses near I-70. The Second Tier Studies will further evaluate and refine the noise impacts that the Preferred Strategy will cause. The Preferred Strategy was developed with a broad footprint, thus at this time the amount of embankment needed is not known. As a part of the Second Tier Studies, the Preferred Strategy will be finalized and its footprint will be refined. The use of noise abatement measures such as walls and berms will be assessed if mitigation of noise is needed as indicated by measurement and modeling. Additional information on noise and its impacts is located in **Section 3.1.10** of the **Draft FTEIS**.

Comment:
This appears to be in step with the needs of the corridor. The challenges associated with addressing the current problems that restrict travel in the study area are significant, but must be overcome if the region is to sustain itself and prosper in the years to come. Continued progress is encouraged as cooperative dialog with Kansas officials so that a joint best final product can be achieved. Thank you for this opportunity to learn of the issues and comment about them.

Response:
Comment acknowledged.

Comment:
The presentation is fantastic. There is an overwhelming amount of information. A lot went into this project so far and is appreciated. I look forward to getting updates at closer times near my area (Between Noland Road and Lee's Summit and I-70 and 40 highway). I use the I-70/40 Highway interchanges a lot.

Response:
Comment acknowledged.

Comment:
Concerns over relocation of residential home and affects of improvements on Phelps Rd Bridge. Sound Barriers

Response:
All assessment of impacts at this point are high level estimates and may change as the study proceeds into more detailed Second Tier Studies. The Second Tier Studies will examine individual parts of the I-70 corridor in more detail. **Section 3.1.4** of the **Draft FTEIS** provides a summary of the estimated overall number of relocations for each of the strategies. The Build Strategies have been developed with broad footprints, thus the relocation counts should be considered an order of magnitude at a point in time. The Second Tier Studies will study the strategies in more detail, including more detailed engineering drawings, and the relocation estimates will likely change. **Chapter 2** of the **Draft FTEIS** provides detailed information on the Build Strategies. **Chapter 3** of the **Draft FTEIS** includes additional maps of the potential environmental impacts.

The Second Tier Studies will further evaluate and refine the noise impacts that the Preferred Strategy will cause. The use of noise abatement measures such as walls and berms will be assessed if mitigation of noise is needed as indicated by measurement and modeling. Additional information on noise and its impacts is located in **Section 3.1.10** of the **Draft FTEIS**.

Comment:
I approve of MoDOT "Future I-70" plan, especially the third lane on I-70 at I-435. Would like to see wider shoulders and a taller divider between EB and WB to cut down on blinding headlights.

Response:
Comment acknowledged.

Comment:
Need to encourage transit alternatives other than bus-on-shoulders to attract real ridership. Also need to reserve ROW for high speed rail with the median.

Response:
Comment acknowledged, however, the Initial Strategy Package 14: Bus Transit Focus in **Section 2** of the **Draft FTEIS** was not carried forward due to not meeting the purpose and need of the project as well as other packages and providing only limited improvement. The Initial Strategy Package 10: Rail Transit in **Section 2** of the **Draft FTEIS** was not carried forward because it did not meet the purpose and need goals; it potentially has higher human environmental and cultural impacts; the Jackson and Benton curves limit the practicality of light rail being able to negotiate the curves; and light rail is not specifically identified in any local or regional plans.

Comment:
Great visuals! City Planning inclusion was good.

Response:
Comment acknowledged.

Comment:
The geometry of I-70 and Van Brunt Blvd. should be changed in my opinion. The on ramp is too short for traffic to successfully merge onto I-70 during rush hour.

Response:
Comment acknowledged. Substantial improvements to the Van Brunt Boulevard Interchange are not currently included in the Preferred Strategy, but improvements may be evaluated as part of the Second Tier Study. Rehabilitation of the I-70 bridge over Van Brunt Boulevard is included.

Verbal Comments

Comment:
Multiple residents were concerned that MoDOT would need to by homes along I-70.

Response:
All assessment of impacts at this point are high level estimates and may change as the study proceeds into more detailed Second Tier Studies. The Second Tier Studies will examine individual parts of the I-70 corridor in more detail. **Section 3.1.4** of the **Draft FTEIS** provides a summary of the estimated overall number of relocations for each of the strategies. The Build Strategies have been developed with broad footprints, thus the relocation counts should be considered an order of magnitude at a point in time. The Second Tier Studies will study the strategies in more detail, including more detailed engineering drawings, and the relocation estimates will likely change. **Chapter 2** of the **Draft FTEIS** provides detailed information on the Build Strategies. **Chapter 3** of the **Draft FTEIS** includes additional maps of the potential environmental impacts.

Comment:
Property owners were concerned that the project would "fence-in" their property, preventing future redevelopment.

Response:
The I-70 First Tier Environmental Impact Statemwnt is a high-level study looking at potential strategies to improve conditions throughout the corridor. All assessment of impacts at this point are high level estimates and may change as the study proceeds into more detailed Second Tier Studies.

The Second Tier Studies will examine individual parts of the I-70 corridor in more detail, including more detailed engineering drawings and impacts. Funding has not been identified to begin the Second Tier Studies and the subsequent phases which are design and construction.

Comment:
There were several individuals with noise concerns related to traffic levels, truck engine breaks, etc. These need to be addressed in the final design.

Response:
In the Second Tier Studies, corridor improvements that require significant changes in horizontal or vertical or an increase in the number of through lanes, then MoDOT will conduct a noise study to provide a preliminary assessment of needed mitigation during the Second Tier Studies. However, the actual mitigation measures will not be determined until the formal design phase of the project in accordance with MoDOT's Noise Policy. Additional information on noise and its impacts is located in **Section 3.1.10** of the **Draft FTEIS**.

Comment:
One commenter thought that major events such as the start of baseball games at the Stadium Complex could be better timed to not interfere as much with peak hour traffic.

Response:
Comment acknowledged. The start time of baseball games are established by Major League Baseball in coordination with television schedules.

Comment:
One commenter expressed a concern that the St. Steven's church basement gets flooded in high rains and that this has occurred since I-70 was built.

Response:
The Second Tier Studies will further evaluate and refine the neighborhood and community impacts of the Preferred Strategy. The Second Tier Studies will refine each strategy and their footprints to avoid or minimize neighborhood and community impacts where possible.

Comment:
One commenter asked about where wetland impacts would occur. He also asked about reducing the amount of land that major freeway interchanges take up such as the I-435/I-70 interchange. He also asked about the origin and destination of traffic along I-70 and whether this would be studied in more detail during the Second Tier Studies.

Response:
The I-435 and I-470 Interchange areas are the primary locations where wetland disturbances occur for all of the Build Strategies. In addition, some wetland disturbances occur near the Lee's Summit Road Interchange. The Second Tier Studies and additional design efforts will likely narrow the impact area and work to avoid, minimize, and mitigate impacts to wetlands. Additional information on wetlands and its impacts is located in **Section 3.1.14** of the **Draft FTEIS**. In the more detailed Second Tier Studies, all available travel data could be used to develop a more refined understanding of traffic flows at specific locations and interchanges.

Comment:
A couple of commenters asked about the timing for future construction. They were concerned about when the project could affect their property.

Response:
The I-70 First Tier EIS is a high-level study looking at potential strategies to improve conditions throughout the corridor. All assessment of impacts at this point are high level estimates and may change as the study proceeds into more detailed Second Tier Studies.

