
Final
Environmental Impact Statement
Page Avenue Extension

St. Charles and St. Louis Counties, Missouri

Comments and Coordination

Prepared for:
The Missouri Highway and Transportation Department

Prepared by:
Booker Associates, Inc.

Volume 3 of 4

November 1992

Route D, St. Louis - St. Charles Counties, Missouri
(Page Avenue Extension)
Bennington Place Westerly to Route 40
Job Nos. 6-U-D-803B, 6-U-D-803C and 6-U-D-803D

Final
Environmental Impact Statement

Submitted Pursuant to 42 USC 4332(2)(c) and 16 USC 4607-8

by the

U. S. Department of Transportation
Federal Highway Administration

and

The Missouri Highway and Transportation Department

Cooperating Agencies

U. S. Army Corps of Engineers
U. S. Coast Guard
National Park Service, U. S. Department of the Interior
U. S. Fish and Wildlife Service, U. S. Department of the Interior



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Volume 3 of 4

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INTRODUCTION

Coordination for the Page Avenue Extension has occurred for more than two decades. Section 3.4, Comments and Coordination, of the accompanying Section 6(f) Evaluation, relates a historical overview of the genesis and evolution of the Page Avenue Extension Red Alignment as well as St. Louis County's Creve Coeur Lake Memorial Park (CCLMP). The introductory summary below and the following letters relate to pertinent communications with various agencies, entities, and individuals since the EIS was initiated in 1988. Volumes of correspondence relating to this project have been received by MHTD as part of the EIS review. Key issues and representative samples of primary coordination documentation relating to environmental issues are included in this document. MHTD files contain additional coordination letters and comments received from interested parties. This introduction is divided into three sections: Scoping Meetings, Pre-DEIS Coordination, and Post-DEIS Coordination.

Scoping Meetings

1. February 24, 1988: First Scoping Meeting

Inasmuch as this was the first scoping meeting, an introduction of the project and proposed schedule were presented. It was established that funds were available to build improvements from Bennington Place to Route 94 at this time.

A representative of the St. Louis County Department of Highways and Traffic prompted discussion relating to an interchange at Amiot. (By early 1990, in response to local public opinion, this idea was dropped.)

A representative of the U. S. Fish and Wildlife Service (USFWS) indicated that the EIS should address secondary impacts which result from an interchange with the proposed Earth City Expressway Extension and Route D. The Missouri Highway and Transportation Department (MHTD) indicated that Earth City Expressway Extension was a local issue and not part of this project.

The USFWS representative questioned how CCLMP would be crossed. MHTD representatives indicated a bridge structure would be primary mechanism.

The USFWS representative noted that for the Red Alignment all applicable statutes for Section 4(f) and NEPA would need to be followed. MHTD indicated the appropriate environmental statutes would be followed.

2. March 25, 1988: Second Scoping Meeting

Comments from St. Louis County representatives indicated that, until Earth City Expressway Extension is constructed, an interchange to the west of Creve Coeur Mill Road would help avoid additional impacts to Creve Coeur Lake Memorial Park. MHTD agreed this would be a better situation.

St. Louis County also indicated that a half-diamond interchange to the west at Amiot Drive would improve local service but would require closing Seven Pines Drive.

Other discussions related to comments from representatives of the City of St. Charles, the St. Charles County Highway Department, the City of St. Peters, and the Page Avenue Bridge Committee concerned access and connecting road alignments along Route 94.

3. October 18, 1988: Third Scoping Meeting

A representative of the Page Avenue Bridge Committee asked for information concerning the completion schedule of the EIS.

A representative of the City of Maryland Heights expressed interest in the proposed Amiot Drive interchange and requested to be kept advised of any changes.

A representative of St. Louis County indicated that the EIS should address replacement land for crossing CCLMP.

Attendees at the scoping meetings, hosted by MHTD, included representatives from USEPA, COE, St. Charles County, St. Louis County, Missouri's House of Representatives, USFWS, the Missouri Department of Conservation, the Page Avenue Bridge Committee, the East-West Gateway Coordinating Council, FHWA and local residents as well as other interested individuals.

PRE-DEIS COORDINATION

U. S. Army Corps of Engineers (COE), Kansas City District

On October 19, 1988, the MHTD sent a letter to the COE requesting comments concerning regulatory wetlands and other environmental matters for the proposed action. A follow-up letter requesting COE to become a cooperating agency was transmitted on July 11, 1989. A previous letter of June 3, 1987 from COE had indicated that it would be a cooperating agency. The 1988 and 1989 letters were provided to coordinate with the new COE District Engineer.

There was additional coordination with COE personnel at the Jefferson City Resident Engineer Office concerning a preliminary field site visit. COE personnel indicated it would be premature on their part to visit the project area until a selected alignment was determined. Afterward, field site visits and coordination with COE could be completed and a 404 Permit requested and finalized.

U. S. Coast Guard (USCG), Second District

On October 19, 1988, MHTD sent a letter to the Bridge Branch, U. S. Coast Guard, Second District, concerning the proposed project. The USCG responded indicating a preference for the Green Alignment crossing of the Missouri River for purposes of navigation. However, the Red Alignment crossing could be approved if design considerations were adequate for navigation purposes. Once the Selected Alternate is approved, a bridge permit will be requested.

Coordination between MHTD and USCG has resulted in the USCG agreeing to be a cooperating agency during the EIS process.

U. S. Fish and Wildlife Service (USFWS)

On June 12, 1987, MHTD received correspondence from the USFWS in response to the notice of intent to prepare an EIS for the Page Avenue Extension published in the Federal Register on May 21, 1987. USFWS concerns were identified as the adverse impacts to parks by extending Page Avenue through Creve Coeur Lake Memorial Park and the secondary impacts of development in the floodplain area, including the proposed Earth City Expressway Extension. Representatives from USFWS attended the three scoping meetings, a special resource agency coordination meeting on March 29, 1988, and an on-site coordination meeting on August 1989 at CCLMP.

On October 19, 1988, MHTD requested specific comments from USFWS about the Page Avenue Extension concerning threatened or endangered species. Based on a January 29, 1987 letter from USFWS noting concern for the wintering habitat of the bald eagle, a special biological assessment was conducted during the winter of 1988-1989. No critical habitat or use of the area was noted for the bald eagle. Subsequent correspondence from USFWS noted that no critical habitat would be encountered along the alternate alignments for the Page Avenue Extension.

In response to secondary and cumulative effects of potential floodplain development, a separate EIS is being conducted for the extension of the Earth City Expressway Extension by Booker Associates, Inc. for the St. Louis County Department of Highways and Traffic. (Some future St. Louis County development scenarios are noted in the Page Avenue Extension EIS in its Floodplain Development section. Progress on the Earth City Expressway Extension DEIS stopped in 1990 because of lack of funding in St. Louis County and reassessment of priorities.

The probability of floodplain development is, in fact, negligible until flood protection is provided for the area. Neither Page Avenue Extension nor Earth City Expressway Extension (to be built at grade) will provide flood protection for development.

U. S. Department of Agriculture, Soil Conservation Service (SCS)

Coordination with SCS occurred during July 1989 in order to evaluate the effect of the proposed alignments on prime and unique farmlands. Forms AD 1006 were prepared and sent to SCS offices for St. Louis and St. Charles Counties. Completed forms were returned on August 30 and August 31, 1989. Revised forms with refined total acreage required amounts which better evaluated the alignment for their total length were submitted and returned January 8, 1990.

None of the build alternates exceeds the 160 threshold limit that would require consideration of modification of the route.

U. S. Environmental Protection Agency (USEPA)

Contact has been made by MHTD during preparation of the Page Avenue Extension DEIS. Representatives of the USEPA attended scoping meetings and a special

St. Charles County

Contact with St. Charles County officials and interest groups throughout the scoping meetings and additional meetings relative to specific design issues. Several meetings were conducted with the Page Avenue Bridge Committee and several State Senators and Representatives.

Spring Bend Estates

As originally conceptualized, the Red Alignment would have impacted this historic site and its unique native wildflower garden. Numerous letters from interested local persons and groups were submitted to MHTD, the Missouri Highway and Transportation Commission, U. S. Senator Danforth, and Dr. Peter Raven, Director of the Missouri Botanical Garden. A majority of the letters indicated a desire for Page Avenue to avoid this site, if possible. MHTD District 6 ("St. Louis Metro District") staff worked with the property owner, Mr. and Mrs. Knowles, and moved the alignment northward to miss any buildings as well as avoid the impact to the flower garden.

Amiot Drive

The second issue that generated a substantial letter-writing campaign (100+ letters) was the prospective meetings of Page Avenue and Amiot Drive. The concept of a half-diamond interchange at Amiot Drive and a requisite closing part of this local thoroughfare, created strong interest. The interchange was in response to earlier concerns regarding access to Page Avenue and relief for the Westport commercial/office area east of Route I-270. As a result of a series of meetings with local residents, MHTD revised the Red Alignment so as to keep Amiot Drive open. It was agreed that Page Avenue would be grade-separated below Amiot Drive and that there would be no interchange.

Other Meetings/Contacts

Many other meetings and interviews have occurred. Included were interviews with representatives of each community affected by any route; contacts with representatives of utilities to determine conflicts and their future projects; additional meetings with neighborhood groups; speaking engagements at local civic and professional organizations; meetings with environmental groups and natural resource agencies; discussions with interested groups concerning transit operations in St. Charles; and the contacts with the Gateway Trailnet, Inc. organization.

POST-DEIS COORDINATION

The Page Avenue Extension's Draft Environmental Impact Statement (DEIS), including a Draft Section 4(f) and 6(f) Evaluation as an appendix, was widely disseminated beginning in late May of 1990. A public hearing was held in the City of St. Charles on June 28, 1990. Over 1,000 people attended and 64 individuals made statements of some kind. It is fair to observe that a large majority of those speaking favored the Red Alignment, including all government officials and most representatives of private organizations as well as interested individuals. Audience reactions also indicated strong support for the Red Alignment.

However, it should also be noted that opposition to the Red Alignment was expressed that helped shape the subsequent environmental review process. For example, an attorney for the Royal Pines Condominium Association at the hearing first advanced the concept of what ultimately was evaluated as the Yellow Segment, a St. Louis County route that would make maximum use of a utility corridor to avoid direct impacts to CCLMP.

The original DEIS written comment period was scheduled to end August 1, 1990. It was first extended to October 1, 1990 and then extended indefinitely thereafter for substantiating comments relating to issues that were unresolved at the time of the DEIS. Written comments have been received from a broad spectrum of federal and state agencies, county and local governments, private organizations, residential groups and concerned individuals.

The majority of public written comments have been consistently supportive of the Red Alignment. However, one major 1990 modification of the Red Alignment in St. Charles County was prompted by public hearing statement as well as subsequent written comments and numerous other contacts and communications. As originally routed, the Red Alignment would have passed through the Timberwood Trails subdivision with the loss of eleven residences. Ultimately, the Red Alignment was re-routed to the south to avoid Timberwood Trails.

On November 2, 1990 the Missouri Highway and Transportation Commission adopted the Red Alignment as the State of Missouri's Selected Alternate for the Page Avenue Extension.

In January of 1991, MHTD began several months of negotiations with St. Louis County to develop mitigation package that was titled the Enhancement Plan for the Red Alignment's CCLMP impacts. The resulting plan comprises many ideas suggested by St. Louis County. It was approved by the Missouri Highway and Transportation Commission on May 3, 1991 and has been an integral element of the Red Alignment ever since. The stipulations of that plan are an integral part of the mitigation required by Section 601 of the Pipeline Safety Act.

Written and other communications involving other governmental entities, environmental organizations, and residential groups both preceded and followed the events described above. For example, since the DEIS was issued, there have been one or more written comments from eleven U. S. Government agencies, four State of Missouri agencies and numerous local governments and elected officials. Local authorities and representatives from St. Charles County, in particular, have continually voiced the need for the Page Avenue Extension and their wishes to accelerate the process of its approval.

Federal and State Government concerns regarding the Page Avenue Extension in general, and the Red Alignment in particular, generally have reflected the orientation and missions of the reviewing agencies. These concerns can be grouped, in large part, into seven broad classifications.

1. More/Better Information. Various requests have been made for more or better information including, but not limited to, more detail or specificity, new points to explore, updates, corrections, quantifications of impacts, etc.

2. Creve Coeur Lake Memorial Park. No single issue has received more scrutiny than the efficacy of traversing St. Louis County's CCLMP with the Red Alignment. Alignments that avoid CCLMP have been evaluated (the Green-Black, Yellow-Black and Blue Segments in combination with the Red Alignment) and determined to produce adverse local impacts of collective extraordinary magnitude. Techniques to mitigate Red Alignment impacts to CCLMP, including but not limited to the mitigation plan, have also been examined further. This has culminated in the mitigation requirements of Section 601 of the Pipeline Safety Act.
3. Floodplain Impacts/Development. Much attention has been devoted to floodplain impacts along the Missouri River and, to a much lesser extent, Dardenne Creek in St. Charles County. The possibility of induced development throughout St. Louis County's expanse of the Missouri River floodplain, facilitated by new levees and/or the proposed Earth City Expressway Extension, has been discounted.
4. Missouri River Bridge Placement/Design/Flood Impacts. Potential impacts of the Red Alignment's Missouri River bridge have been considered and it has been determined that the final design will provide for a bridge structure that will not increase the base flood elevation. A similar process during the design phase will provide structures over the regulatory floodways of Creve Coeur Lake and tributaries that will not increase the base flood elevation.
5. KATY Trail State Park. Potential impacts to the KATY Trail State Park (previously known as Missouri River Train) have been determined along with appropriate mitigation measures. No avoidance alternatives are possible relative to the KATY Trail State Park. Given its location along the Missouri River's St. Charles County shore, any Missouri River crossing must span the trail. Section 601 of the Pipeline Safety Act waives the requirements of Section 4(f) for the trail.
6. Wetlands/Mitigation. Wetland impacts have been delineated and an appropriate mitigation plan is being coordinated with representatives from the Kansas City District, Corps of Engineers, the U. S. Fish and Wildlife Service, and the Missouri Department of Conservation.
7. Noise. Potential Red Alignment noise impacts have been ongoing concerns at three locations: the residential areas along the Red Alignment in St. Louis County. CCLMP and the KATY Trail State Park. Noise impacts have been projected and required mitigation measures specified.

Numerous other concerns have been expressed by reviewing agencies. However, the seven capsule summaries tend to highlight the most protracted or contentious issues. There were broad, expanding areas of consensus in other realms.

In order to facilitate post-DEIS coordination, MHTD arranged several large-scale interagency meetings, one of which included a tour of the St. Louis County project area for reviewers based outside of Metropolitan St. Louis. These events were intended to supplement, not replace, smaller meetings, correspondence, telephone conversations, etc. in resolving specific issues.

On August 28, 1991, MHTD hosted a St. Louis meeting. Attendees included representative of St. Louis County's Department of Parks and Recreation, the Missouri Department of Natural Resources (DNR), the National Park Service (NPS), the U. S. Fish and Wildlife Service (USFWS), the Federal Highway Administration (FHWA), MHTD Commissioners and Booker Associates, Inc. The agenda included a history of the project, a discussion of the Build Alternates, a review of the mitigation plan and a tour of CCLMP, a tour of the neighborhoods where the Red Alignment and alternate alignments would pass through, and visits to key locations in the Missouri River floodplain.

FHWA chaired another interagency meeting in Kansas City on October 30, 1991. Participants included MHTD representatives as well as Regional Directors and staff for NPS, USFWS, the U. S. Environmental Protection Agency (USEPA), the U. S. Army Corps of Engineers (COE), and the U. S. Coast Guard (USCG). NPS said it was "favorably impressed" with the mitigation plan and a general consensus emerged that the Page Avenue Extension is a necessary project. Additional coordination with agency technical personnel was considered mandatory to resolve pending issues.

Jefferson City, Missouri was the site of a two-day series of meeting sponsored by MHTD on December 10 and 11, 1991. Representatives from the following governmental agencies attended some or all of the sessions: FHWA, USFWS, USEPA, COE, the Federal Emergency Management Agency (FEMA), Missouri's Department of Conservation (MDC), St. Charles County's Planning Department and Booker Associates, Inc. Outstanding issues to be resolved and specific plans to provide specific solutions were developed in conference or detailed steps were outlines that would be necessary to resolve the remaining issues.

Listed below are key meeting dates and a brief synopsis of elements associated with the meetings that occurred during the period January 1992 up to the publication of this FEIS:

January 10, 1992. MHTD met with DNR-SHPO to review historic architectural properties and archaeological survey work. Discussed eligibility issues and possible impacts to properties.

January 29, 1992. MHTD met with the U. S. Army Corps of Engineers, Kansas City District (KCD) to discuss wetland delineation and wetland mitigation planning.

January 31, 1992. MHTD discussed wetland jurisdictional issues by telephone with KCD.

February 4, 1992. MHTD met with DNR-SHPO staff to discuss additional information and address design alternatives relating to the proposed action.

February 10, 1992. MHTD met with DNR-SHPO staff to discuss historic architectural properties and issues of effect.

March 2, 1992. MHTD and MHTD and DNR-SHPO discussed the history of MHTD efforts to avoid or minimize impacts to historical architectural properties with DNR-SHPO, including very early interagency coordination discussion indicating location and design revisions to the proposed action.

March 30, 1992. Secretary Manual Lujan of the U. S. Department of the Interior visited Creve Coeur Lake Memorial Park to assess the project and its impacts. A field tour was conducted with the MHTD, national, state and local officials; citizens expressed their views at the park.

September 24, 1992. MHTD and KCD discussed the status of the proposed action.

October 6, 1992. U. S. Congress passed the Pipeline Safety Act of 1992 which includes Section 601. This provides the opportunity for the Secretary of the Department of Transportation to grant a waiver of Section 4(f) for the Red Alignment.

October 13, 1992. MHTD sent DNR copy of park enhancement plan proposed after circulation of Draft EIS in 1990.

October 14, 1992. MHTD and DNR discussed issues related to Creve Coeur Lake Memorial Park and the conversion of parklands to highway use as that relates to the Land and Water Conservation Fund (LWCF) Act.

October 15, 1992. MHTD met with FHWA, DNR, St. Louis County, U. S. Congressional staff and also with the Department of the Interior in Washington, D.C. to discuss the proposed action.

October 16, 1992. Preliminary Final EIS II circulated to ten (10) agencies for review and comment with Section 601 legislation.

October 16, 1992. MHTD and FHWA attended a meeting with DNR staff to discuss proposed action and Section 601.

October 20, 1992. MHTD and FHWA conducted a meeting with KCD staff and Jefferson City representative of KCD to address wetland delineation issues.

October 21, 1992. MHTD and FHWA met with DNR-SHPO staff to address impacts to cultural resources possibly caused by the proposed action.

October 22, 1992. MHTD and DNR-SHPO staff conducted an in-field assessment of architectural properties that would possibly be impacted by the proposed action.

October 23, 1992. FHWA wrote to National Park Service accepting NPS as a cooperating agency for the Final EIS.

October 23, 1992. MHTD and Missouri Department of Conservation (MDC) staff discussed wetland mitigation for proposed action.

October 26, 1992. President George Bush signed the Pipeline Safety Act of 1992 into law.

October 26, 1992. MHTD Page Avenue Committee met. The committee included a staff representative from DNR.

October 27, 1992. MHTD and U. S. Fish and Wildlife Service (FWS) staff discussed Preliminary Final EIS matters.

October 28, 1992. MHTD conducted a conference call with U. S. Department of the Interior staff to discuss Section 601 and CCLMP.

October 29, 1992. MHTD, FHWA and DNR-SHPO staffs met to address impacts to potential historic properties. SHPO signed Memorandum of Agreement (MOA) for the proposed action.

October 29, 1992. FHWA sent MOA to Advisory Council on Historic Preservation (ACHP) for execution.

October 29, 1992. MHTD, FHWA, FWS and MDC staff met to discuss issues of concern to FWS and MDC.

October 30, 1992. MHTD and NPS staff discussed proposed action and comments on Preliminary Final EIS.

November 2, 1992. MHTD Page Avenue Committee met. The committee included a staff representative from DNR.

November 3, 1992. MHTD and MDC staff discussed comments on Preliminary Final EIS.

November 3, 1992. MHTD and KCD discussed preliminary information on wetland delineation. Later, they discussed the initiation of the Section 404 permit process.

November 3, 1992. MHTD and DNR discussed comments on Preliminary Final EIS.

November 4, 1992. FHWA wrote to the U. S. Fish and Wildlife Service (FWS) accepting them as a cooperating agency for the Final EIS. MHTD and FWS discussed comments on Preliminary Final EIS.

November 4, 1992. MHTD and U. S. Coast Guard staff discussed comments on the Preliminary Final EIS.

November 4, 1992. MHTD and DNR discussed comments on Preliminary Final EIS.

November 4, 1992. MHTD and EPA Regional Office discussed comments on Preliminary Final EIS.

November 5, 1992. MHTD and EPA discussed comments on Preliminary Final EIS.

November 6, 1992. MHTD, FHWA and DNR met to discuss CCLMP, cultural resources and other matters.

November 6, 1992. Information on possible noise impacts to CCLMP FAXed to NPS, DNR and St. Louis County. Later conference call with NPS and St. Louis County with staff of DNR, MHTD and FHWA resolved issue of noise impacts taking in CCLMP.

November 6, 1992. MHTD and DNR discussed comments on Preliminary Final EIS.

November 9, 1992. MHTD and DNR discussed comments on Preliminary Final EIS.

November 9, 1992. MHTD Page Avenue Committee met.

November 9, 1992. MHTD and EPA discussed comments on Preliminary Final EIS.

November 9, 1992. MHTD and ACHP discussed additional information needed to allow processing of MOA. Data is sent overnight to ACHP. MHTD and DNR-SHPO also discussed this matter.

November 9, 1992. MHTD and St. Louis District (SLD) of U. S. Army Corps of Engineers discussed proposed action and coordination between KCD and SLD.

November 9, 1992. MHTD and KCD discussed continuing coordination.

November 10, 1992. MHTD, KCD and Jefferson City representative of KCD discussed progress of wetland delineation.

Additional coordination occurred subsequent to November 10, 1992.

Throughout this process, MHTD has made a special effort to be responsive to the public. Its District 6 personnel, in particular, have had innumerable face-to-face contacts and meeting with individuals, residential groups and environmental organizations as well as countless telephone contacts. As previously indicated, public comments have shaped the environmental review process as well as the ultimate design of the Red Alignment, the Selected Alternate. The deletion of an interchange that was originally proposed at Amiot Drive in St. Louis County, in spite of concerted support from the City of Maryland Heights and local businesses, is a good example of responsiveness to the intense local public opinion that sought to eliminate this interchange.

A similar degree of effort has characterized MHTD's relationships with concerned governmental entities. Much of the balance of this document (Volume 3, Comments and Coordination, Page Avenue Extension FEIS) comprises intergovernmental correspondence and comments spanning the DEIS and FEIS preparation periods. Collectively, this material evidences an ongoing commitment to identify, explore, mitigate, and otherwise resolve all the problems attendant to constructing a large modern freeway in a complex corridor of developed and natural environments.



Mark



MISSOURI HIGHWAY AND TRANSPORTATION DEPARTMENT

Wayne Muri
Chief Engineer

Capitol Ave. at Jefferson St., P.O. Box 270, Jefferson City, MO 65102 (314) 751-2551 Fax (314) 751-6555

July 11, 1989

DESIGN

Route D, St. Charles-St. Louis Counties
Page Avenue Extension
Job Nos. 6-U-D-803B, 6-U-D-803C, and 6-U-D-803D
Environmental Impact Statement
Cooperating Agency Request

Colonel John H. Atkinson
Commanding Officer
U. S. Army Corps of Engineers
Kansas City District
700 Federal Office Building
601 East 12th Street
Kansas City, Missouri 64106

Dear Colonel Atkinson:

The Missouri Highway and Transportation Department (MHTD), in coordination with the Federal Highway Administration (FHWA), is planning an extension of Page Avenue (Route D) from Bennington Place in St. Louis County, across the Missouri River into St. Charles County to either Route 40-61 or Interstate 70. FHWA is the lead federal agency for the proposed action.

An Environmental Impact Statement (EIS) is being prepared to address impacts of the proposed projects. The proposed highway is a multiple lane fully-access controlled facility. A new bridge will be built to span the Missouri River. Four build alternates are now being considered in the EIS.

We have corresponded previously with you regarding our responsibilities under Section 404 of the Clean Water Act. Because the proposed action crosses the floodplain of the Missouri River the possibility for impacting potential wetland areas exists. Such wetlands would be under the jurisdiction of the Corps of Engineers (COE) pursuant to Section 404.

Because of this we request that the COE become a cooperating agency for the proposed action.

Colonel Jehn H. Atkinson
July 11, 1989
Page Two

We have corresponded previously regarding environmental matters for the proposed action. To date we have held three scoping meetings attended by agencies, commercial interests, and private citizens. Because no more scoping meetings are scheduled, no cooperation is necessary on that matter from your agency.

We anticipate that you will have the following responsibilities as a cooperating agency.

We are now preparing the draft EIS and you will not need to write any portion of that document. However, any pertinent comments which will contribute to the EIS are requested.

After FHWA approval of the draft EIS, we shall be circulating it for comments. We ask that you provide us with your comments on that document, especially as they pertain to issues under your jurisdiction.

We shall be holding public hearings for the proposed action within the next year. We ask that you consider participating at these hearings.

Prior to completion of the final EIS and Record of Decision (ROD), we anticipate that our agencies (COE, MHTD, and FHWA) will conduct joint field reviews related to potential wetland impacts and mitigation measures. The results of that cooperation will be incorporated into the final EIS and ROD, if impacts are identified and mitigation is required.

If you have any questions about this matter, please contact us. We shall enjoy working with the COE as the proposed action develops.

Very truly yours,



Jim Roberts
Division Engineer
Design

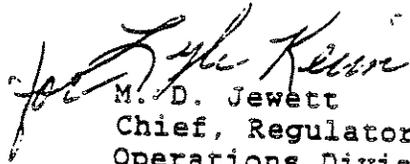
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copy: Gerald J. Raihsen

less environmentally damaging practicable alternative to the project exists, a permit probably would not be issued. If no practicable alternatives exist, a permit may be issued and mitigation may be required. Similarly, in accordance with Executive Order 11988, Floodplain Management, where practicable alternatives exist, our policy is to avoid or minimize adverse impacts on the base floodplain (100-year floodplain) and avoid inducing development to the extent possible.

If you have any questions or need additional information concerning this matter, please feel free to write me or to call Ms. Kathleen Mulder (816) 426-2116.

Sincerely,



M. D. Jewett

Chief, Regulatory Branch
Operations Division

Enclosure



DEPARTMENT OF THE ARMY
NAPOLEON RESIDENT OFFICE, CORPS OF ENGINEERS
NAPOLEON, MISSOURI 64074

July 12, 1989

REPLY TO
ATTENTION OF:

Napoleon Resident Office



Mr. Greg Knauer
Booker Associates, Inc.
1139 Olive Street
St. Louis, Missouri 63101

Dear Mr. Knauer:

This will confirm the telephone conversation on July 12, 1989, between yourself and Mr. Robert Meyer of our Jefferson City Project Office regarding wetland determinations associated with an extension of Page Avenue in St. Charles and St. Louis Counties, Missouri, as proposed by the Missouri Highway and Transportation Department.

As Mr. Meyer stated, it is our policy not to make wetland determinations until we have an application with a definite proposal. If you desire to seek assistance from other Federal Agencies, i.e. Fish and Wildlife Service, Environmental Protection Agency and/or Soil Conservation Service, please feel free to do so. However, the Corps of Engineers, as administrators of the regulatory program, will ultimately determine the presence or absence of any wetlands and the boundaries thereof.

For your information, an interagency cooperative publication by the four agencies mentioned above titled "Federal Manual for Identifying and Delineating Jurisdictional Wetlands" can be purchased by writing the Superintendent of Document, U.S. Government Printing Office, Washington, D.C. 20402 or calling (202) 783-3238. The stock number is 024-010-00-683-8.

If you have any further questions concerning this matter, please feel free to contact Mr. Robert Meyer, Jefferson City Project Office, U.S. Army Corps of Engineers, 631 West Main, Jefferson City, Missouri 65101, telephone number 314-634-2248.

Sincerely,


F. M. FULKERSON
Resident Engineer

All new construction in the flood plain must be responsive to Executive Order (EO) 11988. To achieve compliance, the bridge must not encroach on the Federal Emergency Management Agency designated floodway agreed upon by St. Louis County. In addition, the head loss created by piers and the constriction of the valley may not exceed one foot. Plans of the proposed structure should be forwarded to this office at the earliest possible date for review.

We appreciate your early contact with us on this project.

Sincerely,

A handwritten signature in cursive script, reading "Philip L. Rotert".

Philip L. Rotert
Chief, Planning Division

n

May 12, 1987

SURVEYS AND PLANS

Route D, St. Louis County
West of Bennington Place to Route 40
Cooperating Agency

Colonel Robert M. Amrine, Commanding Officer
Kansas City District Corps of Engineers
700 Federal Office Building
601 East 12th Street
Kansas City, Missouri 64106

Dear Colonel Amrine:

We are initiating the preparation of Environmental Documents for a new Missouri River crossing between St. Charles and St. Louis Counties. We have furnished a Notice of Intent to prepare an Environmental Impact Statement to the Federal Highway Administration requesting it be published in the Federal Register for this project.

Reference is made to the Memorandum of Agreement between the Department of Transportation and the Department of Army on the implementation of Section 404(q) of the Clean Water Act. As part of the cooperation in early and continuing coordination during development of a project, environmental documentation and public involvement, we request your decision on being a Cooperating Agency in this proposal.

Please furnish us notification of your desire to be a Cooperating Agency or any comments in regards to this proposal at your earliest convenience. If we have not received notification or comments from you after 30 days, we will assume you have no comments on the proposal and that you do not desire to be a Cooperative Agency.

As part of the early project involvement, we are furnishing you an aerial mosaic and a USGS map showing the location of the proposed river crossing. We request your review of the impact of the proposal. We will appreciate your assistance and cooperation in this proposal.

Very truly yours,



James F. Roberts
Division Engineer
Surveys and Plans

THH:jlr

Mark

MISSOURI HIGHWAY AND TRANSPORTATION DEPARTMENT

Wayne Muri
Chief Engineer

Capitol Ave at Jefferson St P.O. Box 270, Jefferson City, MO 65102 (314) 751-2551 Fax (314) 751-6555

July 10, 1989

DESIGN

Route D, St. Charles-St. Louis Counties
Page Avenue Extension
Job Nos. 6-U-D-803B, 6-U-D-803C, and 6-U-D-803D
Environmental Impact Statement
Cooperating Agency Request

Mr. Roger K. Wiebusch, Bridge Administrator
Bridge Branch
Second Coast Guard District
United States Coast Guard
1430 Olive Street
St. Louis, Missouri 63103-2398

Dear Mr. Wiebusch:

We have corresponded with you previously regarding the proposed bridge across the Missouri River for the Page Avenue extension in St. Charles and St. Louis counties. An Environmental Impact Statement (EIS) is being prepared for these projects. Because the Missouri River is a navigable stream a bridge permit will be required from the U. S. Coast Guard (USCG). The Federal Highway Administration (FHWA) is the lead federal agency for this action.

A joint Memorandum of Understanding (MOU) signed by FHWA and the USCG states that the USCG will be a cooperating agency for such projects. Through this letter we request that you be a cooperating agency for the preparation of the EIS for the proposed action.

As a cooperating agency, we anticipate that you will have the following responsibilities.

Scoping meetings have been held for the proposed action and no cooperation is necessary on that matter.

We are preparing the draft EIS at this time. You will not need to write any portion of that document. However, any pertinent comments which will contribute to the EIS are requested.

After FHWA approval of the draft EIS, we shall be circulating it for comments. We ask that you provide us with your comments on that document, especially as they

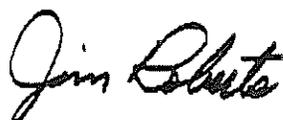
Mr. Reger K. Wiebusch
July 10, 1989
Page Two

pertain to issues under your jurisdiction. We shall be holding public hearings within the year on these projects. We ask that you consider participating at those hearings.

Prior to completion of the final EIS and Record of Decision (ROD), we anticipate that our agencies (USCG, MHTD, and FHWA) will conduct joint field reviews related to the proposed projects. The results of that cooperation will be incorporated into the final EIS and ROD, if necessary.

If you have any questions about this matter, please do not fail to contact us. We shall enjoy working with the USCG as this proposed action develops.

Very truly yours,



Jim Roberts
Division Engineer
Design

mk/lf

copy: Gerald J. Raihsen

U.S. Department
of Transportation
United States
Coast Guard



Commander
Second Coast Guard District

1430 Olive Street
St. Louis, MO 63103-2398
Staff Symbol: (05)
Phone: 314-425-4607
FIS 279-4607

JKK

16591.1/32.0 MoR
July 27, 1989

Mr. Jim Roberts
Division Engineer
Missouri Highway and Transportation Department
P. O. Box 270
Jefferson City, MO 65102

Subj: PROPOSED PAGE AVENUE EXTENSION BRIDGE, MILE 32.0, MISSOURI RIVER

Dear Mr. Roberts:

Thank you for your letter of July 10, 1989 inviting us to serve as a Cooperating Agency for preparation of the Environmental Impact Statement (EIS) for the subject project.

We agree to serve as a Cooperating Agency and provide requirements on the navigational aspects of the project. Draft and Final EIS should be forwarded for our preliminary review in accordance with the USCG/FHWA Memorandum of Agreement.

Sincerely,

Roger K. Wiebusch
ROGER K. WIEBUSCH

Bridge Administrator

By direction of the District Commander

JOHN C. COZAD, *Chairman*
1708 Bryant Building
1102 Grand Avenue
Kansas City 64106

MISSOURI
HIGHWAY AND TRANSPORTATION COMMISSION

WAYNE MURI
Chief Engineer

HELEN T. SCHNARE, *Vice Chairman*
3016 Bluffwood Drive
St. Charles 63301

RICH TIEMEYER
Chief Counsel

C. R. JOHNSTON, *Member*
Springfield 65803

WALTER F. VANDELICHT
Asst. Chief Engineer

PAUL L. EBAUGH, *Member*
1553 Lexington
Cape Girardeau 63701

MARI ANN WINTERS
Secretary

DON WALSWORTH, *Member*
306 North Kansas Avenue
Marceline 64658

HARRY T. MORLEY, *Member*
1227 Fern Ridge Parkway
St. Louis 63141

P.O. Box 270
Jefferson City, Missouri 65102
Telephone (314) 751-2551

November 23, 1988

DESIGN
Route D, St. Charles-St. Louis Counties
Page Avenue Extension
Route 94 to W/O Route I-270 (Bennington Place)
Job No. 6-U-D-803B
Missouri River Bridge
Job No. 6-U-D-803C
Route 40-61 or Interstate Route 70 to Route 94 (St. Charles County)
Agency Coordination

Mr. Roger K. Wiebusch, Bridge Administrator
Bridge Branch
Second Coast Guard District
United States Coast Guard
1430 Olive Street
St. Louis, Missouri 63103-2398

Dear Mr. Wiebusch:

Thank you for your letter of November 17, 1988. To assist you in your review we have enclosed an aerial mosaic (Plate X) for the Page Avenue Extension which illustrates the alternate river crossings. Be advised that these alternates are not established lines. However, based on our studies these are the approximate locations of the two feasible crossings for the proposed projects. We have also enclosed the copy of your navigational charts which you provided to us showing the locations of the alternate bridge crossings. Please note that the locations you had indicated have been shifted upstream up to one quarter mile to reflect the locations shown on Plate X.

We appreciate your input on this matter and look forward to receiving your comments after further review.

Very truly yours,

James F. Roberts

James F. Roberts
Division Engineer
Design

jfr/msk/ph

Attachments

cc: Mr. Gerald J. Reihsen

U.S. Department
of Transportation
United States
Coast Guard



Commander
Second Coast Guard District

1430 Olive Street
St. Louis, MO 63103-2398
Staff Symbol: (ob)
Phone: 314-425-4607
PTS 279-4607

October 03, 1989

Mr. James F. Roberts
Missouri Highway and Transportation Commission
P. O. Box 270
Jefferson City, MO 65102-0270

Subj: PROPOSED PAGE AVENUE EXTENSION BRIDGE

Dear Mr. Roberts:

We have been reviewing the proposed alignment of the subject bridge and have the following navigational comments:

1. From a navigation standpoint, the better location is the "alternate location" because the channel is stable and it is upstream from a sharp river bend.
2. The "preferred location" is immediately downstream from Springhouse Bend. The channel changes in this location depending on the water elevation. During periods of high water it will be very difficult for tows to safely transit the bridge. There is a left set in this vicinity at high water which will push the tows toward the left (St. Charles County) shore.
3. The channel below the "recommended location" changes location depending on water elevation. The channel location at high water is different than at low water. A bridge at this site must provide adequate clearance for all channel locations.
4. A bridge constructed at the "preferred location" will probably require two navigation spans to ensure one will be available for vessels depending on channel location.

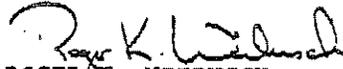
We prefer the "alternate location" based on navigation concerns. A bridge at this location should have right (St. Louis County) pier on and or at least behind the dikes, and the left pier about 450 feet away.

October 03, 1989

Subj: PROPOSED PAGE AVENUE EXTENSION BRIDGE

Additional coordination will be necessary to establish navigational requirements and pier placement for the selected alignment. These are our preliminary comments. As the project progresses our comments will become more specific.

Sincerely,



ROGER X. WIERUSCH

Bridge Administrator

By direction of the District Commander



United States Department of the Interior



FISH AND WILDLIFE SERVICE

COLUMBIA FIELD OFFICE (ES)
P.O. Box 1506
Columbia, Missouri 65205

IN REPLY REFER TO:

February 1, 1989

James F. Roberts, Division Engineer
Missouri Highway and Transportation Commission
P.O. Box 270
Jefferson City, Missouri 65102

Handwritten notes and signatures:
C/W ✓
M&K
MJD
JAC

Dear Mr. Roberts:

This responds to your January 30, 1989 request for comments on the presence of endangered or threatened species in the general vicinity of the extension of Page Avenue (Route D) from Bennington Place in St. Louis County across the Missouri River. The following comments have been prepared under the authority of the Fish and Wildlife Coordination Act (16 U.S.C. 661 et seq.), the National Environmental Policy Act of 1969 (42 U.S.C. 4321-4327), the Endangered Species Act of 1973, (16 U.S.C. 1531-1543), as amended, and the U.S. Fish and Wildlife Service Mitigation Policy.

Endangered Species Comments

Under Section 7(c) of the Endangered Species Act of 1973, Federal agencies are required to obtain from the Fish and Wildlife Service information concerning any species, listed or proposed to be listed, which may be present in the area of a proposed action. Therefore, we are providing you with the following list of species which may be present in the concerned area:

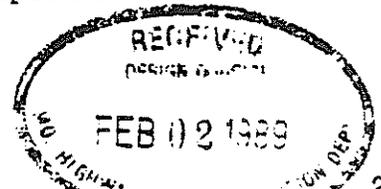
Endangered

bald eagle (Haliaeetus leucocephalus)

There is no designated critical habitat in the project area.

The nature of the subject project indicates that diurnal perches, roost sites, food sources, or other preferred habitat will not be affected. Therefore, the project will not affect the bald eagle. This precludes further action on this project as required under Section 7 of the Endangered Species Act of 1973, as amended. Should this project be modified or new information indicate endangered species may be affected, consultation should be reinitiated.

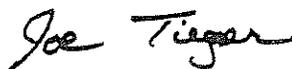
This letter provides comment only on the endangered species aspect of the project. Comments on other aspects of the project under the authority of the provisions of the Fish and Wildlife Coordination Act (16 U.S.C. 661 et. Seq.) will be sent under separate cover.



We appreciate the opportunity to comment at this time and look forward to continued coordination on the highway extension project. We will provide additional comments when the draft environmental impact statement is prepared.

If you have any questions regarding this response or if we can be of any further assistance, please contact Richard Szlemp, Columbia Field Office, P.O. Box 1506, Columbia, Missouri 65205 (314)875-5374 or (FTS)276-5374.

Sincerely yours,



Joe Tieger
Field Supervisor

cc: MDNR-Water Pollution
L. Bobbitt
MDC-Planning
G. Christoff
EPA-404 Section
K. Biggs

RRS:mb:wp:1748SLPAGESA



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ecological Services
Columbia Field Office
P.O. Box 1506
Columbia, Missouri 65205

IN REPLY REFER TO:

June 12, 1987

Mr. Robert G. Anderson
District Engineer
Federal Highway Administration
U.S. Department of Transportation
P.O. Box 1787
Jefferson City, Missouri 65102

Dear Mr. Anderson:

This responds to your May 21, 1987, Federal Register notices (52 FR 19225, 19226) regarding the Federal Highway Administration's (FHA) Notices of Intent to Prepare Environmental Impact Statements (EIS) for two highway construction projects near St. Louis, Missouri. The projects are State Route 115 in St. Charles County, and a new road and bridge crossing the Missouri River between St. Louis County and St. Charles County, that is commonly referred to as "Page Avenue Extension". The following comments have been prepared under the authority of and in accordance with the Fish and Wildlife Coordination Act (16 U.S.C. 661 et seq.), the National Environmental Policy Act of 1969 (42 U.S.C. 4321-4327), the Endangered Species Act of 1973, (16 U.S.C. 1531-1543), as amended, and the U.S. Fish and Wildlife Service Mitigation Policy.

The St. Louis metropolitan area is a rapidly growing urban center that is geographically situated between the Mississippi and Missouri Rivers. As the city and county have grown, the neighboring communities, such as St. Charles County, have also grown to meet the need for homes, shopping centers, schools and other infrastructure, including highways. However, growth will only contribute to the environmental well being of the community if it is well planned, giving the necessary consideration to protecting existing values, including parks, greenways, open space, and fish and wildlife habitat.

The U.S. Fish and Wildlife Service (Service) coordinates with other Federal, State, and Municipal Agencies to provide information to project planners for the purpose of protecting and conserving fish and wildlife habitat.

In this regard, our files show that we began our coordination with the FHA and the Missouri Highway &

Transportation Department (MHTD) on the SR115 bridge and highway project with our letter of March 21, 1975. This letter was included in the Draft Environmental Impact Statement for this project (then referred to as Brown Road) which was published in October, 1975. At that time, the EIS included the entire project from Interstate 70 at St. Charles, eastward to Interstate 270 in St. Louis County. Our records indicate that the Brown Road (SR115) document was not published in final form, and project planning was apparently suspended. The project reappeared in 1984, in a piecemeal fashion, under the new name State Route 115, and documented through the less rigorous environmental assessment process. The 1984 project is to be constructed between Missouri Route 94 in St. Charles and Interstate 270 in St. Louis County. This planning process was recently completed with the publication of the Final Environmental Assessment and Final 4(f) Evaluation on April 2, 1987. Our comments were included with the Department of the Interior letters to FHA dated June 4, 1985, and August 8, 1986.

Our most recent letter to the FHA regarding SR115, Page Avenue Extension, Earth City Expressway, and related concerns was dated January 29, 1987. The text of that letter is restated below, for consideration in your environmental planning process.

"The relocation of State Route 115 bridge and highway is a Federally-funded project that includes an interchange for what will become the northward extension of the Earth City Expressway. While Earth City Expressway is not at this time a Federally-funded project, without the S.R. 115 interchange, this expressway would not likely be extended through this portion of an otherwise undeveloped floodplain. With the continued expansion of the Earth City Expressway, north of the S.R. 115 interchange, some high value wetlands could be impacted, as well as St. Louis County's St. Stanislaus Park.

"To the south of Interstate 70, the Earth City Expressway is planned for extension to an interchange with Page Avenue, itself under consideration for extension across the Missouri River into St. Charles County to link with Highway 94. Of particular concern is the proposed alignment of Page Avenue extension through St. Louis County's Creve Coeur Park, and the impact of the highway interchange of Page Avenue and Earth City Expressway on an important wetland complex known locally as Little Creve Coeur Slough.

"We are aware that both the Earth City Expressway and the Page Avenue extension are presently being planned at the local level. However, the Federally-funded interchange for S.R. 115 requires the full

consideration of the affected portion of Earth City Expressway in planning documentation. (NEPA 40 CFR 1508.25). Further it is reasonable to assume that either or both of these projects would be candidates for Federal-funding at some future planning phase, given their scope and their interrelationships with other Federally-funded highway projects. This will, in all probability, involve consultation under 4(f) of the Department of Transportation Act (49 USC 1653(f)) and the requisite consideration of feasible and prudent alternatives. At this time, alternatives exist and the taking of Federally-funded park land for highway construction can be avoided. We suggest that your agency, in conjunction with other concerned parties, take whatever action may be possible at this time to preserve alternative alignments that would have less impacts on parks, floodplains, wetlands and fish and wildlife resources."

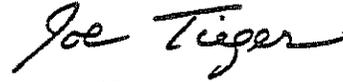
We note in the Federal Register notice that the FHA is intending to limit the scope of the new environmental impact statement for SR 115 to that portion of the project, running from Route 94 west to Interstate 70 in St. Charles County, the segment that was not included, or even addressed, in the environmental assessment for the St. Louis County portion of the project. Because this approach treats the presently planned project as a completed project, the array of alternatives in the new environmental impact statement will be limited to only two; building the project as planned, or not building the project at all. The Service believes that this approach is unnecessarily restricted, and clearly not in accordance with the guidelines for the implementation of the National Environmental Policy Act.

Further, we note in the same notice that neither the SR115 documentation, nor the Page Avenue Extension documentation propose to include the indirect and cumulative impacts of the extension of the Earth City Expressway and related developments in the Missouri River floodplain. The interchanges for the proposed Expressway are shown on existing project drawings. The utility and feasibility of the Expressway is directly dependent on the Federal projects presently being proposed.

Accordingly, we strongly recommend that the FHA expand the scope of the SR115 and Page Avenue environmental planning processes to include full consideration of all project related impacts, be they direct, indirect, or cumulative impacts. Please provide any preliminary plans and drawings at the earliest opportunity so that we will be able to provide timely comments for inclusion in the text of the draft environmental impact statements.

If you have any questions regarding this response or if we can be of any further assistance, please contact Paul J. Burke, Columbia Field Office, P. O. Box 1506, Columbia, Missouri 65205, (314)875-5374 or (FTS)276-5374.