The Second Tier Studies will examine individual parts of the I-70 corridor in more detail, including more detailed engineering drawings and impacts. Funding has been not identified to begin the Second Tier Studies and the subsequent phases which are design and construction.

Transit Action Network – May 7, 2010 Letter

Comment:
Good Report. Overall, I am pleased with the study. It recognizes, tacitly if not explicitly, that the world is changing around us, and that conclusions reached in the past -- including some of the conclusions reached in the I-70 MIS begun for this corridor in 2000 -- may no longer be valid.

Response:
Comment acknowledged.

Comment:
Added Capacity Not Needed. I support the general conclusion that additional lanes are probably not required. Given the many changes that have happened since the earlier studies in this corridor -- significantly higher gas prices, and MARC's pending adoption of a long-range transportation plan that incorporates elements of the "Adaptive Scenario," to cite just two -- the wise course of action is to avoid adding capacity whenever possible, and to instead resolve to implement transportation and other policy measures to make additional capacity unnecessary.

Response:
Comment acknowledged. The Preferred Strategy carries two potential strategies forward east of I-435 for the reasons mentioned in the comment among others discussed in **Section 2.5** of the **Draft FTEIS**.

Comment:
Public Transit. The study supports public transit, but it seems mostly to support just the idea of transit. If transit is or can be a factor in reducing congestion and/or the need to add lanes, what measures are proposed to facilitate adding such service? Direct state funding to supplement local funding is my recommendation for your recommendation.

Response:
Comment acknowledged.

Comment:
Capacity Management. The study appears to support a Transportation Improvement Corridor (a concept that I suggest be called simply "managed capacity" or "managed lanes" in the future). Any management of just part of the total capacity of the highway presents "management" challenges in the form of providing separation, enforcement, etc. The study should, instead, recommend that capacity management techniques be applied to all capacity rather than just a few lanes. Access management techniques (which can include ramp metering, ramp metering with HOV bypass, and other strategies) and pricing strategies (which can include an access fee administered in the form of "value pricing" during just morning peak hours, a daily freeway access fee for SOVs, or other variations) should be more thoroughly explored. Such strategies might not hold much appeal today, but they are likely to be much more acceptable by the time funding is available to make whatever improvements are selected for the corridor.

Response:
The Preferred Strategy did not include the Transportation Improvement Corridor Strategy. Travel demand management techniques as discussed above will continue to be considered as part of the Second Tier Studies.

Comment:
Bus on Shoulder. The study considers and appears to lend support to the concept of "bus on shoulder." Although that concept seems to appeal to transit operators locally, I suggest that a full cost-benefit analysis be done before implementation: What is the cost of providing that capability vs. the actual number of transit passenger hours saved? I suggest that pursuing other strategies (such as TSM/TDM) to reduce congestion for all users would have a greater total benefit, and probably at lower cost. (Incidentally, if the operational protocol for bus on shoulder is that buses would operate on shoulder only when traffic speed drops below 35 mph, and that buses not operate more than 10 mph faster than other traffic, there will be many times when simply shifting buses over to a nearby arterial street would result in faster transit trips.)

Response:
All of the strategies will rebuild I-70 and the downtown loop which will include shoulders to enhance safety. This minimizes the additional cost to allowing bus on shoulder operation to improve the transit travel time versus the automobile. Buses on I-70 operate on predetermined routes that limit the option to periodically shift to nearby arterial routes.

Comment:
Tolling. The concept of tolling deserves further consideration. One way or another, tolls are in our future. One of the most common objections to tolls on highways such as this is that, "We already paid for this highway, and we shouldn't have to pay for it again with tolls." Setting aside the fact that it also costs money to periodically replace worn-out pavement and bridges, typical highway user fees do not come close to covering the full direct costs of building / operating / maintaining a highway such as this. This study would perform an important public service were it to include an estimate of the direct cost of providing for each vehicle mile of travel, broken out among a few classes of vehicles. The family sedan, for example, might contribute roughly a penny per mile in state and federal fuel taxes and other user fees, while it costs all of us two or more cents per mile to provide the highway. With that information in hand, the notion of a direct user fee (such as a toll) to cover part of the cost of the highway becomes a lot more palatable. [Incidentally, we need to distinguish between the "Pennsylvania Turnpike" concept of a toll road where drivers pay the full cost, and a highway like I-70 where tolls might cover just the incremental cost of the higher level of roadway provided.]

Response: Comment acknowledged. The Preferred Strategy does not recommend tolling, but does not preclude it as a future option as part of an overall regional/statewide change in funding facilities such as I-70.

Comment:
Rail in the I-70 Corridor. Rail transit in the corridor is considered in Strategy Package 10, including the shorter segment between the Blue River and 18th Street, but it is dismissed because rail transit would not have access to the Kansas City Terminal Railway tracks due to heavy freight traffic. The most recent commuter rail concept envisions avoiding those tracks, and instead operating over a combination of new ROW and streets between the Blue River and Union Station. Regardless of whether that proposal (currently known as Regional Rapid Rail) comes to fruition as envisioned, there will continue to be interest in establishing commuter rail service in one of the corridors to the southeast. Preserving the possibility of a rail line adjacent to I-70, at least for the segment between Truman Road and the Blue River, would appear to be a low-cost and prudent action to take. The design of Bruce R. Watkins Drive (US 71 Highway) provided for rail transit in the ROW at some future time, and while it has not yet been used, having that option available is valuable.

Response:
The Second Tier environmental studies will take into account the results of the regional transit plans and initiatives currently on-going.

Appendix D.2 Agency Comment Summary

Agency Comments Summary – June 7, 2010

U.S. Army Corps of Engineers (Regulatory Branch) – May 11, 2010

Comment:
The final project must be designed in order to have no adverse effect on the Corps of Engineers' Blue River Channel Modification Project. In addition, flood water conveyance in all floodway/floodplains in the project area should be considered.

Response:
The Second Tier environmental documents will further develop the detail of the identified preferred strategy to adhere to USACE requirements. This comment will be carried forward as part of the scoping process for the Second Tier Studies.

Comment:
The U.S. Fish and Wildlife Service, National Wetland Inventory (NWI) maps were used to identify five potential wetland resources within the I-70 study corridor. The document identifies two of the wetland areas as jurisdictional, under the authority of the Clean Water Act, and three of the wetlands are described as non-jurisdictional. The NWI maps, although useful for planning purposes, are not detailed enough for the Corps or the EPA to make accurate determinations as to regulatory jurisdiction. In addition, the NWI maps are likely outdated as the maps were likely completed in the 1980s.

In order for the Corps of Engineers to complete a preliminary or an approved jurisdictional determination all wetland areas and stream channels within the work/study area must be delineated and reviewed as part of the Department of the Army (DA) permit process. A final determination of jurisdiction of the existing wetlands and streams will be completed at that time. The project should be designed to avoid and minimize all impacts to these resources.

Response:
As the project continues into Second Tier Studies and reaches the design phase, efforts will be made to avoid and minimize all impacts to wetlands. Wetland delineations and assessment will be completed and submitted to the Corps of Engineers for review as part of the permit process.

Comment:
Page 3.14-2 contains a definition of a hydric soil. The hydric soil definition used in this draft document should be changed to the hydric soil definition adopted by the Natural Resources Conservation Service and the U.S. Army Corps of Engineers. The definition of a hydric soil is a

soil that formed under conditions of saturation, flooding, or ponding, for long enough during the growing season to develop anaerobic conditions in the upper part.

Response:
The definition of hydric soil has been revised in **Section 3.2.6** in the **Final FTEIS** as suggested.

Comment:
Page 3.15-2 should include the Indiana bat (*Myotis sodalist*) as a species that could be found within the Study Area and one that must be reviewed in greater detail as part of Second Tier study. The Indiana bat inhabits forested areas along stream channels (riparian zone). The Federal Highway Administration and the U.S. Fish and Wildlife Service should complete consultation concerning all threatened and endangered species that may be adversely affected by the proposed project. This consultation, as outlined in Section 7 of the Endangered Species Act, should be completed by the lead federal agency.

Response:
The Indiana bat (*Myotis sodalist*) has been added as a species that could be found in the Study Area in **Section 3.2.7** in the **Final FTEIS**. The Second Tier Studies will consider potential impacts to the Indiana Bat.

Comment:
As part of the DA permit process and in order to comply with the National Environmental Policy Act (NEPA), the Corps of Engineers will prepare a Record of Decision (ROD) in order to adopt the final EIS prepared by the Federal Highway Administration. If an adverse effect to a historic property, eligible for listing in the National Register of Historic Places, is identified the final EIS should describe the selected strategies for avoiding, minimizing and mitigating any adverse effect to any historic property or historic district that is eligible for listing in the National Register. The DA permit will include special conditions outlining the requirements to mitigate all adverse effects to historic properties that are eligible for listing in the National Register.

Response:
The FTEIS has not identified and adverse impacts to historic properties listed on the National Register of Historic Places. Detail surveys for potentially eligibility properties will be conducted as part of the Second Tier Studies following the NEPA requirements. The Second Tier Studies will describe strategies to avoid, minimize, and mitigate any adverse impacts discovered in during the Second Tier Studies.

U.S. Environmental Protection Agency – May 3, 2010

Comment:
The illustration on Page ES-1 explains that five sub-areas of independent utility will be "broken down into multiple future Second Tier environmental studies". EPA recommends that the Final FTEIS provide a description of the various types of environmental studies, and some insight into the criteria that will be used to determine the type of NEPA analysis accorded to each of the 5 sub-areas (EIS, EA or CE). One good reference for this would be the CEQ's "A Citizen's Guide to the NEPA" (http:ceq.hss.doe.gov/nepa/Citizens_Guide_Dec07.pdf).

Response:
The recommended Sections of Independent Utility (SIU) and a description of the various types of environmental studies (EIS, EA, or CE) recommended for each SIU has been added to **Section 2** of this **Final FTEIS**. The study team has also produced a technical memorandum describing each sub-area and determined the type of NEPA analysis accorded to each SIU. This is located in **Appendix C**.

Comment:
Page ES-13 states the MoDOT is mandated to identify and address disproportionately high and adverse human health or environmental effects of proposed projects on minority and low-income populations. Further, this section indicates that the No-Build Strategy will have no disproportionate and adverse effect. EPA believes that this conclusion should be re-evaluated in light of the fact that the Benton and Jackson Curves are identified as EJ areas, and in a No-Build scenario, any diminishing LOS could result in increased air pollution such as Mobile Source Air Toxics (MSATS), Carbon Monoxide (CO), and Ozone (O_3).

Response:
The No-Build scenario is expected to result in reduced LOS and increased congestion throughout the Study Area, not only through the identified EJ areas. The potential increase in air quality pollution would not be disproportionate and impact all areas around to corridor.

Comment:
EPA recommends providing some narrative to describe "Operation Green Light" and "Smart Moves Regional Transit Vision" in the FTEIS.

Response:
Additional narrative description for "Operation Green Light" and "Smart Moves Regional Transit Vision" has been added to **Chapter 2** in the **Final FTEIS**.

Department of Natural Resources – May 6, 2010

Comment:
The City Environmental site referenced in Table 3.8.1 is no longer an active (operating) hazardous waste treatment storage or disposal facility. City Environmental/U.S. Liquids declared bankruptcy several years ago. EPA, working in coordination with the Department, filed a claim with the bankruptcy court for environmental claims including continuation of long-term groundwater monitoring at the former City Environmental facility. Shallow groundwater at this site remains contaminated with certain chemicals in excess of drinking water maximum contaminated levels.

Response:
The status of City Environmental site was revised to "Inactive" in **Table 3.2** in **Section 3.2.3** in the **Final FTEIS**.

Comment:
The Beazer East (former Koppers wood treating facility), EPA ID/hazardous waste permit number MOD007146517, is located at 6740 Stadium Blvd. This facility was issued a Missouri Hazardous Waste Management Facility Part I Permit by the Department's Hazardous Waste Program and a U.S. Environmental Protection Agency Hazardous and Solid Waste Amendments Part II Permit on July 24, 1997. These permits remain in force pending their reissuance and are the regulatory mechanisms currently governing environmental monitoring and cleanup at the facility. There are no active operations on the facility property with the exception of the environmental activities required by the permits. The permitted property is located directly adjacent to the I-70 Blue River overpass in the space east of the Blue River and west of Manchester Trafficway.

The Beazer East hazardous waste facility is not noted on the maps or in the narrative site summary. Wood treating was performed at this facility for a number of decades. A considerable amount of contaminated soil has been removed from this property and groundwater contamination remains. Should project planners propose any construction on this site, they should be aware of the potential that soil or groundwater may have been contaminated by wood treatment chemicals. Any contaminated soil or groundwater would need to be properly characterized and disposed of or treated, as necessary. The Department's Hazardous Waste Program is also in the process of finalizing environmental covenants on the permitted property and an adjacent parcel of land in private ownership. These covenants

contain land use restrictions that may need to be considered in the context of any construction work that is proposed on the properties covered by the covenants.

Response:
The Beazer East site has been added to **Table 3.2** in **Section 3.2.3** in the **Final FTEIS**. Although the building and address fall outside of the study corridor, the Beazer East property does extend into the Study Area.

Comment:
The 100-year floodplain map provided for this area in the DFTEIS may be outdated. The U.S. Army Corps of Engineers (USACE) Blue River rechannelization project has significantly changed the 100-yaer floodplain in this area. The Department understands that FEMA has been in the process of redrawing 100-year floodplain maps for this area and anticipates that the Beazer facility may now be out of the 100-year floodplain in contrast to the maps provided in the DFTEIS.

Response:
The Study Team has investigated whether the FEMA floodplain revisions to the 100-year floodplain are complete. It is recognized and anticipated that the floodplain will be reduced and impact less of the Beazer East property. The Study Team manually drew the revised FEMA floodplain data for the Blue River based on recent channelization projects from the LOMR. As a result, the Blue River floodplain was reduced. Depending on the timing of the I-435 SUI, the official FEMA floodplain map may be completed. Second Tier environmental studies will revisit the Blue River floodplain changes resulting from the Blue River channel revisions.

Comment:
On Page 3.8-1, the Department recommends that the definition of hazardous waste be revised and include the following text: "Hazardous wastes as regulated by the Environmental Protection Agency (EPA) are defined as "waste with properties that make it dangerous or potentially harmful to human health or the environment. Hazardous wastes can be liquids, solids, contained gases, or sludges. They can be the byproducts of manufacturing processes or simply discarded commercial products, like cleaning fluids or pesticides". For the sake of clarity, for a waste to be considered hazardous, it must either be listed in *40 CFR 261 Subpart D* or exhibit at least one of the four characteristics of hazardous waste; ignitability, corrosivity, reactivity, or toxicity. If the waste is listed or exhibits any one of these characteristics, it is classified as hazardous waste.