Sincerely yours,



Joe Tieger
Field Supervisor

cc: NPS-Omaha
Molly Balazs
OEPR-Frank Stearns
R-3, REC- L. Lewis
MDC-Planning
N. Stucky
MDNR
C. Johnson
EPA-Environmental Review
Ed Vest

Burke: 19225.doc: 06/12/87



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ecological Services
Columbia Field Office
P.O. Box 1506
Columbia, Missouri 65205

IN REPLY REFER TO:

- ASST DIR ENGR
ASST DIR
PLANNING
REGULATORY
BIOLOGY
CAME
DESIGN ENGR
LAWSON ENGR
URBAN ENGR
SPEC ENGR
OFFICE MGR
PLANNING
PLANNING CLERK
FILE

January 29, 1987

Handwritten: SEP 1987

Handwritten: Copy to Roberts, Page 115

Mr. Gerald T. Reihsen
Division Administrator
Federal Highway Administration
P.O. Box 1787
Jefferson City, Missouri 65102

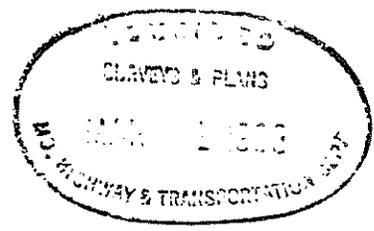
Dear Mr. Reihsen:

This letter is in reference to recent correspondence submitted to your office from the Environmental Protection Agency, dated October 1, 1986, and the National Park Service, dated January 22, 1987, regarding State Highway 115 in St. Charles and St. Louis Counties, Missouri. The following comments have been prepared under the authority of and in accordance with the Fish and Wildlife Coordination Act (16 U.S.C. 661 et seq.), the National Environmental Policy Act of 1969 (42 U.S.C. 4321-4327), the Endangered Species Act of 1973, (16 U.S.C. 1531-1543), as amended, and the U.S. Fish and Wildlife Service Mitigation Policy.

We note with interest that several important road projects are being planned for the St. Louis County floodplain, that will share interchanges with Federally-funded highway projects. Of particular concern is the incremental loss of floodplain and wetland resource values to urbanization, the direct impacts of highway construction on lands purchased for their open space, recreation, and fish and wildlife habitat values, and the cumulative loss of significant wintering habitat for the Federally listed endangered species, the bald eagle (Haliaeetus leucocephalus).

The relocation of State Route 115 bridge and highway is a federally-funded project that includes an interchange for what will become the northward extension of the Earth City Expressway. While Earth City Expressway is not at this time a Federally-funded project, without the S.R. 115 interchange, this expressway would not likely be extended through this portion of an otherwise undeveloped floodplain. With the continued expansion of the Earth City Expressway, north of the S.R. 115 interchange, some high value wetlands could be impacted, as well as St. Louis County's St. Stanislaus Park.

Handwritten: Copy to Mr. Roberts, Bier, Bergman, Roth

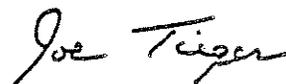


To the south of Interstate 70, the Earth City Expressway is planned for extension to an interchange with Page Avenue, itself under consideration for extension across the Missouri River into St. Charles County to link with Highway 94. Of particular concern is the proposed alignment of Page Avenue extension through St. Louis County's Creve Coeur Park, and the impact of the highway interchange of Page Avenue and Earth City Expressway on an important wetland complex known locally as Little Creve Coeur Slough.

We are aware that both the Earth City Expressway and the Page Avenue extension are presently being planned at the local level. However, the Federally-funded interchange for S.R. 115 requires the full consideration of the affected portion of Earth City Expressway in planning documentation. (NEPA 40 CFR 1508.25). Further it is reasonable to assume that either or both of these projects would be candidates for Federal-funding at some future planning phase, given their scope and their interrelationships with other Federally-funded highway projects. This will, in all probability, involve consultation under 4(f) of the Department of Transportation Act (49 USC 1653(f)) and the requisite consideration of feasible and prudent alternatives. At this time, feasible and prudent alternatives exist and the taking of Federally-funded park land for highway construction can be avoided. We suggest that your agency, in conjunction with other concerned parties, take whatever action may be possible at this time to preserve alternative alignments that would have less impacts on parks, floodplains, wetlands and fish and wildlife resources.

If you have any questions regarding this response or if we can be of any further assistance, please contact Paul J. Burke, Columbia Field Office, P. O. Box 1506, Columbia, Missouri 65205, (314)875-5374 or (FTS)276-5374.

Sincerely yours,



Joe Tieger
Field Supervisor

cc: MDC-Bill Dieffenbach
MDNR-Fred Brunner
R3-FWS-Lynn Lewis
USDOI-REC, Chicago
Sheila Huff

Inter-Department Correspondence

March 29, 1988

SUBJECT SURVEYS AND PLANS
Page Avenue Extension
St. Charles-St. Louis Counties
Route 40-61, St. Charles County
Route K, St. Charles County
Route 115, St. Charles County
TO Meeting at Missouri Department of Conservation
Environmental Concerns

11
7/1
JOC

Memorandum to the File:

The meeting was held at 10:00 a.m. on March 28, 1988, at the Missouri Department of Conservation with the following governmental agencies in reviewing their concerns on the environmental impacts from the completion of the above highway projects. The following agencies and persons were present at the meeting:

Missouri Highway and Transportation Department

James F. Roberts
Mark Kross
Tom Holt

Missouri Department of Conservation

Dan Dickneite
Bill Dieffenbach
Norm Stucky

Federal Highway Administration

Robert Anderson
Donald Neumann

The Missouri Department of Natural Resources

Mike Shindler
Tom Lange
Dick Gaffney

U. S. Fish and Wildlife Service

Joe Tieger
Paul Burke

Environmental Protection Agency

Larry Cavin
Mike Bronoski

Memorandum to File
March 29, 1988
Page Two

Corps of Engineers

Joe Hughs

Mr. Dieffenbach opened the meeting by stating the Conservation Department was concerned how various projects proposed in the St. Louis Area are going to affect the area. They were concerned about the wetlands and floodplains on the Page Avenue Extension and Route 115. Mr. Stucky and Mr. Dieffenbach stated their concerns about the approved plans for the Route 40-61 project and the interchange of Route K with Route 40-61. They were concerned that the approved plan showed the taking of land from the August Busch Wildlife Area. Mr. Stucky indicated they understood from an earlier plan review that the proposed outer roadway would be located on new right-of-way along the east side of the present right-of-way.

Mr. Roberts indicated the department had reviewed the concept for an outer roadway along the August Busch Wildlife Area with the Conservation Commission and it was approved by them. Mr. Stucky agreed that they had reviewed an earlier proposal but he thought there had been some changes made since that time.

A discussion on the access for entrances to the Conservation property and a residence at Route K was made next. It was agreed outer roadway connections would be built to furnish this access. We would review the Route 40-61 involvement with the Busch area and discuss it with them later.

Mr. Tieger commented about a letter written June 6, 1986 by the Fish and Wildlife Service on Section 4(f) involvement with the Busch Wildlife Area at the proposed Route K interchange. He said they were not convinced that this proposal was the most feasible and prudent alternate causing the least damage to the wildlife area. After questioning by Mr. Roberts, he indicated another alternate would be to relocate Route K to utilize Route 94 and the Route 94 interchange.

We indicated the department would furnish Section 4(f) documentation to the Fish and Wildlife Service showing the feasible and prudent alternate is the proposed Route K interchange with Route 40-61. Mr. Tieger questioned if the department had any intention to extend Route K south of Route 40 to connect with Route 94. We indicated no intention for this proposed extension. Mr. Dieffenbach asked about the status of the project. Mr. Roberts indicated we expect to acquire right-of-way in about two years on the Route 40-61 project.

Memorandum to File
March 29, 1988
Page Three

Mr. Tieger then discussed the Page Avenue Extension project. He said this project involved all of the major impacts. There are parklands, wetlands, floodplains, secondary and accumulative impacts and the endangered species of bald eagles. He said the Creve Coeur lake area is a major bald eagle winter roosting area. We would need to comply with all of the requirements for the Endangered Species Act in assessing this impact. This will require a biological assessment.

The discussion then turned to the secondary and accumulative impacts. This focused on the department's responsibility and the need to furnish this information in environmental documents. Although the department may have no plans or control over the development and construction of a roadway facility such as an extension of the Earth City expressway, the secondary impact of development provided by the roadway facility needs to be addressed.

Mr. Tieger was questioned about the type of information and the relevancy of the expected development.

He said he knew of reports which furnished the St. Louis County highway plans, development plans, and also showed two alternates for construction of the Earth City expressway. He said a high density or low density development scenario can be furnished in the environmental document. This option would be perfectly adequate for addressing secondary impacts.

The emphasis was placed on addressing secondary and accumulative impacts by Mr. Tieger although the responsibility and authority is dependent upon other governmental agencies. It is apparent that this was one of the significant issues of the meeting. An equal degree of emphasis was placed on the need to study the habitat area and impact on bald eagles in the Creve Coeur lake area. An early coordination of this information with the Fish and Wildlife Service is needed to expedite the clearance of the environmental documents for the project.

Mr. Gaffney discussed the flood claims for the four state regions of Missouri, Iowa, Nebraska, and Kansas. He said the total flood claims for Iowa, Nebraska, and Kansas were \$24 million while in Missouri it was \$150 million. St. Charles County was \$31 million and St. Louis County was \$27 million. Normally flood damages are greater than the flood insurance claims for a given area.

Mr. Cavin stated EPA had a much larger concern than the specific projects under discussion. They wanted to take a coordinated look at all development in the floodplain area by government agencies and other interests. They wanted advanced identification of expected secondary and accumulative impacts in the floodplain. This would then provide for a means of mitigation or the reservation of certain valuable wildlife areas for protection.

Memorandum to File
March 29, 1988
Page Four

Mr. Roberts indicated that he thought East-West Gateway had prepared studies on future land use. Mr. Dieffenbach stated the Conservation was also concerned about development taking place in the floodplain. They wanted to identify the floodplain environment as it would be twenty years from now.

Mr. Tieger stated he felt he had accomplished the intended purpose of the meeting. The meeting adjourned at 11:30 a.m.

Thomas H. Holt

Thomas H. Holt
Urban Engineer
Surveys and Plans

THH:ph



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

July 1, 1987

Mr. Tolson	Mr. Casper
Mr. Callahan	Mr. Cline
Mr. Conner	Mr. DeLoach
Mr. Felt	Mr. Gale
Mr. Gandy	Mr. Rosen
Mr. Harbo	Mr. Sullivan
Mr. Hendon	Mr. Tavel
Mr. Jones	Mr. Trotter
Mr. Lester	Tele. Room
Mr. Quinn	Miss Holmes
Miss Gandy	Miss Gandy

Mr. Robert Anderson
District Engineer
Federal Highway Administration
U.S. Department of Transportation
P.O. Box 1787
Jefferson City, Missouri 65102

Dear Mr. Anderson:

Reference is made to your May 21, 1987, Federal Register notices (52 FR 19225, 19226) concerning the Federal Highway Administration's (FHWA) Notices of Intent to prepare Environmental Impact Statements (EIS) for the State Route 115 project in St. Charles county and the westward extension of Route D in St. Louis and St. Charles counties.

We fully concur with your intent to prepare EISs for these projects. However, in view of what is already known about the problems and resources in these project areas, and our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act, we believe that acceptable EISs will only result if adequate consideration is given to three areas of particular concern to us. These areas are ¹cumulative/secondary impacts, ²air quality, and ³noise.

As you are probably aware, the Highway Component of the Long Range Plan of the East-West Gateway Coordinating Council calls for the Earth City Expressway to be tied into the proposed improvement of State Highway 115 to the north and to Creve Coeur Mill Road to the south. While these projects (north and south extension of Earth City Expressway) may be constructed without Federal funding, we believe these projects are "reasonably foreseeable," and that, in accordance with Council on Environmental Quality regulations, the EIS for the Route D extension should evaluate them as indirect impacts, or should consider them in the context of evaluating the cumulative impacts of the proposed action. See 40 CFR § 1508.7, 40 CFR § 1508.8, and 40 CFR § 1508.25. Of particular concern in this regard are the many wetland areas that presently exist



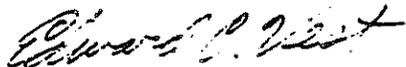
in the likely path of the Earth City Expressway extension to the south and the adjacent areas in which induced development such as Riverport will likely occur. Similarly, although the east leg of 115 from I-270 to St. Charles has been evaluated in an environmental assessment, the east and west legs are directly related since, without both projects, the transportation objectives of the Missouri Highway and Transportation Department will not be realized. Therefore, the EIS on 115 should also relate to the eastern leg and evaluate the cumulative impacts of the total 115 development.

Both EIS's must also assess the impacts of the proposed projects on the hydrocarbon precursors of ambient ozone. Although we are fully aware of your Technical Advisory T 6640.10 which states that it is not necessary to prepare project level analysis of hydrocarbon emissions, we believe these projects merit an exception because both lie in a nonattainment area for ozone. In preparing the air quality assessment, the analysis should include projections of air quality in the area with both existing and planned development. For example, a domed stadium and other development is planned in the Riverport area. We believe the ambient levels used in your model should be developed as if the stadium and other developments were completed. Using this approach, your analysis should be able to provide a fairly accurate prediction of air quality in the area with completion of the highway projects and other planned development.

It is also expected that both EIS's will assess the impacts of noise generated by the project and the need for any noise abatement measures. However, in view of the fact that the use of noise abatement measures in highway projects appears to be a rarity, and that both projects presently include open areas which are eventually expected to be developed, we believe these projects offer opportunities for consideration of pre-development noise abatement measures.

The above constitutes our major concerns with the proposed projects at this point of the planning process. Please keep us informed of your future scoping needs and/or any other facet of the projects with which we can assist. Our point of contact for this project will be Mr. Mike Bronoski, FTS 757-2823.

Sincerely,



Edward C. Vest
Chief, EIS Section

cc: Joe Tieger, USFWS
James F. Roberts, MHTD
Ken Bechtel, FHWA



United States
Department of
Agriculture

Soil
Conservation
Service

555 Vandiver Drive
Columbia, Missouri
65202

September 13, 1989

RE:
St. Louis County, Missouri
Page Avenue Extension
Highway Corridor
Farmland Conversion Impact Rating

Envirodyne Engineers
1908 Innerbelt Business Center Drive
St. Louis, Missouri 63114-5700

Attention: Mr. Paul W. Shetley

Dear Mr. Shetley:

The farmland conversion impact rating for the site referenced above
is attached.

Sincerely,

Bruce W. Thompson
State Soil Scientist

Attachment



The Soil Conservation Service
is an agency of the
Department of Agriculture

PRELIMINARY REPORT (AMENDED)

U.S. Department of Agriculture

FARMLAND CONVERSION IMPACT RATING

PART I (To be completed by Federal Agency)		Date Of Land Evaluation Request Revised 1/8/90		April 14, 1992	
Name Of Project Page Avenue Extension		Federal Agency Involved MHTD			
Proposed Land Use Highway Corridor		County And State St. Louis County, Missouri			
PART II (To be completed by SCS)		Date Request Received By SCS 4-15-92			
Does the site contain prime, unique, statewide or local important farmland? (If no, the FPPA does not apply - do not complete additional parts of this form).		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Acres Irrigated 4060	Average Farm Size 160
Major Crop(s) Corn, soybean, wheat, trk crops	Farmable Land In Govt. Jurisdiction Acres: 143,451 % 38	Amount Of Farmland As Defined in FPPA Acres: 122,176 % 32.1		Date Land Evaluation Returned By SCS 5-22-92	
Name Of Land Evaluation System Used St. Louis	Name Of Local Site Assessment System				
PART III (To be completed by Federal Agency)		Alternative Site Rating			
		Site A	Site B	Site C	Site D
A. Total Acres To Be Converted Directly		224	210	209	212
B. Total Acres To Be Converted Indirectly		639*	Not Known	Not Known	Not Known
C. Total Acres In Site		863	210	209	212
PART IV (To be completed by SCS) Land Evaluation Information					
A. Total Acres Prime And Unique Farmland		642	148	162	161
B. Total Acres Statewide And Local Important Farmland		11	10	9	15
C. Percentage Of Farmland In County Or Local Govt. Unit To Be Converted		.71	.17	.17	.17
D. Percentage Of Farmland In Govt. Jurisdiction With Same Or Higher Relative Value		13.5	23.5	23.5	10.
PART V (To be completed by SCS) Land Evaluation Criterion Relative Value Of Farmland To Be Converted (Scale of 0 to 100 Points)		94	92	92	94
PART VI (To be completed by Federal Agency) Site Assessment Criteria (These criteria are explained in 7 CFR 658.5(b))		Maximum Points			
1. Area In Nonurban Use		15	7	5	6
2. Perimeter In Nonurban Use		10	5	4	3
3. Percent Of Site Being Farmed		20	15	14	13
4. Protection Provided By State And Local Government		20	0	0	0
5. Distance From Urban Builtup Area		---	-	-	-
6. Distance To Urban Support Services		---	-	-	-
7. Size Of Present Farm Unit Compared To Average		10	10	10	10
8. Creation Of Nonfarmable Farmland		25	1	1	1
9. Availability Of Farm Support Services		5	2	2	2
10. On-Farm Investments		20	5	5	5
11. Effects Of Conversion On Farm Support Services		25	5	3	4
12. Compatibility With Existing Agricultural Use		10	5	3	4
TOTAL SITE ASSESSMENT POINTS		160	55	47	48
PART VII (To be completed by Federal Agency)					
Relative Value Of Farmland (From Part V)		100	94	92	94
Total Site Assessment (From Part VI above or a local site assessment)		160	55	47	48
TOTAL POINTS (Total of above 2 lines)		260	149	139	142

Site Selected: Site A Date Of Selection 04/14/92 Was A Local Site Assessment Used? Yes No

Reason For Selection: Site A = Red Alignment *Red Alignment only. Includes 628 acres converted for Creve Coeur Lake Memorial Park Expansion as well as 11 acres for walking/biking path.
 Site B = Blue/Red Combination
 Site C = Green/Black-Red Combination
 Site D = Yellow/Black-Red Combination

FARMLAND CONVERSION IMPACT RATING

PART I (To be completed by Federal Agency)

Date Of Land Evaluation Request: **Revised 1-8-90 July 25, 1989**

Name Of Project: **Page Avenue Extension**

Federal Agency Involved: **MO HWTID c/o EEI**

Proposed Land Use: **Highway Corridor**

County And State: **St. Louis County, Missouri**

PART II (To be completed by SCS)

Date Request Received By SCS: **1-8-90 (Revised request) Site C**

Does the site contain prime, unique, statewide or local important farmland? (If no, the FPPA does not apply - do not complete additional parts of this form). Yes No

Acres Irrigated: **4060** Average Farm Size: **160**

Major Crop(s): **Corn, Soybeans, Wheat, trk. crops**

Farmable Land In Govt. Jurisdiction: Acres: **143,451** %**38**

Amount Of Farmland As Defined in FPPA: Acres: **122,176** %**32.8**

Name Of Land Evaluation System Used: **St. Louis**

Name Of Local Site Assessment System: **St. Louis**

Date Land Evaluation Returned By SCS: **8-30-89 (1-12-90)**

PART III (To be completed by Federal Agency)

	Alternative Site Rating			
	* Site A	Site B	Site C	Site D
A. Total Acres To Be Converted Directly	44	57		
B. Total Acres To Be Converted Indirectly	Not known	Not known		
C. Total Acres In Site	115	101	121	

PART IV (To be completed by SCS) Land Evaluation Information

A. Total Acres Prime And Unique Farmland	50	52	66
B. Total Acres Statewide And Local Important Farmland	43	17	17
C. Percentage Of Farmland In County Or Local Govt. Unit To Be Converted	.076	.056	.057
D. Percentage Of Farmland In Govt. Jurisdiction With Same Or Higher Relative Value	52%	26%	26%

PART V (To be completed by SCS) Land Evaluation Criterion

Relative Value Of Farmland To Be Converted (Scale of 0 to 100 Points)

	81	88	89
--	----	----	----

PART VI (To be completed by Federal Agency)

Site Assessment Criteria (These criteria are explained in 7 CFR 658.5(b))

	Maximum Points			
1. Area In Nonurban Use	15	8	8	
2. Perimeter In Nonurban Use	10	4	6	
3. Percent Of Site Being Farmed	20	7	8	
4. Protection Provided By State And Local Government	20	0	0	
5. Distance From Urban Builtup Area	NA	NA	NA	
6. Distance To Urban Support Services	NA	NA	NA	
7. Size Of Present Farm Unit Compared To Average	10	10	10	
8. Creation Of Nonfarmable Farmland	25	5	5	
9. Availability Of Farm Support Services	5	5	5	
10. On-Farm Investments	20	10	10	
11. Effects Of Conversion On Farm Support Services	10	5	5	
12. Compatibility With Existing Agricultural Use	10	5	5	
TOTAL SITE ASSESSMENT POINTS	145 160	59	62	

PART VII (To be completed by Federal Agency)

Relative Value Of Farmland (From Part V)	100		
Total Site Assessment (From Part VI above or a local site assessment)	145160		
TOTAL POINTS (Total of above 2 lines)	260	59	62

Site Selected: _____ Date Of Selection: _____ Was A Local Site Assessment Used? Yes No

Reason For Selection:

*A = Red Route
 B = Green Route
 C = Green-Black

St. Charles County

U.S. Department of Agriculture

FARMLAND CONVERSION IMPACT RATING

PART I (To be completed by Federal Agency)		Date Of Land Evaluation Request July 25, 1989	
Name Of Project Page Avenue Extension		Federal Agency Involved MO HWTD c/o EEI	
Proposed Land Use Highway Corridor		County And State St. Charles County, Missouri	

PART II (To be completed by SCS)		Date Request Received By SCS August 9, 1989	
Does the site contain prime, unique, statewide or local important farmland? <i>If no, the FPPA does not apply - do not complete additional parts of this form.</i>		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Acres Irrigated 0 Average Farm Size 229
Major Crop(s) corn, Soybeans, Wheat	Farmable Land In Govt. Jurisdiction Acres: 296,978 % 83	Amount Of Farmland As Defined in FPPA Acres 187,000 ^A % 52	
Name Of Land Evaluation System Used	Name Of Local Site Assessment System N/A	Date Land Evaluation Returned By SCS August 31, 1989	

PART III (To be completed by Federal Agency)		Alternative Site Rating			
		* Site A	Site B	Site C	Site D
A. Total Acres To Be Converted Directly		522 ^B	163	39	51
B. Total Acres To Be Converted Indirectly		Not known	Not known	Not known	Not known
Total Acres In Site		705 ^{B/A}	525	154	245

PART IV (To be completed by SCS) Land Evaluation Information		943	530	680	551
Total Acres Prime And Unique Farmland		229	92	2	24
Total Acres Statewide And Local Important Farmland		256	48	29	9
Percentage Of Farmland In County Or Local Govt. Unit To Be Converted		.279%	.087%	.021%	.027%
Percentage Of Farmland In Govt. Jurisdiction With Same Or Higher Relative Value		32.2%	28.2%	47.6%	32.2%

PART V (To be completed by SCS) Land Evaluation Criterion					
Relative Value Of Farmland To Be Converted (Scale of 0 to 100 Points)		64	68	55	64

PART VI (To be completed by Federal Agency)		Maximum Points				
Assessment Criteria (These criteria are explained in 7 CFR 658.5(b))						
1. Area In Nonurban Use		15	7	7	7	7
2. Perimeter In Nonurban Use		10	8	6	3	8
Percent Of Site Being Farmed		20	15	6	5	4
Protection Provided By State And Local Government		20	0	0	0	0
5. Distance From Urban Builtup Area		NA	NA	NA	NA	NA
Distance To Urban Support Services		NA	NA	NA	NA	NA
Size Of Present Farm Unit Compared To Average		10	10	10	10	10
3. Creation Of Nonfarmable Farmland		25	5	5	5	5
Availability Of Farm Support Services		5	5	5	5	5
On-Farm Investments		20	10	10	10	10
Effects Of Conversion On Farm Support Services		25	5	5	5	5
2. Compatibility With Existing Agricultural Use		10	5	5	5	5
TOTAL SITE ASSESSMENT POINTS		160	70	59	55	59

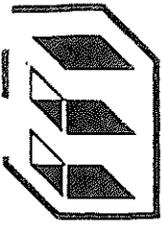
PART VII (To be completed by Federal Agency)						
Relative Value Of Farmland (From Part V)		100	64	68	55	64
Local Site Assessment (From Part VI above or a local site assessment)		160	70	59	55	59
TOTAL POINTS (Total of above 2 lines)		260	134	127	110	123

Selected: Red Route A	Date Of Selection 07/25/89	Was A Local Site Assessment Used? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
------------------------------	-----------------------------------	----------------------------------------------------------------------------------------------------------

- For Selection:
- Red Route **A**
- Green Route **B**
- Green-Blue Dashed Route **C**
- Green Dashed Route **D**

PAGE AVE. EXTENSION

	Red	Green	Green - Blue	Green - Dash
Total Acres in site:	943	530	688	559
Acres Prime & Unique:	180	153	145	188
Acres Statewide Imp.:	457	163	184	117
% Farmland to be conv:	.341 %	.169%	.176%	.299 %
% County same or >:	33.4 %	23.7%	8.3 %	8.3 %
Relative Value of Farmland:	62	69	72	72



**ENVIRODYNE
ENGINEERS**

1908 Innerbelt Business Center Drive
St. Louis, Missouri 63114-5700
(314) 426-0880

File

June 29, 1989
3329-60000

Mr. Jerry Presley, Director
Natural History Section
Missouri Department of Conservation
Post Office Box 180
Jefferson City, Missouri 65102

Dear Mr. Presley:

Envirodyne Engineers, Inc. (EEI) is conducting an environmental assessment of the proposed corridors of the Route D (Page Avenue) and Earth City Expressway extensions from St. Louis County into St. Charles County. I am requesting an Environmental Review of the project area by your department. I have enclosed a copy of a map with the proposed corridors represented on it for your use.

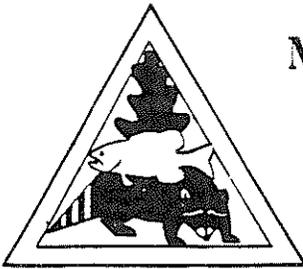
I appreciate your cooperation, and respectfully request that you expedite your report so we can meet our deadline of July 21, 1989.

If you have any questions, please call me or Max Gricevich at (314) 426-0880.

Thank you,

Paul W. Shetley
Environmental Scientist

PWS/kld/015W
Enclosure



MISSOURI DEPARTMENT OF CONSERVATION

MAILING ADDRESS:
P.O. Box 180
Jefferson City, Missouri 65102-0180

STREET LOCATION:
2901 West Truman Boulevard
Jefferson City, Missouri

Telephone: 314/751-4115
JERRY J. PRESLEY, Director

July 25, 1989

Mr. Paul W. Shetley
Environmental Scientist
Envirodyne Engineers
1908 Innerbelt Business Center Drive
St. Louis, Missouri 63114-5700

Dear Mr. Shetley:

This responds to your request for an environmental review of the proposed Page Avenue and Earth City Expressway extensions in St. Louis and St. Charles Counties.

Our Heritage database map files were examined to determine rare and endangered species or other sensitive environmental elements that may be impacted by this proposed project. The sicklefin chub, *Hybopsis meeki*, occurs in the Missouri River less than one-half mile downstream of the proposed new Missouri River bridge. The record of this fish, listed as rare in Missouri, is from 1981. This species occurs only in the Missouri River and the lower Mississippi River to its confluence with the Ohio River. We believe it is imperative that special precautions be taken during project construction to prevent petroleum products and other toxic/deleterious material from entering the river.

Another primary concern relates to wetland impacts and encroachment in the Missouri River floodplain. The alignment of the proposed Earth City Expressway extension passes directly through a highly productive wetland complex. The Page Avenue extension would intersect the Earth City Expressway in this same wetland area, a known wintering area for Canada geese and ducks.

A high priority has been given nationally to wetland protection, and President Bush has stated a goal of no net wetland loss. Therefore, wetland habitat impacted by these proposed projects should be avoided or an acceptable mitigation plan developed and implemented. With regard to the latter option, it must be stressed that the Missouri River agriculture bottomland surrounding the wetland contributes to its high value and should be given consideration in plan development. For example, the ducks and geese wintering in the area rely on adjoining bottomland crop fields as feeding areas.

If the route extensions are completed as proposed, "follow-up development" (such as Earth City and Riverport) will likely in time eliminate these waterfowl feeding areas. While agencies which regulate floodplain development have

COMMISSION

JEFF CHURAN
Chillicothe

JAY HENGES
Earth City

JOHN POWELL
Rolla

RICHARD REED
East Prairie

Mr. Paul W. Shetley
July 25, 1989
Page Two

jurisdictional authority over "follow-up development" through permit approval, completion of the route extensions will make it difficult to argue against further development (and subsequent floodplain encroachment). We recommend, therefore, that a mitigation plan give consideration to the entire ecosystem surrounding the wetland area.

Other than a direct adverse impact on important bottomland fish and wildlife habitat, floodplain encroachment and development indirectly impacts remaining habitat by increasing flood stages and the associated destructive energies of floods. There are over 500,000 square miles of drainage area in the Missouri River basin above the proposed project area. The cumulative impact of floodplain encroachment and development over the years has significantly reduced the floodway and flood carrying capacity of the river. The following data from the USGS gauging station located upstream at Hermann, Missouri verify this fact.

<u>Date</u>	<u>Discharge</u>	<u>USGS Gauge</u>
June 6, 1903	676,000 cfs	29.50 ft.
October 5, 1986	547,000 cfs	35.79 ft.

A discharge of 129,000 cfs less than the 1903 flood of record resulted in a flood stage 6.29 feet higher during the 1986 flood. Even though vast sums have been spent on flood protection measures, flood heights and resulting damages continue to increase. In a natural, unaltered river system, the energies associated with a flood are dissipated over a wide expanse of floodplain and the riparian ecosystem benefits from an influx of nutrients. Loss of floodway and increased stages confines the energy to a small area. The increase in turbulence, velocity and erosive forces adversely affects remaining wetlands and riparian habitat.

The opportunity to offer these comments is appreciated. If you have questions or wish to further discuss this matter, please contact Mr. Norman P. Stucky at the above address.

Sincerely,



DAN F. DICKNEITE
ENVIRONMENTAL ADMINISTRATOR

cc: Federal Emergency Management Agency
U. S. Environmental Protection Agency
U. S. Fish and Wildlife Service
Missouri Department of Natural Resources
Missouri Highway and Transportation Department

JOHN ASHCROFT
Governor

G. TRACY MEHAN III
Director



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

P.O. Box 176
Jefferson City, MO 65102

Division of Energy
Division of Environmental Quality
Division of Geology and Land Sur-
vey
Division of Management Services
Division of Parks, Recreation,
and Historic Preservation

May 24, 1989

Mr. Ralph Tharp
Booker & Associates
1139 Olive Street
St. Louis, MO 63101



Dear Mr. Tharp:

RE: Page Avenue Extension, Project Number E32-31
St. Louis County, Missouri, 63043, 63045, 63044, 63017, 63146, 63141
St. Charles County, Missouri

Thank you for your request for information regarding location of hazardous waste sites in Missouri. Please find enclosed portions of two tracking registers. These list the potential and confirmed contaminated sites the Missouri Department of Natural Resources (MDNR) and the U.S. Environmental Protection Agency (USEPA) are aware of in the county(s) subject to your inquiry.

The MDNR tracking record, the Registry Log, lists all the sites which have been proposed or confirmed for the Registry of Confirmed Abandoned or Uncontrolled Hazardous Waste Disposal Sites in Missouri. Please be aware that not all of the sites proposed for placement on the Registry are final. Many have been appealed by the property owner (see title page key). Also be aware that the Registry lists only sites where hazardous wastes have been disposed of and that properties may be contaminated and not be on the Registry.

Also enclosed is the USEPA Region VII tracking record, CERCLIS. It lists all of the sites that have been identified as having a potential hazardous substance release on the property.

Other information regarding hazardous waste facilities in Missouri is available upon written request. This information includes the following:

1. List of facilities which may treat, store, or dispose of hazardous wastes and have been issued permits by MDNR to do so. (Hazardous Waste Section)
No Charge
2. List of licensed hazardous waste transporters. (Enforcement Section) \$3.00

Mr. Ralph Tharp
May 24, 1989
Page Two

3. List of resource recovery facilities. (Hazardous Waste Section)
No Charge

Please address requests to the Missouri Department of Natural Resources, Waste Management Program, Attention: (appropriate section), P.O. Box 176, Jefferson City, Missouri 65102.

A particular tract of land cannot be certified as free of a hazardous substance without extensive sampling and testing. MDNR does not routinely sample property upon request. The department may take enforcement action, to include sample collection, where there is strong evidence that a hazardous waste or substance is present on the property. The Consulting Engineers Council of Missouri may be able to assist you in locating a firm capable of sampling a tract and determining the presence or absence of a hazardous substance. They can be contacted at 205 East Dunklin, Jefferson City, Missouri 65101, (314) 634-4080.

If you wish to investigate a tract or site beyond the scope of information we have provided, our files are available for your review. An appointment should be made at least twenty-four hours in advance for file review.

I hope you find this information useful. Please contact the Waste Management Program at (314) 751-3176 if you require further information.

Sincerely,

DIVISION OF ENVIRONMENTAL QUALITY



Kevin A. Kelly
Environmental Specialist
Waste Management Program

KAK:sd

Enclosure

9-1-1

O'Loughlin and Associates, Inc.

December 7, 1989

Mr. Freeman P. McCullah, P.E.
Assistant District Engineer
Missouri Highway and
Transportation Department
329 South Kirkwood Road
Kirkwood, MO 63122



Dear Mr. McCullah:

I am writing to you in my capacity as Chairman of The St. Charles County Committee on Light Rail. The Committee, as you are aware, is seeking to have St. Charles County included in a future "Light Rail Alternatives Analysis Study" which would be funded, if approved, under a 75%-25% federal and local match. The members of the Committee, which include community leaders, elected officials, and regional citizens, believe that the Alternatives Analysis, which will include an Environmental Impact Statement, will provide the determining information as to whether an extension of the proposed Metro-Link System into St. Charles County is feasible from an environmental standpoint, and as to whether such a system could be constructed, operated, and maintained cost effectively.

According to the East-West Gateway Coordinating Council (the St. Louis metropolitan regional planning agency), adequate ridership for a proposed extension for the Metro-Link System into St. Charles County can most likely be attained on the I-70 corridor. However, future growth in the County, the Committee believes, warrants that consideration be given to the possibility of including light rail on the proposed Page Avenue Bridge and Extension Project.

Specifically, The St. Charles County Committee on Light Rail would like to request that the Missouri Highway and Transportation Department incorporate the design of the Page Avenue Bridge and Extension Project to be compatible with light rail. We would appreciate the inclusion of this recommendation in the Draft Environmental Impact Statement (DEIS) presently being developed for the Page Project. The inclusion of this recommendation prior to the circulation of the DEIS, in approximately 30-45 days, we are convinced, is of critical importance.

It is not the intent of this Committee to delay or to escalate the cost of this project. We fully support the Page Project, and

the accelerated schedule at which the project is presently proceeding. However, we believe that good transportation planning for St. Charles County must include the possibility of providing light rail service at some later date.

Mr. McCullah, The St. Charles County Committee on Light Rail greatly appreciates your consideration of the above comments, and we look forward to further discussions, on this subject, at the meeting which you have kindly agreed to attend on January 8, 1990.

Sincerely

James W. O'Loughlin
Chairman
The St. Charles County
Committee on Light Rail

GENE J. FELDHUSEN, *Chairman*
Suite 408
10920 Ambassador Dr.
Kansas City 64153

MISSOURI
HIGHWAY AND TRANSPORTATION COMMISSION

ROBERT N. HUNTER, *Chief Engineer*

BRUCE A. RING, *Chief Counsel*

RL E. YATES, *Vice Chairman*
P. O. Box 3737 G.S.
Springfield 65808

L. V. McLAUGHLIN, *Ass't. Chief Engin*

M SCHIERHOLZ, *Member*
P. O. Box 31000
Des Peres 63131

MARI ANN WINTERS, *Secretary*

ELEN T. SCHINARE, *Member*
1701 Park Ave.
St. Charles 63301

P. O. Box 270
Jefferson City, Missouri 65102
Telephone (314) 751-2551

JUL L. EBAUGH, *Member*
P. O. Box 586
Cape Girardeau 63701

*File Loc.
Rte D. St. Louis Co*

R. JOHNSTON, *Member*
P. O. Box 658
Jefferson City 65102

- | | | | |
|--------------------------------------|-------------------|--------|--------------------------|
| <input type="checkbox"/> UTILITIES | DESIGN | BRIDGE | <input type="checkbox"/> |
| <input type="checkbox"/> FED. AID | SUPPL. ROADS | | <input type="checkbox"/> |
| <input type="checkbox"/> COMPUTER | MAINTENANCE ENGR. | | <input type="checkbox"/> |
| <input type="checkbox"/> PHOTO ENGR. | URBAN ENGR. | | <input type="checkbox"/> |
| <input type="checkbox"/> PLANS CLERK | SPEC. ASSIGN. | | <input type="checkbox"/> |
| <input type="checkbox"/> | PAVT. & SOILS | | <input type="checkbox"/> |
| <input type="checkbox"/> HANDLE | FILE | | <input type="checkbox"/> |
| <input type="checkbox"/> 6-211 | DESTROY | | <input type="checkbox"/> |

February 27, 1985

GENERAL: Page Avenue Extension Corridor
St. Charles-St. Louis Counties
Additional Missouri River Crossing

Honorable Fred Dyer
State Senator, District 2
State Capitol Building, Room 431
Jefferson City, Missouri 65101



Dear Senator Dyer:

I have appreciated the opportunity to meet with you and the Representatives from St. Charles County to discuss the continuing traffic congestion we are experiencing during the morning and evening peak hours. Your group exhibited a comprehensive awareness of the developments through the years which have contributed to this rather serious problem. We have given serious consideration to your suggestion that we review, again, the Page Avenue extension corridor in the light of the developments as they have occurred in an effort to establish once again a reasonable corridor for a highway improvement that would provide the desired relief on a long range basis for traffic in that area.

As you will recall, we did some years ago develop corridor studies from Interstate Route 270 in St. Louis County to Interstate Route 70 on an alignment north of the City of St. Charles and on the alignment which was an extension of Page Avenue south of St. Charles between the present crossings at Interstate Route 70 and U.S. Route 40. Those corridor studies were furnished both St. Louis and St. Charles Counties with the suggestion that the counties maintain those corridors relatively free of major improvement in order that at some future date it might be economically feasible to make major highway improvements through those areas. St. Louis County continues to control development along the Page Avenue extension corridor in that county, but as all of us realize, St. Charles County had little success in controlling subdivision and commercial development along that proposed

Senator Dyer
February 27, 1985
Page 2

corridor so that the county is now faced with a situation where that extensive development would make such an improvement extremely costly and perhaps economically unfeasible.

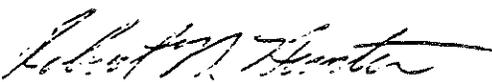
You and the Representatives of St. Charles County indicate that the majority of the people in St. Charles County are now painfully aware of the need for a freeway type improvement from Interstate Route 70 west of St. Charles, easterly to connect with Page Avenue near Interstate Route 270 in St. Louis County with an additional bridge crossing between Interstate Route 70 and U.S. Route 40. You also indicate that there is an awareness of a need for a concerted effort to reserve such a corridor through any future development in order that such an improvement can be made when funds become available.

We have, again, taken a look at the traffic being served by the existing bridge crossings, and we have projected the traffic demands that will be experienced with the new Route 115 bridge in place, the Interstate Route 70 bridges, and the new twin bridge system on Route 40 and find that the traffic will exceed the capacity of the existing, as well as the programmed work to the point where another crossing of the river will be necessary. Each and every one of us knows, however, that with our critical funding limitations and the programmed work under way, there are simply no funds in sight at the state level to proceed with such a project in the foreseeable future unless substantial increases are made in road fund revenues. We agree, however, that it would be sound planning to establish the desired corridor for the future improvement and exact such controls as are necessary to preserve that corridor for that facility.

We will then proceed with an updated study of the Page Avenue extension to Interstate Route 70 west of St. Charles. In doing so, however we again want to make it clear that with that we are making no commitment on direct responsibility for or state funding for any improvement in that corridor.

Again, I appreciate the sincere concern and understanding of the serious traffic problems associated with the dynamic development of your fine county, and we look forward to working with you toward reasonable solutions such as we have been discussing here. When our studies are completed, we will welcome the opportunity to sit down and discuss these with you.

Kind personal regards,



Robert N. Hunter
Chief Engineer

cc: Representative George Dames
Representative Joseph Ortwerth
Representative Douglas Boschert
Representative Ron Stivison
Representative Joan Tobin
Mr. Eugene Feldhausen
Mrs. Helen Schnare
Mr. William F. Schierholz
Mr. Frank Kriz
Mr. James F. Roberts
Mr. Walt Vandelic
Mr. Dale Carney

JOHN C. COZAD, *Chairman*
1700 Bryant Building
1102 Grand Avenue
Kansas City 64106

HELEN T. SCHNARE, *Vice Chairman*
3016 Bluffwood Drive
St. Charles 63301

C. R. JOHNSTON, *Member*
Springfield 65803

PAUL L. EBAUGH, *Member*
1553 Lexington
Cape Girardeau 63791

DON WALSWORTH, *Member*
306 North Kansas Avenue
Marceline 64658

HARRY T. MORLEY, *Member*
1227 Fern Ridge Parkway
St. Louis 63141

MISSOURI
HIGHWAY AND TRANSPORTATION COMMISSION



WAYNE MURI
Chief Engineer

RICH TIEMEYER
Chief Counsel

WALTER F. VANDELIC
Ass't. Chief Engineer

MARI ANN WINTERS
Secretary

12
P.O. Box 270
Jefferson City, Missouri 651
Telephone (314) 751-2551

July 7, 1988

SURVEYS AND PLANS
Route D, St. Charles County
Page Avenue Extension

The Honorable John C. Danforth
U. S. Senator, St. Louis District Office
Old Post Office
815 Olive Street, Room 228
St. Louis, Missouri 63101

Dear Senator Danforth:

We are pleased to reply to comments made by Mr. Walter E. Diggs, Jr. concerning the proposed Page Avenue Extension and the potential involvement with "Spring Bend" wildflower area and historic farmhouse site in St. Charles County. Similar information was furnished you on April 25, 1988 as a reply to comments you received from Mrs. William S. Knowles.

As indicated at that time, this project is in the preliminary stage of design development. A third and final scoping meeting will be held as soon as we can complete a review of the recommendations made at previous meetings. Following this meeting we will complete the preparation of environmental documents, maps, and review the project with other governmental agencies for a future public hearing. We are presently in the process of engaging a consultant to make an environmental analysis of the project and prepare environmental documents. The completion of this stage is expected to take a little more than a year.

A new river crossing is determined by many factors. The location of the bridge site on the Missouri River is controlled by span openings and the location of river piers in order to avoid navigational interference for tows on the river. The direction and magnitude of flood flow controls the length of the bridge and the best site alignment across the river.

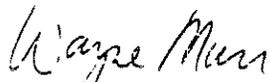
The Honorable John C. Danforth
July 7, 1988
Page Two

As we previously indicated, it is through the cooperation of officials of St. Charles County that an open corridor is available for the project from the Missouri River to Route 94 near Hemsath Road. This is the only corridor remaining free of subdivision development.

We have furnished replies to numerous letters from local constituents on the same subject as Mr. Diggs' letter. All comments concerning the Page Avenue Extension involvement with the Knowles property will be given consideration in preparing the environmental documents. We will utilize whatever practical and prudent measures are available for minimizing the impacts of this project. An opportunity for further comments will be provided when the public hearing is held approximately 18 months from now. We encourage Mr. Diggs to attend.

Mr. Diggs' interest in the project and your assistance in relating this information to him is very much appreciated.

Sincerely yours,


Wayne Muri
Chief Engineer

wm/thh/ph-sp

cc: Mr. J. T. Yarnell

ERNEST F. HOLLINGS, SOUTH CAROLINA, CHAIRMAN

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- No

United States Senate

COMMITTEE ON COMMERCE, SCIENCE,
AND TRANSPORTATION

WASHINGTON, DC 20510-6125

Discussed
July 5, 1988

Roberts

AC

M

C

June 23, 1988

Wayne Muri, Chief Engineer
Missouri Department of Highways
and Transportation
P.O. Box 270
Jefferson City, Missouri 65102

Dear Mr. Muri:

A constituent, Mr. Walter E. Diggs, Jr., has brought to my attention a matter which falls within the jurisdiction of your agency.

I refer this matter to your office for a preliminary examination. I would appreciate receiving your comments, in duplicate, together with the return of the correspondence.

Your attention to this matter is appreciated.

Sincerely,

John C. Danforth

Enclosure

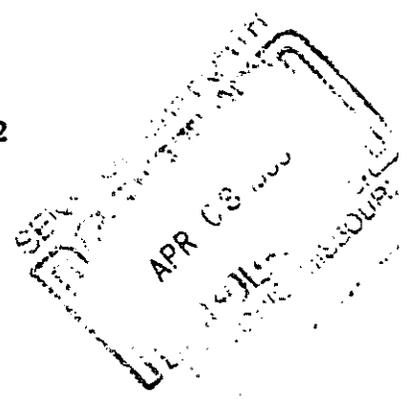
Please reply to:

Senator John C. Danforth
St. Louis District Office
Old Post Office
815 Olive Street, Room 228
St. Louis, Missouri 63101



CASE - STL

MRS. WILLIAM S. KNOWLES
661 E. MONROE AVE.
ST. LOUIS, MISSOURI 63122
1988 APR -4 PM 4:30



March 29, 1988

Honorable Senator John Danforth
Senate Office Building
Washington, D.C. 20510

Dear Senator Danforth;

I think you are the only Danforth that I do not know personally. I run into Bill and Ibbey occasionally, as well as Dottie and Jeff. I have served with Don on the Mary Institute Board of Trustees. My father, Edward Cherbonnier, was with Purina for twenty-nine years and my family were friends with your family and the senior Danforths. My husband and I have been admirers of your career and contributors to your senatorial campaigns.

I am writing to you about the proposed Page Avenue Bridge. In 1936, my father bought 100 acres of farmland in St. Charles County. He built a log cabin next to the historically significant farmhouse there, established a unique and outstanding wildflower garden and farmed the land. Upon his death in 1982, he left the land to my four children with my husband and me as trustees. Their goals for the land, as well as ours, are to preserve the old farmhouse and to do whatever we can to keep the land green.

Subdivisions have sprung up all around us and agents are always calling to see if they can buy the land for development. We feel very deeply that some green spaces should be left in the asphalt jungle. We would, in the future, like to give the land to St. Charles for a park, to the Land Trust, the Nature Conservancy or some such organization in order to protect the land and its wildlife.

Now the problem. St. Charles County, as you know, is one of the fastest growing counties in the country. The traffic between St. Charles County and St. Louis County at the commuting hours is terrible. The present bridges, I-70 and M-115, simply cannot handle the volume, so it has been proposed that Page Avenue in St. Louis currently be extended and a third bridge be built across the Missouri River. There have been several routes suggested for this bridge. The present route would go right between the old farmhouse and my father's wildflower garden. The highway engineers in Kirkwood, who have been most courteous, say that the exact route is subject to change.