Response:
The definition of hazardous waste has been revised in **Section 3.2.3** in the **Final FTEIS** as suggested.

Comment:
The Department recommends that Table 3.11.1 be amended as follows:

Sulfur Dioxide
- "Sulfur Dioxides", should read Sulfur Dioxide without the "s", or it could read "Sulfur Oxides (Sulfur Dioxide)".
- Under Primary Standard, the annual standard is 0.030 ppm, as opposed to 0.03 ppm (this effects rounding).

Ozone
- For the Primary 8-hour Standard listed at 0.075 ppm, the chart indicates the 2000 standard, which should be updated to the 2008 standard.
- In note 3 at the bottom of the chart, the Department recommends listing both the 1997 and 2008 standards, as the 3 year design value applies to both standards. (As written, it implies that this note only applies to the 1997 standard).

Lead
- The Primary Standard listed in the chart is the 1979 standard. The 2008 standard is 0.15 ug/m^3, and the averaging time is rolling 3-month average. The Department recommends listing the standards for both years, as recommended for Ozone as both standards are currently in effect.

Response:
These revisions have been made and are shown in **Table 3.3** of **Section 3.2.5** in the **Final FTEIS**.

U.S. Department of the Interior – May 4, 2010

Comment:
The EIS identifies many historic and other properties that may be eligible under Section 4(f) of the Department of Transportation Act of 1966 (48 U.S.C. 1653(f)). The EIS, however, does not specifically address the impacts to these properties, other than a certain number located in the project area, and the Preferred Alternative may or may not affect several of these properties. The Department assumes that we will see specific evaluations of impacts to these properties in the Tier 2 evaluations, and will defer our concurrence with the FHWA and the MoDOT on feasible or prudent alternatives impacting Section 4(f) properties until that time. In addition,

we will defer to the Tier 2 evaluations on whether all possible planning needed to minimize harm to these resources has been employed.

Response:
There are no anticipated adverse impacts to historic properties listed on the National Register of Historic Places identified in the I-70 Final FTEIS. However, additional analysis will be completed in the Second Tier Studies. Detail surveys for potentially eligibility properties will be conducted as part of the Second Tier Studies following the NEPA requirements. The Second Tier Studies will describe strategies to avoid, minimize, and mitigate any adverse impacts discovered in during the Second Tier Studies.

Federal Aviation Administration – March 29, 2010

Comment:
Airspace Considerations - The project will require formal notice and review from an airspace standpoint under Federal Aviation Regulation (FAR) Part 77, Objects Affecting Navigable Airspace. Construction or alteration of objects can have an adverse impact to operations at the Charles B. Wheeler Downtown Airport (MKC) located northwest of the Kansas City downtown area

- Construction of objects may result in an increase to approach minimums to runways making landings more difficult in adverse weather conditions.
- The location of constructed objects may impact runway protection zones, safety areas, object free areas and obstacle free zones.
- The proposed project could impact the proper operation of navigational aide facilities at the airport.

Response:
The required FAA notice and review will be completed when the downtown section is in the final design phase.

City of Kansas City, Missouri – September 10, 2010

The following comments were also received from the City of Kansas City on June 4, 2010 via email.

Comment:
There is one major concern and that is the mentioning of the closure of the 18th Street Interchange needs to be removed from the report. We understand the not so subtle notice that

there is a desire to close the 18th Street interchange specifically. At this time, until adequate methods to address the access needs with in the interchange area are addressed, we seriously object to the recommendation of closing the 18th Street Interchange. The executive summary and throughout the document there are enough references that the preferred strategy will consider interchange consolidations, modifications with CD roads, and/or elimination of access are sufficient comments. As the Second tier evaluations proceed forward more specific details on interchange improvements can be evaluated in more detail, and specific interchange modifications can be identified through the future processes.

Response:
The reference to the closing of specific interchanges was removed and more general wording, such as ". . . will consider interchange consolidations, modifications with CD roads, and/or elimination of access" was used as needed in the Final FTEIS. As indicated in the comment, the Second Tier Studies will evaluate interchange improvements and modifications in more detail.

Comment:
Our second comment will center around the use of bus transit on the shoulder, and the need to carefully consider overall transportation safety in the implementation of this strategy.

Response:
Comment acknowledged. The safe implementation of this strategy will be a key component of the future design efforts for the project.

Comment:
We feel that the preferred strategy for the entire corridor should be the Improve Key Bottlenecks Strategy for the entire project length. We feel that the Add General Lanes Strategy for only part of the corridor provides an unbalanced overall strategy.

Response:
Comment acknowledged. The reasons for the Preferred Strategy are discussed in **Section 2.5** of the **Draft FTEIS**. Depending on the outcome of the Second Tier Study between I-435 and I-470, Improve Key Bottlenecks could be selected for the entire corridor.

City of Independence, Missouri – May 14, 2010

Comment:
For the eastern segment of the I-70 corridor, the City favors the preferred strategy of 'Add General Lanes' over 'Fix Bottlenecks'. Growth is expected to continue in eastern Jackson County. The addition of I-70 lanes would provide capacity beyond interchange improvements.

Response:
Comment acknowledged. The reasons for the Preferred Strategy are discussed in **Section 2.5** of the **Draft FTEIS**.

Comment:
The City thinks there would be significant value in adding sound barrier walls along portions of the I-70 corridor. Independence property owners adjacent to I-70 have voiced concerns about excess highway noise on numerous occasions. At the appropriate time, consideration should be given to integrating noise reduction into strategies for traffic management.

Response:
All of the Build Strategies are expected to increase noise levels for residents and businesses near I-70. As a part of the Second Tier Studies, the Preferred Strategy will be finalized and its footprint will be refined. If the Selected Strategy requires substantial changes in horizontal or vertical alignments or an increase in the number of through lanes, then noise measurements and modeling will be completed using FHWA approved models. A preliminary assessment of mitigation will occur. Consideration of noise abatement measures, such as walls and/or berms, will be completed in accordance with the MoDOT Noise Policy. Additional information on noise and its impacts is located in **Section 3.1.10** in the **Final FTEIS**.

Mid-America Regional Council (MARC) – May 5, 2010

Comment:
Issue: Adequate consideration of transit and non-motorized modes of transportation.

The report does acknowledge transit, and bike/pedestrian users in the corridor, but doesn't suggest many specific methods to address their needs - mostly deferring to the Second Tier Studies to develop any details of that nature. It would be helpful to have stronger commitment in the First Tier document to accommodate those modes. There needs to be an expression of intent by MoDOT to fund additional transit service in the corridor, if transit service can play a role in reducing congestion, and thereby reducing the need for added capacity. Furthermore, there needs to be a commitment by MoDOT to consider the results of the ongoing transit commuter corridor studies in the Second Tier EIS.

Response:
The level of detail regarding bike/pedestrian facilities is best suited for the Second Tier Studies to examine. The Improve Key Bottleneck Strategy description discussing the interchange improvement elements in **Section 2.2** of the **Final FTEIS** was revised to include bicycle/pedestrian access. The on-going transit commuter corridor studies is one reason the

Preferred Strategy carried forward two potential strategies between I-435 and I-470. The results of the transit commuter corridor studies will be considered in the Second Tier environmental studies.

Comment:
Issue: Truck-only lanes.

The document acknowledges the I-70 Supplemental EIS (Truck-only lanes) but says that the issue will be addressed in the Tier 2 studies. This suggests an assumption that the truck-only lanes don't change the amount of truck traffic to address in the corridor, and the remaining questions are only of designing/locating the transition from truck-only lanes to general purpose lanes. MARC has stated before that there is not enough information from the truck-only lane study to draw this conclusion. This document should contain a more detailed description of the assumptions made about truck traffic in the corridor, and at what point it would be necessary to revisit the Tier 1 conclusions if these assumptions turn out to be incorrect.

Response:
The I-70 Supplemental EIS indicates in Table 1.1 that I-70 west of I-470 is expected to have a one percent annual growth rate in average daily traffic to the year 2030. The annual traffic growth rate for the I-70 FTEIS varies from 1.5 percent to 1.9 percent depending on location along to corridor to the year 2030.

The most significant difference is the I-70 Supplemental EIS focused on daily volumes and not peak hour volumes. The FTEIS focused on the peak hour volumes which included a peak hour truck percent of 4 to 5 percent. The I-70 FTEIS assumed that the peak hour truck percent would remain constant; as a result the peak hour truck volumes would increase at an annual growth rate of 1.5 to 1.9 percent similar to the total traffic volumes. Any truck volume growth above this is anticipated to occur primarily during the off peak hours when there is little congestion and not influence the decisions made in the FTEIS. As a result of this level of truck and general traffic growth, no specific improvements will be required. Should new results from other studies indicate substantially different results, the conclusions of the I-70 FTEIS could be revisited.

Comment:
Issue: Travel demand management/capacity.

The document should more fully analyze the potential of travel demand management and capacity management strategies in the corridor.

Response:
The study determined that travel demand management and capacity management strategies as a standalone strategy was not effective enough to substantially reduce congestion in this study corridor. These strategies can supplement the Preferred Strategy and should be incorporated into the Second Tier Study analyses.

Missouri Federal Assistance Clearinghouse – March 30, 2010

Comment:
The Missouri Federal Assistance Clearinghouse, in cooperation with state and local agencies interested or possibly affected, has completed the review on the above project application.

None of the agencies involved in the review had comments or recommendations to offer at this time. This concludes the Clearinghouse's review.

A copy of this letter is to be attached to the application as evidence of compliance with the State Clearinghouse requirements.

Response:
Comment acknowledged. A copy of this letter is included in **Appendix D.3**.

U.S. Coast Guard – March 22, 2010

Comment:
Please refer to your letter requesting a review and comment for the Draft First Tier Environmental Impact Statement for Route I-70 project. We have determined that pursuant to the Coast Guard Authorization Act of 1982, the subject project does not involve bridges over commercially navigable waters of the United States. Therefore, a Coast Guard bridge permit is not required for this project.

Response:
Comment acknowledged.

Appendix D.3 Agency Comment Letters

FHWA
MO DIV
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MAY 17 2010

DEPARTMENT OF THE ARMY
KANSAS CITY DISTRICT, CORPS OF ENGINEERS
635 FEDERAL BUILDING
KANSAS CITY MO 64106-2896

REPLY TO
ATTENTION OF

DA	
ADA	
Planning	
ROW	
Env Review	✓
Env Pro	
Fin Mgr	
Fin Spec	
Fin Tech	
Bridge	
Civil Rights	
Safety	
Operations	
TE1	
TE2	
TE3	
TE4	✓

May 11, 2010

Regulatory Branch
(2008-1254)

Ms. Peggy Casey
Environmental Projects Team Leader
Federal Highway Administration, Division Office
3220 West Edgewood, Suite H
Jefferson City, Missouri 65109

Dear Ms. Casey:

This letter is in response to the issuance of the Draft I-70, First Tier Environmental Impact Statement (EIS) for the proposed improvements to the Interstate 70 system in the Kansas City, Missouri metro area.

As a cooperating agency, we have reviewed the draft document and have the following comments:

The final project must be designed in order to have no adverse effect on the Corps of Engineers' Blue River Channel Modification Project. In addition, flood water conveyance in all floodway/floodplains in the project area should be considered.

The U.S. Fish and Wildlife Service, National Wetland Inventory (NWI) maps were used to identify five potential wetland resources within the I-70 study corridor. The document identifies two of the wetland areas as jurisdictional, under the authority of the Clean Water Act, and three of the wetlands are described as non-jurisdictional. The NWI maps, although useful for planning purposes, are not detailed enough for the Corps or the EPA to make accurate determinations as to regulatory jurisdiction. In addition, the NWI maps are likely outdated as the maps were likely completed in the 1980s.

In order for the Corps of Engineers to complete a preliminary or an approved jurisdictional determination all wetland areas and stream channels within the work/study area must be delineated and reviewed as part of the Department of the Army (DA) permit process. A final determination of jurisdiction of the existing wetlands and streams will be completed at that time. The project should be designed to avoid and minimize all impacts to these resources.

Page 3.14-2 contains a definition of a hydric soil. The hydric soil definition used in this draft document should be changed to the hydric soil definition adopted by the Natural Resources Conservation Service and the U.S. Army Corps of Engineers. The definition of a hydric soil is a soil that formed under conditions of saturation, flooding, or ponding, for long enough during the growing season to develop anaerobic conditions in the upper part.

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Page 3.15-2 should include the Indiana bat (*Myotis sodalis)* as a species that could be found within the study area and one that must be reviewed in greater detail as part of Second Tier study. The Indiana bat inhabits forested areas along stream channels (riparian zone). The Federal Highway Administration and the U.S. Fish and Wildlife Service should complete consultation concerning all threatened and endangered species that may be adversely affected by the proposed project. This consultation, as outlined in Section 7 of the Endangered Species Act, should be completed by the lead federal agency.

As part of the DA permit process and in order to comply with the National Environmental Policy Act (NEPA), the Corps of Engineers will prepare a Record of Decision (ROD) in order to adopt the final EIS prepared by the Federal Highway Administration. If an adverse effect to a historic property, eligible for listing in the National Register of Historic Places, is identified the final EIS should describe the selected strategies for avoiding, minimizing and mitigating any adverse effect to any historic property or historic district that is eligible for listing in the National Register. The DA permit will include special conditions outlining the requirements to mitigate all adverse effects to historic properties that are eligible for listing in the National Register.

If you have any questions concerning this matter, please feel free to write me or call Mr. Douglas Berka at 816-389-3657 (FAX 816-389-2032).

Sincerely,

David R. Hibbs, Assistant Chief
Regulatory Branch
Operations Division

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

FHWA
MO DIV
RECEIVED
MAY 11 2010

DA
ADA
Planning
ROW
Env Review
Env Pro
Fin Mgr
Fin Spec
Fin Tech
Bridge
Civil Rights
Safety
Operations
TE1
TE2
TE3
TE4

MAY 03 2010

Ms. Peggy Casey, Environmental Projects Team Leader
Federal Highway Administration
3220 W Edgewood, Suite H
Jefferson City, MO 65109

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

Dear Ms. Casey and Mr. Keith:

RE: Review of Draft Environmental Impact Statement for First Tier - Future I-70 Kansas City Metro Project, Proposing to Improve I-70 Corridor from East of the Missouri and Kansas State Line to East of I-470 Interchange, Downtown Central Business Freeway Loop, Kansas City, Jackson County, MO.