I have no objections to the Page Avenue Bridge per se, but I do have several objections to the present route. First, this land is on a site of historical significance. Initially, Indians dwelt on this bluff. Then in 1792, a land grant was given to a French Explorer, Jacques d'Englise, who built two log cabins there. There is strong evidence to show that Lewis and Clark spent the first night of their famous expedition at the spring on the land. Audubon visited there at least twice. A farmhouse, half brick and half stone, was built in 1837. I am in the process of having this house placed on the National Register of Historic Places. What a shame to destroy a place so rich in history.

Secondly, the wildflower garden my father established has been a source of education and enjoyment to many individuals and garden clubs. I enclose a letter from Dr. Peter Raven about its value.

Thirdly, it would seem to be more sensible to put the Page Avenue Bridge further upstream, nearer the US 40 (I-64) bridge. We have watched the center of St. Charles County move rapidly westward from St. Charles to St. Peters and on towards Wentzville. St. Peters' shopping malls include a Famous-Barr, Dillard's and Central Hardware. Monsanto has a facility at St. Peters, Barnes Hospital now has a hospital there, and the University of Missouri's plans for a research park in Wentzville are moving ahead. In ten to fifteen years (the estimated time for the completion of the Page Avenue bridge) the traffic crunch is going to be nearer St. Peters than the city of St. Charles. Wouldn't it be more farsighted to put a third bridge further upstream than within four miles of the I-70 bridge? I have never known a city of any size to have enough bridges to eliminate all traffic congestion during rush-hour. To despoil our valuable land and heritage for four hours a day seems shortsighted and imprudent.

Finally, it has been pointed out to me that since there are many sinkholes and a spring on our property, construction could be more difficult and therefore more expensive.

There is no doubt that we, and our farmer neighbors just to the north, are being penalized because we love the land more than the dollar. People are aware of many of the benefits of our natural environment, the fertile soil, the woods, the plants, the wildlife, but there could also be benefits which are presently undiscovered. Long range planning should strike a balance between development and open spaces. To put the bridge right in the middle of the one green area remaining, effectively destroys the whole property, disregarding its historic, botanical and environmental value.

Any help or suggestions you could give me on this matter would be most appreciated. If you have any questions, or would like to see the land for yourself, we are always proud to show it off. Our telephone number is 314-965-1656, 314-965-5082 or 314-724-8861 in St. Charles.

Sincerely,

Nancy Knowles

Mrs. William S. Knowles

May 5, 1988

Mrs. William S. Knowles
661 East Monroe Avenue
St. Louis, Missouri 63122

Dear Mrs. Knowles:

Thank you for your recent letter and support. Your concern regarding the proposed Page Avenue bridge location has been reviewed.

The Missouri Highway and Transportation Department is presently holding scoping meetings for early coordination of the project with local development and for receiving environmental information. They will soon commence coordination with governmental agencies and begin development of environmental studies for availability at a future public hearing.

The highway department has studied locating the Page Avenue bridge further upstream or nearer the U. S. 40 (I-64) bridge. The estimated bridge cost for the upstream location is \$28 million more than the one near Hemsath Road. The connecting road approaches to the upstream bridge site will displace several more residential homes and will involve greater environmental problems by encroachments on the floodplain and wetlands. The only remaining corridor free of subdivision development is the one located near the Hemsath Road route.

There are also many other factors which affect the proposed location for the new Missouri River crossing. Primarily there is the need to provide suitable span openings and river pier locations that will not interfere with navigation on the river. Another major requirement is the location of the bridge crossing so flood flow is not impeded. The development of the project will include practical and prudent measures available for minimizing impacts.

Thank you for your interest and concern in the project. The highway department will inform you of future meetings and hearings concerning this proposal. You are encouraged to attend and comment at that time.

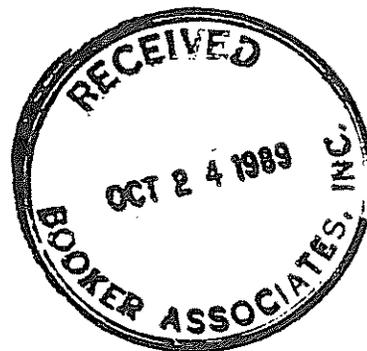
Sincerely yours,

Jo H. Frappier
Director of Governmental Operations
and Legislation

TRUSTEES OF SEVEN PINES SUBDIVISION

P.O. BOX 1461
MARYLAND HEIGHTS, MO. 63043

October 23, 1989



Mr. J. T. Yarnell, District Engineer
Missouri Highway Department
329 South Kirkwood
Kirkwood, MO 63122

Dear Mr. Yarnell:

As Trustees for the Seven Pines Subdivision, we have a responsibility to our residents to insure a consistent high quality living standard. Based on this premise, we feel compelled to state our views on the proposed options for the Page Avenue/Amiot intersection which will be built in our subdivision.

Based on maps which were given to us as public knowledge, it has been our belief that the intersection would consist of a grade separation (Page Avenue running under Amiot). However, it has come to our attention through correspondence with your office, that two other options are proposed which would adversely affect the quality of living in Seven Pines.

One of these would be a full interchange at Page and Amiot which would allow unlimited traffic through our subdivision. We are a subdivision with many young children and fear that this added traffic could be detrimental to their safety. The other option would involve deadending Amiot at Seven Pines Drive and exiting the Page Avenue traffic to Marine Avenue. This would cause problems with the volume of residential traffic using one main entrance at Fee Fee Road and also the limited availability of emergency vehicles due to the lack of our second entrance.

We feel that the planned exit at Amiot is based on traffic going to Westport Plaza and we believe that the three exits already set up for Westport (namely Bennington, Interstate 270 and Westport Drive) are adequate for this purpose.

TRUSTEES OF SEVEN PINES SUBDIVISION

P.O. BOX 1461
MARYLAND HEIGHTS, MO. 63043

Mr. J. T. Yarnell

October 23, 1989

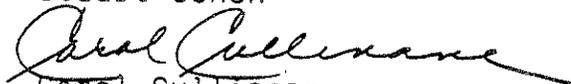
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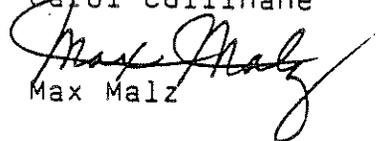
We, as Trustees, are opposed to the Page Avenue Extension in its entirety. However, if the Page Extension does occur, we support the grade separation only, as the option least affecting our subdivision. We strongly urge you to take a more careful look at the grade separation option available to you, as we feel that this selection would more effectively serve the surrounding area.

Sincerely,

The Trustees of Seven Pines


Stuart Cohen


Carol Cullinane


Max Malz

cc: Mr. Wayne Muri
Mr. Freeman McCullah
- Booker Associates
Mrs. Ellen Conant
State Senator Franc Flotron
Representative Todd Akin
Mr. Richard Daykin
Governor John Ashcroft
County Executive Gene McNary
County Council Chairman H.C. Milford
Ms. Dawn Adam Huffman, West County Journal

P.S. to addressee and carbon copy recipients.

We have enclosed the following documents for your reference:

1. Copy of West County Journal article from newspaper dated October 4, 1989.
2. Copy of letter from Richard F. Daykin, Director St. Louis

TRUSTEES OF SEVEN PINES SUBDIVISION

P.O. BOX 1461
MARYLAND HEIGHTS, MO. 63043

Mr. J. T. Yarnell October 23, 1989 Page Three

County Highway Department to Ms. Nancy St. John
(Administrative Assistant to Ellen Conant, County
Councilwoman) dated October 16, 1989.

Please review these documents for discrepancies on the
following points:

1. Is it possible for the County Highway Department to increase a project under a Bond proposal without voter approval (Marine Avenue from two lanes to five)? When and by whom were these additional expenditures approved? Would this not come under the Hancock Amendment?
2. In the letter from Mr. Daykin, he states "the Page Avenue Extension will include ramp connection directly to Marine Avenue in the vicinity of Amiot Drive", while in the newspaper article, Mr. Yarnell is reported to say the State Highway Department "is a long way from deciding which plan to go with".
3. If the Marine Avenue exit is "set in stone", as the County assumes, why is the State Highway Department spending our tax payer money on an Environmental Impact Study?

Please comment on the above!

November 2, 1989



Mr. Greg Knaver
Booker Associates
Environmental Impact Advisors
1139 Olive Street
St. Louis, Missouri 63102

Dear Mr. Knaver:

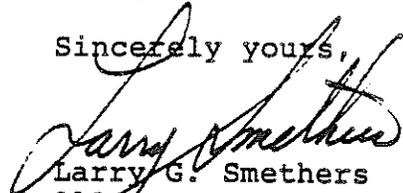
I'm a resident of Seven Pines Subdivision in St. Louis County. This is an area presently under study for the Page extension. I live in the North end of this subdivision and will be directly affected by the proposed plans for the Page extension.

Several times a day I travel West on Marine Avenue to Amiot, make a left on Amiot and stop at Seven Pines Drive. I then proceed one more block West on Amiot and make a left on Sencove Lane. As you can see, I'm directly involved in the area being studied.

I'm opposed to the Page Avenue extension in its entirety. Marine Avenue used to be a nice pleasant tree lined road. Take a look today and see the environmental impact to Marine and I'm sure not in favor of this happening to my residence. However, if the Page extension does occur, I support the grade separation only, as the option least affecting the subdivision. In other words, Page Avenue should be a depressed highway passing under a bridged Amiot Drive. No access or egress from Page to Amiot.

Please keep me advised as to the progress of your evaluation and decision on this Page extension.

Sincerely yours,


Larry G. Smethers
2136 Sencove Lane
Creve Coeur, MO 63146
314-434-1168

cc: The Trustees of Seven Pines
Stuart Cohen
Carol Cullinane
Max Malz

Mr. & Mrs. A.S. Wideman
13242 Windygate Lane
Creve Coeur, MO 63146

Mr. Greg Knauer
Booker Associates
Environmental Impact Advisors
1139 Olive Street
St. Louis, MO 63102



Dear Mr. Knauer,

We purchased a home in Seven Pines over ten years ago. Naturally the surrounding area was much quieter then than it is now. We were attracted by the house and the neighborhood where children could play safely and where we could sit outside in the evening and talk over the day. We understand that the community has grown since then; that St. Charles has grown. Although we are not happy about it, we also understand the need for another route to St. Charles which brought about the Page Extension. We are, however, concerned that the impact of this proposed route on the surrounding community be minimized as much as possible. To deadend Amiot or to create a cloverleaf at the Amiot intersection would have negative effects on the people living in this area. A deadend at Amiot would hinder the natural flow of traffic to our neighbors, the St. John Bosco church, the stores on Dorsett, etc. However even this option is more attractive than a clover leaf which would tear up established homes, increase traffic through our subdivision endangering the lives of our children and reduce our property values. To this solution we are strongly opposed and we will write more letters, contact state and local representatives, attend meetings, demonstrate, in short do whatever is necessary to stop the construction of a cloverleaf.

A sense of community cannot be measured but it is there all the same. Please respect our community, our neighbors, our wishes and select the grade separation for the Page Extension. Thank you.

Al & Margann Wideman

A handwritten signature in black ink, appearing to be "Al Wideman" with a long, sweeping underline.



A. A. Cordi, Ph. D.
13393 Amiot Drive
St Louis MO, 63146
November 3, 1989

Mr Greg Knauer
Booker Associates
Environmental Impact Advisors
1139 Olive Street
St Louis, MO 63102

Sir :

As a homeowner in the Seven Pines subdivision and the father of three children, I would like to tell you how horrified I was by the most recent proposal concerning the extension of Page Avenue. The only proposal I could support is the first one which was proposed. Page Avenue being a depressed highway passing under a bridged Amiot Drive, no access or egress from Page to Amiot. In addition, this solution would not require the extension of Amiot Drive to the Old Farm subdivision, extension which will increase the traffic in this protected area.

I hope you will be able to take care of the preference of the people which will the most affected by your decision.

Sincerely yours

A handwritten signature in black ink, appearing to be "A. A. Cordi".

2128 Hillgate Court
St. Louis, MO. 63146
October 23, 1989



Booker Associates
1139 Olive Street
St. Louis, MO. 63102
Attention: Greg Knauer

Subject: Intersection of Page Avenue Extension
and Amiot Drive

The State Highway Department, on the recommendation of the County Highway Department, is considering deadending Amiot Drive at Seven Pines Drive with access from Page only to the east to Marine Avenue.

If true this would create a traffic hazard and bottleneck in Seven Pines and adjoining subdivisions because it would eliminate one of three present access points.

Primary access at Fee Fee and Seven Pines Drive would then be the main artery for the thousand families in Seven Pines and environs. Closing Amiot would increase traffic at that point by about 50%.

Secondary access through Old Farms is a slow, tortuous alternate with serious traffic problems for its families.

Seven Pines Drive, a through street, is used by motorists other than subdivision dwellers, however a 25 MPH speed limit and radar monitoring discourage many from using it.

Hence the importance of maintaining all three present access points.

If Amiot were to be closed, all school buses would be forced to use Fee Fee Road access slowing morning traffic to a crawl, and in instances where an impatient driver causes an accident, emergency vehicle delays would be critical.

Confined to this single primary access point even weekend shoppers and churchgoers would be hampered traveling to the north and east.

The projected closing of Amiot is inappropriate for the following reasons:

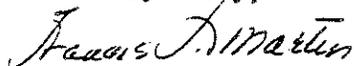
1. It will create a bottleneck that will require rethinking and replanning by our Highway Departments in the future, wasting present engineering effort.
2. It threatens development patterns in the neighborhood, will create a greater traffic burden and will reduce the quality of life for residents, limiting access to our homes.

3. School bus transportation costs will increase due to congestion at the Fee Fee/Seven Pines Drive pressure point.
4. Emergency situations (Fire, Police, Ambulance calls) will be hampered due to forced, roundabout routing; e.g., Maryland Heights support services would be forced to proceed the "long way" around to respond to emergencies for a part of its constituents.

Consequently I respectfully request the adoption of a program for a Page Avenue depressed highway passing under a bridged Amiot Drive with no access or egress from Page to Amiot.

This solution satisfies critical design criteria, avoids a future redesign program that is apt to be required by an unsuitable solution to the problem presently, and satisfies the needs of all the residents.

Yours very truly,



Francis L. Martin







UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

November 5, 1992

Mr. Wayne Muri
Chief Engineer
Missouri Highway and Transportation
Department
P. O. Box 270
Jefferson City, Missouri 65102

- Asst. Dir. Engr-L&D
- Asst. Dir. Engr-Oper
- Utilities
- Fed. Aid
- Recon. Engr.
- Photo Engr.
- _____
- _____
- Design Engr.
- Liaison Engr.
- Spec. Tech. Engr.
- Env. Studies
- CADD Engr.
- Value Engr.
- Other Engr.
- _____

\$

Dear Mr. Muri:

RE: Review of the Preliminary Final Environmental Impact Statement II, Page Avenue Extension

We have reviewed the document, subject above. The Final EIS must be responsive to the enclosed comments in order to meet the requirements of the NEPA process and to fully inform the public regarding project impacts.

Since the requirements to protect public park land in Section 4(f) of the DOT Act have been waived by recent legislation, we did not comment on the preferred alternative which is the Red Alignment through Creve Coeur Park. Instead we focused our comments on opportunities for mitigation measures.

We fully support the inclusion of the mitigation requirements as a part of the legislation, and we seek to be a part of the Planning Design Team being put together by MHTD. The multi-disciplinary approach toward designing the mitigation package through the Team effort will net positive results.

We look forward to the receipt and review of the Final EIS and will work to respond to your requests for a fast turn around. If you have any questions regarding our comments, please write to Mr. Gene Gunn or call Dewayne Knott at (913) 551-7299. Thank you for the opportunity to comment.

Sincerely,

Kerry Herndon, Chief
Environmental Review Branch

Enclosure

cc: Mr. Bob Sfreddo, Division Engineer-Design, MHTD, Jefferson City, Missouri
Colonel Wilbur H. Boutin, Jr., U.S. Army Corps of Engineers, Kansas City, Missouri (ATTN: Regulatory Functions Branch)
Colonel Michael A. Brazier, U.S. Army Corps of Engineers, St. Louis, Missouri
Mr. Ken Bechtel, Federal High Administration, Kansas City, Missouri
Mr. Jerry Brabander, U.S. Fish and Wildlife Service, Columbia, Missouri
Mr. G. Tracy Mehan III, Director, Missouri Department of Natural Resources, Jefferson City, Missouri
Mr. Jerry J. Presley, Director, Missouri Department of Conservation, Jefferson City, Missouri
Mr. Thomas John Barklage, Missouri Highway & Transportation Commission, St. Charles, Missouri
Mr. Les Sterman, Executive Director, East-West Gateway Coordinating Council, St. Louis, Missouri
Mr. Eugene C. Schwendemann, Presiding Commissioner, County of St. Charles, Missouri
Mr. Steven Lauer, St. Charles Planning & Zoning Commission, St. Charles, Missouri
Mr. Buzz Westfall, County Executive, St. Louis County, Clayton, Missouri
Ms. Geri Rothman-Serot, St. Louis County Council, Clayton, Missouri

**COMMENTS ON THE PRELIMINARY FINAL EIS
FOR
PAGE AVENUE EXTENSION**

Region VII EPA commented on the Draft EIS in a letter to Mr. Muri dated August 1, 1990. The comments below refer in part to your response to our comments to the Draft EIS.

WETLANDS

1 Our August 1 letter stated that there were no farmed or cultivated wetlands identified on the DEIS vegetative cover figures, and we requested that the farmed wetland west of Creve Coeur Mill Road (noted on the St. Louis County Soil Survey Map) be shown on Vegetative Cover Figure 3.6.1. We note that the Preliminary Final EIS (PFEIS) still does not include farmed or cultivated wetlands on the vegetative cover figures and should be modified to include them.

2 The PFEIS states that initial wetland identification field work would be conducted on February 18, 1992. The FEIS should contain the wetland delineation field results. We presume that since the wetland delineation took place last February with Corps of Engineers field biologists, that a detailed depiction of wetland areas will be included in the FEIS.

3 The mitigations and enhancements covered in the PFEIS include a wetlands mitigation plan that will be made a part of the Section 404 permitting process and an Enhancement Plan to be applied to the Red Alignment. In addition, there is a \$6,000,000 general mitigation requirement that will be developed to stand alone and separate from these mitigation and enhancement plans. The legislation waiving the Section 4(f) decision clearly sets aside these monies to be applied to the project. The FEIS must make this distinction clear.

4 It is also our understanding that the 178 acres that would be added to Creve Coeur Park as a part of the Creve Coeur Park Enhancement Plan (Figure 4.7) will not be included as a part of the 600 acres discussed in the legislative package. This should be made clear in the FEIS.

WATER QUALITY

5 The FEIS needs to include the description of any waterway channelization or fill work that is being proposed by the project design. Our letter of August 1 highlighted the placement of 4,000 linear feet of fill material in Duckett Creek. We also requested that the FEIS include water flow changes due to any proposed construction activity and particularly any expected changes in the hydrology of wetland areas. The PFEIS does not contain any information regarding these requests. The Water Quality Section of the PFEIS discusses surface and groundwater quality and includes a

discussion of mitigative measures as they pertain to the Missouri Standard Specifications for Highway Construction and current EPA guidelines. We request that the FEIS include assurances that any stream work be done in accordance with the Missouri Channelization Guidelines.

7

We haven't received a copy of the Technical Memorandum Water Quality Technical Report (referenced in the PFEIS). The above issues may be discussed in the report; however, it is appropriate that specific stream impacts should be a part of the FEIS.

8

We note that the second paragraph on page 4-67, Volume I, is very unclear and needs to be rewritten.

AIR QUALITY

9

St. Louis is still not in compliance with the National Ambient Air Quality Standards contained in the Clean Air Act. The Page Avenue Extension project claims to provide relief to traffic movement and thus to reduce vehicle emission levels. We will look for language in the FEIS that ensures specific air quality measurements will be taken and compared with project modeling predictions. We are concerned that there are no air quality monitoring sites located in St. Charles County. Collection of baseline data is important to determine the change in air emissions once the project is completed.

10

The inclusion of light rail design considerations in the document is encouraging, but avoiding funding and implementation because it would be "problematic" seems not to be a justifiable reason for dismissal of light rail as an alternative. We support the St. Charles County Committee on Light Rail request to MHTD that the Page Avenue Extension be compatible with light rail.

11

Paragraph four of Section 2.3.2, on page 2-13 is also unclear and needs to be rewritten.

NOISE

12

The treatment of noise impacts is thorough. We request, however, that noise measurements be taken after project completion. Further, the FEIS should contain language that will ensure that noise protection measures will be implemented should noise levels exceed accepted standards for traffic noise receptors.

13

INDIRECT/SECONDARY IMPACTS

The impact of continued reduction to the Missouri River Floodplain must be addressed and downstream impacts caused by floodplain reductions must be included in the FEIS. Section 4.23.2 discusses the Earth City Expressway Extension as a secondary

development impact to the Page project and concludes that completion of the Page Avenue Extension and flood protection work, "would help set the stage for intense development of the project area floodplain." The growth and development within the Missouri floodplain continues to occur through the piecemeal construction of the Earth City Expressway and its link from the new Highway 115 project to the Page Avenue connection. The floodplain resource must be maintained if it is to function as a buffer to future flood events.

We have voiced our concerns regarding the piecemeal approach toward highway planning and subsequent development in the St. Louis metro area since 1987. As stated in our August 1 letter, we again urge you and other planning officials to develop an area-wide transportation and development plan that includes protection of remaining natural resources.

GENERAL COMMENTS

We are concerned that many of the comments we made in our August 1, 1990, comment letter on the DEIS, where we rated that document an EO-2, have still not been addressed. Our assessment continues to be that in order to meet the requirements of NEPA additional information must be added in the FEIS to inform the public of impacts caused by the project. Please advise us if you would like to meet with us or call Region VII if you have any questions regarding these comments.

RESPONSE TO COMMENTS

U. S. Environmental Protection Agency - Letter of November 5, 1992

1. Farmed wetlands have been identified and mapped on the FEIS.
2. The final field surveys are completed and approved by KCD.
3. The \$6 million is part of the mitigation that earlier was termed the Enhancement Plan for the Red Alignment. The \$6 million is not separate from the mitigation plan.
4. The statement is incorrect. The 178 acres are included in the 600 acres required by Section 601.
5. Any channelization resulting from the project will be done in accordance with Missouri Channelization Guidelines. Any portions of the project requiring fill will be coordinated through KCD-COE by way of a 404 permit. The statement concerning Duckett Creek referred to one of the early alternates which was not necessarily going to place 4,000 feet of fill in this creek. The Selected Alternate, the Red Alignment, will cross Dardenne Creek. The roadway will be primarily a bridge structure and will not impinge on the regulatory floodway. For all structures or berms, design features will be such to allow overland flow to continue as it currently exists.
6. This cannot be accomplished until final design plans are completed. MHTD will coordinate with KCD during the 404 process to determine changes to wetland hydrology.
7. A statement requiring adherence by MHTD to the Missouri Channelization Guidelines has been included in the FEIS. Specific stream impacts will be determined during the design of the project.
8. The paragraph has been reworded.

9. MHTD is not the responsible agency for establishing air quality monitoring stations and locations. However, MHTD will advise the appropriate agency of the comments regarding air quality concerns.
10. Constitutionally, MHTD cannot spend state funds on transit systems. However, MHTD will work to address light rail on the Page Avenue Missouri River Bridge if viable plans are in place prior to the design of that bridge.
11. The paragraph has been reworded.
12. MHTD will consider appropriate noise abatement in accordance with the November 1, 1991 Highway and Traffic Noise and Abatement Policy and Procedures, MHTD. This information was included in the Preliminary FEIS and in Section 4.9.7 of this FEIS.
13. Page Avenue roadway in the Missouri River Floodplain and the Page Avenue Missouri River Bridge will be designed so that there is no change to the regulatory floodplain and that floodplain conveyance and storage will not be reduced. This will be accomplished through commitments made to FEMA by MHTD as the highway design becomes finalized.
14. The Earth City Expressway Extension is no longer a viable project because of lack of funding from St. Louis County. With or without Page Avenue or Earth City Expressway, the development of the Missouri River floodplain is likely. It is one of few remaining large areas of flat ground available in the metropolitan area and therefore a prime candidate for some type of industrial or commercial development - if appropriate flood protection is made available. Therefore it is up to local communities and their permitting processes to determine the use of such areas.
15. MHTD has agreed to be a coordinator with federal and state agencies regarding future large scale transportation projects, however it is up to the East-West Gateway coordinating council to develop and coordinate area-wide transportation and development plan.



MISSOURI HIGHWAY AND TRANSPORTATION DEPARTMENT

Wayne Muri
Chief Engineer

Capitol Ave at Jefferson St., P.O. Box 270, Jefferson City, MO 65102 (314) 751-2551 Fax (314) 751-6555

October 16, 1992

Mr. Morris Kay
Regional Administrator
U.S. Environmental Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, KS 66101

ATTENTION: Mr. Gene Gunn

Dear Mr. Kay:

Subject: Route D, St. Charles and St. Louis Counties, Page
Avenue Extension, Job No. J6U0803, Preliminary
Final Environmental Impact Statement

Enclosed is a copy of the preliminary Final Environmental Impact Statement (FEIS) for the Page Avenue Extension. This document is preliminary in its present form, and the volumes will be combined and polished later for formal submittal to the Federal Highway Administration and then public circulation. We are sending it to you for comment as indicated at the interagency meetings held on October 30 and December 10, 1991 with you or members of your staff.

At those meetings, we agreed to circulate copies of the preliminary FEIS for your review to ascertain if we have addressed the issues you discussed. We are on a tight timeframe for this project, so we would like to have your comments by **November 2, 1992**. Comments will be addressed in the FEIS. We understand that agency officials in the Washington, D.C. offices have been apprised of the priority of this matter.

Legislation has recently been enacted by the U.S. Congress that authorizes the Secretary of Transportation to waive requirements of Section 4(f) of the Department of Transportation (DOT) Act of 1966 (Section 138 of Title 23 U.S.C. and Section 303 of Title 49 U.S.C.) as it applies to the proposed Page Avenue Extension. The congressional action has brought this project back to the forefront. Although the legislation has not been signed into law by the President, we expect this to occur soon. A copy of the legislation is enclosed with your copy of the preliminary FEIS.

Mr. Morris Kay
Page 2
October 16, 1992

We have worked to address your comments on the Draft Environmental Impact Statement (DEIS) and also the issues raised at those interagency meetings into this preliminary FEIS. The formal FEIS will be prepared and submitted to the Federal Highway Administration later this year.

This preliminary document is an intergovernmental exchange that may be withheld under the FOIA request. Premature release of this material to any segment of the public could give some sectors an unfair advantage and would have a chilling effect on intergovernmental coordination. For these reasons, we respectfully request that the public not be given access to this document.

Thank you for your interest and attention to this matter.

Sincerely yours,



Bob Sfreddo
Division Engineer, Design

mk/pr

Enclosures

Copy: Mr. Gerald Reihsen-FHWA



MISSOURI HIGHWAY AND TRANSPORTATION DEPARTMENT

Wayne Muri
Chief Engineer

Capitol Ave. at Jefferson St., P.O. Box 270, Jefferson City, MO 65102 (314) 751-2551 Fax (314) 751-6555

October 2, 1991

Mr. Morris Kay
Regional Administrator
U.S. Environmental Protection Agency
Chief, EIS Section
Region VII
726 Minnesota Avenue
Kansas City, KS 66101

Dear Mr. Kay:

Subject: Route D, St. Charles and St. Louis Counties, Page
Avenue Extension, Job No. 6-U-803, Agency Coordination,
Final EIS

Enclosed is a preliminary copy of the Final Environmental Impact Statement (FEIS) for the subject project. This is being provided to you in advance of the meeting scheduled at the Federal Highway Administration (FHWA) Regional Office at 6301 Rockhill Road, Kansas City at 3:00 P.M. on October 30.

The FHWA has determined that this preliminary document is an intergovernmental exchange that may be withheld under the FOIA request. Premature release of this material to any segment of the public could give some sectors an unfair advantage and would have a chilling effect on intergovernmental coordination and the success of cooperating agency concept. For these reasons, we respectfully request that the public not be given access to this document.

I look forward to seeing you at the meeting.

Sincerely yours,

Wayne Muri
Chief Engineer

wm/mk/vm-de

Copy: Mr. Gerald Reihsen

Enclosures



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

August 1, 1990

Mr. Wayne Muri, Chief Engineer
Missouri Highway and Transportation
Department
P. O. Box 270
Jefferson City, Missouri 65102

Dear Mr. Muri:

RE: Review of Draft Environmental Impact Statement for Page
Avenue Extension

In accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act, we have reviewed the above-referenced document. We rated this project and document EO-2 (Environmental Objections, Insufficient Information). The preferred alternative routing causes a significant impact on public lands resulting in a permanent loss of environmental values. The following comments are provided for your consideration and action:

Taking of Public Lands

Creve Coeur Park and Creve Coeur Lake were the subject of a 1983 report by Booker Associates, Incorporated. Booker stressed that no other lake the size of Creve Coeur Lake existed within fifty miles of metropolitan St. Louis, and that the park and lake were a significant recreation area receiving 1.1 million users a year. Booker Associates went on to say that restoration of the lake was of the highest priority. Based upon that report, and other considerations, EPA provided \$1,005,899.27 in funds for the cost shared project to restore the lake. Booker Associates have prepared the Draft EIS for the Page Avenue extension with an alternative route through the park and lake, which has been selected as the preferred route. Aside from environmental considerations, we cannot support the routing of the proposed project through the lake and jeopardize the resource that EPA expended over a million dollars to help restore.

We are aware of the greater impact to private homeowners in choosing an alternate route, and we appreciate your concern over the additional cost incurred; however, from an environmental

2 viewpoint, the loss of contiguous natural resources and public open space is unacceptable without significant and total compensation. The direct losses caused to the resource are apparent. The indirect losses and impacts come from increased noise, erosion, highway runoff (including heavy metals, road salt, hydrocarbons), increased NO₂ and CO₂ emissions, and the potential of chemical/oil spills on the bridging structure as it passes over the park and lake.

3 We recommend that you consider combining the red route and the green route. This would accommodate the public resource and provide the added traffic artery needed to carry motorists to and from the St. Charles County area.

Wetlands

4 A cursory review of the soil surveys taken of the St. Louis and St. Charles Counties cause us to believe that there are more wetlands affected by the project than are indicated in the Draft EIS. No farmed or cultivated wetlands have been identified on the vegetative cover figures. We feel that the wetland acreage impacted by the construction of any of the alternatives will be significantly greater than stated or expected. The wetland mentioned in 3.6.2 as a farmed wetland on the west side of Creve Coeur Mill Road is noted as a wetland on the St. Louis County Soil Survey Map, but not shown on the vegetative cover figure. We believe this area is one of the few remaining undisturbed emergent wetlands in the county and should be avoided.

The EPA does not consider conservation of existing wetlands as adequate mitigation for wetland losses, except in exceptional circumstances. ~~The mitigation approach to be followed is (1) avoidance, (2) minimization, and (3) compensation. We will follow the mitigation procedures as detailed in the 401(b) guidelines during any 404 permit review process.~~

Channelization

5 We question the need for channel realignment. The text did not discuss realignment requirements; however, we note that the proposal calls for approximately 4,000 feet of fill to be placed in Duckett Creek. If waterways are proposed for realignment, the text must address such activity. Missouri Channelization Guidelines should be followed and a Section 404 permit must be obtained. The text did not include discussion concerning the impact on the hydrology of the water resources on either side of the proposed road. We ask that the Final EIS include water flow changes due to any proposed construction activity, particularly any expected changes in the hydrology of wetland areas.

Air Quality

6 With respect to air pollution reduction, we continue to believe that the logic used to show the reduction in air pollution levels is faulty. While the traffic will move quicker through the St. Louis/St. Charles, Missouri River corridor, the volume will be greater with time; thus, we believe that air emissions will not decrease over the long-term. The National Ambient Air Quality Standards contained in the Clean Air Act are not presently being met in the St. Louis metropolitan area. The solution to air quality is not faster throughways, but rather an integrated traffic management system. We strongly recommend that you also design the highway and attendant bridge system to accommodate a light rail system for future commuters.

Noise

7 Noise projections for the proposed route are adequate; however, we urge you to include a statement in the Final EIS that addresses the need for future noise measurements based on actual traffic volume and flow. If the as built measurements do not meet the noise criteria, the Final EIS should ensure that proper noise abatement actions will be taken.

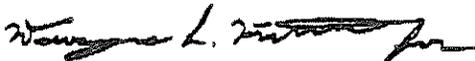
Indirect/Secondary Impacts

8 The EPA continues to be concerned about the indirect/secondary impacts caused by highway construction. We recognize that the current proposal does not include interchanges or frontage roads located in the flood plain of the Missouri River. But it is inevitable that such will be the case. The Draft EIS states, that the Earth City Expressway is planned by others to link up with the Page Avenue Extension. Continued development within the flood plain is detrimental to water quality and wildlife. We believe that a master plan must be designed for St. Louis and the surrounding area. We have discussed our concerns about the continued piecemeal approach to road building on many occasions since 1987. We cannot emphasize to you enough, that the need for an area-wide transportation and development plan that addresses the needs of the remaining natural resources, as well as the needs for measured growth, will be a very real issue for any future proposal brought forward by the city, county or state for the St. Louis/St. Charles metro area.

~~We recognize the need for a traffic corridor across the Missouri River. We also recognize the need for a master plan that will provide for protection of human health, natural resources and landscape features.~~

We would like to meet with you to further discuss the issues raised in the Draft EIS and those contained in this letter. Please write to me or call Mr. Dewayne Knott at (913) 551-7299 to schedule a meeting at a time that is convenient for you. We look forward hearing from you and will work with you toward a satisfactory agreement. Thank you for the opportunity to comment on this worthwhile project.

Sincerely,



Lawrence M. Cavin
Chief, Environmental Review
and Coordination Section

cc: Federal Highway Administration, Jefferson City, Missouri
(Robert G. Anderson)
U.S. Fish & Wildlife Service, Columbia, Missouri
(Richard Szlemp)
U.S. Army Corps of Engineers, Kansas City, Missouri
Missouri Highway and Transportation Department, Kirkwood,
Missouri (J. T. Yarnell)
Missouri Department of Conservation, Jefferson City,
Missouri (Norm Stucky)
Missouri Department of Natural Resources, Jefferson City,
Missouri (John Howland)
Missouri Highway and Transportation Department,
Jefferson City, Missouri (Jim Roberts)
County Road Department, St. Louis County, Missouri
County Road Department, St. Charles County, Missouri
City of St. Louis Street Department, St. Louis, Missouri

RESPONSE TO COMMENTS

United States Environmental Protection Agency - Letter of August 1, 1990

1. The approved Red Alignment would not go through the lake, but cross Creve Coeur Creek upstream of the lake. In addition, in order to mitigate any increase in siltation resulting from construction activities, MHTD has agreed to dredge portions of Creve Coeur Lake that have silted-in since the previous dredging project. Section 601 requires the construction of a sedimentation basin to trap sediment before it enters Creve Coeur Lake.
2. Direct losses to Creve Coeur Lake Memorial Park (CCLMP) will be offset with the addition of at least 600 acres added to the park. All areas will be contiguous to the current boundaries. As noted in the FEIS, there will be increased noise levels that will be attenuated with increased sidewalks on the bridge. There will be localized increases in NO₂ and CO₂; however, in the Route I-70, I-270 and Olive Street Road area, the totals would remain static. Highway runoff and spills will be contained in a collector system of pipes that will convey all runoff to a detention basin off-site of the park, on the west side of Creve Coeur Mill Road.
3. Three new routes have been evaluated in the FEIS that include the Green-Black, Yellow-Black and Blue Alignments, all connecting to the Red Alignment west of Creve Coeur Mill Road.
4. The vegetative cover maps show vegetation at the time of examination. A soybean field, for example, is indicated as "agricultural". The maps of hydric soils included in the FEIS should help those evaluating wetlands which meet only the soil criteria in the Federal Manual. The hydric soils act as indicators in the assessment of wetlands.
5. This comment appears to relate to another project. Only the Green/Blue-Dashed Alternative would have crossed Duckett Creek by bridge. No fill or channel relocation was mentioned as part of this project.
6. The bridge will be wide enough to accommodate elements of mass transit - whether bus lanes, HOV lanes or possibly light rail. Currently, the corridor with priority is along Route I-70. The cost factors for

constructing access over/under and onto the roadway or bridge and then off the roadway/bridge back to the light rail line are very high. When light rail becomes a reality along the St. Louis County North-South Route, then it would seem appropriate to investigate a route out Page Avenue. MHTD is allowing interested parties a chance to formulate planning to incorporate light rail into design of the bridge before that design is finalized. However, the time frame is limited for inclusion and funding for additional light rail is questionable.

7. Section 4.9 has been changed to include this recommendation.
8. See United States Department of the Interior, Response No. 24.



United States Department of the Interior



NATIONAL PARK SERVICE

Midwest Region
1709 Jackson Street

Omaha, Nebraska 68102-2571

IN REPLY REFER TO:

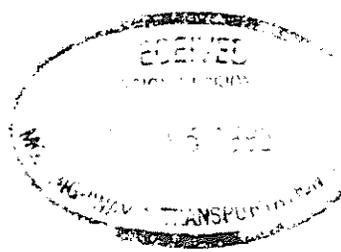
29-00292, 00478, 01146 (MWR-RW)

Mr. Bob Sfreddo
Division Engineer, Design
Missouri Highway and
Transportation Department
Capitol Avenue at Jefferson Street
P.O. Box 270
Jefferson City, Missouri 65102

- Asst. Dir. Eng-110
- Asst. Dir. Oper
- U.S. Fish & Wildlife
- U.S. Forest Serv.
- U.S. Geol. Surv.
- U.S. Nat. Mon.
- U.S. Park & Rec.
- U.S. Wildl. & Nat. Pres.
- Photo Eng.
- _____
- _____

- Design Eng.
- _____
- _____
- Value Eng.
- Office Mgr.
- _____

NOV - 3 1992



Dear Mr. Sfreddo:

This is in response to your recent request for comments on the preliminary final Environmental Impact Statement (FEIS) for the Page Avenue Extension in St. Louis and St. Charles counties, Missouri. As was agreed during the interagency meetings held on August 28 and October 30, 1991, the Midwest Regional Office, National Park Service (NPS), among other agencies, would be provided the opportunity to formally comment on the FEIS prior to its finalization.

Legislation recently enacted by the United States Congress authorized the Secretary of Transportation to waive requirements of Section 4(f) of the Department of Transportation (DOT) Act of 1966 as it relates to the "Red Alternative" route. Therefore, our review of this draft no longer includes an assessment of the various proposed route alternatives, but rather a general assumption that the "Red Alternative" route will be the final selected route.

Section 6(f) Comments:

Pursuant to the Land and Water Conservation Fund (L&WCF) Section 6(f)(3) requirements, the selection of the "Red Alternative" route through Creve Coeur Park will result in an obvious conversion of park land. An assessment of this present draft has been completed with those areas identified for required Section 6(f)(3) conversion documentation. Although certain Land and Water Conservation Fund (L&WCF) actions will be required of the project sponsor and the Missouri Department of Natural Resources, such as the States' formal approval of a final route, we would anticipate most of the environmental and related information necessary for a Section 6(f)(3) evaluation to be included in the FEIS.

① The preliminary FEIS continues to identify and suggest that approximately 40 acres is the "taking" in the park. It is our position that this may only represent a small fraction of the acreage actually impacted by the "Red Alternative". As we have

1 indicated in previous comments, we anticipate that a significant noise impact will occur on the park as a result of this project. In calculating the estimated acres impacted by noise, we would suggest that a highway corridor be identified through the park that encompasses an area of projected noise levels to 57dBA. The preliminary FEIS presently identifies only a corridor to 67dBA, which we believe constitutes a significant adverse noise impact. In similar circumstances, the NPS has suggested that noise levels exceeding a range of 55dBA to 60dBA in park areas and/or an increase of 3dBA above currently measured noise levels may constitute a "taking" for Section 6(f)(3) purposes. An identified area of projected noise levels to 57dBA could be utilized in making a final determination regarding the boundary and size of an anticipated conversion area. We are also presently awaiting the completion of a technical study on noise impact for a more detailed analysis of this issue.

2 The FEIS presently includes a discussion on the "Enhancement Package" which includes mitigation measures for the anticipated impact on Creve Coeur Park. Compliance with Section 6(f)(3) requirements will necessitate the providing of replacement land that has an equal or higher market value and is of reasonably equivalent usefulness to the land being converted. To make this determination, both converted and proposed replacement land must be appraised and an environmental analysis completed. The present document, although containing an environmental analysis on the existing park land, does not meet the environmental requirements of the L&WCF Act in regard to the proposed replacement lands. We would suggest that further environmental analysis be conducted on these particular lands and the results incorporated in the FEIS.

3 Areas that may be considered and proposed as replacement land must also meet the eligibility requirements for L&WCF assisted acquisition as outlined in the "L&WCF Grants-in-Aid Manual" and 36 CFR, Part 39. In particular, issues such as land presently owned by a governmental agency, land being utilized for public recreation, or land intended for purchase with Federal moneys may be declared ineligible for Section 6(f)(3) replacement purposes.

In addition to the above information and to make a final determination of this anticipated Section 6(f)(3) conversion, we would further suggest that the following issues also be addressed in the FEIS:

4 The Intergovernmental Review System (E.O. 12372) review procedures have been adhered to since the proposed conversion and substitution constitutes significant changes to the original Land and Water conservation Fund project.

Although the preliminary FEIS presently discusses the outdoor recreation needs in the immediate area of Creve Coeur Park as

5 identified in the document Recreation spaces, Community Places, 1982-2000, there is no reference to the Missouri Statewide Comprehensive Outdoor Recreation Plan (SCORP). The proposed conversion and substitution must be shown to be in accord with the SCORP.

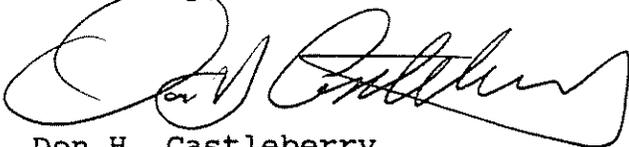
General Comments:

Although the earlier Draft Environmental Impact Statement (DEIS) had failed to adequately address cumulative and secondary impacts, the present document appears to have addressed these issues in a more complete and acceptable manner. In section 4.23, the cumulative and secondary impacts are addressed in sufficient detail including such issues as flood protection, the Earth City Expressway Extension, social, economic and environmental impacts, and others.

6 The cultural resources survey, although limited to localized spot checks of accessible areas or a "windshield" reconnaissance, and literature research, appears to be adequate and acceptable for the FEIS. We note that approximately 10 properties were identified by the Missouri Office of Historic Preservation as being potentially eligible for the National Register of Historic Places. On page 4-122, the Missouri Highway and Transportation Department (MHTD) states that portions of the proposed highway plans are already being redesigned to avoid impact to those historic structures that have been determined eligible or potentially eligible for the National Register of Historic Places. The preliminary FEIS further states "It is expected that no eligible structures will be taken or adversely affected". We remind MHTD that should a no adverse effect or an adverse effect be determined for any of the above properties, or Section 6(f)(3) replacement properties, further coordination with the Advisory Council on Historic Preservation will be required to satisfy the Section 106 review process.

7 We appreciate the opportunity to review the Page Avenue Extension preliminary FEIS through the intergovernmental exchange, and as a recently designated cooperating agency, look forward to actively participating in the final stages of this FEIS process.

Sincerely,



Don H. Castleberry
Regional Director

cc:

Mr. Gerald Reihsen, Federal Highway Administration, Missouri
Highway and Transportation Department, Capitol Avenue at
Jefferson Street, P.O. Box 270, Jefferson City, Missouri 65102

RESPONSE TO COMMENTS

U. S. Department of the Interior, National Park Service - Letter of November 3, 1992

1. The 40 acre taking mentioned in previous editions actually consists of 37 acres, of which 25.8 acres are for actual right-of-way and 11.2 acres for the aerial easement. Areas required for noise impacts that exceeded 57 dBA and visual impacts have been noted in the Section 6(f) report and the FEIS.
2. Replacement lands will be of at least equal market value and of reasonably equivalent usefulness. Land appraisals have been completed. Environmental analysis of the replacement lands has been completed and is included in the Section 6(f) report at Section 3.3.3 and in the FEIS.
3. The replacement lands meet the LWCF eligibility requirements. Section 3.3.1 of the Section 6(f) Evaluation addresses this matter.
4. MODNR agrees that circulation of the FEIS through the State intergovernmental review process will satisfy this requirement.
5. Coordination and reference to the SCORP is in the Section 6(f) report.
6. An intensive field survey of cultural resources has been completed for all alignments and the mitigation lands, to the extent possible.
7. MHTD has a MOA executed by the SHPO and ACHP and this is included in the FEIS. Coordination and development of an appropriate mitigation plan will occur.



MISSOURI HIGHWAY AND TRANSPORTATION DEPARTMENT

DESIGN FILE COPY

Wayne Muri
Chief Engineer

Capitol Ave at Jefferson St. P.O. Box 270, Jefferson City, MO 65102 (314) 751-2851 Fax (314) 751-6555

October 16, 1992

U.S. Department of the Interior
Office of Environmental Affairs
1849 C Street, NW, Room 2340 MBI
Washington, D.C. 20240

ATTENTION: Mr. Frank Stearns

Dear Sir or Madam:

Subject: Route D, St. Charles and St. Louis Counties, Page
Avenue Extension, Job No. J6U0803, Preliminary
Final Environmental Impact Statement

Enclosed are six copies of the preliminary Final Environmental Impact Statement (FEIS) for the Page Avenue Extension. One additional copy each was sent to the National Park Service, Midwest Region office and the U.S. Fish and Wildlife Service, Columbia field office for their review. This document is preliminary in its present form, and the volumes will be combined and polished later for formal submittal to the Federal Highway Administration for approval and then public circulation. We are sending it to you for comment as indicated at the interagency meetings held on August 28 and October 30, 1991 with you or members of your staff.

At those meetings, we agreed to circulate copies of the preliminary FEIS for your review to ascertain if we have addressed the issues you discussed. We are on a tight timeframe for this project, so we would like to have your comments by **November 2, 1992**. Comments will be addressed in the FEIS. We understand that agency officials in the Washington, D.C. offices have been apprised of the priority of this matter.

Legislation has recently been enacted by the U.S. Congress that authorizes the Secretary of Transportation to waive requirements of Section 4(f) of the Department of Transportation (DOT) Act of 1966 (Section 138 of Title 23 U.S.C. and Section 303 of Title 49 U.S.C.) as it applies to the proposed Page Avenue Extension. The congressional action has brought this project back to the forefront. Although the legislation has not been signed into law by the President, we expect this to occur soon. A copy of the legislation is enclosed with your copies of the preliminary FEIS.

U. S. Department of the Interior
Page 2
October 16, 1992

We have worked to address your comments on the Draft Environmental Impact Statement (DEIS) and also the issues raised at all interagency meetings into this preliminary FEIS. The formal FEIS will be prepared and submitted to the Federal Highway Administration later this year.