The U.S. Environmental Protection Agency (EPA) has reviewed the First Tier – Future I-70 Draft Environmental Impact Statement (DEIS). Our review is provided pursuant to the National Environmental Policy Act 42 U.S.C. 4231, Council on Environmental Quality regulations 40 C.F.R. Parts 1500-1508, and Section 309 of the Clean Air Act. The DEIS was assigned the CEQ number 20100074.

Based on our overall review and the level of our comments, the EPA has rated the DEIS for this project Lack of Objections (LO).

EPA offers the following recommendations as the Final EIS is developed:

1. The illustration on Page ES-1 explains that five sub-areas of independent utility will be "broken down into multiple future Second Tier environmental studies". EPA recommends that the Final FTEIS provide a description of the various types of environmental studies, and some insight into the criteria that will be used to determine the type of NEPA analysis accorded to each of the 5 sub-areas (EIS, EA or CE). One good reference for this would be the CEQ's "A Citizen's Guide to the NEPA" (.http://ceq.hss.doe.gov/nepa/Citizens_Guide_Dec07.pdf).

2. Page ES-13 states that MoDOT is mandated to identify and address disproportionately high and adverse human health or environmental effects of proposed projects on minority and low-income populations. Further, this section indicates that the No-Build Strategy

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PAPER CONTAINS RECYCLED FIBERS

will have no disproportionate and adverse effect. EPA believes that this conclusion should be re-evaluated in light of the fact that the Benton and Jackson Curves are identified as EJ areas, and in a No-Build scenario, any diminishing LOS could result in increased air pollution such as Mobile Source Air Toxics (MSATS), Carbon Monoxide (CO), and Ozone (O_3).

3. EPA recommends providing some narrative to describe "Operation Green Light" and "Smart Moves Regional Transit Vision" in the FTEIS.

Thank you for the opportunity to provide our comments regarding this project. If you have any questions, please contact me at 913-551-7148 or via email at cothern.joe@epa.gov.

Sincerely,

for Larry Shepard

Joseph E. Cothern
NEPA Team Leader
Environmental Services Division

Draft Environmental Impact Statement Rating Definitions

Environmental Impact of the Action

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

"Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

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STATE OF MISSOURI
Jeremiah W. (Jay) Nixon, Governor • Mark N. Templeton, Director
DEPARTMENT OF NATURAL RESOURCES
www.dnr.mo.gov

May 6, 2010

Ms. Peggy Casey
Environmental Projects Team Leader
Federal Highway Administration, Division Office
3220 West Edgewood, Suite H
Jefferson City, Missouri 6 5109

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

Re: Interstate 70 Draft First Tier Environmental Impact Statement, Jackson County, Missouri

Dear Ms. Casey and Mr. Keith:

The Missouri Department of Natural Resources (Department) appreciates the opportunity to review the Interstate 70 Draft First Tier Environmental Impact Statement (DFTEIS) for Jackson County, Missouri. The Department offers the following comments for consideration.

Hazardous Waste Issues

The City Environmental site referenced in Table 3.8.1 is no longer an active (operating) hazardous waste treatment storage or disposal facility. City Environmental / U.S. Liquids declared bankruptcy several years ago. EPA, working in coordination with the Department, filed a claim with the bankruptcy court for environmental claims including continuation of long-term groundwater monitoring at the former City Environmental facility. Shallow groundwater at this site remains contaminated with certain chemicals in excess of drinking water maximum contaminant levels.

The Beazer East (former Koppers woodtreating facility), EPA ID/hazardous waste permit number MOD007146517, is located at 6740 Stadium Blvd. This facility was issued a Missouri Hazardous Waste Management Facility Part I Permit by the Department 's Hazardous Waste Program and a U.S. Environmental Protection Agency Hazardous and Solid Waste Amendments Part II Permit on July 24, 1997. These permits remain in force pending their reissuance and are the regulatory mechanisms currently governing environmental monitoring and cleanup at the facility. There are no active operations on the facility property with the exception of the

environmental activities required by the permits. The permitted property is located directly adjacent to the I-70 Blue River overpass in the space east of the Blue River and west of Manchester Trafficway.

The Beazer East hazardous waste facility is not noted on the maps or in the narrative site summary. Woodtreating was performed at this facility for a number of decades. A considerable amount of contaminated soil has been removed from this property and groundwater contamination remains. Should project planners propose any construction on this site, they should be aware of the potential that soil or groundwater may have been contaminated by wood treatment chemicals. Any contaminated soil or groundwater would need to be properly characterized and disposed of or treated, as necessary. The Department 's Hazardous Waste Program is also in the process of finalizing environmental covenants on the permitted property and an adjacent parcel of land in private ownership. These covenants contain land use restrictions that may need to be considered in the context of any construction work that is proposed on the properties covered by the covenants.

The 100-year floodplain map provided for this area in the DFTEIS may be outdated. The U.S. Army Corps of Engineers (USACE) Blue River rechannelization project has significantly changed the 100-year floodplain in this area. The Department understands that FEMA has been in the process of redrawing 100-year floodplain maps for this area and anticipates that the Beazer facility may now be out of the 100-year floodplain in contrast to the maps provided in the DFTEIS.

On page 3.8-1, the Department recommends that the definition of hazardous waste be revised and include the following text: "Hazardous wastes as regulated by the Environmental Protection Agency (EPA) are defined as "waste with properties that make it dangerous or potentially harmful to human health or the environment. Hazardous wastes can be liquids, solids, contained gases, or sludges. They can be the byproducts of manufacturing processes or simply discarded commercial products, like cleaning fluids or pesticides". For the sake of clarity, for a waste to be considered hazardous, it must either be listed in *40 CFR 261 Subpart D* or exhibit at least one of the four characteristics of hazardous waste: ignitability, corrosivity, reactivity, or toxicity. If the waste is listed or exhibits any one of these characteristics, it is classified as hazardous waste.

Air Quality Issues

The Department recommends that Table 3.11.1 be amended as follows:

Sulfur Dioxide:

- "Sulfur Dioxides", should read Sulfur Dioxide without the "s", or it could read "Sulfur Oxides (Sulfur Dioxide)".
- Under Primary Standard, the annual standard is 0.030 ppm, as opposed to 0.03 ppm (this effects rounding).

Ozone:

- For the Primary 8-hour Standard listed at 0.075 ppm, the chart indicates the 2000 standard, which should be updated to the 2008 standard.
- In note 3 at the bottom of the chart, the Department recommends listing both the 1997 and 2008 standards, as the 3 year design value applies to both standards. (As written, it implies that this note only applies to the 1997 standard).

Lead:

- The Primary Standard listed in the chart is the 1978 standard. The 2008 standard is 0.15 ug/m^3, and the averaging time is a rolling 3-month average. The Department recommends listing the standards for both years, as recommended for Ozone, as both standards are currently in effect.

We appreciate the opportunity to provide comments for the Interstate 70 Draft First Tier Environmental Impact Statement, Jackson County, Missouri. If you have any questions or need clarification, please contact me or Ms. Jane Beetem, phone number (573) 751-3195. The address for correspondence is Department of Natural Resources, P.O. Box 176, Jefferson City, MO 65102. Thank you.