This preliminary document is an intergovernmental exchange that may be withheld under the FOIA request. Premature release of this material to any segment of the public could give some sectors an unfair advantage and would have a chilling effect on intergovernmental coordination. For these reasons, we respectfully request that the public not be given access to this document.

Also enclosed is previous correspondence relating to a request for the U.S. Department of the Interior to be a cooperating agency on the proposed action. Given recent developments, we again request that your agency become a cooperating agency for the proposed action.

Thank you for your interest and attention to this matter. We look forward to a reply regarding your involvement as a cooperating agency.

Sincerely yours,



Bob Sfregdo
Division Engineer, Design

mk/pr

Enclosures

Copy: Mr. Gerald Reihisen-FHWA



IN REPLY REFER TO

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Fish and Wildlife Enhancement
Columbia Field Office
606 East Cherry Street
Columbia, Missouri 65201



FWE/APWE-CMFO

NOV. 16 1992

Bob Sfreddo, Division Engineer (Design)
Missouri Highway and Transportation
Department
P.O. Box 270
Jefferson City, Missouri 65102

Dear Mr. Sfreddo:

This responds to your November 16, 1992, letter and biological assessment requesting concurrence that the proposed Page Avenue Extension project, Job No. 350803, is not likely to adversely affect federally-listed threatened or endangered species. Two species, the bald eagle (*Haliaeetus leucocephalus*) and pallid sturgeon (*Scaphirhynchus albus*), may occur in the project area. Please reference our letter of February 1, 1989, concurring that the proposed project is not likely to adversely affect the bald eagle.

Based on the contents of your biological assessment, we also concur with your determination that the proposed project is not likely to adversely affect the pallid sturgeon, federally-listed as endangered on September 9, 1990, with the following provisions.

- 1) The U.S. Fish and Wildlife Service (Service), as a cooperating agency in preparation of the final design of the project, and Missouri Department of Conservation (MDC) will participate in decisions concerning placement and configuration of bridging structures, both within the Missouri River floodplain and at stream and backwater crossings. The final design will include measures to avoid any adverse impacts to wetland and aquatic habitats, and enhance existing habitat conditions, to the extent practicable; and
- 2) The Service and MDC also will participate in the design of the Missouri River bridge drainage system to preclude, in so far as is practicable, contaminated run-off and hazardous material spills from entering the wetland and aquatic environment of the Missouri River system.

Should plans for this proposed project be modified beyond the scope of the above provisions, or new information indicate that listed species may be affected, consultation should be reinitiated with this office.

In addition to the assistance discussed in the above provisions, the Service, as a cooperating agency, and the MDC also will provide guidance in final design and implementation of the overall plan to compensate for wetland-related impacts throughout the project area. Opportunities may exist to enhance habitat that may be utilized by the bald eagle and/or the pallid sturgeon, as well as other sensitive fish and wildlife species.

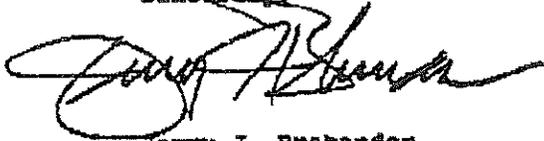
We appreciate your continued cooperation in planning activities for the proposed Page Avenue Extension and other transportation projects, especially concerning conservation of federally-listed threatened and endangered species and wetland habitats. We look forward to working with you further in the final design and implementation of these activities.

Mr. Bob Sfredde
Page Ave. Ext. - 88

2

Should you have questions regarding the contents of this letter, or require additional information, please contact this office at 314/876-1911, or by FAX at 314/876-1914.

Sincerely,



Jerry J. Brabander
Field Supervisor

cc: FWS/APWE-SE; Twin Cities, MN (Attn: C. Johnson)
MDC-Planning; Jefferson City, MO (Attn: N. Stucky)

JJB:jb:1230/1541/XCPAGEXH



MISSOURI HIGHWAY AND
TRANSPORTATION DEPARTMENT

Wayne Muri
Chief Engineer

Capitol Ave. at Jefferson St., P.O. Box 270, Jefferson City, MO 65102 (314) 751-2551 Fax (314) 751-6555

November 16, 1992

Mr. Jerry Brabander
Field Supervisor
U.S. Fish and Wildlife Service
Columbia Field Office
608 E. Cherry Street
Room 207
Columbia, MO 65201

Dear Mr. Brabander:

Subject: Route D, St. Charles and St. Louis Counties, Page
Avenue Extension, Job No. J6U0803, Pallid Sturgeon
Biological Assessment, Final Environmental Impact
Statement

Enclosed is a copy of a Biological Assessment for the pallid
sturgeon (Scaphirynchus albus). The assessment was prepared
to address project impacts to the species as required by the
Endangered Species Act of 1973. The assessment reaches the
finding that the project is not likely to affect the pallid
sturgeon. We request your agency's concurrence in that
finding.

Thank you for your interest and attention as a cooperating
agency in this matter.

Sincerely yours,

Bob Sfreddo
Division Engineer, Design

mk/pr

Enclosures

Copy: Mr. Gerald Reihsen-FHWA



IN REPLY REFER TO:

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Fish and Wildlife Enhancement
Columbia Field Office
608 East Cherry Street
Columbia, Missouri 65201



FWS/AFWE-CMFO

NOV. 04 1992

Bob Sfreddo, Division Engineer (Design)
Missouri Highway and Transportation
Department
P.O. Box 270
Jefferson City, Missouri 65102

Dear Mr. Sfreddo:

Enclosed is a copy of the June, 1992, draft recovery plan for the Pallid Sturgeon (*Scaphirhynchus albus*) for use in preparation of your Biological Assessment on the Page Avenue Project. Also enclosed is a copy of the pertinent Interagency Regulations for consultations under Section 7 of the Endangered Species Act (50 CFR 402). A discussion of the preparation of a Biological Assessment is found at 50 CFR 402.12 (b).

Please be aware that the enclosed draft recovery plan is not in final form, and that it is subject to change upon further review. The information and citations contained in this draft document, however, should constitute the best information currently available concerning this species.

We appreciate your cooperation in this matter, and look forward to working with you further in the Page Avenue project. Should you have questions or require additional information, please contact this office at 314/876-1911.

Sincerely,

Jerry J. Brabander
Field Supervisor

Enclosures - 2

JJB:jb:1230/XCPAGEXG





IN REPLY REFER TO:

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Fish and Wildlife Enhancement
Columbia Field Office
608 East Cherry Street
Columbia, Missouri 65201

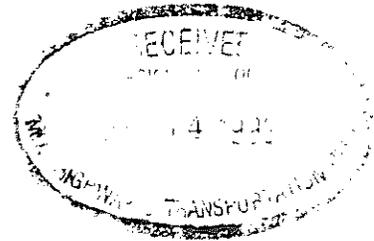
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- Asst. Dir. Eng.-LE
- Asst. Dir. Engr-Oper
- Utilities
- Fed. Aid
- Recon. Engr.
- Photo Engr.
- _____
- CME
- Liaison Engr.
- Spec. Assn. Engr.
- Env. Studies
- CADD Engr.
- Value Engr.
- Office Mgt.
- _____

FWS/AFWE-CMFO

NOV. 0 2 1992

Bob Sfreddo, Division Engineer (Design)
Missouri Highway and Transportation
Department
P.O. Box 270
Jefferson City, Missouri 65102



Dear Mr. Sfreddo:

This responds to your October 16, 1992, letter requesting a review of the preliminary Final Environmental Impact Statement (pFEIS) for the Page Avenue Extension project, Job No. J6U0803. Please reference letters of January 29, 1987, June 12, 1987, and February 1, 1989, from the U.S. Fish and Wildlife Service (Service) to your agency, and correspondence of October 22, 1990, and November 5, 1991, from the Department of the Interior to the Federal Highway Administration as background for the following comments and recommendations pertinent to the pFEIS.

Our February 1, 1989, correspondence provided concurrence in your determination that the proposed project would not likely adversely affect the bald eagle (*Haliaeetus leucocephalus*). Since that time, the pallid sturgeon (*Scaphirhynchus albus*) has been federally-listed as endangered (see 55 FR 36641) under authority of the Endangered Species Act of 1973 (ESA). Under Section 7 of the ESA (50 CFR 402), it is the responsibility of the Federal action agency, or its designated non-Federal representative (50 CFR 402.08), to determine whether an action is likely to adversely affect a listed species or its designated critical habitat.

The range of the pallid sturgeon is primarily the Missouri River and the Mississippi River downstream of its confluence with the Missouri River. Pallid sturgeon require large, turbid, free-flowing, braided-channel riverine habitat with sandy and rocky substrate. Modifications to this species' habitat have blocked movements, destroyed or altered its spawning areas, reduced its food sources or its ability to obtain food, altered water temperatures, and changed the hydrograph of the large riverine habitat it requires to successfully complete its life cycle. Over-fishing, pollution, and hybridization also may have led to the species' dramatic decline and ultimate listing as endangered.

Because of the precarious position of the pallid sturgeon, it is imperative that activities that may further impact its habitat be scrutinized closely. A major goal of the draft Pallid Sturgeon Recovery Plan¹ is protection and restoration of riverine habitat diversity, including backwaters and side channels. We recommend that a Biological Assessment (see 50 CFR 402.12) be prepared as part of the Final Environmental Impact Statement (FEIS) for this project, and that the proposed Red Alignment crossing of the Missouri River be evaluated further based on its potential impact to backwater and side channel habitat diversity, and consequent potential effect on the pallid sturgeon.

1

¹ Pallid sturgeon recovery team. June 1992. Draft pallid sturgeon recovery plan. Fish and Wildl. Serv., Denver, CO. 33+pp.

The FEIS may function as the Biological Assessment so long as the information needs of 50 CFR 402.12(f) are included; we would be pleased to work with you as you prepare the Biological Assessment.

1 Should the Biological Assessment conclude that the project may affect the pallid sturgeon, the Federal Highway Administration should request initiation of formal consultation with this office. If it is determined that the project is not likely to adversely affect the species, and the Service concurs in that determination, Section 7 consultation would be completed. Both the determination of effect and Service concurrence must be provided in writing.

2 We recommend that an addition route be evaluated in the FEIS. We understand the argument that routes other than the selected alternative, the Red Alignment, would result in significant disruption of established neighborhoods in the vicinity of Creve Coeur Lake, and are sympathetic to that viewpoint. However, the Green Alignment between the common point west of Creve Coeur Lake and Highway 94 in St. Charles County appears to traverse less of the Missouri River floodplain and crosses the Missouri River at a much less important point than the Red Alignment.

This "Red-Green-Red" Alignment does not appear to be evaluated in the pFEIS, even though it seems to be a more direct route than the strict Red Alignment or the other combinations analyzed. The Missouri River crossing associated with the Red Alignment would traverse a backwater wetland and side channel complex. This habitat is rare on the Missouri River and should not be altered adversely.

3 Should the Red Alignment crossing remain the selected alternative, the final design should eliminate adverse impacts to this backwater and side channel area. As discussed at our October 29, 1992, meeting, it may be possible to increase habitat diversity through creative design of bridge supports. Although we would prefer that the crossing avoid the subject backwater and side channel complex completely, we are willing to work with you in designing appropriate structures.

4 The wetland mitigation plan proposed appears to provide significant opportunity for offsetting impacts of the project. Location and configuration of some of the features may, however, require adjustment in order to result in an appropriate level of mitigation for the resources being affected. As we discussed on October 29, 1992, incorporation of the area known as Little Creve Coeur Lake and other surrounding lands into the mitigation plan could add greatly to fish, wildlife and related environmental resource management opportunities in this portion of the Missouri River floodplain.

The Service has considerable experience in restoration of wetland habitat through our management of National Wildlife Refuges and our *Partners for Wildlife* program. We would be pleased to provide assistance to your agency in the final design of measures to offset wetland impacts attributable to the Page Avenue project. In order to provide such assistance in an appropriate forum, we request that the Service be included on the design committee authorized by section c of Amendment No. 3404 to the Pipeline Safety Act (S.1583).

5 We also are concerned regarding the cumulative, long-term effect of the Page Avenue project and other related activities (e.g., Earth City Expressway, Highway 115) on the floodplain, wetland and riverine habitat of the St. Louis and St. Charles County area. Since the Missouri Highway and Transportation Department (MHTD) is a major player in ongoing development projects directly related to floodplain alteration, we recommend that your agency facilitate formulation of a comprehensive, enforceable plan to ensure preservation of a viable, functioning natural ecosystem in the Missouri River floodplain that

Mr. Bob Sfreddo, MHTD
Page Avenue pFEIS

3

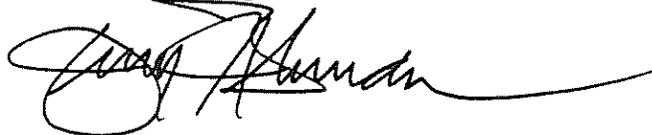
takes into consideration preservation and management of key habitat corridors and complexes. The Service is eager to work with MHTD and other local, State and Federal agencies and groups toward this end.

6 By copy of this letter to the Federal Highway Administration, we also request that the Service be included as a cooperating agency in preparation of the final selected alternative and implementation plan. We believe that our agency possesses unique information and skills that would serve well in assuring the most environmentally sound project possible. We request that the Federal Highway Administration advise us of the viability of this proposal at the earliest convenience, so that we can plan staff work schedules accordingly.

In summary, the MHTD should closely assess the potential impact of the proposed project on the pallid sturgeon, and include a determination of effect in the FEIS. We also recommend that the "Red-Green-Red" alignment be evaluated further concerning overall environmental impact, especially in the vicinity of the crossing of the Missouri River. Adjustments in the proposed wetland mitigation plan also are appropriate, in our view. In addition, and very importantly, a comprehensive plan should be developed, with input from local, State and Federal perspectives, to conserve the natural resource values of wetland, agricultural and riverine habitats within the floodplain of the Missouri River in St. Louis and St. Charles Counties; the MHTD could serve as a catalyst in this important endeavor.

We appreciate the opportunity to provide comments on the pFEIS, and look forward to working with your agency in the future on this and other transportation projects. Should you have questions or require additional information, please contact this office at 314/876-1911.

Sincerely,



Jerry J. Brabander
Field Supervisor

cc: FHWA; Jefferson City, MO (Attn: Gerald Reihsen)
MDC; Jefferson City, MO (Attn: Norm Stucky)
FWS; Twin Cities, MN (Attn: Mamie Parker)
NPS; Omaha, NE (Attn: Clay McDermott)

JJB:jb:1230/XCPAGEXF

RESPONSE TO COMMENTS

U. S. Fish and Wildlife Service - Letter of November 2, 1992

1. This has been addressed in Section 4.16.2 of the FEIS.
2. This has been addressed in Section 4.27.1.
3. See Response #4 to Missouri Department of Conservation (MDC).
4. See Response #6 to MDC.
5. MHTD has committed to include the USFWS in area-wide planning activities coordinated through the regional metropolitan planning organization.
6. MHTD has included USFWS as a cooperating agency for the FEIS.

DE

November 4, 1992

Mr. Jerry J. Brabander
Fish and Wildlife Service
608 East Cherry Street
Columbia, MO 65201

Dear Mr. Brabander:

Subject: Page Avenue Extension
Project 6-U-803
St. Louis and St. Charles Counties

We have received a copy of your November 3, 1992 letter to Mr. Sfreddo.

With pleasure, we accept your offer to be a cooperating agency during completion of the Final EIS for this project and look forward to working with you. We would also welcome your participation in the "Design Committee" proposed in the Federal legislation and will so recommend to the Missouri Highway and Transportation Department. This committee is to be appointed by the Governor so our agency is not directly responsible for its make-up.

Again, we appreciate your cooperation in moving this important project forward.

Sincerely yours,

R. G. ANDERSON

Gerald J. Reihsen, P.E.
Division Administrator

cc: MHTD Design
Greg Schroeder-MHTD Counsel



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MISSOURI HIGHWAY AND TRANSPORTATION DEPARTMENT

Wayne Muri
Chief Engineer

Capitol Ave. at Jefferson St., P.O. Box 270, Jefferson City, MO 65102 (314) 751-2551 Fax (314) 751-6555

October 16, 1992

Mr. Jerry Brabander
Field Supervisor
U.S. Fish and Wildlife Service
Columbia Field Office
608 E. Cherry Street
Room 207
Columbia, MO 65201

ATTENTION: Mr. Jim Hazelman

Dear Mr. Brabander:

Subject: Route D, St. Charles and St. Louis Counties, Page
Avenue Extension, Job No. J6U0803, Preliminary
Final Environmental Impact Statement

Enclosed is a copy of the preliminary Final Environmental Impact Statement (FEIS) for the Page Avenue Extension. Six copies were sent to the U.S. Department of the Interior, Office of Environmental Affairs in Washington, D.C., and one copy to the National Park Service, Midwest Regional office in Omaha. This document is preliminary in its present form, and the volumes will be combined and polished later for formal submittal to the Federal Highway Administration and then public circulation. We are sending it to you for comment as indicated at the interagency meetings held on August 28, October 30, and December 11, 1991 with you or members of your staff.

At those meetings, we agreed to circulate copies of the preliminary FEIS for your review to ascertain if we have addressed the issues you discussed. We are on a tight timeframe for this project, so we would like to have your comments by **November 2, 1992**. Comments will be addressed in the FEIS. We understand that agency officials in the Washington, D.C. offices have been apprised of the priority of this matter.

Legislation has recently been enacted by the U.S. Congress that authorizes the Secretary of Transportation to waive requirements of Section 4(f) of the Department of Transportation (DOT) Act of 1966 (Section 138 of Title 23 U.S.C. and Section 303 of Title 49 U.S.C.) as it applies to the proposed Page Avenue Extension. The congressional action has brought this project back to the forefront.

Mr. Jerry Brabander
Page 2
October 16, 1992

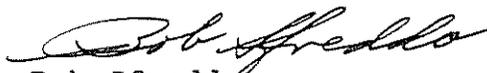
Although the legislation has not been signed into law by the President, we expect this to occur soon. A copy of the legislation is enclosed with your copy of the preliminary FEIS.

We have worked to address your comments on the Draft Environmental Impact Statement (DEIS) and also the issues raised at all interagency meetings into this preliminary FEIS. The formal FEIS will be prepared and submitted to the Federal Highway Administration later this year.

This preliminary document is an intergovernmental exchange that may be withheld under the FOIA request. Premature release of this material to any segment of the public could give some sectors an unfair advantage and would have a chilling effect on intergovernmental coordination. For these reasons, we respectfully request that the public not be given access to this document.

Thank you for your interest and attention to this matter.

Sincerely yours,



Bob Sfredde
Division Engineer, Design

mk/pr

Enclosures

Copy: Mr. Gerald Reihnsen-FHWA



MISSOURI HIGHWAY AND TRANSPORTATION DEPARTMENT

DESIGN FILE COPY
L. Wayne Muri
Chief Engineer

Capitol Ave. at Jefferson St., P.O. Box 270, Jefferson City, MO 65102 (314) 751-2551 Fax (314) 751-6555

October 16, 1992

U.S. Department of the Interior
Office of the Solicitor
1849 C Street, NW, Room 6556 MBI
Washington, D.C. 20240

ATTENTION: Ms. Ruth Ann Storey

Dear Sir or Madam:

Subject: Route D, St. Charles and St. Louis Counties, Page
Avenue Extension, Job No. J6U0803, Preliminary
Final Environmental Impact Statement

Being sent under separate cover to Mr. Frank Stearns, Office of Environmental Affairs, are six copies of the preliminary Final Environmental Impact Statement (FEIS) for the Page Avenue Extension. One additional copy each was sent to the National Park Service, Midwest Region office and the U.S. Fish and Wildlife Service, Columbia field office for their review. This document is preliminary in its present form, and the volumes will be combined and polished later for formal submittal to the Federal Highway Administration for approval and then public circulation. We are sending it to you for comment as indicated at the interagency meetings held on August 28 and October 30, 1991 with you or members of your staff.

At those meetings, we agreed to circulate copies of the preliminary FEIS for your review to ascertain if we have addressed the issues you discussed. We are on a tight timeframe for this project, so we would like to have your comments by **November 2, 1992**. Comments will be addressed in the FEIS. We understand that agency officials in the Washington, D.C. offices have been apprised of the priority of this matter.

Legislation has recently been enacted by the U.S. Congress that authorizes the Secretary of Transportation to waive requirements of Section 4(f) of the Department of Transportation (DOT) Act of 1966 (Section 138 of Title 23 U.S.C. and Section 303 of Title 49 U.S.C.) as it applies to the proposed Page Avenue Extension. The congressional action has brought this project back to the forefront. Although the legislation has not been signed into law by the President, we expect this to occur soon. A copy of the legislation is enclosed with copies of the preliminary FEIS.

U. S. Department of the Interior
Page 2
October 16, 1992

We have worked to address your comments on the Draft Environmental Impact Statement (DEIS) and also the issues raised at all interagency meetings into this preliminary FEIS. The formal FEIS will be prepared and submitted to the Federal Highway Administration later this year.

This preliminary document is an intergovernmental exchange that may be withheld under the FOIA request. Premature release of this material to any segment of the public could give some sectors an unfair advantage and would have a chilling effect on intergovernmental coordination. For these reasons, we respectfully request that the public not be given access to this document.

Also enclosed is previous correspondence relating to a request for the U.S. Department of the Interior to be a cooperating agency on the proposed action. Given recent developments, we again request that your agency become a cooperating agency for the proposed action.

Thank you for your interest and attention to this matter. We look forward to a reply regarding your involvement as a cooperating agency.

Sincerely yours,



Bob Sfreddo
Division Engineer, Design

mk/pr

Enclosures

Copy: Mr. Gerald Reihsen-FHWA

Specific Comments

- 8 The draft document recognizes the need for replacement of converted lands under Section 6(f)(3) of the L&WCF Act. However, paragraph 3.1.7, Ownership Clauses (page 1-7), contains a misstatement. It is stated in this paragraph that "Due to the use of these funds (L&WCF), the park operates in conjunction with the requirements of the Federal Land and Water Conservation Fund Act, which includes a reversionary clause, Section 6(f)" (emphasis added). Section 6(f)(3) requires replacement with land of "at least equal fair market value and reasonably equivalent usefulness" of any land converted to other than public outdoor recreation. No fund-assisted land ever reverts to the Federal Government under this Act.
- 9 It is indicated in the draft document that in the event of conversion at the CCLMP, possible replacement parcels have been identified adjacent to the park. Cost estimates for the replacement land have not been included in the construction estimates. Replacement land cost estimates should be included in the final document.
- 10 It is stated in paragraph 3.1.11, Avoidance Alternatives (page 1-14), that the no-build alternative was rejected because it would not alleviate the overcrowded traffic condition. As other reviewers have noted, development of mass transit systems was not considered as a solution to the commuter traffic. This possibility should be addressed.
- 11 Under the Red Alternate, there would be a severe visual impact on the CCLMP that would not be compensated by the view from the elevated highway. There also would be impacts due to increased traffic noise levels. Both these impacts would reduce the aesthetic quality of the park and make the area less suitable for passive or active recreation.
- 12 Although the elevated highway bridge will be supported on piers, the construction will require the permanent removal of mature trees. Contrary to the statement made in Chapter 8, page 1-11, considerably more area will be impacted than the area equal to that required by the support piers. Special precautions would be necessary during and after construction to prevent siltation of Creve Coeur Creek and Lake.
- 13 We question why there is a difference between the amounts of predicted peak hour noise levels in the Red and Green Alignments. Were the Red Alignment's predicted noise levels calculated with a noise barrier, while the Green Alignment's were not? If so, why not?
- 14 Page 1-31. The remark that the Green Alignment would render the leased parkland virtually useless is an overstatement and should be deleted.
- Page 1-33. It is difficult to understand how a major highway project could become an integral portion of a community park. Although it is stated in the draft document that the St. Louis County Department of Parks and Recreation wanted all interested parties to know that the extension of Page Avenue likely would be proposed at a future date, it should be further emphasized that the draft continues, "The Department of (the) Interior stated that although the

transportation corridor would be mentioned for the record, all applicable laws and regulations would need to be satisfied at the time such a project was to be initiated" Page 4-95. At this time it does not appear that this is the case. The positive visual impact of the view from an elevated highway across CCLMP would be minor and would by no means counter the negative visual impact of the view of the elevated highway from the park itself, as suggested in the draft document. It will be difficult to view much of the park from a 4-lane highway with a 42-inch noise barrier. The park's primary uses lie in recreation and aesthetics; the draft does recognize the scenic panorama that the park area currently provides.

Because of the above, and because of our objections under Section 4(f), the National Park Service finds that it is unable at this time to consider a request for the conversion of land in the CCLMP under Section 6(f) of the L&WCF Act.

ENVIRONMENTAL STATEMENT COMMENTS

General Comments

The draft environmental statement (DEIS) fails to adequately address cumulative and secondary impacts. The planned Earth City Expressway Extension is mentioned, but no analysis of potential cumulative impacts associated with this additional thoroughfare that crosses the Page Avenue project area is provided. Likewise, there is no mention of SR-115 to which Earth City probably will be connected.

15 The DEIS does not consider Executive Orders 11988 or 11990 which deal with protection of floodplains and wetlands, respectively, in spite of a February 10, 1988, written request from the U.S. Environmental Protection Agency, Kansas City Region VII, to at least consider Executive Order 11988 in future planning. The DEIS does not adequately address mitigation for impacts to wetlands and other fish and wildlife habitats. Mitigation should be an inherent part of the project and needs to be considered as part of the alternatives analysis. If alternatives result in impacts that cannot be adequately mitigated, then those alternatives may need to be modified or eliminated.

Potential environmental impacts may be lessened through the development of a comprehensive long-term regional transportation network that would take advantage of any existing infrastructure as well as explore alternatives other than highways. Buses and light rail need to be incorporated into this plan, if and where feasible. The Page Avenue Extension supposedly is designed to fulfill projected transportation needs of 2015. Additional transportation alternatives need to be investigated such that implementation would serve the entire metropolitan area's future needs, while minimizing residential and commercial disturbance as well as the encroachment upon the dwindling fish and wildlife resources in the area.

Specific Comments

16 Page 1-2. Although it may be true that the Page Avenue and Earth City Expressway Extensions will not directly provide for increased flood protection, they will encourage floodplain development due to the establishment of infrastructure and interchanges which will spur the construction of more complete and higher levels of levee protection. This should be addressed in the final statement.

30 The DEIS does not address the cumulative impacts of Page Avenue and Earth City Expressways both being constructed in the Missouri River floodplain, adjacent to CCLMP, and through the valuable wetland area west of the park. Earth City Expressway probably would be tied into SR-115. At a minimum, the cumulative impacts of the Page Avenue, Earth City, and SR-115 Expressways should be considered in the final statement. The entire network of highways in the St. Charles and St. Louis metropolitan area needs to be considered under cumulative and secondary impacts.

31 Known mineral resources in the area are limestone, shale, sand and gravel, and coal. Although the DEIS addresses the existence of mineral resources, it does not mention coal, or discuss the effect of the project on mineral resources. We suggest that subsequent versions of the document acknowledge all mineral resources in the area and discuss impacts to those resources. If no adverse impacts are identified, a statement to that effect should be included.

FISH AND WILDLIFE COORDINATION ACT COMMENTS

32 It is indicated in the DEIS that a Section 404 permit from the U.S. Army Corps of Engineers would probably be required for project implementation. The U.S. Fish and Wildlife Service (FWS) advises that it will review the Corps' public notice for the final project proposal, once the alignments have been determined, to ensure that adequate mitigation measures for fish and wildlife habitat losses have been incorporated, where necessary, in the project's final plans and specifications. The FWS notes that the extent of wetlands present may be greater than currently suggested in the draft statement.

SUMMARY COMMENTS

The Department of the Interior objects to Section 4(f) approval of this project with regard to the CCLMP and the MSDLA on the grounds that the Black Alignment would avoid impacts to these parklands. We have no objection to Section 4(f) approval for the use of the KATY Trail by any of the proposed alignments, providing the measures to minimize harm discussed above are included in the final statement.

We recommend selection of a preferred project alternative based roughly upon a Red-Black Alignment with a modified eastern section (to reduce community impacts) that would avoid the CCLMP and the MSDLA to the maximum extent possible, as well as avoid the wetland area just west of the park where the currently proposed Red and Green Alignments diverge. We are very concerned about the future impacts to this area by the forthcoming Earth City Extension proposal that appears to go directly through the area, thus essentially eliminating it.

Because of our concerns, we may, depending upon the proposal included in the final environmental impact statement, refer this project to the Council on Environmental Quality under Section 1504 of the Council's Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (40 CFR). We wish to coordinate fully to try to resolve the issues presented in our above comments in order to preclude the necessity for referral.

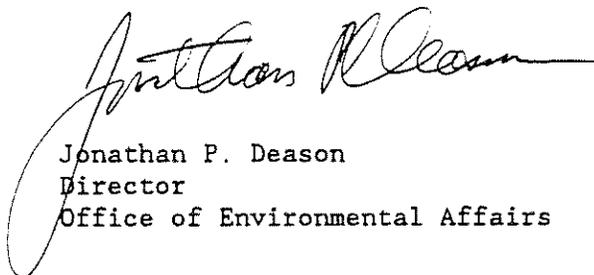
As this Department has a direct and continuing interest in the proposed project, we are willing to provide technical assistance in further project planning and development. For technical assistance pertaining to park and recreation resources, please contact the Regional Director, Midwest Regional Office, National Park Service, 1709 Jackson Street, Omaha, Nebraska 68102 (FTS 864-3431 or 402-221-3431).

For technical assistance pertaining to fish and wildlife resources and the Fish and Wildlife Coordination Act, please contact the Field Supervisor, U.S. Fish and Wildlife Service (ES), P.O. Box 1506, Columbia, Missouri 65201 (FTS 276-1911 or 314-876-1911).

For technical assistance pertaining to mineral resources, please contact the Chief, Intermountain Field Operations Center, Bureau of Mines, P.O. Box 25086, Building 20, Denver Federal Center, Denver, Colorado 80225 (FTS 776-0421 or (303) 236-0421).

Thank you for the opportunity to provide these comments.

Sincerely,



Jonathan P. Deason
Director
Office of Environmental Affairs

cc:
Mr. Wayne Muri
Chief Engineer, Missouri Highway
and Transportation Department
P.O. Box 270
Jefferson City, Missouri 65101

RESPONSE TO COMMENTS

United States Department of the Interior - Letter of October 22, 1990

1. Since the publication of the DEIS, Section 601 of the Pipeline Safety Act of 1992 has waived the requirements of Section 4(f).
2. Section 601 of the Pipeline Safety Act waives the requirements of Section 4(f).
3. Section 4(f) has been waived by Section 601 of the Pipeline Safety Act.
4. The loss of parkland has been mitigated by requirements of Section 601 of the Pipeline Safety Act and of those required by the Land and Water Conservation Fund Act
5. The bridge will have a visual impact within the south area of the park that will be mitigated through the requirements of Section 601 of the Pipeline Safety Act. A Design Committee required by that Act will address such impacts in the park.
6. St. Louis County Department of Parks and Recreation (DPR) has prepared a comprehensive master plan for the park, including the existing parkland and the land areas associated with the mitigation plan required by Section 601 and developed in coordination with MHTD. This plan provides for two distinct areas: the active use areas in the north and the passive use, environmental education areas in the southern portion of the park. DPR personnel have stated that - yes the park will be different with the highway bridge going through the park - but it will be better as a result of the mitigation plan and the increased services and facilities it will be able to provide.
7. The impacts to wetlands will occur whether the bridge traverses the park or adjacent lands. For the selected Red Alignment, the alignment is beyond the southern end of the lake. This reduces the direct impact to wetlands by avoidance. In order to provide mitigation for impacts to wetlands mitigation plans and locations have been addressed with MDC and USFWS. The area of biggest concern is to satisfy all the impacts in one

large area and protect the Upper Creve Coeur Lake area. This area is documented as a waterfowl resting area; it is high on the priority of both MDC and USFWS as preserving this area to the largest extent possible. MDC is willing to participate in the management of proposed wetland mitigation areas. In addition, the CCLMP master plan indicates the development of an area for environmental education in the south end of the park that would provide a good interpretive exhibit of functioning wetlands; that is required by Section 601 of the Pipeline Safety Act. This protection and creation of high quality wetlands will provide for a greater diversity of wildlife habitat while protecting special wetlands.

8. Section 3.1.7 has been changed to indicate replacement lands are required.
9. Cost estimates are now included for lands identified in the mitigation plan.
10. Additional discussion for the potential of mass transit to alleviate overcrowded traffic conditions has been added in Chapter 2.
11. While it is acknowledged that there would be visual and noise impacts that would reduce the aesthetic quality of passive recreation in the immediate vicinity of the proposed bridge structure, we disagree that the active recreational use will be impaired by the bridge. In order to offset impacts in the passive use area at the southern end of the park, the mitigation plan indicates that land will be added to the southern end of the park to add similar types of habitats as that disturbed by the bridge intrusion. Without acquisition, potential private development would preclude the availability of the land for park expansion/usage and could introduce adverse proximal impacts.
12. Short-term impacts during construction will impact an area greater than the support piers. The height of the bridge will not require the removal of most trees; however, the construction of the piers will require some tree removal and disturbance of soils. MHTD has a tree replacement policy of replacing each tree of greater than 6" diameter with two new trees. In addition to construction controls to minimize sediment loading to adjacent areas, MHTD has also committed to dredging Creve Coeur Lake and construction of a siltation lake as part of its mitigation program as

required by Section 601 of the Pipeline Safety Act. The Design Committee required by Section 601 will address impacts of the highway through the park.

13. Measurements and projections were based on the locations of receptors which represent the various corridors. Receptors are not the same from corridor-to-corridor and road conditions at one receptor are not necessarily the same as those at another. Results among alternatives, hence, vary.
14. The Green Alignment would have bisected the leased area with the roadway and the berm. It would have eliminated the designated use at that time which was an open polo field (which had subsequently moved to the north of this area). The statement has been changed.
15. Executive Orders 11988 and 11990 have been addressed in Volume 1 of the FEIS. A wetland finding and a floodplain finding indicating there are no practicable alternatives are included in that document.
16. Section 4.14 has been modified to more fully address floodplain development in the St. Louis area.
17. See Response 6. to USEPA letter of 8/1/90.
18. While it is agreed that the Page Avenue Extension would not be a transportation panacea, it would provide tremendous relief to the traffic crossing the Missouri River. In that light, the proposed Earth City Expressway Extension, which will handle north-south traffic movements within St. Louis County rather than river crossings, is neither required nor needed for the success of Page Avenue to relieve the congestion of the other bridge crossings.
19. Table 2.4-4 has not been changed. The TSM alternatives address the possible level of service improvements for the projected ADT. The mass transit improvement potential along the I-70 corridor would divert approximately 2,800 vehicles during peak flow and not change the deteriorating level of service.

20. River productivity in terms of aquatic plants and animals is relative. Relative to other large midwestern rivers, such as the Illinois, the Ohio and the Mississippi, the Missouri, even in its pre-channelized state, has never been "productive" in this sense. The text section has been expanded to indicate that this is the context of the "productivity" statement.
21. The paragraph is part of the "Vegetation/Habitat" section. Quality of the wetlands is presented in terms of vegetative composition, which is not, in this case, a "value judgment" since it is supported by quantitative data. In other sections, quality of wetlands is described in terms of their current vegetative soils and hydrologic condition as well as their relationship to surrounding lands.
22. An "agricultural weed community", referred to in the cited paragraph, is quite different in vegetative composition from a "wetland community" in terms of vegetative composition, although they may share floral elements.
23. The hydrological requirements have been restated in terms of days (21 days = 3 weeks).
24. Construction of the Page Avenue Extension, by itself, will not induce development because there is no flood protection available. Other floodplain development in already protected areas is being actively pursued in Chesterfield Valley and will likely satisfy demand for the immediate future. There is little doubt that over the long term, development pressures would eventually be such that a levee will be constructed and development occur, with or without the Page Avenue Extension. Our statement has been modified to reflect this.
25. The analysis for considering lowering the Page Avenue Extension was completed in the context of indicating that while physically possible for only a 4,000' segment, the money saved on fill would not provide enough dollars for a levee to protect the roadway. In addition, there is also the statement that MHTD indicated that roadway funds for this project cannot be used for levee construction. The roadway would have to be built on fill, above the 100-year flood protection level.
26. See Response No. 24.

27. Though the area may have once been forested and the majority of the trees removed, the proposed action is not going through contiguous forested areas except adjacent to Creve Coeur Lake. The mitigation proposals as part of the mitigation plan required by Section 601 would dedicate a linear bikeway, grassed area and wetlands area adjacent to Page Avenue between Creve Coeur Mill Road and the agricultural levee.
28. The mitigation plan will add at least 600 acres of area in the floodplain as dedicated parkland, portions of which will retain important habitat characteristics for migratory waterfowl.
29. Page Avenue Extension would include an interchange with River Valley Drive leading to Creve Coeur Mill Road. The potential for an interchange with a built Earth City Expressway Extension is possible, but unlikely, in the near future (5 years) and uncertain within the long-term outlook because no funds exist and the sales tax issue that was to provide funds for construction of the Earth City Expressway was voted down.
30. Section 4.14 has been revised to indicate possible impacts from the construction of the Earth City Expressway. The Page Avenue Extension project area limits were established by the major routes of I-70, I-270, Olive Street Road and Route 40/61, all of which provide definitive geographical and demographic barriers within which to evaluate the impacts of the project. It is outside the scope of this study to assess the impacts of the entire network of highways in the St. Charles area and the St. Louis metropolitan area. That would be better accomplished as an environmental evaluation of the regional transportation plan.
31. Sand and gravel operations and limestone quarries currently operate in the project area. Both shale and coal are indicated in subsurface geological layers, but no current operations extract them. No adverse impacts on these operations are anticipated to result from the proposed project. Limestone aggregate, sand and gravel will most probably be procured locally, enhancing operations that provide such materials.
32. The wetlands identified as being impacted are those that are in the right-of-way, which meet the 1987 wetlands determination criteria for hydric soils, vegetation and hydrology.

Asst. Dir. Eng-4.0
 Asst. Dir. Eng-Op
 Utilities
 Fed. Aid
 Plans Eng
 Plans G-1
 Plans G-2
 Plans G-3
 Plans G-4
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 Plans G-19
 Plans G-20

GSW
 DE
 MK

October 23, 1992

Mr. Don H. Castleberry, Regional Director
 United States Department of the Interior
 1709 Jackson Street
 Omaha, NE 68102-2571

Dear Mr. Castleberry:

Subject: Page Avenue Extension
 St. Louis-St. Charles Counties
 Project 6-U-803

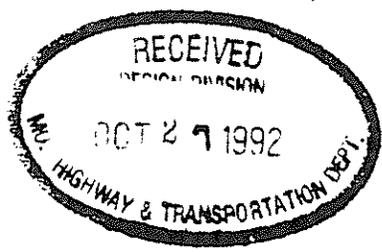
We have received your October 20, 1992 letter requesting to be a cooperating agency for the final stages of the EIS process. We would be happy to have your agency in that capacity for this project so that Section 6(f)(3) matters can be successfully concluded.

Sincerely yours,

R. G. ANDERSON
 Gerald J. Reihsen, P.E.
 Division Administrator

cc: MHTD Design

- CHIEF ENGR
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- FISCAL
- IRAD
- LEGAL
- M&T
- M&R
- PLANNING
- RAW
- TRANSP
-





United States Department of the Interior



NATIONAL PARK SERVICE

Midwest Region
1700 Jackson Street
Omaha, Nebraska 68102-2571

SEE EMPLOYER'S FILE

29-00292, 00478, 01146 (MWR-RW)

OCT 29 1982

Mr. Gerald J. Reihsen
Division Administrator
Federal Highway Administration
P.O. Box 1787
Jefferson City, Missouri 65102

Dear Mr. Reihsen:

The National Park Service (NPS) Midwest Regional Office, as Federal administrator of the Land and Water Conservation Fund (LWCF) program in Missouri, has an inherent interest in the proposed Page Avenue Extension road project in St. Louis, Missouri. As we have indicated in previous comments and correspondence with the taking of land anticipated to occur if the route through Creve Coeur Park becomes a reality, Section 6(f)(3) of the LWCF Act of 1965 (Act), as amended, must be appropriately addressed. The information required to address Section 6(f)(3) should be incorporated in the final Environmental Impact Statement (EIS) for the above highway project.

With measures recently enacted to legislatively resolve the Section 4(f) issue, this Office is now able to actively and expeditiously review Section 6(f)(3) considerations as required by the Act. We are, therefore, requesting that the NPS Midwest Regional Office be approved for designation as a cooperating agency. As a cooperating agency we would hope to participate in the final stages of the EIS process and to encourage the incorporation of necessary documentation for a successful evaluation of Section 6(f)(3).

We would appreciate your consideration of this request and look forward to a favorable response. If you require additional information, please feel free to contact Clay McBarrett of my staff at 402-321-3203.

Sincerely,

Don H. Castleberry
Regional Director



JOHN ASHCROFT
Governor

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Chief Council
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Sent 10-26
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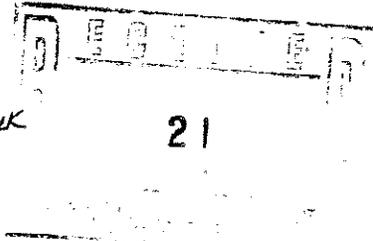
RON KUCERA
Acting Director

W
M

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF PARKS, RECREATION, AND HISTORIC PRESERVATION
P.O. Box 176 Jefferson City, MO 65102 314-751-2479

October 20, 1992

- Asst. Dir. Engr-L&D
- Asst. Dir. Engr-Oper
- Parks
- Fed. Ad.
- Recon. Engr.
- Photo Engr.
- CME
- Design Engr.
- Admin Engr.
- Public Aff. Engr.
- State Historic Coord.
- CADD Engr.
- Value Engr.
- Office Mgt.
- File



Mr. Don H. Castleberry
Regional Director
National Park Service
Midwest Region
1709 Jackson Street
Omaha, Nebraska 68102-2571

Re: Request for Conversion
Creve Coeur Park - St. Louis County
LWCF Projects 29-00292, 29-00478, 29-01146

Dear Mr. Castleberry:

Congress recently passed legislation, S.1583 - Pipeline Safety Act, that authorizes the Secretary of Transportation to waive the requirements of section 4(f) of the Department of Transportation Act after certain requirements are met. Since it is anticipated that the President will sign that legislation, we hereby give notice that the state of Missouri is initiating the Land and Water Conservation Fund Act 6(f) conversion process on the above project.

As you know, the Missouri Highway and Transportation Department plans to construct a ten lane bridge across Creve Coeur Park in St. Louis County within the Land and Water Conservation Fund (LWCF) project boundary as a part of the Page Avenue extension project. Actual construction will directly impact approximately forty acres of park land. Other impacts will include visual, noise, and potential environmental intrusions.

A 6(f) boundary map and appraisals for both the converted and the replacement lands will be submitted when completed. In addition, the state will provide adequate replacement lands, appraisals, and 6(f) boundary maps for any park lands which the National Park Service subsequently determines to be converted as a result of construction and operation of the proposed project through the environmental impact process.



Mr. Don H. Castleberry
October 20, 1992
Page 2

Please feel free to contact me at the above address if you have questions.

Very truly yours,



William Palmer
Deputy State Liaison Officer and
Director, Division of Parks,
Recreation, and Historic Preservation

Enclosure

WP:sl

cc: ✓ Mr. Wayne Muri, Chief Engineer, Missouri Department of Highway
and Transportation, P.O. Box 270, Jefferson City, MO 65102-0270

Mr. George Westfall, County Executive, St. Louis County,
41 South Central Avenue, Clayton, MO 63105

Mr. Clay McDermeit, Chief, Western Heartlands Division,
Recreation Assistance Programs, National Park Service,
1709 Jackson Street, Omaha, NE 68102-2571



MISSOURI HIGHWAY AND TRANSPORTATION DEPARTMENT

DESIGN FILE COPY
Wayne Muri
Chief Engineer

Capitol Ave. at Jefferson St., P.O. Box 270, Jefferson City, MO 65102 (314) 751-2551 Fax (314) 751-6555

October 16, 1992

Mr. Don H. Castleberry
Regional Director
U.S. Department of the Interior
National Park Service
Midwest Region
1709 Jackson Street
Omaha, NB 68102-2571

ATTENTION: Mr. Clay McDermeit

Dear Mr. Castleberry:

Subject: Route D, St. Charles and St. Louis Counties, Page
Avenue Extension, Job No. J6U0803, Preliminary
Final Environmental Impact Statement

Enclosed is a copy of the preliminary Final Environmental Impact Statement (FEIS) for the Page Avenue Extension. Six additional copies were sent to the Department of the Interior, Office of Environmental Affairs in Washington, D.C., and one copy to the U.S. Fish and Wildlife Service, Columbia field office. This document is preliminary in its present form, and the volumes will be combined and polished later for formal submittal to the Federal Highway Administration for approval and then public circulation. We are sending it to you for comment as indicated at the interagency meetings held on August 28 and October 30, 1991 with you or members of your staff.

At those meetings, we agreed to circulate copies of the preliminary FEIS for your review to ascertain if we have addressed the issues you discussed. We are on a tight timeframe for this project, so we would like to have your comments by **November 2, 1992**. Comments will be addressed in the FEIS. We understand that agency officials in the Washington, D.C. offices have been apprised of the priority of this matter.

Legislation has recently been enacted by the U.S. Congress that authorizes the Secretary of Transportation to waive requirements of Section 4(f) of the Department of Transportation (DOT) Act of 1966 (Section 138 of Title 23 U.S.C. and Section 303 of Title 49 U.S.C.) as it applies to the proposed Page Avenue Extension. The congressional

Mr. Don H. Castleberry
Page 2
October 16, 1992

action has brought this project back to the forefront. Although the legislation has not been signed into law by the President, we expect this to occur soon. A copy of the legislation is enclosed with your copy of the preliminary FEIS.

We have worked to address your comments on the Draft Environmental Impact Statement (DEIS) and also the issues raised at all interagency meetings into this preliminary FEIS. The formal FEIS will be prepared and submitted to the Federal Highway Administration later this year.

This preliminary document is an intergovernmental exchange that may be withheld under the FOIA request. Premature release of this material to any segment of the public could give some sectors an unfair advantage and would have a chilling effect on intergovernmental coordination. For these reasons, we respectfully request that the public not be given access to this document.

Also enclosed is previous correspondence relating to a request for the U.S. Department of the Interior to be a cooperating agency on the proposed action. Given recent developments, we again request that your agency become a cooperating agency for the proposed action.

Thank you for your interest and attention to this matter. We look forward to a reply regarding your involvement as a cooperating agency.

Sincerely yours,



Bob Sfreddo
Division Engineer, Design

mk/pr

Enclosures

Copy: Mr. Gerald Reihsen-FHWA



United States Department of the Interior



NATIONAL PARK SERVICE

Midwest Region

1709 Jackson Street

Omaha, Nebraska 68102-2571

IN REPLY REFER TO:

29-00292, 00478, 01146(MWR-RW)

JAN 30 1992

Mr. Bob Sfreddo
Division Engineer, Design
Missouri Highway and
Transportation Department
Capitol Avenue at Jefferson Street
P.O. Box 270
Jefferson City, Missouri 65102

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 Ast Div Engr - L & D
 Ast Div Engr - Oper
 Design Engr
 Liaison Engr
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Dear Mr. Sfreddo:

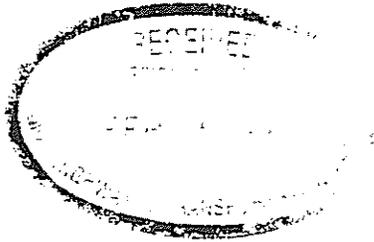
We are in receipt of your recent letter regarding the proposed Page Avenue Extension project in St. Louis and related Environmental Impact Statement (EIS). We appreciate your offer of allowing us the use of your environmental documentation for our National Environmental Policy Act (NEPA) clearances and invitation to become a cooperating agency for the final EIS.

It is our understanding that the consideration for becoming a cooperating agency for the NEPA process can only occur by either the request of the lead Federal agency or by our request with approval by the lead Federal agency. We also note that NEPA, throughout its guidelines, recommends that the cooperating agency participate in the process at the earliest possible timeframe. Although we have been given the opportunity to review and comment on various drafts, it would be difficult to categorize that as "participation in the process." Finally, it would seem that since the final EIS is anticipated early this year, our position should remain as a review agency contributing to the identification of environmental concerns and not one of a cooperating agency in this NEPA process.

Thank you for the above offer and for advising us on the status of the Page Avenue Extension final EIS. We look forward to further coordination with your office during the final stages of this project.

Sincerely,


Kenneth R. Compton
Assistant Regional Director,
Recreation Assistance Programs



cc:
Mr. Gerald Reihsen, Federal Highway Administration,
Missouri Highway and Transportation Department,
Capitol Avenue at Jefferson Street, P.O. Box 270,
Jefferson City, Missouri 65102



17 WLN



MISSOURI HIGHWAY AND TRANSPORTATION DEPARTMENT

Wayne Muri
Chief Engineer

Capitol Ave. at Jefferson St., P.O. Box 270, Jefferson City, MO 65102 (314) 751-2551 Fax (314) 751-6555

January 13, 1992

Mr. Don Castleberry
Regional Director
Midwest Regional Office
National Park Service
1709 Jackson Street
Omaha, NB 68102

Dear Mr. Castleberry:

SUBJECT: Route D, St. Charles and St. Louis Counties
Page Avenue Extension, Cooperating Agency Request

As you know, our department is proceeding with the preparation of a Final Environmental Impact Statement (FEIS) for the proposed Page Avenue Extension in the St. Louis area. We anticipate that the FEIS will be submitted to the Federal Highway Administration (FHWA) early this year.

Because our preferred alternative, the Red Line, crosses Creve Coeur Lake Memorial Park in which Land and Water Conservation Fund (LWCF) Act monies have been invested, your agency has involvement in this process. We have been coordinating with members of your staff on this matter, and we appreciate their input and cooperation.

I am writing to ask if you wish to use our environmental documentation for the Page Avenue Extension for the purposes of any National Environmental Policy Act (NEPA) clearances your agency might have. If you adopt our FEIS to accommodate your NEPA requirements, we are asking you if you wish to become a cooperating agency for the FEIS.

Please let us know of your position in this matter. We look forward to your reply.

Sincerely,

Bob Sfredo
Division Engineer, Design

mk/pr

Copies: Mr. Gerald Reihsen-FHWA
Mr. J. T. Yarnell-6



MISSOURI HIGHWAY AND
TRANSPORTATION DEPARTMENT

Wayne Muri
Chief Engineer

Capitol Ave. at Jefferson St., P.O. Box 270, Jefferson City, MO 65102 (314) 751-2551 Fax (314) 751-6555

October 2, 1991

Mr. Don H. Castleberry
Regional Director
Midwest Regional Office
National Park Service
1709 Jackson Street
Omaha, Nebraska 68102

Dear Mr. Castleberry:

Subject: Route D, St. Charles and St. Louis Counties, Page
Avenue Extension, Job No. 6-U-803, Agency Coordination,
Final EIS

Enclosed is a preliminary copy of the Final Environmental Impact Statement (FEIS) for the subject project. This is being provided to you in advance of the meeting scheduled at the Federal Highway Administration (FHWA) Regional Office at 6301 Rockhill Road, Kansas City at 3:00 P.M. on October 30.

The FHWA has determined that this preliminary document is an intergovernmental exchange that may be withheld under the FOIA request. Premature release of this material to any segment of the public could give some sectors an unfair advantage and would have a chilling effect on intergovernmental coordination and the success of cooperating agency concept. For these reasons, we respectfully request that the public not be given access to this document.

I look forward to seeing you at the meeting.

Sincerely yours,

Wayne Muri
Chief Engineer

wm/mk/vm-de

Copy: Mr. Gerald Reihsen

Enclosures



DEPARTMENT OF THE ARMY
KANSAS CITY DISTRICT, CORPS OF ENGINEERS
700 FEDERAL BUILDING
KANSAS CITY, MISSOURI 64108-2896

November 17, 1992

REPLY TO
ATTENTION OF:

Project Evaluation Section

Mr. Bob Sfreddo
Division Engineer
Design Division
P.O. Box 270
Jefferson City, Missouri 65102

Dear Mr. Sfreddo:

We are responding to your November 17, 1992, letter requesting concurrence with your consultant's preliminary wetland map being prepared for the Final Environmental Impact Statement on Page Avenue extension.

As you noted, our field investigators, Messrs. Jim Ptacek and Duane Mitchell, have worked closely with your consultant to verify the field work. Also, Mr. Joe Hughes, of this office, reviewed the wetland map with the field investigators and your consultant on November 14, 1992, at the consultant's office in St. Louis. At the conclusion of that review, all parties present agreed that the maps represented the official jurisdiction of the Corps of Engineers regulatory program in accordance with Section 404 of the Clean Water Act (33 USC 1344). This letter will confirm that determination by Messrs. Hughes, Ptacek and Mitchell, which is contingent on the following:

a. The information prepared by your consultant and reviewed by Mr. Hughes is true and accurate. Kansas City District personnel did not verify all sample locations or survey the entire route corridor.

b. The map is not altered from what we reviewed and is reproduced as agreed upon.

c. You furnish documentation to us to justify the delineation map and each individual determination. Adequate documentation must include:

- (1) Aerial and ground photographs properly labelled; topographic, soil survey, Food Security Act inventory, National Wetland Inventory and other maps used by your consultant.

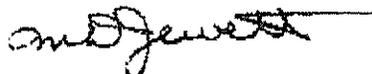
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- (2) Corrected sampling data sheets. (Messrs. Ptacek and Hughes outlined several corrections that must be made.)
- (3) A thorough summary/transmittal memorandum describing the site, the methods, the assumptions on which determinations were made and specific site characteristics.
- (4) Full size strip maps and report size (exact duplicate) delineation maps.

d. Mr. Hughes informed your consultant that they must check further with the Soil conservation Service (SCS) regarding the former "farmed wetland" area on Mr. Stolte's land just west of Creve Coeur Lake Park. We need to know the SCS's reasons for changing its designation on this area from "FW" to "PC." Since we have delineated this area as jurisdictional wetland, we will attempt to reconcile this difference with SCS before notifying our headquarters of the lack of agreement of our determinations.

We trust this letter will serve your purposes. If you have any questions, please write to me or call Mr. Joe Hughes on 816-426-5357.

Sincerely your,



M. D. Jewett
Chief, Regulatory Branch
Operations Division

Copy Furnished:

Mr. Gerald Reihsen, FHWA



MISSOURI HIGHWAY AND TRANSPORTATION DEPARTMENT

Wayne Muri
Chief Engineer

Capitol Ave. at Jefferson St., P.O. Box 270, Jefferson City, MO 65102 (314) 751-2551 Fax (314) 751-6555

November 17, 1992

Colonel Wilbur H. Boutin, Jr.
Commanding Officer
U. S. Army Corps of Engineers
Kansas City District
700 Federal Office Building
601 East 12th Street
Kansas City, Missouri 64106

Dear Colonel Boutin:

Subject: Route D, St. Charles and St. Louis Counties, Page
Avenue Extension, Job No. J6U0803, Jurisdictional
Wetlands Determination

Your district and Jefferson City offices' staffs have been working closely with our consultants in assessing jurisdictional wetland impacts relating to the Page Avenue Extension. Now that the consultant's field work has been completed and verified by your staff, we request your concurrence in their assessment of project related wetland impacts.

We wish to thank you and your staff for the high level of effort and assistance provided as a cooperating agency in this matter.

Sincerely yours,

A handwritten signature in cursive script that reads "Bob Sfreddo".

Bob Sfreddo
Division Engineer, Design

bg/pr

Copy: Mr. Gerald Reihsen-FHWA



DEPARTMENT OF THE ARMY
 KANSAS CITY DISTRICT, CORPS OF ENGINEERS
 700 FEDERAL BUILDING
 KANSAS CITY, MISSOURI 64106-2896

REPLY TO
 ATTENTION OF:

November 9, 1992

Environmental Resources Branch
 Planning Division

- | | |
|---------------------------------------------------------|-------------------------------------------|
| <input checked="" type="checkbox"/> Asst. Dir. Eng-LE | <input type="checkbox"/> Liaison Eng. |
| <input checked="" type="checkbox"/> Asst. Dir. Eng-Oper | <input type="checkbox"/> Spec. Asst. Eng. |
| <input type="checkbox"/> Chief | <input type="checkbox"/> Civ. Engrs. Div. |
| <input type="checkbox"/> Dist. Ad. | <input type="checkbox"/> CADD Eng. |
| <input type="checkbox"/> Resour. Eng. | <input type="checkbox"/> Value Eng. |
| <input type="checkbox"/> Photo Eng. | <input type="checkbox"/> [Redacted] |
| <input type="checkbox"/> [Redacted] | <input type="checkbox"/> [Redacted] |

YMK

Mr. Bob Sfreddo
 Division Engineer, Design
 Missouri Highway and
 Transportation Department
 P.O. Box 270
 Jefferson City, Missouri 65102

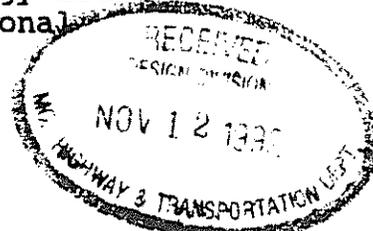
Dear Mr. Sfreddo:

The Kansas City District, Corps of Engineers (KCD), has completed its review of the Preliminary Final Environmental Impact Statement II (PFEIS2), for the proposed Page Avenue Extension Project, St. Charles and St. Louis Counties, Missouri. Dated February 1992, the PFEIS2 for the Missouri Highway and Transportation Department's (MHTD) Page Avenue Project was provided to KCD by letter dated October 16, 1992. As MHTD is under a tight timeframe and requested comments be returned by November 2, 1992, KCD's review has been concentrated on our regulatory and flood plain responsibilities. KCD appreciates the opportunity to review the PFEIS2 and offers the following comments in accordance with our responsibilities as a Cooperating Agency.

REGULATORY

1. a. In order to allow an accurate comparison of impacts, wetlands which are described in the Final EIS should be determined using the same method for each alternative. The methods used to determine wetlands should be described in the initial discussion of these sections. For the Section 404 public interest review, the areas should be evaluated using the 1987 Corps of Engineers Wetlands Delineation Manual. If wetlands are to be evaluated for quality or function and value, the method used should be described.

b. The term "farmed wetland" in the PFEIS2 refers to the Soil Conservation Service's (SCS) classification of an area. These areas were generally developed by SCS using the hydric soils map and available hydrology data. These areas do not always equate with jurisdictional



2 | wetlands under Section 404 of the Clean Water Act. An area designated as "farmed wetland" by the SCS may also be considered a jurisdictional wetland under 404. It is possible however, that only a portion of the overall "farmed wetland" area meets the three-parameter criteria described in the 1987 Corps of Engineers Wetland Delineation Manual. If the 404 criteria are used to describe existing wetlands, all areas listed as cropland, pasture and hayland, and described as "farmed wetland," should be investigated to determine if they include jurisdictional wetlands. The acreage of affected wetlands on Tables 3.5-2 and 4.12-1 should be modified, by alternative, to indicate the acreage of jurisdictional wetlands identified by such an investigation. The acreages of cropland and pasture-hayland should be adjusted accordingly.

c. Areas determined to be "prior converted" by the SCS are generally considered to be non-wetland under 404 unless field investigation would determine an obvious omission.

3 | d. In Sections 3.6.1 and 4.12.1, impacts are reported for emergent wetlands on the Red Alignment. However, no acreages are provided in Tables 3.5-2 or 4.12-1. The acreage of emergent wetlands affected by the Red Alignment should be presented in both Tables, with total wetland acreages adjusted accordingly.

4 | e. As noted in Section 3.6.7, areas mapped as non-hydric soil may still have inclusions of hydric soil that were either too small to map or which may have developed recently. If these areas exhibit hydric soil indicators, they meet the hydric soil criteria for a 404 jurisdictional determination. This should be noted here, and most importantly, at the end of the first paragraph in Section 3.6.1.

5 | f. If wetland plants occur in the area described in Section 3.6.1, paragraph 2, it is possible that saturation is present. In addition, map unit #40, Eudora Silt Loam, is not a hydric soil, only the Blake inclusions. This should be clarified and stated in EIS.

6 | g. Ponds are noted for several of the alignments. If wetlands are described using criteria for jurisdictional wetlands under Section 404 of the Clean Water Act, ponds that have developed a fringe wetland should have the area supporting wetland vegetation quantified and included in the description of wetland impacts.

7 | h. The extent of jurisdictional wetlands in the Dardenne Creek bottoms will be determined using field verification of the extent of wetland plants and hydrologic evidence, including SCS aerial slides, Federal Emergency Management Act (FEMA) flood study information, and field indicators. The hydrological information, together with the field verification, will be used to determine the extent of the area that meets the hydric soil criteria. KCD will coordinate with the St. Louis District's Regulatory Branch to address their comments and concerns concerning wetlands in the Dardenne Creek bottoms. The extent of flooding observed on the aerial photos should be noted in Section 4.12.2, paragraph 3. This section should also include a soils description, as observed in the field.

8 | i. In regard to statements in Section 4.12.4, KCD reiterates that, while the 1987 Corps of Engineers Wetland Delineation Manual is used to determine the extent of jurisdictional wetlands, **it can not be used to evaluate the quality or functions of wetlands.**

9 | j. It should be noted on page 4-78, in the description of Site B in Section 4.12.7, that Waldron Silty Clay is hydric when frequently flooded for long durations, i.e., 7-14 days. The last sentence in the Site C description should also be rewritten to state that all of the soils are classified as hydric when certain hydrological conditions are met, as indicated by the SCS Hydric Soils of the United States.

10 | k. As noted in the last paragraph on page 4-85, more detailed information on the proposed mitigation sites will be required. This information should include a jurisdictional determination of the mitigation areas, using the 1987 Corps of Engineers Wetland Delineation Manual.

l. KCD's Regulatory Branch is currently coordinating with MHTD and your consultant, Booker Associates, Inc., (Booker) to develop further information on wetland impacts and mitigation that will address some of these comments. KCD expects this additional information to be incorporated into the Final EIS.

m. Questions or requests for information regarding wetlands should be directed to Mr. David Hoover in KCD's Regulatory Branch, at telephone number (816) 426-5047.

Because of the short review period, KCD has limited its flood plains review to the PFEIS2's discussion of Flood Plain Impacts in Section 4.14.

FLOOD PLAINS

11 a. As part of KCD's review and coordination of the first PFEIS, during a January 31, 1992, conference call with Mr. Mike Brynac of Booker, KCD had agreed that a hydraulic analysis would not be required in the Final EIS if the Final EIS included the following comments:

(1) future activity concerning the proposed Page Avenue Extension will be coordinated through KCD's Flood Plain Management Services Branch;

12 (2) the Final EIS must include a more detailed and accurate discussion of the effects of all existing and proposed downstream encroachments which are affecting or will affect the designated Missouri River floodway at the proposed bridge site; and,

13 (3) the Final EIS must also include a statement that all governmental regulations regarding the Missouri River floodway and navigation requirements will be followed in the design of the adopted crossing location.

b. Statements and commitments made in Section 4.14.1 of this PFEIS2 appear to satisfy KCD's previous concerns regarding Booker's misinterpretation of the quantity of allowable effect still remaining for floodway encroachments in this reach of the Missouri River. The PFEIS2 now states that the Page Avenue Extension will be designed such that there will be no increase in the base flood elevation within the floodway, and that any increase in flood elevation in the floodway fringe will not exceed the FEMA regulatory limits.

c. KCD recommends however, that the Final EIS include the following specifics regarding the present floodway encroachments at Missouri River mile 33.0:

14 Present floodway encroachments at Missouri River mile 33.0 show only a 0.4-foot difference between the elevations of the natural 100-year-frequency flood and FEMA's regulatory floodway. Existing and proposed developments downstream of river mile 33.0 cause another 0.3-foot increase in the 100-year-frequency flood

14 elevation. As a result, the Page Avenue Extension has an available encroachment of, and can cause no more than, a 0.1-foot increase in the 100-year computed water surface profile.

15 d. In the PFEIS2, MHTD has made the commitments to: (1) construct the proposed Page Avenue Extension in a manner which does not increase the base flood elevation in the floodway and which does not exceed regulatory limits in the base flood elevation in the floodway fringe; (2) conduct a detailed hydraulic analysis of the flows and water surface elevations with KCD and FEMA during early design stages; (3) contact KCD's Flood Plain Management Services Branch regarding the cumulative effects of previous downstream construction on the FEMA regulatory floodway; and, (4) use the Missouri River Step Backwater and the HEC-2 computer programs. With these commitments, Booker and MHTD have satisfactorily incorporated KCD's August 9, 1990, comments on the Draft EIS into this PFEIS2.

If you have any questions or need additional information regarding these comments, please contact my staff member, Mr. Martin Schuettpelz, in Planning Division, at telephone number (816) 426-5063.

Sincerely,


Wilbur H. Boutin, Jr.
Colonel, Corps of Engineers
District Engineer

RESPONSE TO COMMENTS

U. S. Army Corps of Engineers, Kansas City District - Letter of November 9, 1992

1. Information describing the wetland studies which are the basis of the comparisons among corridors has been added to the EIS. These studies consisted of: (1) review of existing data (FWS NWI maps, USGS topographic maps, SCS mapping and hydric soils lists, and SCS historic aerial photos); (2) "walk-over" surveys during which vegetation was recorded and classified in terms of its "indicator status" in accordance with the 1987 Corps of Engineers Manual and "Wetland Delineation" forms from the same Manual were completed. Soils information was obtained only from SCS mapping. More detailed wetland studies were performed for the Red Alignment once right-of-way and preliminary intersection design studies had been completed. Other than classification of wetland types, no "function and value" studies have been completed.
2. The modification proposed was performed during 1991 updates of the 1989 studies.
3. Noted and changes made accordingly.
4. Noted and changes made accordingly.
5. Noted and changes made accordingly.
6. The changes suggested were made in the more detailed studies of the Red Alignment. They were not made in the "corridor level" studies. However, the remainder of the deep water habitat included in the 1989 studies (Creve Coeur Lake and Missouri River), which makes up most of the "open water" category, has been eliminated from wetland calculations. The remaining acreage in question is, thus, small and does not affect the corridor comparisons.
7. This was performed during the November 1992 studies.
8. Agreed.

9. This section has been deleted from the EIS.
10. This information was gathered in the November 1992 studies and will be included in subsequent planning for mitigation. As noted during the studies, some of the area involved is in question regarding its status (i.e., "prior converted" vs. "farmed wetland"). This issue must be resolved through coordination between KCD and USDA/SCS.
11. The commitment for further coordination between MHTD and KCD for the hydraulic analysis during the design phase of the project is noted in the FEIS.
12. Comment No. 14 has been included in Section 4.14 and identifies the effect of existing and proposed encroachments.
13. This statement has been included in the FEIS, Executive Summary, and in Section 4.11.
14. The specified statement has been added to Section 4.14.
15. MHTD will fulfill the stated commitments.



MISSOURI HIGHWAY AND
TRANSPORTATION DEPARTMENT

Wayne Muri
Chief Engineer

Capitol Ave. at Jefferson St. P.O. Box 270, Jefferson City, MO 65102 (314) 751-2551 Fax (314) 751-6555

October 16, 1992

Colonel Wilbur H. Boutin, Jr.
U.S. Army Corps of Engineers
Kansas City District
700 Federal Office Building
601 East 12th Street
Kansas City, Missouri 64106

ATTENTION: Mr. Joe Hughes

Dear Colonel Boutin:

Subject: Route D, St. Charles and St. Louis Counties, Page
Avenue Extension, Job No. J6U0803, Preliminary
Final Environmental Impact Statement

Enclosed is a copy of the preliminary Final Environmental Impact Statement (FEIS) for the Page Avenue Extension. This document is preliminary in its present form, and the volumes will be combined and polished later for formal submittal to the Federal Highway Administration and then public circulation. We are sending it to you for comment as indicated at the interagency meetings held on October 30 and December 10, 1991 with you or members of your staff.

At those meetings, we agreed to circulate copies of the preliminary FEIS for your review to ascertain if we have addressed the issues you discussed. We are on a tight timeframe for this project, so we would like to have your comments by **November 2, 1992**. Comments will be addressed in the FEIS. We understand that agency officials in the Washington, D.C. offices have been apprised of the priority of this matter.

Legislation has recently been enacted by the U.S. Congress that authorizes the Secretary of Transportation to waive requirements of Section 4(f) of the Department of Transportation (DOT) Act of 1966 (Section 138 of Title 23 U.S.C. and Section 303 of Title 49 U.S.C.) as it applies to the proposed Page Avenue Extension. The congressional action has brought this project back to the forefront. Although the legislation has not been signed into law by the President, we expect this to occur soon. A copy of the legislation is enclosed with your copy of the preliminary FEIS.

Colonel Wilbur H. Boutin, Jr.

Page 2

October 16, 1992

We have worked to address your comments on the Draft Environmental Impact Statement (DEIS) and also the issues raised at those interagency meetings into this preliminary FEIS. The formal FEIS will be prepared and submitted to the Federal Highway Administration later this year.

This preliminary document is an intergovernmental exchange that may be withheld under the FOIA request. Premature release of this material to any segment of the public could give some sectors an unfair advantage and would have a chilling effect on intergovernmental coordination. For these reasons, we respectfully request that the public not be given access to this document.

Thank you for your interest and attention to this matter.

Sincerely yours,



Bob Sfreddo
Division Engineer, Design

mk/pr

Enclosures

Copy: Mr. Gerald Reihsen-FHWA



MISSOURI HIGHWAY AND TRANSPORTATION DEPARTMENT

Wayne Muri
Chief Engineer

Capitol Ave. at Jefferson St., P.O. Box 270, Jefferson City, MO 65102 (314) 751-2551 Fax (314) 751-6555

November 21, 1991

Mr. Dave Hoover
Department of the Army
Kansas City District Corps of Engineers
700 Federal Building
601 East 12th Street
Kansas City, MO 64106-2896

Attention: OD-PE

Dear Mr. Hoover:

Subject: Route D, St. Charles-St. Louis Counties,
Job No. 6-U-803, Page Avenue Extension

As requested from Mark Kross, we have enclosed copies of environmental materials regarding the Page Avenue Extension. These include the following:

1. Wetland and plant community technical report.

This is the technical report completed at the Draft Environmental Impact Statement (DEIS) stage. It will be modified for the Final EIS (FEIS) and after further coordination with the COE and other appropriate agencies.

2. The comment letter on the DEIS by the Federal Emergency Management Agency (FEMA).

The FEMA letter was inadvertently omitted from the preliminary FEIS sent to you in October. Comment #2 of the FEMA letter contradicts Comment #1. Comment #2 reads that an increase in the Base Flood Elevation "is not allowable under the National Flood Insurance Program Regulations." Comment #1 reads "the Base Flood . . . may be conveyed without causing more than [sic] a one-foot increase to the Base Flood Elevation." The proposed action will have bridges spanning the regulatory floodway with only piers placed within those floodways. The increase in the Base Flood Elevation will be negligible, on the order of a 0.1 foot increase. For this particular reach of the Missouri River, the indicated allowable increase ranges from 0.4 foot to 0.6 foot.

Mr. Dave Hoover
Page 2
November 21, 1991

3. The cultural resource overview.

The cultural resource overview addresses previous cultural resource studies in the area and the anticipated cultural resources within the project area. We are completing our field surveys of the alternate alignments in the St. Louis and St. Charles Counties now. The latest compilation of the survey results is attached for your information. It will be updated as the field work is completed this fall. To date, no historic architectural property subject to Section 4(f) has been identified. Also, especially in St. Charles County, the Green Line and its variants currently have a greater density of impacted archaeological properties than the Red Line.

We are working to arrange a meeting early in December with field and technical personnel of your staff and FEMA to address issues discussed in the interagency meeting on October 30. We shall be contacting respective agencies soon about this matter.

If you have any questions about any issues, please contact Mark Kross, Environmental Studies Coordinator, at (314) 751-4606.

Sincerely yours,


Bob Sfreddo
Division Engineer, Design

mk/pr

Enclosures



MISSOURI HIGHWAY AND TRANSPORTATION DEPARTMENT

Wayne Muri
Chief Engineer

Capitol Ave. at Jefferson St., P.O. Box 270, Jefferson City, MO 65102 (314) 751-2551 Fax (314) 751-6555

October 2, 1991

Colonel Wilbur H. Boutin, Jr.
District Engineer
Kansas City District
U. S. Army Corps of Engineers
700 Federal Office Building
601 East 12th Street
Kansas City, Missouri 64106-2896

Dear Colonel Boutin:

Subject: Route D, St. Charles and St. Louis Counties, Page
Avenue Extension, Job No. 6-U-803, Agency Coordination,
Final EIS

Enclosed is a preliminary copy of the Final Environmental Impact Statement (FEIS) for the subject project. This is being provided to you in advance of the meeting scheduled at the Federal Highway Administration (FHWA) Regional Office at 6301 Rockhill Road, Kansas City at 3:00 P.M. on October 30.

The FHWA has determined that this preliminary document is an intergovernmental exchange that may be withheld under the FOIA request. Premature release of this material to any segment of the public could give some sectors an unfair advantage and would have a chilling effect on intergovernmental coordination and the success of cooperating agency concept. For these reasons, we respectfully request that the public not be given access to this document.

I look forward to seeing you at the meeting.

Sincerely yours,

Wayne Muri
Chief Engineer

wm/mk/vm-de

Copy: Mr. Gerald Reihsen

Enclosures

Sec. 2.4.1.4, page 2-16 (Page Ave. Extension-Red Alignment)

2 This Summary of the proposed Red Alignment ends with a general statement about reducing traffic volumes on the other Missouri River bridges. As the preferred alternative, the Red Alignment's summary paragraph should contain the same, if not more, of the specific information regarding reduction in traffic volumes at other bridges (Route 115, I-70, and Route 40/61), as found in Summaries of the other Alignments, e.g., para. 2.4.2.4.

Section 3.4, page 3-12 (WATER QUALITY)

3 The DEIS claims that "the (Missouri) river has never been productive in terms of the growth of aquatic plants and animals". This is an extremely broad as well as inaccurate statement. In a one-year study of the river's recreational usage, the lower reach of the Missouri River produced a total number of 136,399 fish, or 0.32 fish/hour of fishing ("Recreational Use Survey of Missouri River"; Fleener, George G., 1989; Missouri Department of Conservation). Approximately 70% of the fish species harvested were channel catfish, carp, buffalo, and freshwater drum. Fleener's study documents the Missouri River's current use and productivity.

Sec. 3.16.1, pgs. 3-64/65 (CULTURAL RES., Survey Rationale)

4 The DEIS indicates that "An Overview of the Cultural Resources . . ." was prepared as an appendix to the DEIS. This cultural resources overview however, is not included in the Appendices (Section 8) of the DEIS. If the cultural resources report was not intended for publication in the DEIS' Appendices Section, the Final EIS should provide the reader with the document's location and availability.

5 Two references to "Holt 1987" are found on page 3-65. However, there is no Reference List for this Section and no other identification of the reference source. The Holt reference should be identified at either this location in the text or in a Reference List for the entire Section.

Sec. 4-12, pages 4-76 to 4-80 (HABITAT AND WETLAND IMPACTS)

The discussion concerning impacted wetlands appears to be incomplete. Tables 3.5-2 (Affected Environment) and 4.26-1 (Environmental Consequences) indicate that the Red Alignment will affect considerably more wetlands than the Green Alignment. However, the discussion in Section 4.12 states, "The total wetlands on the Green Alignment is slightly less or equal to the Red Alignment depending on how farmed wetlands are considered." The information presented on Tables 3.5-2 and 4.26-1 appears to conflict with the discussion in Section 4.12. Without quantitative information regarding the acreage of farmed wetlands which would be affected by the Red and Green Alignments, KCD cannot adequately evaluate potential impacts to wetlands.

6 The quantity of both farmed and non-farmed wetland acreage affected by the alternative alignments should be presented in the Final Environmental Impact Statement for the proposed Page Avenue Extension Project, particularly in this Section (HABITAT AND WETLAND IMPACTS) and on the Tables listed above.

FHWA and your agency should both be aware that, in accord with Section 404 of the Clean Water Act, a Public Notice would be issued and a public interest review would be conducted for any fill material placed into waters of the U.S., including wetlands. As a result of the public interest review and as mitigation for any wetlands destroyed by the proposed project, creation of new wetlands would probably be required at a 1:1 ratio.

Section 4.14.1.1, pages 4-82 to 4-84 (Effects of Page Ave. Extension on Missouri River Profiles, Red Alignment)

7 Discussion of KCD's ("KCCOE") hydrology/hydraulic analysis is technically inaccurate and incomplete. As an example, KCD did not use the conveyance delineated by the levee confinement for flows greater than the 10-year flood, except at selected locations. KCD also used varied conveyance widths for the 50-, 100-, and 500-year floods. Although these conveyances were available, it's not clear if they were used by Booker & Associates (B&A) during DEIS

preparation. KCD requests B&A recontact our Hydrology Branch prior to preparation of the Final EIS to clarify the hydraulic analysis and discussion.

The Federal Emergency Management Agency (FEMA) requires that the effect of all floodway encroachments not exceed one foot, i.e., the one foot of allowable encroachments is a cumulative number. In view of the fact that other floodway encroachments have already occurred downstream, only a portion of the one-foot of allowable effect for a 100-year flood still remains available for use by this and all other projects within the floodway.

8 The first full paragraph on page 4-84 claims there will only be a "small increase in the water surface elevations" for the 10, 50, and 100-year floods upstream of the proposed bridge on the Red Alignment. "Small" is a subjective term however, and the DEIS fails to provide the specific numbers or the water surface profiles necessary to quantify the term. In view of our previous comment, the Final EIS for the Page Avenue project should provide the specific increases and the water surface profiles. If the "small increase" exceeds the remaining part of the one foot total allowable, some adjustment in either the bridge opening or the floodway will be required.

The third from last paragraph in this Section discusses the proposed project's effect on the water surface elevation for the 500-year event upstream of the proposed bridge, i.e., increasing the 500-year profile by "nearly three feet". KCD disagrees with this paragraph's closing sentence. A three-foot rise in the 500-year flood's upstream water surface profile is not "minimal".

Section 4.14.1.3, pages 4-85 to 4-88 (FLOODPLAIN IMPACTS, Floodplain Development Potential)

The DEIS' comparison of the undeveloped potential of the Missouri River floodplain in St. Louis County to the existing Riverport and Earth City developments does not appear to recognize the FEMA floodway restrictions mentioned earlier. The Earth City levee, completed before

the Federal Flood Insurance program became effective in St. Louis County in September 1978, is grandfathered into the program. The Riverport development occupies a unique location, adjacent to and in the "shadow" of the Highway I-70 bridge approach fill. ~~the majority of the remaining Missouri River floodplain area cannot be protected by levees which afford any substantial degree of flood protection, due to the resulting increases in upstream water surface profiles.~~

Throughout the DEIS

- 9 | References to a "storm" are inappropriate. The correct terminology is a "flood" or a "flood event", together with the appropriate frequency, e.g., a "50-year flood event". The term "backwater" is also used inappropriately in the DEIS. Backwater computations evaluate discharges and provide water surface profiles for the peak flow of selected flood events. A higher, greater, or increased "water surface profile" would be the more correct terminology. Typographical errors discovered during our review are attached on a separate listing.
- 10 |

If you have any questions regarding these comments or require any additional information, please contact Mr. Martin R. Schuettepelz at telephone no. 816-426-5063. Thank you again for keeping KCD informed and providing us with an opportunity to review the DEIS for the Page Avenue Extension project. Please continue to keep us informed of future project developments.

Sincerely,


Wilbur H. Boutin, Jr.
Colonel, U.S. Army
District Engineer

Enclosure

RESPONSE TO COMMENTS

Kansas City District, Corps of Engineers - Letter of August 9, 1990

1. Section 4.23, Secondary Impacts, has been revised to indicate impacts from the Earth City Expressway Extension. Figures 2.1 through 2.10 have been modified to indicate the possible Earth City Expressway Extension.
2. Section 2.4.1.4 has been modified to parallel the other summaries.
3. See Missouri Department of Conservation Response No. 4 and United States Department of the Interior Response No. 11.
4. The overview is a separate Technical Report supporting document and available from MHTD, Jefferson City, Missouri.
5. Section 4.22.9 has been modified to include the Holt reference.
6. See Missouri Department of Natural Resources Response No. 3.
7. See Section 4.14. This section has been rewritten based on comments, using KCD methodology and discussions with KCD.
8. Section 4.14 now contains the quantified increase in numbers.
9. Wording has been changed per comments.
10. Typographical errors have been corrected.



MISSOURI HIGHWAY AND TRANSPORTATION DEPARTMENT

Wayne Muri
Chief Engineer

Capitol Ave. at Jefferson St., P.O. Box 270, Jefferson City, MO 65102 (314) 751-2551 Fax (314) 751-6555

October 16, 1992

Colonel Michael Brazier
U.S. Army Corps of Engineers
St. Louis District
1222 Spruce Street
St. Louis, Missouri 63103-2833

ATTENTION: Mr. Bill Groth

Dear Colonel Brazier:

Subject: Route D, St. Charles and St. Louis Counties, Page
Avenue Extension, Job No. J6U0803, Preliminary
Final Environmental Impact Statement

Enclosed is a copy of the preliminary Final Environmental Impact Statement (FEIS) for the Page Avenue Extension. This document is preliminary in its present form and the volumes will be combined and polished later for formal submittal to the Federal Highway Administration and then circulation. We are sending it to you for comment as indicated at interagency meetings held on August 28, October 30, December 10, and December 11, 1991.

At those meetings, we agreed to circulate copies of the preliminary FEIS for review to ascertain if we have addressed the issues that were discussed by various resource agencies. We are on a tight timeframe for this project, so we would like to have your comments by **November 2, 1992**. Comments will be addressed in the FEIS. We understand that agency officials in the Washington, D.C. offices have been apprised of the priority of this matter.

Legislation has recently been enacted by the U.S. Congress that authorizes the Secretary of Transportation to waive requirements of Section 4(f) of the Department of Transportation (DOT) Act of 1966 (Section 138 of Title 23 U.S.C. and Section 303 of Title 49 U.S.C.) as it applies to the proposed Page Avenue Extension. The congressional action has brought this project back to the forefront. Although the legislation has not been signed into law by the President, we expect this to occur soon. A copy of the legislation is enclosed with your copy of the preliminary FEIS.

Colonel Michael Brazier
Page 2
October 16, 1992

We have worked to address your comments on the Draft Environmental Impact Statement (DEIS) and also the issues raised at all interagency meetings into this preliminary FEIS. The formal FEIS will be prepared and submitted to the Federal Highway Administration later this year.

This preliminary document is an intergovernmental exchange that may be withheld under the FOIA request. Premature release of this material to any segment of the public could give some sectors an unfair advantage and would have a chilling effect on intergovernmental coordination. For these reasons, we respectfully request that the public not be given access to this document.

Thank you for your interest and attention to this matter.

Sincerely yours,



Bob Sfreddo
Division Engineer, Design

mk/pr

Enclosures

Copy: Mr. Gerald Reihsen-FHWA

U.S. Department
of Transportation

United States
Coast Guard



Commander
Second Coast Guard District

1222 Spruce Street
St. Louis, MO 63103-2832
Staff Symbol:
Phone: (ob)
314-539-3724

November 4, 1992

Mr. Bob Sfreddo
Missouri Highway and Transportation
Department
Capitol Avenue at Jefferson Street
P.O. Box 270
Jefferson City, MO 65102

Subj: PROPOSED PAGE AVENUE EXTENTION BRIDGE, MILE 32.0, MISSOURI
RIVER

Dear Mr. Sfreddo:

Please refer to your letter dated 16 October 1992.

We have completed our review of the Preliminary Final Environmental Impact Statement (PFEIS) and determined it is adequate to support a bridge permit application. Our main concerns were navigation impacts of the Missouri River bridge and the Section 4(f) impacts to the KATY Trial.

The impacts to navigation have been adequately discussed. Since the project has been exempted from compliance with the provisions of Section 4(f) of the Department of Transportation Act. We are no longer required to consider the impacts to the KATY trial. The document is adequate to support a bridge permit application.

Sincerely,

A handwritten signature in black ink that reads "Roger K. Wiebusch".

ROGER K. WIEBUSCH
Bridge Administrator

By direction of the District Commander





MISSOURI HIGHWAY AND TRANSPORTATION DEPARTMENT

Wayne Muri
Chief Engineer

Capitol Ave at Jefferson St., P O Box 270, Jefferson City, MO 65102 (314) 751-2551 Fax (314) 751-6555

October 16, 1992

Mr. Roger Wiebusch
Bridge Administrator
Bridge Branch
Second Coast Guard District
United States Coast Guard
1222 Spruce Street
St. Louis, MO 63103-2832

ATTENTION: Mr. Bill Flahart

Dear Mr. Wiebusch:

Subject: Route D, St. Charles and St. Louis Counties, Page
Avenue Extension, Job No. J6U0803, Preliminary
Final Environmental Impact Statement

Enclosed is a copy of the preliminary Final Environmental Impact Statement (FEIS) for the Page Avenue Extension. This document is preliminary in its present form, and the volumes will be combined and polished later for formal submittal to the Federal Highway Administration and then public circulation. We are sending it to you for comment as indicated at the interagency meeting held on October 30, 1991 with you or members of your staff.

At that meeting, we agreed to circulate copies of the preliminary FEIS for your review to ascertain if we have addressed the issues you discussed. We are on a tight timeframe for this project, so we would like to have your comments by **November 2, 1992**. Comments will be addressed in the FEIS. We understand that agency officials in the Washington D.C. offices have been apprised of the priority of this matter.

Legislation has recently been enacted by the U.S. Congress that authorizes the Secretary of Transportation to waive requirements of Section 4(f) of the Department of Transportation (DOT) Act of 1966 (Section 138 of Title 23 U.S.C. and Section 303 of Title 49 U.S.C.) as it applies to the proposed Page Avenue Extension. The congressional action has brought this project back to the forefront. Although the legislation has not been signed into law by the President, we expect this to occur soon. A copy of the

Mr. Roger Wiebusch
Page 2
October 16, 1992

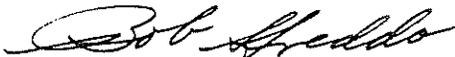
legislation is enclosed with your copy of the preliminary FEIS.

We have worked to address your comments on the Draft Environmental Impact Statement (DEIS) and also the issues raised at all interagency meetings into this preliminary FEIS. The formal FEIS will be prepared and submitted to the Federal Highway Administration later this year.

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Thank you for your interest and attention to this matter.

Sincerely yours,



Bob Sfreddo
Division Engineer, Design

mk/pr

Enclosures

Copy: Mr. Gerald Reihisen-FHWA



MISSOURI HIGHWAY AND TRANSPORTATION DEPARTMENT

Wayne Muri
Chief Engineer

Capitol Ave. at Jefferson St., P.O. Box 270, Jefferson City, MO 65102 (314) 751-2551 Fax (314) 751-6555

October 2, 1991

Mr. Roger K. Wiebusch
Bridge Administrator
2nd Coast Guard District
U. S. Coast Guard
1430 Olive Street
St. Louis, Missouri 63103-2398

Dear Mr. Wiebusch:

Subject: Route D, St. Charles and St. Louis Counties, Page
Avenue Extension, Job No. 6-U-803, Agency Coordination,
Final EIS

Enclosed is a preliminary copy of the Final Environmental Impact Statement (FEIS) for the subject project. This is being provided to you in advance of the meeting scheduled at the Federal Highway Administration (FHWA) Regional Office at 6301 Rockhill Road, Kansas City at 3:00 P.M. on October 30.

The FHWA has determined that this preliminary document is an intergovernmental exchange that may be withheld under the FOIA request. Premature release of this material to any segment of the public could give some sectors an unfair advantage and would have a chilling effect on intergovernmental coordination and the success of cooperating agency concept. For these reasons, we respectfully request that the public not be given access to this document.

I look forward to seeing you at the meeting.

Sincerely yours,

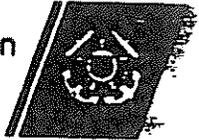
Wayne Muri
Chief Engineer

wm/mk/vm-de

Copy: Mr. Gerald Reihsen

Enclosures

U.S. Department
of Transportation
United States
Coast Guard



Commander
Second Coast Guard District

Job # 6-U-803

1430 Olive Street
St. Louis, MO 63103-2398
Staff Symbol: (ob)
Phone: 314-425-4607
FTS 279-4607

- Asst Dir Engg - L&D
- Asst Dir Engg - Const
- Unassgn
- Port Adm
- Admin Engr
- Press Engr
- Architect
- C-Mo
- Design Engr
- Liaison Engr
- Unassn Engr
- Spec Asst Engr
- Comm. Engr
- CAD Engr
- Value Engr
- Traffic Mgr
- File

mak BG

16591.1/32.6 MoR
August 20, 1990

copied Bridge
3-22-90

Mr. Wayne Muri
Chief Engineer
Missouri Highway and Transportation Department
P. O. Box 270
Jefferson City, MO 65102

Subj: PROPOSED PAGE AVENUE EXTENSION BRIDGE, MILE 32.6, MISSOURI RIVER

Dear Mr. Muri:

Please refer to our letter of July 30, 1990, furnishing comments on the Draft Environmental Impact Statement for the subject bridge.

As mentioned, we have held a coordination meeting with navigation interests to develop recommended clearances for river traffic for both of the alignments being studied for this bridge crossing.

At the preferred location (Red alignment), the left descending channel pier should be located on the landward side of the existing dikes and revetment. The right channel pier should be located to provide no less than 600 feet from the bank.

1 At the alternate location (Green alignment), the right descending channel pier should be landward of the revetment. The left channel could be located approximately 500 feet from the revetment resulting in a horizontal clearance of 500 feet for river traffic.

Bridges over this reach of the Missouri must provide a minimum vertical clearance over the navigation channel of at least 52 feet above the 2 percent flowline. If grades are a problem, we usually permit a reduction in the low steel elevations within 25 feet of each channel pier face.

We would be receptive to an application for a Coast Guard Bridge Permit for either alignment providing the above recommended navigational clearance. You can contact me or Mr. B. J. Flahart (314-425-4607), if you have any questions on our recommendations or need assistance in preparing the permit application.

Sincerely,

JAMES J. LANTRY
Captain, U. S. Coast Guard
Chief, Operations Division
By direction of the District Commander





Federal Emergency Management Agency

Region VII
911 Walnut Street, Room 200
Kansas City, MO 64106

OCT 23 1992

- Asst. Dir. Engr-LE 6
- Asst. Dir. Engr-Oper
- Utilities
- Fed. Aid
- Recon. Engr.
- Photo Engr.
- ~~C-MS~~
- Design Engr.
- Liaison Engr.
- Spec. Assn. Engr.
- Env. Science Cont. *MMK*
- O&D Engr.
- Video Engr.
- Office Mgr.
- File

Bob Sfreddo
Division Engineer, Design
Missouri Highway and Transportation Department
P.O. Box 270
Jefferson City, Missouri 65102

Dear Mr. Sfreddo:

This will acknowledge receipt of the Preliminary Final Environmental Impact Statement (FEIS) for Route D, St. Charles - St. Louis Counties, Page Avenue Extension.

The Regional Office has reviewed the FEIS and have noted that you have addressed our previous comments concerning this project.

The Preliminary FEIS states that all crossings over floodplains will be evaluated for any encroachments on regulatory floodways and that they will be designed to avoid any adverse impact. It was also stated that all required local flood plain development permits would be obtained.

If you have any questions, please contact Mr. Albert L. Schulz at 816-283-7009.

Sincerely,

Stephen R. Harrell

Stephen R. Harrell, Chief
Natural & Technological Hazards
Division





MISSOURI HIGHWAY AND TRANSPORTATION DEPARTMENT

Wayne Muri
Chief Engineer

Capitol Ave. at Jefferson St., P.O. Box 270, Jefferson City, MO 65102 (314) 751-2551 Fax (314) 751-6555

October 16, 1992

Mr. S. R. Mellinger
Regional Director
Federal Emergency Management Agency
911 Walnut Street, Room 200
Kansas City, MO 64106

ATTENTION: Mr. Al Schulz

Dear Mr. Mellinger:

Subject: Route D, St. Charles and St. Louis Counties, Page
Avenue Extension, Job No. J6U0803, Preliminary
Final Environmental Impact Statement

Enclosed is a copy of the preliminary Final Environmental Impact Statement (FEIS) for the Page Avenue Extension. This document is preliminary in its present form, and the volumes will be combined and polished later for formal submittal to the Federal Highway Administration and then public circulation. We are sending it to you for comment as indicated at the interagency meeting held on December 10, 1991 with you or members of your staff.

At that meeting, we agreed to circulate copies of the preliminary FEIS for your review to ascertain if we have addressed the issues you discussed. We are on a tight timeframe for this project, so we would like to have your comments by **November 2, 1992**. Comments will be addressed in the FEIS. We understand that agency officials in the Washington, D.C. offices have been apprised of the priority of this matter.

Legislation has recently been enacted by the U.S. Congress that authorizes the Secretary of Transportation to waive requirements of Section 4(f) of the Department of Transportation (DOT) Act of 1966 (Section 138 of Title 23 U.S.C. and Section 303 of Title 49 U.S.C.) as it applies to the proposed Page Avenue Extension. The congressional action has brought this project back to the forefront. Although the legislation has not been signed into law by the President, we expect this to occur soon. A copy of the legislation is enclosed with your copy of the preliminary FEIS.

Mr. G. Tracy Mehan, III

Page 2

January 27, 1992

to redesign sections of the highway plans to avoid impacting properties or specific structures already identified as significant or eligible to the Register. Mr. Weichman believed that the proposed redesign would allow "no effect" determinations in these cases.