Sincerely,

DEPARTMENT OF NATURAL RESOURCES

Dru Buntin
Deputy Director for Policy

DB:jbj

United States Department of the Interior
OFFICE OF THE SECRETARY
Washington, DC 20240

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Mr. Kevin Ward
Division Administrator
Federal Highway Administration
3220 West Edgewood, Suite H
Jefferson City, Missouri 65109

Dear Mr. Ward:

As requested, the Department of the Interior (Department) has reviewed the Draft First Tier Environmental Impact Statement (EIS) for **Interstate 70 (I-70) Corridor Improvements, from the Kansas state line to east of Interstate 470, Jackson County, Missouri.** The Federal Highway Administration (FHWA) and the Missouri Department of Transportation (MoDOT) prepared this document. The Department offers the following comments and recommendations for your consideration.

Section 4(f) Comments

The purpose of the EIS was to develop strategies for improvements to I-70 in the Kansas City metropolitan area. Four strategies were developed for this first tier evaluation: (1) a No Build strategy that would concentrate on new paving, improvements to existing bridges, and changes to certain ramps to improve traffic flow and congestion; (2) a Key Bottleneck strategy that would include factors of the no build strategy plus a focus on specific congestion locations; (3) an Add General Lanes strategy utilizes the Key Bottleneck strategy but focuses on increasing the number of traffic lanes; and (4) a Transportation Improvement Corridor strategy that would include factors of the Add General Lanes strategy plus a focus on providing a specialized transportation corridor, barrier-separated from the regular traffic lanes, and used for congestion-managed lanes, reversible lanes, High Occupancy Vehicle lanes, or bus lanes. The EIS identifies the Key Bottleneck strategy as the Preferred Alternative. Following the completion of the first tier study, the project area will be divided into five Tier 2 segments of independent utility, which will consider specific impacts to five specific sections of the I-70 Corridor in separate environmental documents.

The EIS identifies many historic and other properties that may be eligible under Section 4(f) of the Department of Transportation Act of 1966 (48 U.S.C. 1653(f)). The EIS, however, does not specifically address the impacts to these properties, other than a certain number located in the project area, and the Preferred Alternative may or may not affect several of these properties. The Department assumes that we will see specific evaluations of impacts to these properties in the Tier 2 evaluations, and will defer our concurrence with the FHWA and the MoDOT on feasible or prudent alternatives impacting Section 4(f) properties until that time. In addition, we will defer to the Tier 2 evaluations on whether all possible planning needed to minimize harm to these resources has been employed.

The Department has a continuing interest in working with the FHWA and the MoDOT to ensure that impacts to resources of concern to the Department are adequately addressed. For matters related to Section 4(f) resources, please contact Regional Environmental Coordinator Nick Chevance, National Park Service, Midwest Regional Office, 601 Riverfront Drive, Omaha, Nebraska 68102; telephone 402-661-1844.

We appreciate the opportunity to provide these comments.

Sincerely,

Willie R. Taylor
Director, Office of Environmental
Policy and Compliance

cc:
Ms. Peggy Casey
Environmental Projects Team Leader
FHWA Division Office
3220 West Edgewood, Suite H
Jefferson City, Missouri 65109

Mr. Kevin Keith
Chief Engineer
Missouri Department of Transportation
Post Office Box 270
Jefferson City, Missouri 65102

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U.S. Department
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Federal Aviation Administration

Central Region
Iowa, Kansas
Missouri, Nebraska

901 Locust
Kansas City, Missouri 64106-2325

March 29, 2010

Ms. Peggy Casey
Environmental Projects Team Leader
Federal Highway Administration, Division Office
3220 West Edgewood, Suite H
Jefferson City, MO 65109

Re: Draft Tier EIS for Route I-70, Jackson County, MO
(I-70 Corridor Improvements from Kansas/Missouri State Line to I-470)

Dear Ms. Casey:

The Federal Aviation Administration (FAA) reviews other federal agency environmental documents from the perspective of the FAA's area of responsibility; that is, whether the proposal will have negative effects on aviation. We generally do not provide comments from an environmental standpoint. Therefore, we have reviewed the material furnished with Allan Zafft's letter dated March 8. 2010 addressed to Mr. Christopher Blum at the Federal Aviation Administration and have no comments regarding environmental matters. Note that future EAs and EISs may be directed to my attention.

Airspace Considerations

The project will require formal notice and review from an airspace standpoint under Federal Aviation Regulation (FAR) Part 77, Objects Affecting Navigable Airspace. Construction or alteration of objects can have an adverse impact to operations at the Charles B. Wheeler Downtown Airport (MKC) located northwest of the Kansas City downtown area

- Construction of objects may result in an increase to approach minimums to runways making landings more difficult in adverse weather conditions.
- The location of constructed objects may impact runway protection zones, safety areas, object free areas and obstacle free zones.
- The proposed project could impact the proper operation of navigational aide facilities at the airport.

Given the time required to conduct an aeronautical study, we recommend a 120-day notification to accommodate the review process and issue our determination letter. Proposals may be filed at http://oeaaa.faa.gov (requires free registration).

I encourage you to submit a request for airspace study soon in order to determine if there are any potential effects to the airport from the proposed project. Be sure to submit information for any roads, objects, and temporary construction equipment (e.g. cranes) that exceed the notice criteria.

More information on this process may be found at:
http://www.faa.gov/airports/central/engineering/part77/

If you have questions, please contact me at glenn.helm@faa.gov or 816-329-2617.

Sincerely,

Glenn Helm, P.E.
Environmental Specialist

cc: Joseph Miniace, FAA, ACE-1
Todd Madison, FAA, ACE-611B
Angela Muder, FAA ACE-620F
Michael Roper, Airport Manager (MKC)

City of Independence

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www.ci.independence.mo.us • (816) 325-7000

May 14, 2010

Allan Zafft
Transportation Planning Coordinator
600 NE Colbern Road
Lee's Summit, MO 64086

RE: I-70 DRAFT FIRST-TIER ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Zafft:

The City of Independence appreciates the opportunity to comment on the I-70 Draft First-Tier Environmental Impact Statement. The City views the I-70 interchange at I-470 as high priority for strategic safety and access improvements. Addressing short access ramps and merging difficulties would benefit the thousands of drivers in their daily trips through the I-470 interchange.

For the eastern segment of the I-70 corridor, the City favors the preferred strategy of 'Add General Lanes' over 'Fix Key Bottlenecks'. Growth is expected to continue in eastern Jackson County. The addition of I-70 lanes would provide capacity beyond interchange improvements.

The City thinks there would be significant value in adding sound barrier walls along portions of the I-70 corridor. Independence property owners adjacent to I-70 have voiced concerns about excess highway noise on numerous occasions. At the appropriate time, consideration should be given to integrating noise reduction into strategies for traffic management.

As the I-70 project shifts into second tier evaluation, the City will continue to have strong interest in participating. If there are questions about these comments, please contact Donna Coatsworth, Traffic Engineer, at 816-325-7608.

Sincerely,

John Powell

John Powell, P.E.
Public Works Director

dkc:
Cc: Donna Coatsworth, Traffic Engineer

600 Broadway, Suite 200
Kansas City, Missouri 64105-1659

816/474-4240
816/421-7758 FAX
www.marc.org

MARC
Mid-America Regional Council

May 5, 2010

Allan Zafft
Missouri Department of Transportation
600 NE Colbern Road
Lee's Summit, MO 64086

Dear Allan:

On behalf of the Mid-America Regional Council, I wish to submit the attached comments related to the Draft I-70 First Tier Environmental Impact Statement. These comments were reviewed and approved by the Total Transportation Policy Committee (TTPC) on April 20, 2010, and by the MARC Board of Directors on April 27, 2010.

Please feel free to contact me if you have any questions regarding the MARC comments. Thank you.