We request your determination of these structures' eligibility to the National Register of Historic Places as soon as possible. Thus if any additional structures are found to be eligible, we can work with your staff to ensure the project will have no impact on them.

Thank you for your cooperation and assistance with this large and important highway project. If we can provide any additional information, please contact us immediately.

Sincerely,



Bob Sfreddo
Division Engineer, Design

br/kd

Copies: Lee Gilleard (w/attachments)-DNR
Gerald Reihsen-FHWA
Mark Kross-de



MISSOURI HIGHWAY AND
TRANSPORTATION DEPARTMENT

Wayne Muri
Chief Engineer

Capitol Ave. at Jefferson St., P. O. Box 270, Jefferson City, MO 65102 (314) 751-2551 Fax (314) 751-6555

January 3, 1992

Mr. G. Tracy Mehan, III
Director
Missouri Department of Natural Resources
P. O. Box 176
Jefferson City, MO 65102

Dear Mr. Mehan:

Subject: Route D, St. Charles and St. Louis Counties, Page Avenue Extension, Job No. 6U0803, Creve Coeur Lake Memorial Park and Katy Trail State Park

Since the circulation of the Draft Environmental Impact Statement (DEIS) for the Page Avenue Extension in the summer of 1990, we have been working with federal, state, and local agencies to address potential impacts of the proposed action.

Your staff was involved in an interagency meeting on August 28, 1991 with us and the National Park Service (NPS), the U. S. Fish and Wildlife Service (FWS), St. Louis County Department of Parks and Recreation, and the Federal Highway Administration (FHWA). Then we discussed the Creve Coeur Lake Memorial Park (CCLMP) enhancement plan proposed by St. Louis County and accepted by our department.

Since then another meeting was held on October 30, 1991 in Kansas City sponsored by FHWA. Attendees included regional directors and staff of the U. S. Environmental Protection Agency (EPA), NPS, FWS, the U. S. Army Corps of Engineers (COE), the U. S. Coast Guard (USCG), FHWA and our department. At that meeting the consensus was that the need for the project was apparent; however, the EIS needed better documentation for the decision-making process. It was obvious that coordination with agency technical personnel to discuss the issues and reach resolution was needed. The NPS indicated they were "favorably impressed" with the CCLMP enhancement plan.

Mr. G. Tracy Mehan, III
Page 2
January 3, 1992

On December 10 and 11, 1991, we hosted meetings with FWS, COE, EPA, the Federal Emergency Management Agency (FEMA) and the Missouri Department of Conservation (MDC) to address the issues. These meetings were very productive and concerns were addressed in a cooperative manner. We shall be providing each agency which was involved in the October and December meetings with a copy of a preliminary Final Environmental Impact Statement (FEIS) for comment early this year.

Issues in your DEIS comment letter dated September 5, 1990 are being addressed. We are collecting additional data that present a stronger case that there is no feasible and prudent alternative to construction of the Red Line. The U. S. Department of the Interior (DOI) has indicated that FHWA approval of the FEIS will allow the Section 6(f) replacement process for CCLMP to be started.

On October 22, 1990, DOI concurred that "there are no feasible and prudent alternatives to some use of the Missouri River (KATY) Trail (if a build alternative is found necessary in the solution of regional transportation problems), because of the linear extent of the trail." DOI indicated that the KATY Trail State Park was possibly in need of further Section 4(f) review because of an aerial easement over the trail, visual impacts, and noise impacts. The latter two could be of sufficient magnitude to constitute a constructive use of the trail, according to DOI.

We would appreciate your views on these matters. For the preferred Red Line, the KATY Trail State Park will be spanned by bridges crossing from St. Louis County across the Missouri River and into the uplands of St. Charles County. The bridge will be about 65 feet above the trail. No piers will be constructed within the trail and they will be designed to be situated a maximum distance from it.

An aerial easement will be required to provide for the bridges spanning the trail. This is considered as a taking, and compensation is proposed as mitigation for that. The easement across the trail is necessary for maintenance activities which might be necessary for the bridges. The width of the easement across the trail will be about 185 feet.

The river bridges will be visible for users of the trail although the spans will be about 65 feet above the trail. However, the trail is already spanned by about 10 roadway and railway crossings from St. Charles to Sedalia. Major highway crossings of the trail include Route 115 in St. Charles, I-70 in St. Charles, U.S. Routes 40-61 in St. Charles County,

Mr. G. Tracy Mehan, III
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January 3, 1992

U.S. 54 in Jefferson City, U.S. 63 north of Jefferson City, I-70 at Rocheport and Route 5 in Franklin. The trail spans I-70 southwest of Boonville. For those segments of the trail which are open, the highways apparently do not impair the use of the trail for the public.

The crossings noted above also are germane to the issue of noise impacts. We don't believe that noise has adversely affected usage for segments of the trail currently open. Our noise readings at the proposed trail crossing indicate an existing noise reading of 43 dBA. Our preliminary studies to determine the worst case projected noise levels indicate that they will occur from 300 to 350 feet beyond the centerline of the bridges. In the design year (2015) these are 66 dBA for bridges with a 32-inch siderail and 65 dBA for those with a 42-inch siderail. Levels at 65 dBA or above warrant consideration of noise abatement measures over the trail. The 42-inch siderail only eliminates about one (1) dBA of noise which is below the reduction necessary for consideration of abatement. The 1 dBA reduction is not perceptible to the human ear. These projected noise levels do not account for the natural shielding of the nearby bluffs.

The FHWA identifies constructive use as occurring when a project's proximity impacts are so severe that the protected activities, features, or attributes that qualify a resource for protection under Section 4(f) are substantially impaired. FHWA has determined that constructive use caused by a noise impact of a project is when it substantially interferes with the use and enjoyment of a noise-sensitive facility such as an outdoor amphitheater, the sleeping area of a campground, or an historic site that has a quiet setting as a recognized feature of the site's significance. We do not believe the noise levels projected at the KATY Trail State Park constitute a constructive use of the trail.

Temporary construction impacts will occur at the trail as bridges are constructed over it. The existing natural vegetation beneath the bridges will be retained as much as possible. After construction, the disturbed areas will be restored to suitable vegetation.

It is possible that construction of the bridges over the trail will require brief closures of the trail for the safety of trail users, such as during the erection of bridge girders. The construction contractor, who will be responsible for safety measures, can provide a flagman for trail traffic during such critical phases of construction. Also, overhead protection to

Mr. G. Tracy Mehan, III
Page 4
January 3, 1992

prevent injury from falling objects will be provided to protect trail users during the remainder of construction.

We intend to provide a bike trail connecting CCLMP with the Missouri River bridges as part of the CCLMP enhancement plan. That trail would be carried across the river to the first interchange in St. Charles County at Upper Bottom Road. From there, access to the KATY Trail State Park would be available on local roadway facilities. We view this provision for a trail from CCLMP to the interchange at Upper Bottom Road as a beneficial impact of the proposed action for recreation.

We would appreciate your views on these topics for consideration in our preliminary FEIS. If you choose to speak with us before a written reply, please call me at 751-2876 or Mark Kross, Environmental Studies Coordinator at 751-4606. We look forward to your response.

Sincerely yours,



Bob Sfredao
Division Engineer, Design

mk/bw

Copies: Mr. Gerald Reihsen-FHWA
Mr. Don Castleberry
Mr. J. T. Yarnell-6

JOHN ASHCROFT
Governor



*Design
Is a shift P^o* U-80371

Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation,
and Historic Preservation

G. TRACY MEHAN III

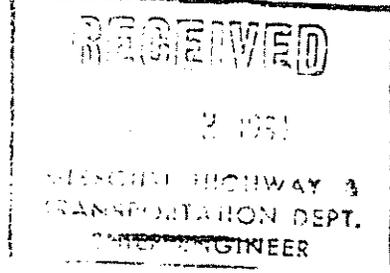
- Asst. Dir. Engr. & P.
- Asst. Dir. Engr.
- Utilities
- Fed. Aid
- Econ. Engr.
- Photo Engr.
- G-Asst.

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

- CADD Engr.
- Value Engr.
- Office Mgr.
- File

OFFICE OF THE DIRECTOR
P.O. Box 176
Jefferson City, MO 65102
314-751-4422

December 24, 1990



Mr. J. T. Yarnell, District Engineer
Missouri Highway and Transportation Dept.
St. Louis Metro District
329 South Kirkwood Road
Kirkwood, MO 63112

Dear Mr. Yarnell:

The Department of Natural Resources has been contacted by William and Lesley Knowles concerning the donation of their property (110 acres) in St. Charles County for park purposes. Since the Knowles' land borders and provides ready access to the Missouri River State Trail, contains a historic 1836 brick house and contains panoramic views of the Missouri River valley, we have chosen to accept this generous offer.

The Knowles' donation offer, as it currently stands, is to be exclusive of any of their land that will be acquired by the Missouri Highway and Transportation Department for the Page Avenue Extension. My understanding is that your department is scheduled to acquire 13.2 acres of the Knowles' land, with the right-of-way coming within about 80 feet of the historic house. The Knowles are not necessarily opposed to the acquisition of a part of their land for the Page Avenue Extension. However, they are extremely concerned about the proximity of the road and the effects construction activity will have on the structure of the historic house. I believe the Knowles have shared their concerns with you.

Since the Department of Natural Resources will be the future owner of this house, I share the concerns of the Knowles. I ask that the Department of Highway and Transportation, if at all possible, shift its planned taking northward by 100 feet in



Mr. Yarnell
December 24, 1990
Page 2

the vicinity of the house. A map is included showing your proposed taking and the area both the Knowles and the Department of Natural Resources would like to see shifted northward. Such a shift would provide more of a visual and construction buffer between the house and highway.

Your consideration of this request is appreciated. If you have any questions, please do not hesitate to call Don Schulteheinrich of this office (314/751-5358).

Very truly yours,

DEPARTMENT OF NATURAL RESOURCES

G. Tracy Mehan, III
Director

GTM:dsr

Enclosure

c: ~~Mr.~~ Wayne Muri
Mr. & Mrs. William Knowles

JOHN ASHCROFT
Governor



G. TRACY MEHAN III
Director

Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation,
and Historic Preservation

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

OFFICE OF THE DIRECTOR

P.O. Box 176
Jefferson City, MO 65102
314-751-4422

September 5, 1990

Mr. Wayne Muri
Chief Engineer
Missouri Highway and
Transportation Department
P.O. Box 270
Jefferson City, MO 65102

Mr. Robert Anderson
District Engineer
Federal Highway Administration
Division Office
P.O. Box 1787
Jefferson City, MO 65102

Dear Mr. Muri and Mr. Anderson:

Staff within the Missouri Department of Natural Resources have reviewed the Draft Environmental Impact Statement (DEIS) for the proposed Page Avenue Extension project in St. Louis/St. Charles Counties, Missouri. Considering the population growth occurring in St. Charles County and the pattern of employment necessitating St. Charles County residents to travel to St. Louis County, it is apparent that transportation between the two counties must be improved. The issue is whether the construction of the preferred alternative, the red route, will provide for such improvement and if it will meet both the needs of transportation and environmental protection.

Information provided on Appendix page 1-26 indicates that the red route has been preserved as a potential transportation corridor and will have the least impact in terms of community disruption. It will promote maintenance of neighborhood cohesiveness and will least disrupt major utilities. The document goes on to state that this route will impact more diverse types of vegetative cover than either of the other two finally considered routes, the green and green/black. Both of these have been identified as having the potential to reduce visual and aesthetic assets and sever the cohesiveness of neighborhoods they will traverse.

Mr. Wayne Muri
Mr. Robert Anderson
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September 5, 1990

1 The DEIS points out that for all intents and purposes the alignments all provide the same level of service in terms of transportation. This analysis is somewhat confusing considering that the red and green alignments have such very different termini. One is led to question why no consideration has been given to some combination of the proposed red and green alignments.

2 The DEIS further indicates that none of the proposed alignments will solve all the problems associated with the anticipated large traffic volumes. If none of the proposed highway routes will serve to meet the demand for transportation, why have the traffic system management and mass transit, including light rail, alternatives been so readily dismissed? It appears that even if one of the highway routes is constructed, additional measures must be taken. It would seem to promote sound planning principles for the DEIS to include consideration of the compatibility of a light rail corridor with the highway alignments as noted, and dismissed, on page 2-12, of the document. Addressing this issue in conjunction with the project currently under study would appear to promote avoidance of the very types of corridor development problems experienced in evaluating the instant red/green preference dilemma.

Both the following and the attached comments are offered to aid in preparing the final document.

Wetlands

3 The potential for adverse impact to wetlands should be thoroughly addressed. The DEIS has been prepared with reference to the national "no net loss of wetlands" policy. However, it appears that wetland loss has been viewed in terms of quantity and not function or value. Much of the proposed mitigation has been proposed in terms of created wetland, and primarily viewed from the perspective of that needed for waterfowl management. Wetlands serve far more functions than habitat provision. For example, the DEIS indicates that wetland bottomland woodland and persistent emergent wetland will be most severely impacted. Proposed mitigation involves deepening pools for waterfowl areas (page 4-79). Mitigation cannot be addressed without consideration of the function and value of the wetland lost.

Mr. Wayne Muri
Mr. Robert Anderson
Page -3-
September 5, 1990

4 Areas evaluated for wetland impact have been selected on the basis of the criteria put forth in the Federal Manual for Identifying and Delineating Jurisdictional Wetlands. It appears that in conducting the evaluation, great emphasis was placed on the seven-day flooding criteria, and in some instances, exclusively (page 3-18--3-21). Analysis of the criteria set forth in the federal manual is currently underway by a wetlands committee within this department. This committee has not yet reached consensus regarding the proper interpretation of the seven-day criteria--nor, to our knowledge, have the federal agencies involved in developing the manual. Therefore, we would be hesitant to place too much emphasis on identifying and evaluating wetlands solely on that criteria at this time.

5 We believe it important to emphasize the importance of this particular wetland and flood plain environment. As noted on page 1-8, Creve Coeur Lake is a natural oxbow lake, one of the few in Missouri. Oxbow lakes are no longer characteristic of the present day Missouri River regime because of man's alteration and management of the river. Because it is a relatively unique resource, the need to preserve the integrity of this feature is intensified. Therefore, careful consideration must be given not only to the construction impacts on this wetland environment--to siltation problems occurring in the lake, Creve Coeur Creek and wetland area--but also to the potential for ongoing adverse impact from runoff from the proposed bridge and road once it would be in operation (gas and oil products and winter road safety chemicals). The DEIS does address these issues, but it does not describe what the actual impacts might be.

Section 4(f)

~~Section 4(f) of the Department of Transportation Act states that the Secretary of Transportation shall not approve any program or project which requires the use of any publicly-owned land from a public park or recreation area of national, state or local significance unless there is no feasible and prudent alternative to the use of such land, and the program includes all possible planning to minimize harm to such park or recreational area. As written, the DEIS and 4(f) statement does not prove there is no feasible or prudent alternative.~~ In fact, the document presents two alternatives, both of which are less costly than the preferred alternative. In addition, the red, green and green/black alignments were identified as potentials from a list of 15 (page 1-1). Presumably, 12 were readily rejected as neither feasible nor prudent. The 4(f) statement indicates that the red alternate has been preserved as a potential transportation route through cooperative efforts between St. Louis County and the Missouri Highway and Transportation Department. The document

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September 5, 1990

also points out that the green alignment was "originally" (page 1-17) envisioned as a possible alternate route for the Page Avenue extension in the early 1970s when there was very little development in the area south and east of Creve Coeur Park.

5a

Knowing that the red route would present a Section 4(f) issue, why did the county and the MHTD not strive to maintain the green route as a potential transportation corridor in the same manner as, or alternatively to, the red route?

Having previously identified the green route as an alternate to the red route in the effort to avoid 4(f) lands in the construction of this project, we would question St. Louis County's decision to enter into a lease for parkland placing additional 4(f) lands in the path of an identified alternate. It is noted that the Environmental Impact Statement process was initiated in October, 1988. The lease of property from the Metropolitan Sewer District for park and recreation purposes was entered into in August of 1989.

5b

~~Should there be no feasible or prudent alternative, the mitigative measures necessary to implement Section 4(f) require that a letter be provided by the agency with jurisdiction over the 4(f) lands stating that it concurs with the assessment of the impacts and the proposed mitigation. The document does not contain a concurrence letter.~~

6

When identifying the 4(f) land that would be impacted if either the red or green route were constructed, the document primarily discusses the amount of acreage that would be taken for highway purposes, or the "direct" impacts, e.g., page 4-110. The statement indicates that the red route requires 22 acres (plus the 14 acres for aerial easement) and the green route requires 8.1 acres of parkland. Under Section 4(f) implementation measures, not only must consideration be given to the actual land taken for highway purposes, it must be given to the degree to which the action of building a highway will adversely impact the use of any contiguous 4(f) lands for their intended purposes. Consideration also must be given to mitigation for aesthetic purposes. It appears that no attempt has been made to value the impacts to intended use or aesthetics, to proximity impacts, or to "in part" takings for purposes of mitigation.

The 4(f) statement states that St. Louis County Parks and Recreation Department has indicated that the crossing of the Creve Coeur Park by the red alignment is viewed as being disruptive to the continuity of park programming for future plans. It has been noted that the construction of the bridge will impact the aesthetic vista of otherwise open water and woods. Construction of the access to the park in the vicinity

Mr. Wayne Muri
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September 5, 1990

7 of Creve Coeur Mill Road has the potential to cause deterioration in the traffic flow through the park thus adversely impacting the quality of park visitation. In the instance of bisecting the leased property, use for its intended purpose as a polo field will be eliminated. Mitigation may need to be provided for replacement of the entire 40 acre tract and not just for the 8 acres of actual taking for highway right-of-way purposes. Likewise, mitigation may need to be provided for any aerial easements acquired for bridge construction. The statement points out that the bridge will be noticed by park users but will not impair the recreational use of the area. This statement is not necessarily true. If the easement interferes with the Creve Coeur property's use for solitude or nature observation and study, mitigation for the lost experiential use of the property would need to be assured.

Section 4(f) does not deal solely with the taking and replacement of a physical parcel of land for highway use. It also encompasses interference with intended use of the park property as a whole.

Section 6(f)

~~Implementation of measures to address Section 6(f) of the Land and Water Conservation Fund Act also include the provision that a conversion to other than outdoor recreation use will be considered only if all practical alternatives to the conversion have been evaluated and rejected on a sound basis. For reasons similar to those indicated in the 4(f) section of our response, the DEIS does not adequately provide justification to dismiss the alternatives.~~

8 If no alternatives exist, property taken must be replaced by property of equal fair market value and equivalent recreational utility. No attempt has been made to establish the fair market value of the properties to be converted to other than outdoor recreation use. In addition, the statement has not addressed how the property proposed for replacement will serve to fulfill the equivalent utility test.

At the time Land and Water Conservation Fund assistance was provided for acquisition of land for Creve Coeur Park in 1971 (LWCF Project Number 29-00292; site also covered under LWCF Project Numbers 29-00478 and 29-01146), efforts were made by the St. Louis County Department of Parks and Recreation to exclude the potential red route transportation corridor from the protective Section 6(f) park boundary. As evidenced by copies of correspondence, included in the DEIS and on file in our offices, from the Department of the Interior dated September 10 and October 5, 1971, these efforts were not successful. The

Mr. Wayne Muri
Mr. Robert Anderson
Page -6-
September 5, 1990

Department of the Interior has always maintained that any action regarding highway construction in Creve Coeur Park must stand the test of Section 4(f) of the DOT Act and Section 5(f), now 6(f), of the LWCF Act. The necessity of compliance was confirmed in correspondence from the Department of Natural Resources (Hirner) dated July 12, 1989.

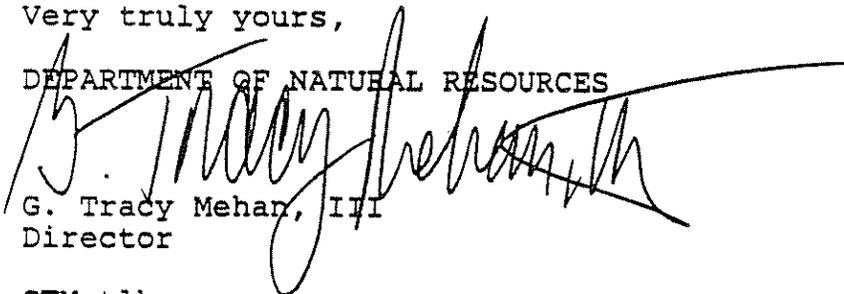
The Draft EIS (page 3-34) indicates that between 1970 and 1985, residential land use in the project area has more than doubled, commercial acreage has more than tripled, industrial acreage grew by more than a third, land used for extraction purposes has almost tripled, land devoted to transportation uses has increased by 20%, and land developed for public purposes such as schools and libraries has almost doubled. Land used for recreation purposes is reported to have declined more than 20%. Considering this, coupled with the issues raised by this review of the Draft EIS and the 4(f) and 6(f) statement, it appears that more careful thought should be given to the advisability of the taking of public park and recreation lands and wetlands for highway purposes. Certainly, a stronger case must be made that there is no feasible or prudent alternative to construction of the red route.

9

We appreciate this opportunity to comment on this Draft Environmental Impact Statement. We hope that you will give serious consideration to our comments and recommendations. Should you have any questions regarding our comments, please contact Mr. Thomas Lange of my office at 751-3195.

Very truly yours,

DEPARTMENT OF NATURAL RESOURCES


G. Tracy Mehan, III
Director

GTM:tlk

Attachment

Missouri Department of Natural Resources
Specific Comments On
Draft Environmental Impact Statement
Page Avenue Extension
St. Louis/St. Charles Counties, Missouri

September 5, 1990

Section 2.1, page 2-4, Earth City Expressway Extension, and
Section 7.0, Comments and Coordination, page 7-3, paragraph 3 -

10 A separate EIS is being prepared by Booker Associates for the Earth City Expressway Extension, which was not analyzed as part of this DEIS. NEPA, 40 CFR 1508.25, requires full consideration of cumulative environmental impacts resulting from not only the individual project, but also other known planned projects and anticipated induced developments. The cumulative impacts of this proposed development and related, associated, and induced development are not addressed.

11 Section 3.13.1, Planning in St. Louis County - The territory in and around the St. Louis County portion of the proposed Page Avenue Extension is within the incorporated City of Maryland Heights, which participates in the National Flood Insurance Program, and which regulates development activities in identified flood hazard areas. The Howard Bend Levee District's Missouri River levees are located where they were convenient to build, historically. Many portions are within the regulatory floodway of the river, and cannot be increased in height. Levee grading would require permits from the City of Maryland Heights. (Reference Title 44, Code of Federal Regulations, 60.3(d).

Section 3.14, Flood Plains - The reference to the United States Department of Housing and Urban Development (HUD) is obsolete, and (since 1979) incorrect. The Federal Insurance Administration is an arm of the Federal Emergency Management Agency, which also provides flood disaster assistance. On the east side of the Missouri River, the Flood Insurance Rate Maps (FIRMs) are for the City of Maryland Heights. On the west side of the Missouri River, the maps are for unincorporated St. Charles County, and are being revised by FEMA at this time.

12 For Federal Highway Administration funds or any other funding to be made available for the Page Avenue Extension project, Presidential Executive Order 11988 on flood plain management sets out a planning/decision-making process in which flood plains are not to be developed unless there is no practicable alternative.

A "floodway" is one of the regulatory mechanisms of the National Flood Insurance Program, however, governments have management powers by statutory authority. Local governments which join the National Flood Insurance Program regulate flood plain development activities, in return for which, the federal government makes flood insurance available in its jurisdiction.

13 | Section 3.14, paragraph 4, sentence 1 - The Federal Insurance Administration, in its regulations, uses the term, "base flood", which is defined as the flood which has a one percent chance of occurrence in any year. The term, "100-year flood", conveys a false notion that it can happen only once in a century, whereas the truth is that it can occur twice in rapid succession within the same year, and the statistical validity is limited by the adequacy of the records for any given watercourse. As such, the term is being replaced with "base flood."

14 | Section 3.14, paragraph 4, sentence 2 - This sentence is incorrect. Title 44, CFR 60.3(d) (3) states, "Prohibit encroachments, including fill, new construction, substantial improvements, and other development within the adopted regulatory floodway that would result in any increase in flood levels within the community during the occurrence of the base flood." The proposed development must show no rise in base flood levels as a result of encroachment in the regulatory floodway, or the developer should work through the local communities, in conjunction with the Federal Emergency Management Agency, to revise the regulatory floodway. The one foot maximum increase in flood stage applies to flood hazard areas where no floodway has been delineated.

It probably would be appropriate to recount flood history for this reach of the Missouri River, in Section 3-14. Passing reference is made to the 1986 flood on page 3-56. A base flood probably has not been experienced in this reach of the river in more than one hundred years. Nor is mention made that the Missouri River is one of the major rivers of this continent, with a drainage area of over 529,000 square miles, and that this mighty river has been constrained to a half-mile in width just above its mouth by the twin bridges of I-70 and adjacent levees. This historic action already has increased flood stages and velocities in this reach.

Section 3.3.4, Karst Areas - If a highway route passes through areas drained by sinkholes, extra care must be exercised to minimize karst drainage changes.

15 | Section 3.3.5, Groundwater - The alluvial groundwater explanation is adequate. The bedrock aquifer description is too brief to contain much usable information. Errors in this section include spelling of Maquoketa, and attributing high groundwater production rates in deep aquifers to thick sandstone units. The production is predominately from fractured dolomite units. The only sand units having significant water production below the St. Peter are sandstone interbeds in the Roubidoux Formation, and the Gunter Sandstone Member of the Gasconade Dolomite.

Natural groundwater quality of deep aquifers in the project area is not well known. South and east, deep aquifers yield

good-quality water. North and west of the project area deeper zones contain highly mineralized water.

The Department of Natural Resources must be notified if abandoned water wells are encountered during construction, or if water wells currently in use must be abandoned due to the project. When notified, we will provide plugging specifications to eliminate the chances of groundwater contamination due to improper well abandonment.

~~Aside from the usual dangers of groundwater contamination from construction activities, the Page Avenue Extension should not significantly impact groundwater resources of the area.~~

16

Section 3.4, Water Quality - This section is very weak. The DEIS references a document entitled Technical Memorandum Water Quality Technical Report which is not included in this document. Perhaps significant information is provided in that report, and it should be considered for inclusion in the DEIS Appendix.

17

Section 3.6, Wetlands - Using the Federal Manual for Identifying and Delineating Jurisdictional Wetlands (the Manual), SCS Soil Survey Maps, USDA Agricultural Service overflight photographs, and field examinations, wetlands were identified along each path of proposed development. The Manual defines the criteria for each of the three components necessary for wetland identification: hydric soil, hydrophytic vegetation, and wetland hydrology. Apparently only areas that appeared "to meet at least the wetland flora and hydrology requirements" were further evaluated for quality of habitat and the potential effects of their loss. Areas meeting hydric soil criteria should also be further evaluated. The method used to evaluate the quality of a wetland was not discussed. It should be clarified as to how wetland qualification of each of the areas evaluated will be utilized.

Hydrologic criteria are defined in the Joint Manual. It would seem that the hydrologic criteria defined in the Manual were not utilized. The statement, "Hydrology of the possible wetland areas was estimated on the basis of size of water bodies associated, topography, visual evidence of past flooding or impoundment, and presence or absence of levees or other structures and of drainage systems present", seems inconsistent with the Federal Manual and leads to anomalous statements such as, "The hydrology for the area is at best marginally hydric, being saturated following heavy rains."

18

The following quote is another anomalous and ambiguous statement: "These may not meet the hydrology requirement, i.e., pooled water for several weeks or longer at a time." To meet the hydrologic criteria, inundation need occur for one week or more during the growing season.

It should be pointed out that hydric soils are hydric soils--they are not marginally hydric; and hydric soils plus hydric plants are quantifiable indicators of wetland hydrology. Comprehensive federal lists for both now exist and are the standard. More specifically, if two of three criteria quantitatively meet the wetland definition, discarding consideration of a site on assumption that the third qualitative criteria is not met, is suspect and should be challenged. The DEIS appears to take advantage of the unquantifiable nature of wetland hydrology, as the criteria is established in the draft Delineation Manual, to discard areas that should, according to soils and plants, be defined as wetland.

19

Example: "other" bank of Creve Coeur Lake (page 3-19)--The two soils are listed hydric soils; the wooded area is dominated by listed hydrophytic plants; this is a wetland. On what basis, given these factors, do the authors consider it otherwise because of a perceived difference in flood frequency? Very specific details should be provided.

20

Example: the narrow maple-poplar wooded strip along Dardesme Creek (page 3-20). Again, floristically this is a wetland--and with hydric soils. Occasionally, flooding for short time periods is not a wetland exclusionary criteria. In fact, the opposite is true. Obviously, this hydrology is significant enough to maintain wetland soils and plants. This is a jurisdictional wetland.

21

The federal Delineation Manual lists seven-day water pooling as the hydrologic threshold--not "several weeks or longer at a time" (page 3-21). This would completely change the authors' interpretations of wetland/non-wetland, and bring it in line with the delineation process. Then, the above-mentioned inconsistencies with having wetland soils and plants persisting without associated wetland hydrology will cease being a mystery and a contention point.

22

Section 4.10, Water Quality Impacts - Our major concern with this section relates to a statement on page 4-73, specifically, "The green alignment crosses more water bodies than the other build alternates, and therefore, there is the potential that runoff contaminants would enter more water bodies." There may indeed be more bridge crossings involved, however, this does not necessarily equate to contaminant entry into the streams in question. One bridge crossing and its associated construction activities could generate more contaminants than several in combination, depending on site conditions, stream characteristics, weather conditions during construction, etc. The DEIS needs to do a better job of explaining the individual stream crossings and proposed plans for each. Also, we noted that Table 4-10.1 does not appear to be consistent with Table 3.4-1.

Section 4.1.5, Secondary Development Impacts, paragraphs 3 and following, page 4-13 - The Page Avenue Extension and the Earth City Expressway Extension, across and in the flood plain of the Missouri River, are correctly said to increase demands for enhanced flood protection, thereby to allow conversion of farmland to structured uses.

23 | The master plan for this development dates back into the 1960s before Earth City, the second I-70 bridge, and other components of the plan were built. The extension of the Earth City Expressway to the south was a major feature of the old county master plan to develop the Missouri River flood plain in St. Louis County. The cumulative effects of these encroachments on the flood plain are not assessed, here or in other National Environmental Policy Act documents. The results, succinctly, are increases in flood damages, loss of prime foodland near the urban market, loss of wetland habitat, loss of open space, loss of aesthetic variety, and degradation of the quality of the human environment.

Presidential Executive Orders 11988 and 11990 were issued in part to preserve the inherent values of flood plains and wetlands. The National Environmental Policy Act, and the Farmland Protection Act were adopted in order to preserve the nation's natural resources while development proceeds in an environmentally sound manner.

Section 4.8, Air Quality Impacts - The locale of the project is a nonattainment area for ozone, yet no analysis is included for the change in emissions of hydrocarbons (HC) or nitrous oxides (NOx) emissions, the precursors for ozone formation. Unlike CO, ozone is a regional problem resulting from mobile, area and point sources over wide areas, and the contribution from the project alone would not be enough to predict a change to the ozone concentration. HC and NOx emissions from the improved road system could, however, be compared to existing levels produced by the current road system.

24 | Booker used the Mobile 3 Source Emission Factors to calculate CO emission rates for mobile sources instead of the later Mobile 4 version. Mobile 4 in other applications has produced higher CO estimates than Mobile 3.

Though improvements such as this one may produce some air quality benefit, we believe that it is a short-term benefit. As roads are expanded to accommodate traffic, auto travel is further encouraged creating more emissions and more need for road expansion. Instead of condoning more spending on a system that already is the single largest contributor of HC and NOx emissions, one should at least consider the promotion and enlargement of the mass transit system. An endorsement of this and most expansions of the urban highway system is endorsing a system that actually hinders the mass transit effort by keeping people in their cars.

25 | Section 4.11, Permits - In the event that the Page Avenue Extension project is implemented, local government Flood Plain Development permits are required for any excavating, filling, grading, paving, drilling, fencing, or construction in a flood plain. Local ordinances and Title 44, CFR, 60.3(d) require this. It is assumed all contractors are responsible for securing all necessary permits prior to work.

26 | Section 4.12, Habitat and Wetland Impacts - The value of maturing forest in this area (page 4-76) is very high; the value of roadside fescue or fescue/crown vetch/sericea lespedeza plantings in any circumstance is very low. To consider replacing the former with the latter a positive feature of the project is inappropriate. Categorizing 150 acres of detrimental impacts to emergent wetland and wetland forest as insignificant (page 4-76) should not be done so vaguely and without supporting text. One line devoted to this is completely insufficient to support a claim with which many will likely disagree.

Section 4.14, Flood Plain Impacts - As mentioned in Section 4.13, page 4-80, there is a flood plain associated with Creve Coeur Lake. There is a regulatory floodway delineated as part of the Flood Insurance Study for the City of Maryland Heights. (Reference map panel 15 for the City.)

27 | Section 4.14.1.1, Red alignment - In paragraph 3, it appears the "10-year storm" has been equated with the ten-year flood event. They must not be equated. In paragraph 4, the writer refers to a "rainfall event, including the 500-year storm", as if equated to a flood event.

As experienced in Missouri, it might take two one-hundred-year storms, in rapid succession, to produce a base flood on a given watercourse. There are also times when a major flood can occur following a series of minor storms in rapid succession, or a long period of wet weather (for example, 1973), when the discharge of the river is far less than a base flood, but a base flood stage occurs. Antecedent conditions, season of year, and development factors enter the picture.

28 | On page 4-84, the text indicates that there is encroachment into the regulatory floodway by the piers. It also indicates that there is a rise in the base flood elevation resulting from the piers. Within a regulatory floodway, no increase in base flood elevations is permitted.

29 | Also on page 4-84, it is stated that for a 500-year flood, stages increase nearly three feet. The meaning of the statement "the effect of this increase on the flood plain is minimal in most areas" is unclear. Clarification should be given as to whether any buildings are within this area and what effect three more feet of floodwater would have on any such buildings.

30 On page 4-84, it is stated that the backwater increase caused by the project will be one foot, if there is no encroachment into the regulatory floodway, by definition. Again, the regulatory floodway concept is misapplied.

31 Section 4.14.1.2, Green Alignment - In paragraph 3, the DEIS seems to be equating "storms" and "floods", which are not the same. Also, encroachment into the regulatory floodway must produce no increase in base flood elevation. A backwater effect of half a foot is not allowable. Local government permit-granting authorities, and the Federal Emergency Management Agency, Region VII should be consulted.

32 Section 4.17.1 and .2 - Underground Storage Tanks/Mitigation - There are incorrect regulation citations on page 4-93. Federal and State regulation citations are listed as 40 CFR 280.7 and 10 CSR 20-10.70. The correct citations are: 40 CFR 280.71, .72 and .73; and 10 CSR 20-10.071., .072 and .073.

33 The DEIS does not identify the specific underground storage tank (UST) facilities that would be closed by the various alignment options. All USTs that will be removed from service by construction of the highway must be permanently closed in accordance with state and federal regulations.

The DEIS does not identify any UST facilities other than those registered with the Department of Natural Resources. All UST sites must be handled in accordance with the requirements of the state and federal regulations, regardless of whether they are registered with the state.

The DEIS does not discuss disposal of wastes (tanks, sludges and contaminated soils) from UST closures. The discussion should address the potential for certain of these wastes to be hazardous wastes (sludges and contaminated soils) and appropriate waste management procedures.

34 The DEIS does not address the site assessment requirements of State and Federal UST closure regulations. In addition, the DEIS does not address spill and leak reporting requirements of State law (sections 260.500, etc., RSMo 1986).

Finally, the DEIS does not examine the potential for remediation of UST sites that may be required as part of closure under State and Federal regulation.

35 Appendix Section 1.0 - Page 1-1 makes reference to the Land and Water Conservation Act. The Act should be noted by its proper title, the Land and Water Conservation Fund Act.

36 Appendix Section 3.1.7 - It is stated that the Land and Water Conservation Fund (LWCF) Act includes a reversionary clause, section 6(f). Section 6(f) of the Act is not a reversionary clause. Rather, the section provides that property acquired or

developed with LWCF assistance shall not be converted to other than public outdoor recreation uses without the approval of the Secretary of the Interior. Approval is to be granted only if the conversion is in accord with the Statewide Comprehensive Outdoor Recreation Plan, and only upon such conditions deemed necessary to assure the substitution of other recreation properties of at least equal fair market value and of reasonably equivalent usefulness and location.

37 | Appendix Section 3.4, Summary of Impacts - The red alignment is recommended as the preferred alignment because of, among other things, "less cost" (Appendix page 1-27). However, the SUMMARY OF IMPACTS table on Appendix page 1-25 would indicate that the cost of the red alignment, with the extended bridge length provided as a mitigative measure, is greater than that of the other two. The cost figures portrayed in Section 3.4 (SUMMARY OF IMPACTS, page 1-25 of the Appendix) should be revised. The construction costs for the green and green-black alignments stated in the summary do not agree with the cost analysis presented on Appendix pages 1-20 and 1-21. Also, upon review of the cost analysis figures for the red alignment on page 1-14, it appears that the project costs stated in the summary do not include the construction of an extended bridge, which would increase total project costs to \$67 million as opposed to \$55 million. If it is presumed that an extended bridge is to be constructed as a mitigative measure, the SUMMARY should reflect that cost. In addition, it appears that costs for replacement parcels for properties mitigated for 6(f) purposes have not been specifically included in the analysis for the red route. Clarification should be provided regarding whether those costs are included in the general right-of-way costs.

38 | Appendix Section 3.5, Measures to Minimize Harm - Appendix page 1-30 states that the increase in bridge length will add \$2.4 million to the costs. The SUMMARY in Section 3.4, however, would indicate that the added length will result in a \$12 million increase.

While not an error, per se, the cost analyses for all alternate routes appear deficient. None seem to include consideration of mitigation costs for lost parkland, prime and unique farmland, or wetlands. Again, while not an error per se, the document is deficient in addressing the cumulative impacts of highway construction. The environmental impacts of future development such as additional residential, retail, commercial and industrial establishments that will result once a new transportation route has been established must be fully acknowledged.

39 | Appendix Section 4.0, Affected Properties-St. Charles County - The description of the acquisition of the MKT Railroad right-of-way also is in error. The DEIS (Appendix page 1-35) states that much of the right-of-way was acquired under Section D of the National Trails System Act using U.S. Department of Interior funds for purchase. No funds were provided by Interior

for this purpose. The right-of-way was purchased with funds contributed by a private individual to the Conservation Foundation of Missouri Charitable Trust Fund for that specific purpose.

RESPONSE TO COMMENTS

Missouri Department of Natural Resources - Letter of September 5, 1990

1. The primary emphasis on the traffic assignments for the various alignments was focused on the number of vehicles crossing the Missouri River and then to disbursement throughout St. Charles County from the alignments. The FEIS analyzes four alternatives in St. Louis County: Red, Green-Black, Yellow-Black and Blue, that are all connected to the Red at a point west of Creve Coeur Mill Road.
2. While not exceeding the demand, the new route would improve conditions and maintain a better level of service than would be possible without the Page Avenue Extension. HOV and light rail discussions have been included in Section 2.
- 3.&4. Wetlands potentially affected by this project were identified and delineated in accordance with the procedures presented in the Corps of Engineers Wetlands Delineation Manual (1987). Those procedures include the application of "mandatory technical criteria for wetland identification." These criteria were applied. Thus, the identification and delineation of jurisdictional wetlands in the project area has been performed in full accord with current guidance and presents a sound basis for evaluation of impacts.

Consideration of the functions and values of wetlands, impacts on them, and mitigation of those impacts is by no means as standardized. Wetlands serve a broad variety of functions, with "value" related both to the extent which they fulfill those functions and the "values" of the functions themselves. These functions are not always in harmony with each other. The various agencies involved in protecting and enhancing the resources of the project area have different charters and different agendas. Hence, the "values" they ascribe to different wetland functions are not always in accord.

The wetlands sections of the FEIS represent an attempt to present a "balanced view" of the wetlands resources of the area without bias toward any agenda or "management point of view". Your letter states that

"mitigation cannot be addressed without consideration of the function and value of the wetland lost". We concur and add that this consideration must encompass local, regional and state concerns which are represented and understood by the collective agencies involved.

5. See Response No. 1, Mazur, Department of Natural Resources. Highway runoff and any spills will be contained in a collector system of pipes that will convey all runoff to a detention basin off-site of the park, on the west side of Creve Coeur Mill Road. Section 601 of the Pipeline Safety Act requires dredging of Creve Coeur Lake and construction of a siltation lake.
- 5a. The Red Alignment corridor for the extension of Page Avenue had been preserved since the mid to late 1960s when subdivision development in western St. Louis County was beginning and on the increase. The Red Alignment corridor was identified so that subdivision developers were aware of the proposed highway locations. By the time the alignment was selected, various subdivision developments had occurred and "squeezed" the alignment into a corridor that would go through the park in order to have the best direct access to St. Charles County. This was prior to the development of Creve Coeur Lake Memorial Park as it currently exists and prior to the use of federal funds in the purchase of additional park lands.
- 5b. St. Louis County Department of Parks and Recreation has provided a letter dated December 12, 1991 signed by its new director, Jerry Schober, that indicates support for the project and endorses the mitigation "Enhancement Plan" then proposed by MHTD. The Enhancement Plan was incorporated into the mitigation plan required by Section 601.
6. The mitigation plan measures required by Section 601 of the Pipeline Safety Act for Creve Coeur Lake Memorial Park identifies the addition of at least 600 acres adjacent to the park and additional measures described in the FEIS. Replacement lands required in accordance with Section 6(f) of the LWCF Act are identified and acceptable.
7. See Response No. 6.

8. See Response No. 6.
9. Additional alternatives, the Yellow-Black and Blue Alignments, have been analyzed as park-avoidance alternatives and are included in the Section 6(f) Evaluation.
10. See United States Department of the Interior Response No. 24.
11. There is no intent, nor necessity to increase any portion of the Howard Bend Levee.
12. See United States Department of the Interior Response No. 15.
13. Terminology has been changed to base flood.
14. Section 4.14 has been modified to correct wording and quantify any increases.
15. Changes have been incorporated into Section 3.3.
16. The Water Quality Technical Report is available from MHTD, Jefferson City, Missouri.
17. Maps delineating "hydric soils" in the project area have been included in the FEIS. In evaluating "habitat", we evaluated only that habitat which existed at the time of evaluation. Hence, areas of hydric soils, but which lacked wetland vegetation or hydrology, were evaluated as poor wetland in terms of habitat.
18. It should be pointed out that the DEIS terms no soil "marginally hydric". Neither do we wish to "take advantage of the unquantifiable nature of wetland hydrology. We wish to point out in this regard, however, that past and current drainage manipulation has severely impacted much of the area's wetland. This in no way diminishes, but rather, enhances the "value" of remaining wetland. This approach also presents the reviewer with valuable information on the potential of areas which have been impacted.

19. The "other bank of Creve Coeur Lake" is not listed as anything other than a wetland.
20. Jurisdictional wetlands have been identified in coordination with the Corps of Engineers.
21. The sentence partially cited in the comment is poorly constructed and may be subject to the interpretation of the commentor. The intent of the sentence was not to redefine the Manual's hydrologic criterion. The sentence has been restructured to read, "These may meet the hydrology requirement and may be subject to pooled water for several weeks or longer at a time."

Two points are of importance in this regard. The first is that no accurate direct determination of the hydrologic criteria can be made in the absence of long-term observation. In such absence, it must be inferred by the other two criteria. The second point is that such inferences (and supporting quantification) were made during the development of the DEIS. Thus, changing the subject sentence will not "completely change the authors' interpretation of wetland/non-wetland ...". The phenomena of manipulation of landforms and associated drainage alteration and their effects on wetland hydrology are neither mysterious nor contentious to those in the field of wetland observation, delineation or classification.

22. See Response No. 16 above. Detailed examinations were made of all potential stream crossing areas, with the resulting opinion that the differences in sensitivity among them would be more than offset by the differences among construction and operation/maintenance practices which might be applied. At this stage of project design, we have no knowledge concerning which areas might be subject to more application of chemicals than others or the detailed construction schedule. Given this lack of detailed information and the lack of major differences among potential stream crossings (in terms of "ecological sensitivity"), degree of involvement with water bodies seems to be a sound, though very general, parameter for comparing potential impacts.

Differences between Tables 4.10-1 and 3.4-1 have been resolved in the text.

23. See United States Department of the Interior Response No. 30.
24. The scope of work for this project was limited to CO emissions. Modeling methodology and model selection was coordinated with MHTD and represented the most acceptable and standard practice in the given application at the time of analysis.
25. All required permits will be obtained from the appropriate local authorities.
26. We have reviewed this section carefully in light of the reviewer's comments and fail to see how it could have been interpreted as it evidently was. In order of the reviewer's comments: No statement to the effect that replacement of maturing woodland with crown vetch and fescue would enhance the area's "value" was made. No "categorizing of detrimental effects to 150 acres to emergent wetlands ... as insignificant" was performed. Further, no statement of the "significance" of any of these changes was made and we cannot locate any "claim" in any given line.

Concerning the subject "150 acres" the DEIS states "Although the acreage is small ... detrimental affect." What this means is, although the acreage is small, the impact on it is great! This does not equate to "insignificant".

The concept of "edge", which involves a positive effect of vegetative admixtures on overall wildlife habitat, is an accepted ecological and wildlife management principle. The area referred to in the subject paragraph displays little grass and grass-forb habitat. The addition of such habitat would be, in this context, a positive effect. The DEIS makes no implication that "crown vetch" plantings provide habitat which is superior to woodlands or that wetlands should be replaced by roadside plantings.

27. Terminology has been changed.

28. Section 4.14 has been revised.
29. Section 4.14 has been revised.
30. Section 4.14 has been revised to clarify the definition of regulatory floodway.
31. Section 4.14 has been rewritten to correct terminology.
32. The citations were the general regulation citations and have been changed to include specific sections.
33. The final design plans will dictate which specific UST locations will require closure. The listing on Table 4.17-2 identifies USTs by alignment.
34. A section has been included discussing the potential for hazardous waste and site remediation.
35. The table has been corrected.
36. Appendix, Section 3.17, has been changed to remove the reversionary clause statement.
37. Costs have been corrected and additional costs for mitigation included.
38. The final Section 6(f) Evaluation includes costs for the mitigation program required by Section 601.
39. Appendix, Section 4.0, has been corrected as noted.

Mr. Robert Anderson
Mr. Wayne Muri
Page -2-
August 1, 1990

I appreciate your consideration of this request.

Very truly yours,

DEPARTMENT OF NATURAL RESOURCES

Gay W. Hummel for GTM

G. Tracy Mehan, III
Director

GTM:kj

JOHN ASHCROFT
Governor

G. TRACY MEHAN III
Director



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176
Jefferson City, MO 65102

Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation
and Historic Preservation



June 8, 1990

Missouri Highway & Transportation Dept.
329 South Kirkwood Road
Kirkwood, MO 63122

RE: Public Hearing for Location and Design of Route D (Page Avenue)
Extension

Dear Sir or Madam:

I would like to offer comment on the above referenced project with regard to potential impacts to Creve Coeur Lake.

Restoration of Creve Coeur Lake in the late 1970's involved a major sediment removal (4.8 million cubic yards) project by the St. Louis County, Department of Parks and Recreation. Total costs for this lake restoration work exceeded two million dollars which was supported (50%) through an Environmental Protection Agency Clean Lakes grant.

1 Through a comprehensive scientific study at another Clean Lakes project in Kansas City, it has been shown that highway construction contributes extremely high sediment loading to down stream lakes. I recommend that you review this project for alternate routes or develop and execute an effective sediment control plan to protect Creve Coeur Lake. In addition, Creve Coeur Lake has the following beneficial uses protected under the Missouri Water Quality Standards (10 CSR 20-7.031): protection of warm water aquatic life, livestock and wildlife watering and boating.

I will not be able to attend the public hearing scheduled for June 28, 1990 and would like the above comments to be included as public testimony.

Sincerely,

WATER POLLUTION CONTROL PROGRAM

Daniel J. Mazur

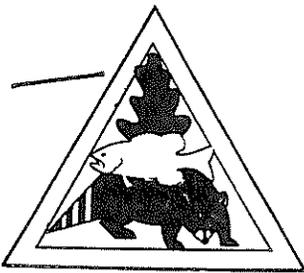
Daniel J. Mazur
Environmental Specialist

cc: St. Louis County, Dept. of Parks & Recreation
Ms. Donna Sefton, EPA, Region VII
Mr. Greg Knauer, Booker Association

RESPONSE TO COMMENTS

Department of Natural Resources - Letter of June 8, 1990

1. Sediment controls will be included in the construction specifications. As part of the mitigation plan required by Section 601, MHTD will dredge portions of Creve Coeur Lake that have accumulated silt since the previous dredging project in order to enhance lake usefulness, remove any construction sediment, and obtain fill material. A siltation lake required by Section 601 will be constructed upstream of Creve Coeur Lake.



MISSOURI DEPARTMENT OF CONSERVATION

MAILING ADDRESS
P.O. Box 180
Jefferson City, Missouri 65102-0180

STREET LOCATION
2901 West Truman Boulevard
Jefferson City, Missouri

Telephone: 314/751-4115
Missouri Relay Center 1-800-735-2966 (TDD)
JERRY J. PRESLEY, Director

November 2, 1992

Design

5

Mr. Wayne Muri, Chief Engineer
MO Highway and Transportation Department
P. O. Box 270
Jefferson City, MO 65102

Attention: Mr. Bob Sfreddo

Dear Mr. Muri: *Wayne*

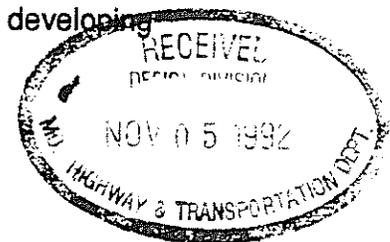
- Asst. Dir. Engr.-L&D
- Asst. Dir. Engr.-Oper
- Utilities
- Fed. Aid
- Recon. Engr.
- Photo Engr.
- C-ME
- Design Engr.
- Liaison Engr.
- Spec. Assn. Engr.
- Inv. Studies Coord.
- O&D Engr.
- Value Engr.
- Office Mgr.
- File

11/11/92

Thank you for the opportunity to review and comment on the Preliminary Final Environmental Impact Statement for the proposed Page Avenue Extension project in St. Louis/ St. Charles Counties. The document is a significant improvement over the draft EIS in addressing important issues relating to potential environmental impacts.

Several additional issues, comments or concerns that should be addressed in the final EIS include:

- 1 • The Pallid Sturgeon, Scaphirhynchus albus, is now listed as a federally rare and endangered species. Mr. Kim Graham of our Fisheries Research staff in Columbia is on the recovery team for this species. Please do not hesitate to contact him at 314/882-9880 to discuss information relevant to potential project impacts on this species.
- 2 • Protection and/or enhancement of Missouri River chutes and side channels is a high priority in the present Corps of Engineers effort to restore a portion of this significant riverine ecosystem. The proposed red alignment crosses the lower end of the Jane Dowing Chute and Island. Should it be necessary to construct bridge piers in this chute, could they be designed to create turbulence, thereby scouring a deep hole in the chute immediately downstream of the bridge?
- 3 • A large quantity of fill material will be required to elevate the roadway crossing the Missouri River floodplain. Selectively borrowing material from the floodplain should be utilized to create high quality wetland habitat. Our staff are available to confer on guidelines for developing such wetland habitat.



COMMISSION

JERRY P. COMBS
Kennett

ANDY DALTON
Springfield

JAY HENGES
St. Louis

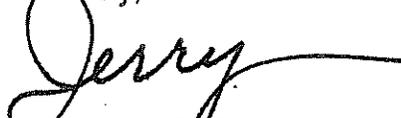
JOHN POWELL
Rolla

Mr. Wayne Muri
November 2, 1992
Page Two

- 4 • We are pleased that a sedimentation basin will be constructed adjacent to the creek above Creve Coeur Lake. To assure the basin functions to keep sediment out of the lake, it should be large enough so the discharge velocity is slowed sufficiently to allow suspended particulate matter to settle out. It will be necessary to divert the creek into the basin. We recommend blocking the upper end of what will be the old creek channel and leaving the lower end open.
- 5 • We understand the Corps of Engineers is presently working to complete delineation of wetland habitat that will be adversely impacted by this project. We support the recommendation that Sites B and C are the preferred location for compensatory replacement wetlands. In addition to restoration of wooded wetland habitat (Site C), we recommend acquisition of the farmed wetland identified as Upper Creve Coeur Lake. This area offers an excellent opportunity to restore a high quality, emergent wetland habitat by cessation of present drainage efforts.
- 6 • As you are aware, our respective staffs have been coordinating for a number of years on the proposed upgrade of Route 40/61 to Interstate 64. As presently planned, this project would require acquisition of a narrow strip of land along the north edge of the Busch Wildlife Area. We would like to suggest that consideration be given to acquiring replacement land in the Missouri River floodplain southwest of the proposed Page Avenue red alignment. This replacement land, combined with that which your Department will be acquiring for mitigation of the Page Avenue project, could be of sufficient size to provide an important Urban Wild Acres area.

Our staff look forward to coordinating further with you on these matters. Mr. Norm Stucky will continue to be the point of contact for our Department. Please do not hesitate to contact him at the above address.

Sincerely,


JERRY J. PRESLEY
DIRECTOR

cc: U.S. Fish and Wildlife Service, Columbia, MO (Brabander)

We recommend that serious consideration be given to taking the alternate green-black route around the lake and then tying in to the preferred red route. This would avoid the many potential problems of running the road through the park and over the lake.

- 8 | Historic birding data for the Creve Coeur Lake area is referenced on page 3-25. We deem it appropriate to include these data in Section 7, Comments and Coordination.

In our July 25, 1989 letter of comment on the Page Avenue project, concern was expressed that floodplain development and subsequent loss of Missouri River floodway has significantly increased flood stages to the detriment of remaining riverine wetlands and riparian habitat. The issue of floodway protection and floodplain management is inadequately addressed in the EIS document. No mention is made of Executive Orders 11988 nor is information presented to compare the projected floodway impacts of the alternate corridors or alignments.

- 9 | ~~All excellent reference dealing with this issue is in "Executive Summary, Missouri River Flood Plain, Legal and Institutional Framework Study, Missouri Basin Commission, November 1980."~~

- 10 | Best management practices that "could be" included in future project plans to minimize adverse water quality impacts are listed on pages 73-74. We recommend that these practices definitely be included.

- 11 | The impact of river crossings on channel hydraulics is discussed on page 81. Do the alternate crossings differ in extent of adverse hydraulics? This information would be helpful in selecting an alternate that will minimize adverse impacts to the river channel and floodplain.

Mitigation of Adverse Impacts. The absence of a wetland determination for each alignment makes it difficult to compare alternatives on the basis of wetland impacts and mitigation requirements. The cost of mitigating unavoidable impacts could be significantly different between the alternate routes being considered.

- 12 | When preparing a mitigation plan it is important to keep in mind that the area surrounding the actual wetland contributes significantly to its function and value. For example, prior to being drained and farmed in 1989, several thousand ducks and geese overwintered on the Little Creve Coeur Marsh. The marsh provided the necessary aquatic habitat while the adjoining cropland met important feeding and resting habitat requirements. Department wetland biologists are available to assist in developing a plan to mitigate for both the function and value of habitat destroyed by the proposed project.

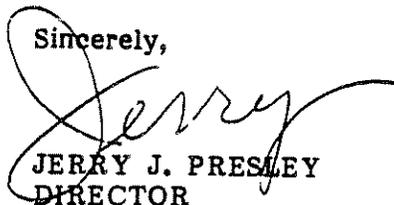
Regardless of the alignment chosen, significant quantities of fill will be required to elevate the highway above the 100 year flood elevation of the Missouri River. Selective borrowing of fill material offers an excellent opportunity to restore or recreate wetland habitat.

We would further recommend that consideration be given to combining area route improvement projects such as Page Avenue Extension, Route 115 and Interstate 64 and developing a single, centrally located mitigation area to offset unavoidable adverse impacts of these projects. The Green Bottoms/Catfish Island area in St. Charles County just upstream from the Page Avenue alignment offers excellent potential in this regard.

Follow-on Commercial or Residential Development. The fact that this is a difficult area to address is acknowledged. Still, it must be recognized that major projects like the proposed Page Avenue Extension do trigger further development activities. Of particular concern in this area is pressure for industrial development within the Missouri River floodplain and urban sprawl westward into St. Charles County. In the process, fish, wildlife and forestry resources are lost while the real losers are people whose quality of life and mental well-being depend on contact and interaction with open spaces and these resources. If a viable resource base is to be conserved and maintained, we, as Americans, must become more energy conscious and give higher priority to developing mass transit systems. It is an impossible task to build enough highways and bridges in the St. Louis area to accommodate single occupancy traffic.

The opportunity to provide these comments is appreciated. If you have questions or wish to further discuss this matter, please contact Mr. Norman P. Stucky at the above address. We look forward to continued coordination on this project.

Sincerely,



JERRY J. PRESLEY
DIRECTOR

cc: U. S. Environmental Protection Agency
Kansas City, Kansas

U. S. Fish and Wildlife Service
Columbia, Missouri

Thank you for the opportunity to review and comment on this document. ~~Please insure that we are included on your mailing list to receive a copy of the final EIS,~~ and future EIS's which may indicate potential public health impact and are developed under the National Environmental Policy Act (NEPA).

Sincerely yours,

Kenneth W. Holt

Kenneth W. Holt, M.S.E.H.
Environmental Health Scientist
Center for Environmental Health
and Injury Control



United States
Department of
Agriculture

Soil
Conservation
Service

555 Vandiver Drive
Columbia, Missouri 65202

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160
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July 10, 1990

Mr. Wayne Muri
Chief Engineer
Missouri Highway and
Transportation Department
P.O. Box 270
Jefferson City, Missouri 65102

Dear Mr. Muri:

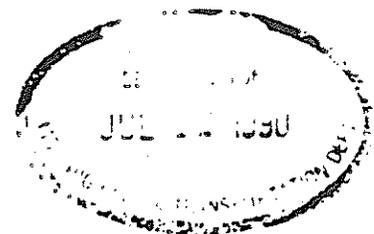
Our office has reviewed the Draft Environmental Impact Statement for the Page Avenue Extension, Job Nos. 6-U-803B, 6-U-803C and 6-U-803D.

We do not have any additional comments as AD-1006 forms were completed previously and included in the document. Considering all concerns, the red alignment seems to be preferable.

We appreciate the opportunity to review and comment.

Sincerely,

RUSSELL C. MILLS
State Conservationist



The Soil Conservation Service
is an agency of the
Department of Agriculture



Mark



MISSOURI HIGHWAY AND TRANSPORTATION DEPARTMENT

Wayne Muri
Chief Engineer

Capitol Ave. at Jefferson St., P.O. Box 270, Jefferson City, MO 65102 (314) 751-2551 Fax (314) 751-6555

November 9, 1992

Advisory Council on Historic Preservation
Old Post Office Building
Suite 803
1100 Pennsylvania Avenue-NW
Washington, D.C.

ATTENTION: Ms. MaryAnn Naber

Dear Ms. Naber:

Subject: Route D, St. Charles and St. Louis Counties, Page Avenue Extension, Job No. J6U0803, Information Concerning Cultural Resources in the Vicinity of the Page Avenue Red Route

Enclosed is the additional information that you requested concerning cultural resources associated with the Page Avenue Extension project in St. Louis and St. Charles Counties, Missouri (MHTD Job No. J6U0803). The additional information includes a copy of "An Overview of the Cultural Resources Within the Vicinity of the Page Avenue Extension, St. Louis and St. Charles Counties" by David Crampton, Volume 2 of the "Preliminary Final Environmental Impact Statement II, Page Avenue Extension", the revised text for the cultural resources survey section of the Final Environmental Impact Statement, and documentation and photographs of National Register-eligible structures located in the vicinity of the Page Avenue Red Route.

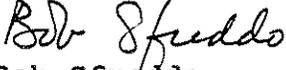
Legislation has recently been enacted by the U.S. Congress that authorizes the Secretary of Transportation to waive requirements of Section 4(f) of the Department of Transportation (DOT) Act of 1966 (Section 138 of Title 23 U.S.C. and Section 303 of Title 49 U.S.C.) as it applies to the proposed Page Avenue Extension. The congressional action has brought this project back to the forefront. The legislation has been signed into law by the President.

This preliminary document is an intergovernmental exchange that may be withheld under the FOIA request. Premature release of this material to any segment of the public could give some sectors an unfair advantage and would have a chilling effect on intergovernmental coordination. For these reasons, we respectfully request that the public not be given access to this document.

Advisory Council on Historic Preservation
Page 2
November 9, 1992

We hope that the enclosed information will answer your questions. If you require any additional information, please contact either Mark Kross (314) 751-4606 or Bob Reeder (314) 751-0473 of our staff. Thank you for your assistance.

Sincerely yours,


Bob Sfreddo
Division Engineer, Design

br

Enclosures

Copy: Mr. Gerald Reihsen-FHWA
Mark Kross-de



U.S. Department
of Transportation
Federal Highway
Administration

Region 7
Iowa, Kansas
Missouri, Nebraska

P. O. Box 1787
Jefferson City, Missouri 65102

October 29, 1992

Mr. Don L. Klima, Executive Director
Advisory Council on Historic Preservation
The Old Post Office Building
1100 Pennsylvania Avenue, N.W., Suite 809
Washington, D.C. 20004

Dear Mr. Klima:

Subject: Page Avenue MOA
Job No. J6U0803

Enclosed is a Memorandum of Agreement (MOA) for the Page Avenue (Route D) highway project in St. Louis and St. Charles Counties. The agreement is the result of extensive Section 106 coordination between our office, the Missouri Highway and Transportation Department, and the State Historic Preservation Officer. We request that the Advisory Council execute this agreement.

We feel the agreement is appropriate due to the nature and scope of the Page Avenue project. This project extends 21 miles through heavily developed St. Louis County and rapidly developing St. Charles County. There is considerable support for this project including local citizens, elected officials from St. Louis and St. Charles Counties, the Governor of Missouri, members of the U.S. House of Representatives, and both U.S. senators.

A draft Environmental Impact Statement (EIS) has been provided previously to your office. In addition, Appendix A through D to the MOA contain information on the types of historic and archaeological sites impacted. We have also included selected sections from the preliminary final EIS which provides greater detail than the draft EIS.

Due to the high level of state and congressional interest in this project, we request your expeditious handling of the MOA. A response by November 13 is requested.

Sincerely yours,

for Gerald J. Reihsen, P.E.
Division Administrator

Enclosure

MEMORANDUM OF AGREEMENT
AMONG THE FEDERAL HIGHWAY ADMINISTRATION,
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION,
THE MISSOURI HIGHWAY AND TRANSPORTATION DEPARTMENT,
AND THE MISSOURI STATE HISTORIC PRESERVATION OFFICER
FOR THE CONSTRUCTION OF THE ROUTE D PROJECT
IN ST. LOUIS AND ST. CHARLES COUNTIES, MISSOURI
(MHTD JOB NO. J6U0803)

WHEREAS, the Federal Highway Administration (FHWA), Department of Transportation, proposes to fund the construction of Route D (MHTD Job No. J6U0803) in St. Louis and St. Charles Counties, Missouri and,

WHEREAS, the FHWA has determined that the construction of Route D may have an effect upon properties included in or eligible for inclusion in the National Register of Historic Places (NRHP) and has consulted with the Advisory Council on Historic Preservation (Council) and the Missouri State Historic Preservation Officer (SHPO) pursuant to Section 800.13 of the regulations (36 CFR Part 800) implementing Section 106 of the National Historic Preservation Act (16 U.S.C. 470f), and

WHEREAS, the standards, guidelines, and definitions given in Appendix A are applicable throughout this Memorandum of Agreement (MOA);

NOW, THEREFORE, the FHWA, the Council, the Missouri Highway and Transportation Department (MHTD), and the SHPO agree that this undertaking shall be implemented in accordance with the following stipulations to satisfy the FHWA's Section 106 responsibility in order to take into account the effect of the undertaking on prehistoric and historic properties listed in Appendix B, Appendix C, and Appendix D.

Stipulations

The FHWA ensures that the following measures shall be carried out.

1. The FHWA shall ensure that a cultural resources survey of the Route D Project (MHTD Job No. J6U0803) is completed in a manner consistent with the Secretary of the Interior's Standards and Guidelines for Identification (43 FR 44720-23) and taking into account the National Park Service Publication, The Archaeological Survey: Methods and Uses, and the Missouri SHPO's Guidelines for Contract Cultural Resource Survey Reports and Professional Qualifications (January 1986). This cultural resources survey has been completed for most of the project area and to the extent possible given inaccessibility to certain private properties. The cultural resources survey includes a survey of historic and prehistoric archaeological sites, historic sites, and historic architectural sites. A final report describing the results of the survey and meeting the standards of the SHPO shall be submitted to the SHPO for review and approval. The FHWA shall evaluate properties identified through the survey in accordance with 36 CFR Part 800.4(c). If the survey results in the identification of properties that are eligible for the National Register, the FHWA shall comply with 36 CFR Part 800.5.

2. For those sites which the FHWA and the SHPO agree are not eligible for inclusion to the National Register of Historic Places (NRHP), no further investigations will be required and the proposed project may proceed in those areas.

3. The FHWA shall ensure that a mitigation plan is developed in consultation with the SHPO for those properties which the FHWA and the SHPO agree are eligible for inclusion to the NRHP. The plan shall be consistent with the standards, guidelines, and regulations incorporated herein as Appendix A and with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (U.S. Department of the Interior 1983).

The mitigation plan should include but not be limited to the following:

a. The plan will discuss the mitigation, or avoidance, of any effects to historic architectural properties determined eligible for inclusion to the NRHP.

b. Prior to any effect on an historic structure eligible to the NRHP, the FHWA will contact the National Park Service (NPS) Regional Office to determine what level and kind of recordation is required for the property. Unless otherwise agreed to by NPS, the FHWA shall ensure that all documentation is completed and accepted by the Historic American Building Survey (HABS) or the Historic American Engineering Record (HAER) prior to any effect, and that copies of this documentation are made available to the SHPO and appropriate local archives designated by the SHPO. Marketing of historic structures will be part of the mitigation plan.

c. The plan shall discuss the mitigation, or avoidance, of any effects to archaeological sites determined eligible for inclusion to the NRHP. Mitigation of any effects shall be based on a data recovery plan formulated in consultation with the SHPO and in accordance with the standards, guidelines, and regulations incorporated herein as Appendix A.

d. The mitigation plan shall be submitted by the FHWA to the SHPO for 30 days review. Unless the SHPO objects within 30 days after receipt of the plan, the FHWA shall ensure that it is implemented.

e. The FHWA shall take the SHPO's comments into account when implementing the mitigation plan.

f. After data recovery, final reports resulting from actions pursuant to the MOA will be provided to the consulting parties and to the National Park Service for possible submission to the National Technical Information Service. The FHWA shall ensure that such reports are responsive to the current professional standards as per the Secretary of the Interior's Standards and Guidelines.

g. The FHWA will ensure that the consulting parties are provided with interim reports on the status of this MOA every ninety (90) days.

h. The FHWA shall ensure that adequate laboratory time, space, and funds are available for limited analysis of any osteological, cultural, and biological materials recovered, as stipulated in the Secretary of Interior's Standards and Guidelines.

i. A repository within the State of Missouri for adequately curating all recovered materials and data will be selected by the FHWA in consultation with the SHPO, in accordance with 36 CFR 79.

j. The FHWA shall ensure that any human remains excavated during data recovery operations are reburied subsequent to analysis of their biological/morphological characteristics within twelve (12) months after the completion of the field work in a location where their subsequent disturbance is unlikely and in a manner as similar as possible to the manner in which they were originally interred, pursuant to Missouri Stat. RSMO 194.400, as interpreted by the SHPO.

4. For those sites for which the FHWA and the SHPO are not in agreement concerning National Register eligibility, the FHWA will request a formal determination from the Keeper of the National Register, in accordance with the regulations outlined in 36 CFR Part 63 (as incorporated under 36 CFR 60, August, 1986). Those sites which the Keeper determines eligible will be treated in accordance with Stipulation Number Three.

5. The FHWA shall ensure that all work pursuant to this MOA is carried out by, or under the direct supervision of, a person or persons meeting the minimum qualifications set forth in the Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation.

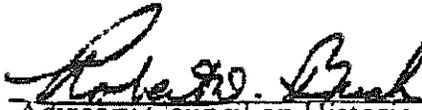
6. If, at any time during the implementation of the measures stipulated in this MOA, an objection to any such measure should be raised by any of the consulting parties, the FHWA shall request the further comments of the Council pursuant to 36 CFR Section 800.5e.

7. In accordance with the NRHP procedures (36 CFR Part 800), the FHWA shall forward documentation concerning the condition and significance of any site at which data recovery operations are undertaken to the Keeper of the National Register within one year following the completion of the data recovery, with recommendations for nomination, boundary changes, or removal from National Register eligibility, as appropriate.

8. Failure to carry out the terms of this MOA requires that the FHWA again request the Council's comments in accordance with 36 CFR Part 80. If the FHWA cannot carry out the terms of the MOA, it will not take or sanction any action or make any irreversible commitment that would result in adverse effects with respect to the National Register or eligible properties covered by the agreement, or would foreclose the Council's consideration of modifications or alternatives that could avoid or mitigate the adverse effects until the commenting process has been completed.

9. Within 90 days after carrying out the terms of the MOA, the FHWA shall provide a written report to all signatories to the MOA on the actions taken to fulfill the terms of the MOA.

Execution of this Memorandum of Agreement by the FHWA, the SHPO and the MHTD, and the FHWA's carrying out of its terms, evidences that the FHWA has afforded the Council an opportunity to comment on the Route D Project and its effect on historic properties, and that the FHWA has taken into account the effects of the project on historic properties, in accordance with Section 106 of the National Historic Preservation Act.



Advisory Council on Historic Preservation 11/10/92
Date



Federal Highway Administration 10-20-92
Department of Transportation Date



Missouri State Historic Preservation Officer 29 October 1992
Date



Missouri Highway and Transportation Department 10/21/92
Date

APPENDIX A

The following regulations, guidelines and definitions are applicable throughout this Memorandum of Agreement:

Regulations

36 CFR Part 800: Protection of Historic Properties, Regulations of the Advisory Council on Historic Preservation Governing the Section 106 Review Process (final rule Federal Register Vol. 51, No. 169, September 2, 1986).

36 CFR Part 60: Nominations to the National Register of Historic Places (Federal Register Vol. 51, No. 150, August 5, 1986).

36 CFR Part 63: Determination of Eligibility for Inclusion in the National Register of Historic Places (Federal Register Vol. 51, No. 150, August 5, 1986).

36 CFR Part 79: Curation of Federally Owned and Administered Archaeological Collections (Proposed Rule, Federal Register Vol. 52, No. 167, August 28, 1987).

Guidelines

Department of Transportation Guidelines: Procedures for Considering Environmental Impacts (Federal Register Vol. 45, No. 250, December 29, 1980).

National Park Service Guidelines: Guidelines for Federal Agency Responsibilities Under Section 110 of the National Historic Preservation Act (Federal Register Vol. 53, No. 31, February 17, 1988).

Department of the Interior Guidelines: Archaeology and Historic Preservation; Secretary of the Interior's Standards and Guidelines (Federal Register Vol. 48, No. 190, September 29, 1983).

Advisory Council on Historic Preservation Guidelines: Treatment of Archaeological Properties: A Handbook (November, 1980).

Missouri Office of Historic Preservation Guidelines: Guidelines for Contract Cultural Resource Survey Reports and Professional Qualifications (January, 1986).

Definitions

Phase I Survey: An intensive, on-the-ground survey of the proposed project corridor using systematic pedestrian survey, systematic coring techniques such as shovel tests or auger holes, or a combination of these techniques, for the purpose of identifying potential prehistoric, historic, or historic-architectural sites.

Phase II Testing: A systematic program consisting of controlled surface collections and controlled systematic subsurface excavations using either manual or mechanical techniques, or both, for the purpose of determining the significance of an archaeological site or sites in terms of the National Register of Historic Places criteria of eligibility (36 CFR Part 60).

Data Recovery Program: A systematic, extensive and intensive program conducted for the purpose of recovering archaeological data from a National Register-eligible site determined significant for its data content and not for in-place preservation. Such a program will be developed and executed in accordance with a research design accepted by agreement between the FHWA and SHPO.

Research Design: A plan drafted for the purpose of recovering significant archaeological data from a National Register-eligible site and incorporating the analysis of such data into the framework of currently relevant archaeological research topics or questions.

APPENDIX B. PAGE AVENUE PREVIOUSLY REPORTED SITES
JOB NO. J6U0803

<u>SITE NUMBER</u>	<u>SITE AGE</u>	<u>SETTING</u>	<u>ROUTE</u>	<u>DISTANCE TO CENTERLINE</u>	<u>COMMENTS</u>
23SL11	Late Archaic Early Woodland	Slope	Red Green	150	Significance and integrity unknown
23SL118	Prehistoric	Slope	Green	60	Previously destroyed
23SL116	Paleo-Indian Dalton/Early Archaic Late Archaic	Slope	Green	60	Mostly destroyed
23SL591	Late Woodland	Ridgetop	Red	75	Previously destroyed
23SC683	Prehistoric	Slope	Blue- Dashed	60	Most of it previously destroyed
23SC686	Prehistoric/ Historic	Ridgetop	Blue- Dashed	0	Extensively disturbed
23SC684	Prehistoric	Ridgetop	Blue- Dashed	60	Extensively disturbed
23SC685	Prehistoric	Ridgetop	Blue- Dashed	60	Partially disturbed Parts are intact
23SC529	Prehistoric	Ridgetop	Blue- Dashed	300	Previously disturbed
23SC531	Prehistoric	Slope	Blue- Dashed	300	Previously disturbed
23SC535	Prehistoric	Ridgetop	Blue- Dashed	250	Previously disturbed
23SC534	Prehistoric	Ridgetop	Blue- Dashed	300	Previously disturbed
23SC530	Prehistoric	Ridgetop	Blue- Dashed	75	Probably destroyed
23SC532	Prehistoric	Ridgetop	Blue- Dashed	230	Previously disturbed
23SC654	Late Archaic	Slope	Green	0	Probably not NRHP eligible
23SC20	Prehistoric	Floodplain	Red	50	23SC20/23SC Previously tested-not eligible

APPENDIX B. PAGE AVENUE PREVIOUSLY REPORTED SITES
 JOB NO. J6U0803

<u>SITE NUMBER</u>	<u>SITE AGE</u>	<u>SETTING</u>	<u>ROUTE</u>	<u>DISTANCE TO CENTERLINE</u>	<u>COMMENTS</u>
23SC488	Middle Archaic Early Woodland	Ridgetop Slope	Red	50	Large site
23SC665	Prehistoric	Floodplain	Green	250	Previously determined-not eligible-Destroyed
23SC604	Prehistoric	Floodplain	Green	0	Previously determined-not eligible
23SC710	Late Woodland Historic	Ridgetop	Green	50	Large site
23SC495	Prehistoric	Slope	Green	0	Large site
23SC537	Historic	Ridgetop	Green	320	House is 125 years old Barn is 150 years old
23SC494	Prehistoric	Ridgetop	Green	300	Small site
23SC609	Late Woodland	Hilltop	Green	0	Boschert Site Previously excavated
23SC656	Late Woodland	Ridgetop	Green	275	Partially impacted

APPENDIX C. PREVIOUSLY UNREPORTED PAGE AVENUE
ARCHAEOLOGICAL SITES AND RECOMMENDATIONS
JOB NO. J6U0803

<u>SITE NO./ FIELD SITE NO.</u>	<u>AGE</u>	<u>SITE SIZE (m²)</u>	<u>ROUTE/ DISTANCE TO CL (m)</u>	<u>COMMENTS</u>	<u>RECOMMENDATIONS</u>
23SL766 Field Site 1	Prehistoric	3500	Red 40	Partially disturbed hilltop setting Moderate artifact density	P-II Testing
23SL767 Field Site 2	Prehistoric	200	Green 0	Completely destroyed	No further work
23SL768 Field Site 4	Prehistoric	2250	Red Mitigation land-200	Will not be impacted	No further work
23SL769 Field Site 5	Middle Archaic	1500	Red Mitigation land-10	Completely destroyed Hilltop setting Will not be impacted Low artifact density	No further work
23SL770 Field Site 6	Middle- Late Woodland	750	Red Mitigation land-10	Partially disturbed Hilltop setting Will not be impacted	No further work
23SL771 Field Site 7	Prehistoric	75	Red Mitigation land-100	Extensively disturbed Hilltop setting Will not be impacted	No further work
23SC805 Field Site 8	Prehistoric	5000	Red 30	Ridgetop setting Cultivated field	P-II Testing
23SC806 Field Site 9	Prehistoric	7500	Red 0	Ridgetop setting Cultivated field	P-II Testing
23SL772 Field Site 11	Prehistoric	100	Red Mitigation land-100	Completely destroyed Ridgetop setting Will not be impacted	No further work
23SL773 Field Site 12	Prehistoric	700	Red Mitigation land-100	Completely destroyed Ridgetop setting Will not be impacted	No further work
23SL774 Field Site 13	Prehistoric	1000	Red Mitigation land-50	Partially destroyed Ridgetop setting Will not be impacted	No further work

APPENDIX C. PREVIOUSLY UNREPORTED PAGE AVENUE
ARCHAEOLOGICAL SITES AND RECOMMENDATIONS
JOB NO. J6U0803

<u>SITE NO./ FIELD SITE NO.</u>	<u>AGE</u>	<u>SITE SIZE (m²)</u>	<u>ROUTE/ DISTANCE TO CL (m)</u>	<u>COMMENTS</u>	<u>RECOMMENDATIONS</u>
23SL775 Field Site 14	Prehistoric	2000	Red Mitigation land-150	Partially destroyed Ridgetop setting Will not be impacted	No further work
23SL776 Field Site 15	Historic	7800	Red Mitigation land	Possible refuse dump Cultivated field High artifact density	P-II Testing Archival research
23SC807 Field Site 16	Prehistoric	5000	Red 100	Ridgeslope setting Cultivated field Very low artifact density	No further work
23SC808 Field Site 17	Prehistoric	11,250	Red 0	Low Ridgetop Cultivated field Partially destroyed Moderate artifact density	P-II Testing
23SC809 Field Site 18	Prehistoric Historic	1000	Red 0	Hillcrest and slope Cultivated field Low artifact density	No further work
23SC810 Field Site 19	Prehistoric	10,000	Red 0	Ridgetop setting Cultivated field	P-II Testing
23SC811 Field Site 20	Historic	625	Red 0	Ridgetop setting Cultivated field Very low artifact density	No further work
23SC812 Field Site 22	Early Archaic	2500	Red 50	Ridgeslope setting Cultivated field Moderate artifact density	P-II testing
23SC813 Field Site 23	Prehistoric	650	Red 70	Ridgeslope setting Cultivated field Low artifact density	No further work
23SC814 Field Site 24	Prehistoric	900	Red 120	Ridgeslope setting Cultivated field Very low artifact density	No further work

APPENDIX C. PREVIOUSLY UNREPORTED PAGE AVENUE
ARCHAEOLOGICAL SITES AND RECOMMENDATIONS
JOB NO. J6U0803

<u>SITE NO./ FIELD SITE NO.</u>	<u>AGE</u>	<u>SITE SIZE (m²)</u>	<u>ROUTE DISTANCE TO CL (m)</u>	<u>COMMENTS</u>	<u>RECOMMENDATIONS</u>
23SC815 Field Site 25	Prehistoric	900	Red 100	Ridgeslope setting Cultivated field Low artifact density	No further work
23SC816 Field Site 26	Prehistoric	400	Red 70	Ridgeslope setting Cultivated field Low artifact density	No further work
23SC817 Field Site 27	Historic	5625	Red 0	Ridgetop setting Cultivated field Probably assoc. with standing structure	No further work
23SC818 Field Site 28	Prehistoric	400	Red 60	Ridgeslope setting Partially disturbed	No further work
23SC819 Field Site 29	Prehistoric	5000	Red 60	Ridgetop setting Cultivated field Moderate artifact density	P-II Testing
23SC820 Field Site 30	Prehistoric	625	Red 80	Ridgeslope setting Cultivated field Low artifact density	P-II Testing
23SC821 Field Site 31	Prehistoric	5000	Red 0	Ridgetop setting Cultivated field	P-II Testing
23SC822 Field Site 33	Late Archaic Late Woodland	5000	Red 0	Ridgetop setting Cultivated field High artifact density	P-II Testing
23SC823 Field Site 34	Prehistoric	2500	Red 30	Ridgeslope setting Cultivated field Moderate artifact density	P-II Testing
23SC824 Field Site 35	Prehistoric	1250	Red 0	Ridgeslope setting Cultivated field Partially impacted Low artifact density	No further work
23SC826 Field Site 36	Prehistoric	100	Red 0	Floodplain setting Cultivated field Very low artifact density	No further work

APPENDIX C. PREVIOUSLY UNREPORTED PAGE AVENUE
 ARCHAEOLOGICAL SITES AND RECOMMENDATIONS
 JOB NO. J6U0803

<u>SITE NO./</u> <u>FIELD SITE NO.</u>	<u>AGE</u>	<u>SITE</u> <u>SIZE</u> <u>(m²)</u>	<u>ROUTE</u> <u>DISTANCE</u> <u>TO CL (m)</u>	<u>COMMENTS</u>	<u>RECOMMENDATIONS</u>
23SC827 Field Site 37	Prehistoric	10,000	Red 100	Ridgetop setting Cultivated field Moderate artifact density	P-II Testing
23SC828 Field Site 38	Prehistoric	25	Red	Ridgetop setting Cultivated field Very low artifact density	No further work
23SC829 Field Site 39	Prehistoric	375	Red 0	Ridgetop setting Cultivated field	P-II Testing
23SC830 Field Site 40	Prehistoric	1250	Red 0	Ridgetop setting Cultivated field Low artifact density	P-II Testing
23SC831 Field Site 41	Prehistoric	375	Red 100	Hillslope setting Cultivated field Very low artifact density	P-II Testing
23SC832 Field Site 42	Prehistoric	6200	Red 0	Hillslope setting Cultivated field Moderate artifact density	P-II Testing
23SC833 Field Site 43	Prehistoric	600	Red 0	Ridgetop setting Cultivated field	No further work
23SC834 Field Site 44	Prehistoric	625	Red 0	Hilltop setting Cultivated field	P-II Testing
23SC835 Field Site 45	Prehistoric	100	Red 0	Hilltop setting Cultivated and eroded field Very low artifact density	No further work
23SC836 Field Site 46	Historic	900	Red 0	Hilltop setting Cultivated field Moderate artifact density	Possible P-II Testing Archival research

APPENDIX C. PREVIOUSLY UNREPORTED PAGE AVENUE
 ARCHAEOLOGICAL SITES AND RECOMMENDATIONS
 JOB NO. J6U0803

<u>SITE NO./ FIELD SITE NO.</u>	<u>AGE</u>	<u>SITE SIZE (m²)</u>	<u>ROUTE/ DISTANCE TO CL (m)</u>	<u>COMMENTS</u>	<u>RECOMMENDATIONS</u>
23SC837 Field Site 47	Historic	2500	Red 0	Hilltop setting Cultivated field Moderate artifact density	Possible P-II Testing Archival research
23SC838 Field Site 48	Prehistoric	50	Red 20	Hillslope setting Cultivated field Very low artifact density	No further work
23SC839 Field Site 49	Prehistoric	625	Red 0	Hillslope setting Cultivated field Low artifact density	No further work
23SC840 Field Site 50	Woodland	1875	Red 20	Hilltop setting Cultivated field Partially disturbed High artifact density	P-II Testing
23SC841 Field Site 51	Prehistoric	625	Red 30	Hillslope setting Cultivated and eroded field Low artifact density	No further work
23SC842 Field Site 52	Prehistoric	100	Red 50	Hilltop setting Cultivated field Very low artifact density	No further work
23SC843 Field Site 53	Prehistoric	2500	Red 40	Ridgeslope setting Cultivated field Low artifact density	P-II Testing
23SC844 Field Site 55	Prehistoric	900	Green Dashed 100	Ridgetop setting Cultivated field Moderate artifact density	P-II Testing
23SC845 Field Site 56	Prehistoric	50	Red 50	Hilltop setting Cultivated field Very low artifact density	No further work

APPENDIX C. PREVIOUSLY UNREPORTED PAGE AVENUE
 ARCHAEOLOGICAL SITES AND RECOMMENDATIONS
 JOB NO. J6U0803

<u>SITE NO./ FIELD SITE NO.</u>	<u>AGE</u>	<u>SITE SIZE (m²)</u>	<u>ROUTE DISTANCE TO CL (m)</u>	<u>COMMENTS</u>	<u>RECOMMENDATIONS</u>
23SC846 Field Site 57	Historic	2500	Red 50	Hilltop setting Cultivated field Moderate artifact density	Possible P-II Testing Archival research
23SC847 Field Site 58	Prehistoric	450	Red 0	Ridgetop setting Cultivated and eroded field	No further work
23SC848 Field Site 59	Prehistoric	100	Green 270	Ridgetop setting Cultivated field Will not be impacted	No further work
23SC849 Field Site 60	Late Archaic	2500	Green 260	Ridgetop setting Cultivated field Will not be impacted	No further work
23SC850 Field Site 61	Prehistoric	1800	Green 70	Ridgetop setting Cultivated field	P-II Testing
23SC851 Field Site 62	Prehistoric	1200	Green 0	Ridgetop setting Cultivated field	P-II Testing
23SC852 Field Site 63	Prehistoric	875	Green 50	Ridgetop setting Cultivated field Moderate artifact density	P-II Testing
23SC853 Field Site 64	Prehistoric	100	Green 150	Ridgetop setting Cultivated field Low artifact density	P-II Testing
23SC854 Field Site 65	Prehistoric	400	Green 180	Ridgetop setting Cultivated field Will not be impacted	No further work
23SC855 Field Site 66	Woodland	700	Red 0	Ridgetop setting Cultivated field Low artifact density	P-II Testing
23SC856 Field Site 67	Prehistoric	3500	Green Dashed 0	Ridgetop setting Cultivated field Moderate artifact density	P-II Testing

APPENDIX C. PREVIOUSLY UNREPORTED PAGE AVENUE
ARCHAEOLOGICAL SITES AND RECOMMENDATIONS
JOB NO. J6U0803

<u>SITE NO./</u> <u>FIELD SITE NO.</u>	<u>AGE</u>	<u>SITE</u> <u>SIZE</u> <u>(m²)</u>	<u>ROUTE/</u> <u>DISTANCE</u> <u>TO CL (m)</u>	<u>COMMENTS</u>	<u>RECOMMENDATIONS</u>
23SC857 Field Site 68	Late Archaic	900	Green Dashed 0	Ridgetop setting Cultivated field	P-II Testing
23SC858 Field Site 69	Prehistoric	5000	Green Dashed 0	Ridgetop setting Cultivated field Moderate artifact density	P-II Testing
23SC859 Field Site 70	Prehistoric	2000	Green Dashed 120	Ridgetop setting Cultivated field	P-II Testing
23SC860 Field Site 71	Prehistoric	5500	Green Dashed 60	Ridgetop setting Cultivated field Moderate artifact density	P-II Testing
23SC861 Field Site 72	Prehistoric	15,000	Green Dashed 120	Ridgetop setting Cultivated field Moderate artifact density	P-II Testing
23SC862 Field Site 73	Prehistoric	500	Green Dashed 180	Ridgetop setting Cultivated field	P-II Testing
23SC863 Field Site 74	Prehistoric	5000	Green Dashed 20	Slope setting Cultivated field	P-II Testing
23SC864 Field Site 75	Late Woodland	7500	Green 80	Ridgetop setting Cultivated field	P-II Testing
23SC865 Field Site 76	Prehistoric	625	Green 60	Ridgetop setting Cultivated field Very low artifact density	No further work
23SC866 Field Site 77	Prehistoric	300	Green, Green Dashed 150	Ridgetop setting Cultivated field Very low artifact density	No further work

APPENDIX C. PREVIOUSLY UNREPORTED PAGE AVENUE
 ARCHAEOLOGICAL SITES AND RECOMMENDATIONS
 JOB NO. J6U0803

<u>SITE NO./</u> <u>FIELD SITE NO.</u>	<u>AGE</u>	<u>SITE</u> <u>SIZE</u> <u>(m²)</u>	<u>ROUTE/</u> <u>DISTANCE</u> <u>TO CL.(m)</u>	<u>COMMENTS</u>	<u>RECOMMENDATIONS</u>
23SC867 Field Site 78	Prehistoric	5000	Green Dashed 60	Slope setting Cultivated field Moderate-High artifact density	P-II Testing
23SC880 Field Site 79	Prehistoric	700	Green	Hilltop setting Cultivated field	P-II Testing
23SC881 Field Site 80	Prehistoric	5000	Green	Hillslope setting Cultivated field Low artifact density May continue into woods	P-II Testing
23SC882 Field Site 81	Prehistoric	2500	Green	Hillslope setting Cultivated field Low artifact density May continue to hilltop	P-II Testing
23SC883 Field Site 82	Prehistoric	2000	Green	Terrace setting Cultivated field Low artifact density	P-II Testing

APPENDIX D. PAGE AVENUE HISTORIC STRUCTURES
JOB NO. J6U0803

<u>NAME AND/OR ADDRESS</u>	<u>APPROXIMATE AGE</u>	<u>NATURE OF STRUCTURE</u>	<u>ROUTE/ DISTANCE* CENTERLINE (m)</u>	<u>COMMENTS</u>
Little Lake Golf Course Site 23SL737 (St. Louis County)	Late 19th/ Early 20th Century	Recreational facility	Green 100	Potentially NRHP- eligible To be destroyed
Gronefeld Farm 2355 Upper Bottom Road (St. Charles County)	1936	Farmhouse with outbuildings	Red 15	NRHP-eligible Not impacted
Ostman Property Towers Road (St. Charles County)	1905	Farmhouse with outbuildings	Green dashed 130	Not NRHP-eligible Probably not impacted
Hadley Property 1501 St. Peters (Cottleville Road) (St. Charles County)	Late 19th/ Early 20th Century	Farmhouse with outbuildings	Green 0	Not NRHP-eligible To be destroyed
Unknown 1551 St. Peters (Cottleville Road) (St. Charles County)	Late 19th Century	Farmhouse with outbuildings	Green 180	Not NRHP-eligible Probably not impacted
Ohmes Residence 325 Ohmes Road (St. Charles County) (previously recorded as site 23SC537)	Late 19th Century	Farmhouse with outbuildings	Green 250	Only barn NRHP- eligible House is ca. 125 yrs old Barn is ca. 150 yrs old Not impacted
Kolkmeier Residence 806 Caulks Hill Road (St. Charles County)	ca. 1850	Farmhouse with outbuildings	Green 0	Not NRHP-eligible To be destroyed
Tappmeyer Barn Creve Coeur Mill Road (St. Louis County)	Early 20th Century	Barn	Red 100	Not NRHP-eligible To be destroyed
Schmittel Residence River Valley Road (St. Louis County)	Mid-20th Century	Farmhouse with outbuildings	Red mitigation	Not NRHP-eligible To be destroyed
Dennis and Teresa Dickherber Property (St. Charles County)	1955	farmhouse with outbuildings	Red 150	Not NRHP-eligible To be destroyed

APPENDIX D. PAGE AVENUE HISTORIC STRUCTURES
JOB NO. J6U0803

<u>NAME AND/OR ADDRESS</u>	<u>APPROXIMATE AGE</u>	<u>NATURE OF STRUCTURE</u>	<u>ROUTE/ DISTANCE* CENTERLINE (M)</u>	<u>COMMENTS</u>
Anteman Property Post Road (St. Charles County)	Late 19th/ Early 20th Century	Farmhouse with outbuildings	Red 25	Not NRHP-eligible To be destroyed
Boore Barn River Valley Road (St. Louis County)	1945	Isolated wood or timber frame barn	Red 5	Not NRHP-eligible To be destroyed
the Capt. John Campbell House (St. Charles County)	Early 19th Century	Farmhouse with outbuildings	Red 60	House determined NRHP-eligible Outbuildings not NRHP eligible Only outbuildings will be impacted
Hemsath Property Hemsath Road (St. Charles County)	ca. 1870	Farmhouse with outbuildings	Red 15	NRHP-eligible Not impacted
Brinkman Residence Route 94 (St. Charles County)	Late 19th Century	Farmhouse with outbuildings	Red 0	Not NRHP-eligible To be destroyed
Robert Kaplan Trust (St. Charles County)	Late 19th Century	Farmhouse with outbuildings	Red 0	Potentially NRHP- eligible To be destroyed
McElhiney-Knowles Estate (St. Charles County)	1838	Farmhouse with outbuildings	Red 25	NRHP-eligible Not impacted
Polkemeyer Property (St. Charles County)	1936	Farmhouse with outbuildings	Red 20	NRHP-eligible Not impacted
Harry Dickherber Property (St. Charles County)	1904	Farmhouse with outbuildings	Red 0	NRHP-eligible Not impacted
Dingledine Property 84 Dingledine Road (St. Charles County)	Mid 19th Century	Farmhouse with outbuildings	Green Dashed	NRHP-eligible Not impacted

APPENDIX D. PAGE AVENUE HISTORIC STRUCTURES
 JOB NO. J6U0803

<u>NAME AND/OR ADDRESS</u>	<u>APPROXIMATE AGE</u>	<u>NATURE OF STRUCTURE</u>	<u>ROUTE/ DISTANCE* CENTERLINE (m)</u>	<u>COMMENTS</u>
Rosehaven Dr. (St. Louis County)	Early 20th Century	Double family residence with outbuildings	Red mitigation	Not NRHP-eligible To be destroyed

* distance is the distance in meters from the tentative edge of the right of way to the nearest building that has been determined eligible





MISSOURI HIGHWAY AND TRANSPORTATION DEPARTMENT

Wayne Muri
Chief Engineer

Capitol Ave. at Jefferson St., P.O. Box 270, Jefferson City, MO 65102 (314) 751-2551 Fax (314) 751-6555

September 6, 1991

Mr. Les Sterman
Executive Director
East-West Gateway Coordinating Council
911 Washington Avenue
St. Louis, MO 63101

Dear Mr. Sterman:

This letter is a follow up to our letter of August 5, 1991, wherein we requested that all of the highway improvements of the Missouri Highway and Transportation Department that fall within the MSTTA area of St. Louis be included in the Transportation Improvement Program (TIP) of the East-West Gateway Coordinating Council. This matter was also further discussed yesterday between Mr. Marty Altman of your organization and Mr. Bob Sfreddo of the Missouri Highway and Transportation Department.