Sincerely,

Jim Hubbell
Transportation Planner II
Mid-America Regional Council

Enc: 1

Chair
Tom Cooley
Commissioner
Unified Government
of Wyandotte County/
Kansas City, Kan.

1st Vice Chair
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MARC Comments on Draft I-70 First Tier Environmental Impact Statement

1. **ISSUE:** Adequate consideration of transit and non-motorized modes of transportation

   COMMENT: The report does acknowledge transit, and bike/pedestrian users in the corridor, but doesn't suggest many specific methods to address their needs - mostly deferring to the second tier studies to develop any details of that nature. It would be helpful to have stronger commitment in this First Tier document to accommodate those modes. There needs to be an expression of intent by MoDOT to fund additional transit service in the corridor, if transit service can play a role in reducing congestion, and thereby reducing the need for added capacity. Furthermore, there needs to be a commitment by MoDOT to consider the results of the ongoing transit commuter corridor studies in the Second Tier EIS.

2. **ISSUE:** Truck-only lanes

   COMMENT: The document acknowledges the I-70 Supplemental EIS (Truck-only lanes) but says the issue will be addressed in the Tier 2 studies. This suggests an assumption that the truck-only lanes don't change the amount of truck traffic to address in the corridor, and the remaining questions are only of designing/locating the transition from truck-only lanes to general purpose lanes. MARC has stated before that there is not enough information from the truck-only lane study to draw this conclusion. This document should contain a more detailed description of the assumptions made about truck traffic in the corridor, and at what point it would be necessary to revisit the Tier 1 conclusions if these assumptions turn out to be incorrect.

3. **ISSUE:** Travel demand management/capacity

   COMMENT: The document should more fully analyze the potential of travel demand management and capacity management strategies in the corridor.

Jeremiah W. (Jay) Nixon
Governor

State of Missouri
OFFICE OF ADMINISTRATION
Post Office Box 809
Jefferson City, Missouri 65102
Phone: (573) 751-1851
Fax: (573) 751-1212

Kelvin L. Simmons
Commissioner

March 30, 2010

Alla Zafft
MoDOT
600 NE Colbern Road
Lee's Summit, MO 64086
allan.zafft@modot.mo.gov

Dear Mr. Zafft:

Subject 1009058
Assistance

The Missouri Federal Assistance Clearinghouse, in cooperation with state and local agencies interested or possibly affected, has completed the review on the above project application.

None of the agencies involved in the review had comments or recommendations to offer at this time. This concludes the Clearinghouse's review.

A copy of this letter is to be attached to the application as evidence of compliance with the State Clearinghouse requirements.

Please be advised that I am the contact for the Federal Funding Clearinghouse. You can send future requests to the following address: Sara VanderFeltz, Federal Funding Clearinghouse, 201 West Capitol, Room 125, and Jefferson City, Missouri 65101.

Sincerely,

Sara VanderFeltz

Sara VanderFeltz
Administrative Assistant

cc:

10009058

MAR 15 2010

Missouri
Department
of Transportation

MoDOT

Elizabeth A. Wright, District Engineer

District 4 – Kansas City Area
600 NE Colbern Road
Lee's Summit, MO 64086
(816) 622-6500
Fax (816) 622-6323
Toll free 1-888 ASK MoDOT
(1-888-ASK-6636)
www.modot.mo.gov

March 8, 2010

Sara Vanderfeltz
Missouri Federal Assistance Clearinghouse
Office of Administration
State Capital Building, Room 125
P.O. Box 809
Jefferson City, MO 65102

Dear Ms. Vanderfeltz:

Enclosed is one (1) electronic CD copy of the Draft First Tier Environmental Impact Statement for Route I-70, Jackson County, Missouri, (FHWA-MO-EIS-10-01-D, MoDOT Job Number J4I1486B).

This material is transmitted for your review and comment on behalf of the Federal Highway Administration (FHWA) and Missouri Department of Transportation (MoDOT) in compliance with the Council on Environmental Quality's "Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act". This Draft First Tier EIS has been prepared in accordance with Section 1502 of the Regulations and has been submitted for filing to EPA as specified in Section 1506.9.

FHWA and MoDOT anticipate the publication of the Notice of Availability in the *Federal Register* on March 19, 2010. Comments are due to one of the addresses on the signature page of the Draft First Tier EIS by May 7, 2010.

Please contact me with any questions regarding the transmittal of this Draft First Tier EIS at 816-622-0687 or Allan.Zafft@modot.mo.gov.

Sincerely,

Allan Zafft

Allan Zafft
Project Manager
Missouri Department of Transportation
Enclosures

cc: Peggy Casey, Federal Highway Administration - Missouri Division Office
Matthew Burcham, Missouri Department of Transportation - Central Office
Chris Nazar, Wilbur Smith Associates
Project File

U.S. Department of Homeland Security
United States Coast Guard

Commander
Eighth Coast Guard District

1222 Spruce Street
St. Louis, MO 63103-2832
Staff Symbol: dwb
Phone: (314) 269-2382
Fax: (314) 269-2737
Email: david.a.orzechowski@uscg.mil
www.uscg.mil/da/westernriversbridges

16591.6/Blue River
March 22, 2010

Mr. Allan Zafft
Project Manager
Missouri Department of Transportation
600 NE Colbern Road
Lee's Summit, MO 64086

Subj: DRAFT FIRST TIER ENVIRONMENTAL IMPACT STATEMENT FOR ROUTE I-70, JACKSON COUNTY, MISSOURI

Dear Mr. Zafft:

Please refer to your letter requesting a review and comment for the Draft First Tier Environmental Impact Statement for Route I-70 project. We have determined that pursuant to the Coast Guard Authorization Act of 1982, the subject project does not involve bridges over commercially navigable waters of the United States. Therefore, a Coast Guard bridge permit is not required for this project.

We appreciate the opportunity to comment on the project.

Sincerely,

ROGER K. WIEBUSCH
Bridge Administrator
By direction of the District Commander

CITY OF FOUNTAINS
HEART OF THE NATION

KANSAS CITY
MISSOURI

Public Works Department
Director's Office

September 10, 2010

Ms. Beth Wright
District Engineer
Missouri Department of Transportation – District 4
600 NE Colbern Road
Lee's Summit, MO 64086

Re: I-70 First Tier EIS

Dear Ms. Wright:

The following is a summary of our previous comments submitted by email on the Draft First Tier Environmental Impact Statement for Route I-70, Jackson County, Missouri.

First, we have a major concern with mentioning of the closure of the 18th Street Interchange and request that it be removed from the report. We understand the desire to close the 18th Street interchange specifically. At this time, until adequate methods to address the access needs within the interchange area are addressed, we seriously object to the recommendation of closing the 18th Street Interchange. The executive summary and throughout the document there are enough references that the preferred strategy will consider interchange consolidations, modifications with CD roads, and/or elimination of access are sufficient comments. As the Second tier evaluations proceeds forward more specific details on interchange improvements can be evaluated in more detail, and specific interchange modifications can be identified through the future processes.

Second comment centers around the use of bus transit on the shoulder, and the need to carefully consider overall transportation safety in the implementation of this strategy.

Finally, we feel that the preferred strategy for the entire corridor should be the Improve Key Bottlenecks Strategy for the entire project length. We feel that the Add General Lanes Strategy for only part of the corridor provides an unbalanced overall strategy.

If you have any questions, please let me know.

Sincerely,

Stanley J. Harris, P.E.
Director of Public Works