In addition to those projects in the tentative program furnished to you, we are also strongly recommending that the extension of Page Avenue (Route D) from Route 94 west to Route 40 (I-64) also be included in the TIP.

The Federal Highway Administration has urged the department to include the entire improvement of Page Avenue Extension in the TIP. We concur in this suggestion in that considerable study has gone into this project and the department is currently completing a Final Environmental Impact Statement (FEIS) that includes the segment from Route 94 to Route 40 (I-64). Having the improvement on the TIP compliments the FEIS and the FEIS compliments having Page Avenue Extension on the TIP. In addition, we are currently involved in protective buying and hardship buying of right of way on the section of Route D (Page Avenue Extension) from Route 94 to Route 40 (I-64). We currently have federal funds approved in the amount of \$3,500,000 from the Right of Way Revolving Fund for this work and we have a request which we expect to be approved shortly for \$4,000,000 in additional funds from this source for protective and hardship buying of right of way from Route 94 to Route 40.

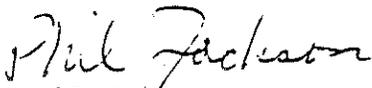
Mr. Les Sterman
Page 2
September 6, 1991

The department has also completed preliminary plans for this portion of the improvement for which we currently estimate the total cost for right of way to be \$26,500,000 and construction to be \$121,250,000. This work will be assigned the following job numbers. The portion from Route 40 (I-64) near Route N to Route 94 at Route N is assigned Job No. 6-U-970 and the portion from Route 94 at Route N along Route 94 to Jungs Station Road is assigned Job No. 6-U-971. Job No. 6-U-970 is 9.0 miles in length. Job No. 6-U-971 is 5.0 miles in length.

We trust the preceding information will provide you with sufficient documentation that the extension of Route D from Route 94 to Route 40 is a viable project and has had considerable planning and community involvement to insure that it will be completed. We hope that East-West Gateway can see the merits of adding this project to the TIP along with the other projects in the MSTa area that were included in the Right of Way and Construction Program that was furnished you with our letter of August 5.

We appreciate your kind and continued cooperation in this vitally important planning coordination activity that is of utmost importance to the transportation picture of the St. Louis urbanized area.

Sincerely yours,



Phil Jackson
Division Engineer, Planning

pj/bs/ph

Statement by Les Sterman, Executive Director
East-West Gateway Coordinating Council

Prepared for:

Design and Location Hearing
Route D (Page Avenue) Extension

Written Copy 06/28/90
Public Hearing Statement

My name is Les Sterman, Executive Director of the East-West Gateway Coordinating Council. East-West Gateway is a voluntary association of local governments in the St. Louis region, formed for the purpose of solving problems which cross jurisdictional boundaries. We are also the Metropolitan Planning Organization for the region, designated by the Governors of Illinois and Missouri and the federal government for the purpose of doing regionwide transportation planning for the St. Louis area.

We at Gateway have long been concerned with the problems of growth and development in St. Charles County. Long before it became a topic of such intense interest in St. Charles, we warned of the growing need for highway improvements to address traffic congestion. Our staff has done more studies and plans regarding growth and transportation in St. Charles County than in any other county in our two state region. It is a real pleasure to see some of those plans start to become reality. I am here tonight representing the elected officials of the entire metropolitan area and the professional staff of the East-West Gateway Coordinating Council in support of the extension of Page Avenue including a new bridge across the Missouri River. We do not however, support any specific location for this important roadway. This decision is a local one, to be made by the elected officials and citizens of St. Charles and St. Louis Counties, in cooperation with the Missouri Highway and Transportation Department.

The reason that this project is so important to the region and to the citizens of St. Charles and St. Louis Counties is not to fuel further growth and development. That growth is caused by economic, social and geographic factors. New highways will not sustain that growth nor will highway congestion alone constrain it. This is proven by the economic growth of some of the nations large metropolitan areas such as Los Angeles, Boston, Atlanta, San Francisco and Chicago which continue to prosper and grow even though traffic congestion is very severe.

The continued growth of St. Louis and St. Charles Counties is a given. What is at stake is the quality of life for those hundreds of thousands of people who live or do business in these

counties. If we plan well now, make good decisions and invest in our region we can reduce the burden and waste of traffic congestion. Moving ahead with Page Avenue is one of those good decisions. It is important to make it now.

It is very important to note that highway congestion is not a passing phenomenon. Even after the Rte. 115 and Page Avenue Bridges are built and other major highway projects are completed, congestion 20 years from now will not diminish from today's levels. We know of no cities where highway construction has erased congestion. Yet if these projects do not move ahead, congestion will dramatically worsen. St. Charles County will suffer from the worst highway congestion in Missouri and the peak "hour" will last for most of the daylight hours.

The same vision and perseverance which make this and other major highway projects possible should be applied to seeking lasting solutions to congestion. Strategies like ridesharing, high occupancy vehicle lanes and even public transit need to be part of our planning vocabulary. If we do not begin to pursue alternative forms of transportation now, we are condemning hundreds of thousands of commuters to sitting in traffic for an ever increasing portion of their lives. The Page Avenue extension project offers some rare opportunities to take advantage of these strategies, some of which are noted in the draft Environmental Impact Statement. These should be given serious consideration as the project is designed.

Because this is a large and complex project and because it traverses some environmentally sensitive areas, we understand that there will be concern on the part of many who fear long term damage to the environment. We urge the Highway and Transportation Department to use extraordinary care and judgement in the design of the project to minimize harm to the environment.

The opportunity to conceive and build a project of this kind is rare and often passes quickly. We urge you to move ahead quickly with the Page Avenue extension. Thank you.



U.S. Department
of Transportation
Urban Mass
Transportation
Administration

Midwestern Area Office

6301 Rockhill Road
Suite 303
Kansas City, Missouri 64131

November 8, 1991

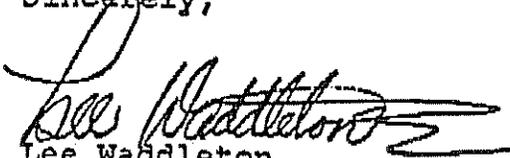
Mr. Les Sterman
Executive Director
East-West Gateway Coordinating Council
911 Washington
St. Louis, Missouri

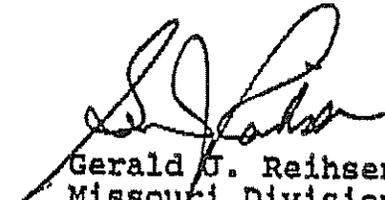
Re: Air Quality Conformity
Determination

Dear Mr. Sterman:

The Federal Highway Administration (FHWA) and the Urban Mass Transportation Administration (UMTA) concur in the East-West Gateway Coordinating Council's September 30, 1991 and supplemental October 31, 1991 Air Quality Conformity Determination that the current long-range Transportation Plan and FY 1992 Transportation Improvement Program conform with the St. Louis ozone and carbon monoxide State Implementation Plans under the EPA/DOT Interim Conformity guidance published pursuant to the 1990 Clean Air Act Amendments.

Sincerely,


Lee Waddleton
Midwestern Area Director
Urban Mass Transportation


Gerald U. Reihsen
Missouri Division Administrator
Federal Highway Administration



RECEIVED
 JUN 27 1990
 H. C. MILFORD
 County Executive Highway Dept

OFFICE OF THE COUNTY EXECUTIVE
 SAINT LOUIS COUNTY
 CLAYTON, MISSOURI 63105

June 26, 1990

DIST ENGR	
ASST DE DESIGN	<i>M</i>
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ALL DEPTS	
CONSTRUCTION	
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OFFICE MGR	
PERSONNEL	
R/W	
C-ME	
FILE	

Mr. J. T. Yarnell, District Engineer
 Missouri Highway and Transportation Department
 329 South Kirkwood Road
 Kirkwood, Missouri 63122

Dear Mr. ~~Yarnell~~: *J.T.*

Reference is made to your recent request for comments by St. Louis County on the alignment of the proposed Page Avenue Extension.

Since 1971, the County Departments of Planning and Highways and Traffic have required development to set aside right-of-way for the Page Avenue Extension. We are supportive of the alignment which utilizes this dedicated right-of-way and crosses the southern end of the Creve Coeur Park. The southern alignment depicted on your map would have an unfavorable impact on the subdivisions in the area, by the taking of numerous homes and the bisecting of local neighborhoods.

Thank you for the opportunity to comment on the proposed Page Avenue Extension.

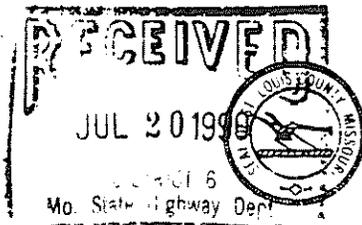
Sincerely

HC
 H. C. Milford
 County Executive

HCM:ml

- cc: Mr. Jan H. Paynton, Director, Department of Highways and Traffic
- Mr. Roger M. Grow, Director, Department of Planning
- Mr. Albert L. Phillips, Acting Director, Department of Parks and Recreation
- Mr. Gregory W. Knauer, Vice-President and Manager, Planning Department, Booker Associates, Inc.

NO RESPONSE



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OFFICE OF THE COUNTY EXECUTIVE
 SAINT LOUIS COUNTY
 CLAYTON, MISSOURI 63105
 July 18, 1990

H. C. MILFORD
 COUNTY EXECUTIVE

Mr. J. T. Yarnell, District Engineer
 Missouri Highway Department
 329 South Kirkwood
 Kirkwood, MO 63122

Dear Mr. ~~Yarnell~~: *J. T.*

Some question has been raised as to the County's position on an interchange at Amiot and the Page Avenue Extension. I have stated in the past that my preference is for an interchange at Page Avenue and the Earth City Expressway. When I decided to reduce the improvements to Marine Avenue it was with the understanding that the Amiot interchange would not be built.

If you have any questions about this, please do not hesitate to contact me.

Sincerely,

 H. C. Milford
 County Executive

HCM:dj



OFFICE OF THE COUNTY EXECUTIVE
 SAINT LOUIS COUNTY
 CLAYTON, MISSOURI 63105

July 30, 1990

H. C. MILFORD
 COUNTY EXECUTIVE

Mr. Robert G. Anderson
 District Engineer
 FHWA Division Office
 P. O. Box 1787
 Jefferson City, Missouri 65102

Subject: Draft Environmental Impact Statement
 For Page Avenue Extension

Dear Mr. Anderson:

Thank you for the opportunity to review the approved Draft Environmental Impact Statement for the proposed Page Avenue Extension through St. Louis County. You requested a review and comment prior to August 1, 1990.

As stated in our previous correspondence, dated June 20, 1990, St. Louis County is supportive of the alignment which utilizes the previously dedicated right-of-way and crosses the southern end of Creve Coeur Park. The Environmental Impact Statement regarding this corridor has been reviewed and concurred in by St. Louis County.

Thank you again for the opportunity to comment on the Draft Environmental Impact Statement for the proposed Page Avenue Extension.

Sincerely,

H. C. Milford
 H. C. Milford
 County Executive

HCM:dj

- cc: Mr. Jan H. Paynton, Director, Department of Highways and Traffic
- Mr. Roger M. Grow, Director, Department of Planning
- Mr. Albert L. Phillips, Acting Director, Department of Parks and Recreation
- Mr. J. T. Yarnell, District Engineer, Missouri Highway and Transportation Department
- Mr. Gregory W. Knauer, Vice President and Manager, Planning Department, Booker Associates, Inc.

BOOKER ASSOCIATES, INC.			
	INFO.	ACT	INTI
JEM			
KCF			
TRP			
CI Trans.			
FPE Mill/Ind			
FMS			
PMG			
PJG			
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Depts. Arch.			
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IRD			
Spec. Proj. Teams			
General File			
Dept. File			
Files File			

cc GWK
 E3231
 Done T.I.
 7-30
 1/30/90



OFFICE OF THE COUNTY EXECUTIVE
SAINT LOUIS COUNTY
CLAYTON, MISSOURI 63105

H. C. MILFORD
COUNTY EXECUTIVE

July 30, 1990

<input type="checkbox"/> Mr. Tolson	<input type="checkbox"/> Mr. Casper
<input type="checkbox"/> Mr. DeLoach	<input type="checkbox"/> Mr. Callahan
<input type="checkbox"/> Mr. Mohr	<input type="checkbox"/> Mr. Conrad
<input type="checkbox"/> Mr. Bishop	<input type="checkbox"/> Mr. Felt
<input type="checkbox"/> Mr. Casper	<input type="checkbox"/> Mr. Gale
<input type="checkbox"/> Mr. Callahan	<input type="checkbox"/> Mr. Rosen
<input type="checkbox"/> Mr. Conrad	<input type="checkbox"/> Mr. Sullivan
<input type="checkbox"/> Mr. Felt	<input type="checkbox"/> Mr. Tavel
<input type="checkbox"/> Mr. Gale	<input type="checkbox"/> Mr. Trotter
<input type="checkbox"/> Mr. Rosen	<input type="checkbox"/> Mr. Tele. Room
<input type="checkbox"/> Mr. Sullivan	<input type="checkbox"/> Mr. Holmes
<input type="checkbox"/> Mr. Tavel	<input type="checkbox"/> Miss Gandy
<input type="checkbox"/> Mr. Trotter	
<input type="checkbox"/> Mr. Tele. Room	
<input type="checkbox"/> Mr. Holmes	
<input type="checkbox"/> Miss Gandy	

11

117

[Handwritten initials]

Mr. Wayne Muri, Chief Engineer
Missouri Highway and Transportation Department
P. O. Box 270
Jefferson City, Missouri 65102

Subject: Draft Environmental Impact Statement
for Page Avenue Extension

Dear Mr. Muri: *WAYNE*

Thank you for the opportunity to review the approved Draft Environmental Impact Statement for the proposed Page Avenue Extension through St. Louis County. You requested a review and comment prior to August 1, 1990.

As stated in our previous correspondence, dated June 20, 1990, St. Louis County is supportive of the alignment which utilizes the previously dedicated right-of-way and crosses the southern end of Creve Coeur Park. The Environmental Impact Statement regarding this corridor has been reviewed and concurred in by St. Louis County.

Thank you again for the opportunity to comment on the Draft Environmental Impact Statement for the proposed Page Avenue Extension.

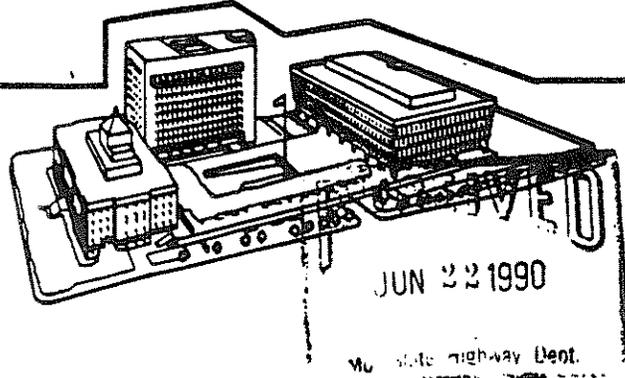


Sincerely,

[Signature]
H. C. Milford
County Executive

HCM:dj

- cc: Mr. Jan H. Paynton, Director, Department of Highways and Traffic
- Mr. Roger M. Grow, Director, Department of Planning
- Mr. Albert L. Phillips, Acting Director, Department of Parks and Recreation
- Mr. J. T. Yarnell, District Engineer, Missouri Highway and Transportation Department
- Mr. Gregory W. Knauer, Vice President and Manager, Planning Department, Booker Associates, Inc.



ST. LOUIS COUNTY, MISSOURI
H. C. MILFORD, COUNTY EXECUTIVE
DEPARTMENT OF HIGHWAYS AND TRAFFIC
JAN H. PAYNTON, DIRECTOR

June 19, 1990

Mr. J. T. Yarnell, District Engineer
Missouri Highway and Transportation Department
329 South Kirkwood Road
Kirkwood, Missouri 63122

Subject: Page Avenue Extension

Dear Mr. Yarnell:

The Department of Highways and Traffic has reviewed the proposed location strip map for Route D, St. Louis County and St. Charles County, Route 94 to Bennington Place, which will be presented at the June 28, 1990 public hearing.

For a number of years, we have recommended right-of-way dedications and reservations as development occurred along this corridor in St. Louis County. We are very supportive of the Page Avenue Extension and new river crossing into St. Charles County, and realize its impact on the development and redevelopment of portions of West St. Louis County.

It is noted that the proposed interchange at the future Earth City Expressway provides a connection to River Valley Drive to the north. River Valley Drive at its intersection with Creve Coeur Mill Road is an extremely dangerous intersection. Due to the elevation differential between the Creve Coeur Mill Road pavement and the existing St. Louis Southwestern Railroad tracks, the sight distance is substandard, the geometrics are poor and the approach grade on River Valley Drive is steep. It is requested that you consider extending the northern terminus of proposed Earth City Expressway to an intersection with Creve Coeur Mill Road west of the St. Louis Southwestern Railroad tracks. This would provide a safer and more direct movement for vehicles traveling to and from the north. We would assume that movements to the south would use River Valley Drive to Creve Coeur Mill Road. St. Louis County is intending to pursue the funding of a southward extension of Earth City Expressway to a new intersection with Creve Coeur Mill Road. This southward extension would eliminate the need to use the River Valley Drive-Creve Coeur Mill Road intersection.

At the request of your consultant, Booker Associates, Inc., St. Louis County has reanalyzed the November 16, 1987 communication from Mr. Wayne Kennedy, former Director, Department of Parks and Recreation, regarding the alignment of the Page Avenue Extension.

Mr. J. T. Yarnell, District Engineer
Missouri Highway and Transportation Department

-2-

June 19, 1990

St. Louis County concurs with the previous statements 1, 2 and 4. However, we no longer see the need for a costly addition to the Page Avenue bridge addressed in statement 3, to accommodate joggers and cyclists as Page Avenue will be constructed to expressway standards. With the previous requested extension of the bridge, a sufficient area will be available at ground level to provide these facilities.

We thank you for the opportunity to comment on the proposed location of Page Avenue Extension, and again assure you of this Department's continued support.

Very truly yours,



Jon H. Paynton, Director

JHP/DES/blr

cc: Ms. Dee A. Joyner, Executive Assistant to the County
Executive

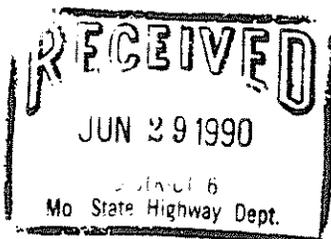
St. Louis County Council

Ellen R. Conant
Councilwoman, 3rd District

Nancy St. John
Administrative Assistant



COUNTY GOVERNMENT CENTER
ADMINISTRATION BUILDING
7900 FORSYTH BOULEVARD
CLAYTON, MISSOURI 63105
889-2438



June 27

COMMITTEES	
DIST ENGR.	Justice, Health and Welfare
ASST DE DESIGN	Planning
ASST D.E. OPER	Intergovernmental Relations Revenue and Personnel
ALL DEPTS	Missouri Association of Counties
CONSTRUCTION	
DESIGN	
DIST INVEST	
GARAGE	
LEGAL	
MAINT & IR	
MAT'L	
OFFICE MGR	
PERSONNEL	
R/W	
C-ME	
FILE	

Mr. J. T. Yarnell, District Engineer
Missouri Highway and Transportation Department
329 South Kirkwood Road
Kirkwood, MO 63122

Dear Mr. Yarnell:

Since I am unable to attend the public hearing on June 28, 1990 concerning the proposed Page Avenue extension, I want to notify you that I am supporting the red alignment.

Since 1971, St. Louis County Department of Planning and Highways and Traffic have set aside land to preserve a right-of-way for the Page Avenue Extension. This corridor supports the proposed "red route".

The green alignment would have a severe impact on many residents who live in my district. Many, many homes would be demolished and the highway would be cutting through established neighborhoods where people have worked very hard for a long time to preserve a quiet family atmosphere.

The red alignment would be the least disruptive to the residents nearby. I hope the decision will be for this corridor.

Thank you.

Sincerely,

Ellen R. Conant

Ellen R. Conant
Councilwoman
Third District

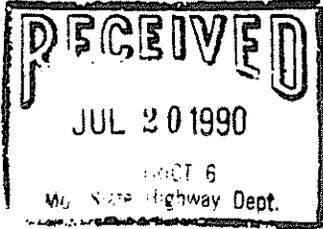
St. Louis County Council

Ellen R. Conant
Councilwoman, 3rd District

Nancy St. John
Administrative Assistant



COUNTY GOVERNMENT CENTER
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7900 FORSYTH BOULEVARD
CLAYTON, MISSOURI 63105
889-2438



July 18, 1990

COMMITTEES
Justice, Health and Welfare,
Chairman
Intergovernmental Relations

<input checked="" type="checkbox"/>	DIST ENGR	Revenue and Economic
<input checked="" type="checkbox"/>	ASST DE	Missouri Association
<input checked="" type="checkbox"/>	ASST DE OPER	of Counties
<input type="checkbox"/>	ALL DEPTS	
<input type="checkbox"/>	CONSTRUCTION	
<input checked="" type="checkbox"/>	DESIGN	
<input type="checkbox"/>	DIST INVEST	
<input type="checkbox"/>	GARAGE	
<input type="checkbox"/>	LEGAL	
<input type="checkbox"/>	MAINT & IR	
<input type="checkbox"/>	MATL	
<input type="checkbox"/>	OFFICE MGR	
<input type="checkbox"/>	PERSONNEL	
<input type="checkbox"/>	R/W	
<input type="checkbox"/>	C-ME	
<input type="checkbox"/>	FILE	

Mr. J. T. Yarnell, District Engineer
Missouri Highway and Transportation Department
329 South Kirkwood Road
Kirkwood, MO 63122

Dear Mr. Yarnell:

Since the public hearing you held on June 28, 1990 about the proposed Page Avenue extension, I have been following reports in the media about the desire of some people to have an interchange at Amiot and Page Avenue. Many of these people do not live in this area and would not suffer the consequences of the additional commuting traffic.

As you know from my letter of June 27, 1990, I support the red alignment. I want you to know I concur with your assessment that an interchange at Amiot and Page Avenue is not necessary.

An interchange at this site would be very disruptive to many subdivisions. It could possibly impact future commercial development along the Marine corridor and totally change the complexion of the surrounding neighborhoods.

This part of my district is a wonderful place to live, raise a family, and retire. I hope the Missouri Highway and Transportation Department will continue to recognize an interchange is unwarranted at this location.

Thank you.

Sincerely,

Ellen R. Conant

Ellen R. Conant
Councilwoman
Third District



VINCENT C. SCHOEMEHL, JR.
MAYOR
JAMES M. SHEA
DIRECTOR OF PUBLIC UTILITIES

City of St. Louis
DEPARTMENT OF PUBLIC UTILITIES
—WATER DIVISION—

Design And Construction Section
1640 So. Kingshighway Blvd.
St. Louis, Missouri 63110
(314) ~~771-4880~~ 771-4806



STANLEY T. FLETCHER
DIVISION ENGINEER

March 6, 1991

Mr. J.T. Yarnell, P.E.
District Engineer
Missouri Highway and Transportation Department
329 South Kirkwood Road
Kirkwood, Missouri 63122

Re: Page Avenue Extension
Green Route Alternate Location

Dear Mr. Yarnell:

On December 21, 1990, Mr. Randy Chang of your office met with us to explain the referenced project. Since the Green Route alternate location would cross our conduit right-of-way twice, Mr. Chang asked us to review the project and comment about how it would impact on us. He left plans with us that show the alternate Green Route.

As background, it should be pointed out that we have three water conduits in our right-of-way. Conduit 1 is a 62 inch steel riveted joint main constructed from 1925 to 1929. Conduit 2A is a 60 inch steel dresser coupling joint main constructed from 1936 to 1937. Conduit 3 is a 72 inch welded steel welded joint main constructed from 1971 to 1972.

Your two proposed crossings of our conduit right-of-way would occur at your station 891+00+/-, near Creve Coeur Mill Road; and at your station 940+00+/-, just east of Old Farm Estates subdivision. In addition, there is a slight conflict at your station 909+00+/-100, just west of Old Farm Estates. At that point it appears that your highway right-of-way will encompass portions of all three of our conduits, but they will not be under the pavement itself, merely alongside.

We have reviewed our files and have talked with other utilities, but as yet have no good information on cost of relocation of each conduit. In order to avoid our conduit crossings at Stations 891+00 and 940+00, each conduit would need to be relocated approximately 4,900 feet between Stations 891+00 and 940+00. If bridge crossings are used as noted under Option 2, mentioned later, there will be a conflict at Station 909+00 which will require approximately 500 feet of relocation per conduit. We should have an estimate of these costs in the near future.

Mr. J.T. Yarnell, P.E.
District Engineer
Missouri Highway and Transportation Department

March 6, 1991
Page 2 of 3

In addition to the direct costs involved in relocation, there are other factors to consider. The Highway Department will have to acquire additional right-of-way for our relocated conduits to occupy. During construction, we could only allow for one conduit at a time to be taken out of service for draining, connecting with the new relocated section, disinfecting and putting back into service. We feel that valving and an interconnecting manifold at each end of the relocated conduits would facilitate and minimize disinfection and also expedite reconnection and reduce downtime on the conduits.

These conduits supply approximately one third of the water used by the City of St. Louis. In addition, they supply a major portion of the water used by the cities of St. Charles and St. Peters, and upon completion of connections currently under construction, they will supply a significant portion of the water used by St. Louis County. We need two conduits to be in service at any time so that if a break should occur on one of the mains in use, we still have a transmission conduit in service.

The second option would include the two crossings of the Highway over our Right-of-Way. As we understand your plans, you are proposing bridges over our conduits. This would seem to be a way to avoid doing anything with our conduits. However, we are concerned that vibrations from traffic could transfer to the bridge foundation and in turn cause vibrations in the soils surrounding our conduits. We feel that the two older conduits, 60+ and 50+ years old, could be susceptible to joint weakening and possible failure if subjected to continual vibrations. Due to the volume of water these conduits carry, any failure could cause severe damage to the highway and would need to be protected. The newer conduit, nearly 20 years old, would not be as susceptible to joint problems; however, it has suffered a previous failure along Water Works Road not far from the Creve Coeur Mill Road crossing which should be taken into consideration.

With this second option, we would require that the conduits be reinforced concrete encased directly adjacent to the bridge foundations for a distance to where your soils engineering experts figure that vibrations from the bridge foundations are negligible. This would give better protection to our conduits. Also required under this second option, would be the 500 foot relocation at Station 909+00 mentioned above.

If concrete encasement were to be utilized on this project, it could be done with our conduits in service. Certain precautions would need to be followed during the construction process. Hand digging would be necessary near the pipe surface and below it to avoid damage to the coating and pipe wall. Due to the weight of water in the unsupported pipe, the length of pipe uncovered at any one time would be limited to 25 feet. Also, based upon inspection, if the existing pipes show signs of weakness due to corrosion or other factors, they should be repaired or replaced. Concrete encasement should be performed on the equivalent of new pipe.

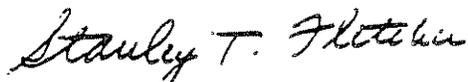
Mr. J.T. Yarnell, P.E.
District Engineer
Missouri Highway and Transportation Department

March 6, 1991
Page 3 of 3

We have one other request concerning your bridge crossings. To allow for the possibility of performing maintenance or repairs on our mains, we need an equipment clearance of 18 feet minimum between ground surface and the lowest point of the bridge deck structure.

I hope that our comments have addressed your needs sufficiently enough for you to proceed on the evaluation of the alternate Green Route. If you have any further questions or need clarification on points already covered, please contact me or Joe Kammerer at 771-4806.

Sincerely,



Stanley T. Fletcher
Division Engineer
Design and Construction Section

STF/JJK/mbe

cc: W.R. Bosse, Water Commissioner
Dave Visintainer, Executive Engineer
G. Frank Herron, Executive Engineer
Ken Fetter, Special Projects Engineer
Joe Kammerer, Assistant Division Engineer, Design & Construction



City of St. Louis

DEPARTMENT OF PUBLIC UTILITIES



VINCENT C. SCHOENMELT, JR.
MAYOR
JAMES M. SHERA
DIRECTOR OF PUBLIC UTILITIES

RECEIVED
JUN 3 - 1991
MAY 30, 1991
No. State Highway Dept.

WATER DIVISION -
Construction Section
1400 Kingshighway Blvd.
St. Louis, Missouri 63110
(314) 425-6000 771-4806

STANLEY T. FLETCHER
DIVISION ENGINEER

Bergman

STC

Mr. J.T. Yarnall, P.E.
District Engineer
Missouri Highway and Transportation Department
329 South Kirkwood Road
Kirkwood, Missouri 63122

Re: Page Avenue Extension
Green Route Alternate Location

Dear Mr. Yarnall:

DIST. ENGR	
ASST. D.E. - DESIGN	<i>[initials]</i>
ASST. D.E. - OPER.	<i>[initials]</i>
ALL DEPTS.	
COMM. RELATIONS	
CONSTRUCTION -	
DESIGN	<i>[initials]</i>
DIST. INVEST	
GARAGE	
LEGAL	
MAINT. & TR.	
MAT'L.	
OFFICE MGR.	
PERSONNEL	
R/W	
C-ME	

This letter is a follow-up to our March 6, 1991 letter in which we stated that we did not then have good information on costs for relocation of our large transmission conduits. We have since made some estimates of relocation costs, which Mr. Randy Chang of your office indicated in a phone conversation yesterday that the Highway Department is still interested in receiving.

WE BASED OUR ESTIMATES ON FIGURES OBTAINED FROM THE 1984 version of the Dodge Guide to Public Works and Heavy Construction Costs for steel water pipe in trenches including excavation, backfill, thrusts and welded joints. These costs were then extrapolated from 1984 costs to 1991 costs using the Engineering News Record's Construction Cost Indexes. We arrived at costs per lineal foot of \$410 for the sixty inch diameter conduits and \$550 for the seventy-two inch diameter conduit.

Referring to our previous letter, if you had to relocate our conduits between your Stations 891+00 and 940+00, those 4,900 feet for all three conduits would cost about \$6,713,000.00 total. If you had to relocate our conduits at the other location in question, in the area of your Station 909+00, those 500 feet for all three conduits would cost about \$685,000.00 total. The total combined cost for the required relocations is estimated to be \$7,398,000.00. Please note that these costs reflect direct construction costs only. Associated costs such as engineering costs, administrative costs and inspection costs should be considered also. We will leave those costs to your estimators at this time.

Mr. Wayne Muri, Chief Engineer
July 30, 1990
Page 2

① These figures are not conservative as EIS accurately states about their report's figures, but are well within reason and are what is accepted and adopted in the Master Plan which is used by St. Charles County decision makers for planning purposes. It is therefore encouraged by the St. Charles County Planning Department that the figures used in this study will be the States figures. These reasonable figures will have a repercussion on the statistics of the entire EIS showing higher projected Average Daily Traffic Counts and therefore showing greater justification of need, benefit, and urgency of the Page Avenue Project. These changes are encouraged to be made for the Final EIS, which should also utilize the results from the 1990 Census. Additionally, the Planning Department has a computer data base modified from Assessor's Office Records that should add accuracy for housing counts in the project area that can be made available for the final EIS.

If you have any questions, please advise.

Sincerely,



Steven G. Lauer
Planning Director

SGL/yjl

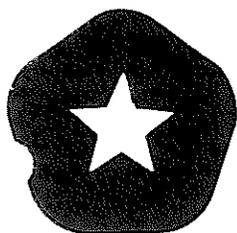
Enclosure

cc: Mr. Robert G. Anderson
District Engineer
FHWA Division Office
✓ Mr. Jim Roberts
Division Engineer, Design

RESPONSE TO COMMENTS

St. Charles County Planning & Zoning Commission - Letter of July 30, 1990

1. Data for the project area was coordinated with the East-West Gateway Coordinating Council which conducts regional transportation planning. This data was used in developing the ADT by MHTD and is the appropriate data for this document even if viewed as conservative. Detailed 1990 census data was not available in time to reflect changes to this document.



CITY OF ST. PETERS

CITY HALL MEXICO ROAD AT VENTURE DRIVE
P.O. BOX 9 ST. PETERS, MISSOURI 63376
(314) 928-1800

June 25, 1990

Missouri Highway and Transportation Department
Capitol Avenue at Jefferson Street
P.O. Box 270
Jefferson City, Missouri 65102

Re: Page Avenue Extension Project

Dear Sirs:

The City of St. Peters is supportive of the Missouri Highway and Transportation Commission's preferred corridor, Route D, known as the "Red Line", for the proposed Page Avenue Extension project. City residents have long recognized the need to provide for an improved and enhanced transportation system. These residents have, "put their money where their mouths are" by consistently voting themselves tax increases to support the funding of transportation improvements. This has resulted in the passage of both City and County sales tax increases specifically earmarked to enhance the local and arterial roadway system of the County. City residents were also overwhelmingly supportive of the Proposition A gasoline sales tax increase for statewide road improvements.

As you are aware, the City of St. Peters has experienced dramatic population increases over the past thirty years. Population increases from 400 persons in 1960 to an estimated 40,000 today has placed St. Peters in its position as one of the fastest growing cities in the entire Midwest. The citizens of our community moved here to take advantage of the City's more affordable housing, its progressive government and to gain a better quality of life. This resultant land rush brought with it unique challenges to our transportation network. The building of the twin structures on Interstate 70, an additional span at Interstate 64 (40-61), and the approval of the new Highway 115 project have all been in direct response to increased traffic and an attempt to maintain this standard of living. Even with these improvements the County will not be able to keep pace with development. Contrary to some views, the Page Avenue Extension project is not designed to spur economic growth and development. Rather, it is an attempt to respond to development which will occur regardless of the outcome of this project.

Page Two
Missouri Highway &
Transportation Department

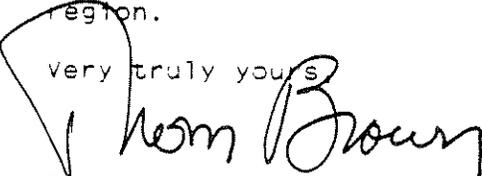
The Staff of the City of St. Peters is presently completing its review of the Draft Environmental Impact Statement for the Page Avenue Extension. Our initial principal concerns are as follows:

- ① . The provision of one-way outer roads along Highway 94 may have negative impacts on both existing and proposed business interests;
- ② . Without the implementation of Phase II of this project, traffic volumes may be further impacted along Highway 94;
- ③ . The provision of commuter parking lot areas commensurate with anticipated traffic volumes should be addressed; and
- ④ . Stormwater detention needs to be a primary issue of concern to adequately intercept runoff from additional paved areas.

Other comments are expected to address the issues of improved base mapping, ramp details and interchange geometries, among others. The City will submit these suggestions by August 1, 1990. We request that you allow these specific comments to be placed in the final document as an official part of the record.

Thank you for your time and attention to our request and we applaud your efforts to address the critical transportation needs of our region.

Very truly yours



Thomas W. Brown
Mayor
City of St. Peters

Mr. Wayne Muri
July 31, 1990
Page Two

11. Page 3-57 The St. Charles County Master Plan has been completed. Incorporate most recent data from this plan.
12. Figure 3.2.2 The correct spelling is Jungermann Road. Towers Road is located south of the location shown.
13. Figure 3.2.3 The correct road name is St. Peters - Cottleville Road. Show Mid Rivers Mall Drive.
14. Figure 3.26 St. Peters Road has been renamed Mid Rivers Mall Drive. Show correct alignment.
15. Figure 3.7 There are a number of existing land uses which are not accurately shown. Please consult with City Staff for assistance.
16. Figure 3.8 The City boundaries for St. Peters are not accurately shown. Please consult with City Staff for assistance.
17. The report needs to address the indirect economic impacts to businesses based upon the proposed one-way service roads.
18. The report needs to address the energy consumption for automobiles based upon the proposed one-way service roads.
19. The water quality impacts associated with stormwater runoff and detention needs to be considered.
20. Page 4-51 Verify that no office complexes are included in the commercial land use classification.
21. Page 4-51 Include information on the City of St. Peters.
22. Page 4-89 There is no Harvester, Missouri. The correct location is unincorporated St. Charles County.
23. Figure 1 Provide correct names for St. Peters park areas. Please consult with City Staff for assistance.
24. Consider the provision for noise abatement along the Timberwood Trails subdivision alignment.
25. Provide some minimal capacity improvements/signalization West on Highway 94 to alleviate impact of Phase I project at its terminus with Highway 94.

Mr. Wayne Muri
July 31, 1990
Page Three

Thank you for providing the City of St. Peters with the opportunity to offer our comments. Should you have any questions on specific items, do not hesitate to contact Mr. Dan Lang, Planning and Development Coordinator at 928-1800, extension 316.

Very truly yours,



Robert R. Irvin
City Administrator
City of St. Peters

RRI/DRL/bk

RESPONSE TO COMMENTS

City of St. Peters - Letter of July 31, 1990

1. Change made.
2. Base mapping uses 1989 aerial photographs.
3. ADT counts were prepared by MHTD based on 1989 data.
4. Change made.
5. Change made.
6. A copy has been obtained and utilized in preparing the FEIS.
7. Noted.
8. Noted.
9. See Response No. 3.
10. See Response No. 3.
11. A copy of the plan has been obtained and information used where appropriate.
12. Change made.
13. Noted.
14. See Response No. 2.
15. This is a generalized land use map based on data available in 1989.
16. City boundaries have been corrected.

17. See City of St. Peters letter dated June 25, 1990, Response No. 1.
18. A detailed origin-destination study to provide a basis for any energy study along the outer roadway is beyond the scope of this FEIS.
19. See Section 4.10.
20. No office complexes occur.
21. Change made.
22. Change made.
23. Noted.
24. Alignment relocated to the south; abatement will be considered.
25. MHTD will coordinate/consider changes in final design.

RESOLUTION NO. 6-18-90 (4)

A RESOLUTION SUPPORTING THE EXPEDITIOUS COMPLETION OF THE PAGE AVENUE BRIDGE AND EXTENSION PROJECT.

Be it resolved by the Mayor and Board of Aldermen for the City of Lake Saint Louis, Missouri as follows:

WHEREAS, the proposed Page Avenue Bridge and Extension Project will alleviate present traffic conditions in St. Charles, County; and

WHEREAS, the proposed Page Avenue Bridge and Extension Project will ease traffic conditions on I-70; and

WHEREAS, the proposed Page Avenue Bridge and Extension Project will provide for better access to the southern part of St. Charles County; and

WHEREAS, the local arterial highway network has been planned to accommodate major bridge and highway improvements proposed by the Missouri Highway and Transportation Department.

NOW, THEREFORE, BE IT RESOLVED THAT THE CITY OF LAKE SAINT LOUIS, MISSOURI SUPPORTS THE EXPEDITIOUS COMPLETION OF THE MISSOURI HIGHWAY AND TRANSPORTATION DEPARTMENT'S PREFERRED CORRIDOR, KNOWN AS THE "RED LINE", FOR THE PROPOSED PAGE AVENUE BRIDGE AND EXTENSION PROJECT.

PASSED AND APPROVED THIS 18th DAY OF JUNE, 1990



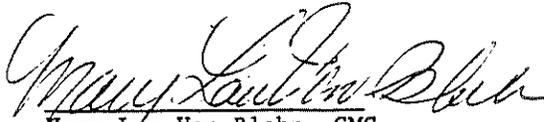
Edward W. Hajek, Jr., Mayor

ATTEST: 
Mary Lou Von Blohn, CMC, City Clerk

Two -
sided.
(OVER)

I, Mary Lou Von Blohn, City Clerk for and within the City of Lake Saint Louis, Missouri hereby certify this to be a true and accurate copy of the official document of record as it appears in the files for the City of Lake Saint Louis, Missouri.

IN WITNESS HERETO, I SET MY HAND AND OFFICIAL SEAL OF THE CITY OF LAKE SAINT LOUIS, MISSOURI THIS 18 DAY OF June 1990.

 (SEAL)
Mary Lou Von Blohn, CMC
City Clerk

CITY OF O'FALLON
State of Missouri

STATE OF MISSOURI)
) SS
COUNTY OF ST. CHARLES)

I, Ilene D. Galvin, City Clerk within and for the City of O'Fallon, Missouri, do hereby certify that the foregoing constitutes a full, true and correct copy of Resolution No. 6-19-90, passed by the Board of Aldermen and approved by the Mayor on the 19th Day of June, 1990.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of the City of O'Fallon, Missouri, at my office in said City this 25th day of June, 1990.

(SEAL)

Ilene D. Galvin
Ilene D. Galvin, City Clerk
City of O'Fallon

CITY OF O'FALLON
State of Missouri

RESOLUTION NO. 6 - 19 - 90

RESOLUTION SUPPORTING THE EXPEDITIOUS COMPLETION OF THE
PAGE AVENUE BRIDGE AND EXTENSION PROJECT

WHEREAS, the proposed Page Avenue Bridge and Extension Project will alleviate present traffic conditions in St. Charles County, and

WHEREAS, the proposed Page Avenue Bridge and Extension Project will ease traffic conditions on I-70, and

WHEREAS, the proposed Page Avenue Bridge and Extension Project will provide for better access to the southern part of St. Charles County, and

WHEREAS, the proposed Page Avenue Bridge and Extension Project will improve the quality of life for St. Charles residents by eliminating major traffic tie ups, and

WHEREAS, the local arterial highway network has been planned to accomodate major bridge and highway improvements proposed by the Missouri Highway and Transportation Department.

NOW THEREFORE, be it resolved that the City of O'Fallon supports the expeditious completion of the Missouri Highway and Transportation Department's preferred corridor, known as the "Red Line," for the proposed Page Avenue Bridge and Extension Project.

READ AND PASSED BY THE BOARD OF ALDERMEN OF THE CITY OF O'FALLON, MISSOURI, THIS 19th DAY OF JUNE, 1990.

ATTEST:

Edward J. Gruenauer
MAYOR

Gene D. Galvin
City Clerk

Mayor and Board of Aldermen

Wentzville, Missouri

RESOLUTION

WHEREAS, the proposed Page Avenue Bridge and Extension Project will alleviate present traffic conditions in St. Charles County.

WHEREAS, the proposed Page Avenue Bridge and Extension Project will ease traffic conditions on I-70.

WHEREAS, the proposed Page Avenue Bridge and Extension Project will provide for better access to the southern part of St. Charles County.

WHEREAS, the proposed Page Avenue Bridge and Extension Project will improve the quality of life for St. Charles County residents by eliminating major traffic tie ups.

WHEREAS, the local arterial highway network has been planned to accommodate major bridge and highway improvements proposed by the Missouri Highway and Transportation Department.

NOW, THEREFORE, BE IT RESOLVED, that the City of Wentzville, Missouri supports the expeditious completion of the Missouri Highway and Transportation Departments preferred corridor, known as the "Red Line", for the proposed Page Avenue Bridge and Extension Project.

Read and adopted this 27th day of June, 1990 by the Board of Aldermen of the City of Wentzville, Missouri.

In witness whereof I have hereunto set my hand and caused this seal to be affixed.


David Hoekel
Mayor Pro-Tem, David Hoekel

ATTEST: Leslie L. Wilson, City Clerk

DATE: June 27, 1990

Resolution supporting the expeditious completion of the Page Avenue Bridge and Extension Project

Whereas the proposed Page Avenue Bridge and Extension Project will alleviate present traffic conditions in St. Charles County.

Whereas the proposed Page Avenue Bridge and Extension Project will ease traffic conditions on I-70.

Whereas the proposed Page Avenue Bridge and Extension Project will provide for better access to the southern part of St. Charles County.

Whereas the proposed Page Avenue Bridge and Extension Project will improve the quality of life for St. Charles County residents by eliminating major traffic tie ups.

Whereas the local arterial highway network has been planned to accommodate major bridge and highway improvements proposed by the Missouri Highway and Transportation Department.

Now be it resolved that the Village of Dardenne Prairie supports the expeditious completion of the Missouri Highway and Transportation Departments preferred corridor, known as the "Red Alignment" for the proposed Page Avenue Bridge and Extension Project.

Read and adopted this 27th day of the month of June, 1990 by the Village of Dardenne Prairie Board of Trustees.

A handwritten signature in black ink, appearing to be "J. K. ...", enclosed in a rectangular box.

STATE OF MISSOURI
COUNTY OF ST. CHARLES

§
§
§

I, Robert R. Irvin, City Clerk within and for the City of St. Peters, Missouri, do hereby certify that the foregoing constitutes a true and correct copy of Resolution No. 779 as fully as the same remains on record in my office.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of the City of St. Peters, Missouri, at my office in said City this 28th day of June, 1990.



ROBERT R. IRVIN
City Clerk
City of St. Peters, Missouri

A RESOLUTION SUPPORTING THE LOCATION AND DESIGN OF THE PAGE AVENUE EXTENSION IN ST. CHARLES COUNTY

WHEREAS, St. Charles County, Missouri, is one of the fastest growing counties in the United States with significant highway and bridge needs; and

WHEREAS, the City of St. Peters is a rapidly growing community requiring extraordinary administrative efforts to coordinate, plan and control this rapid growth and provide the necessary municipal services; and

WHEREAS, a modern transportation system serving the communities in this district, and throughout the State, is vital to our economic welfare, safety and quality of life; and

WHEREAS, the Missouri Highway and Transportation Commission has taken actions to allow for the acceleration of the scheduling of the two major bridge and extension projects proposed for St. Charles County; and

WHEREAS, the proposed Page Avenue Bridge and Extension Project will improve the quality of life for St. Charles County residents by easing traffic conditions on I-70 and eliminating major traffic tie ups; and

WHEREAS, the proposed Page Avenue Bridge and Extension Project will help to alleviate present traffic conditions in St. Charles County and provide for better access to the southern part of the County;

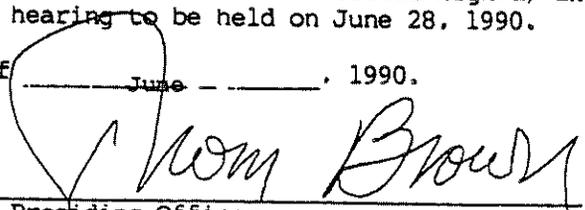
NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF ALDERMEN OF THE CITY OF ST. PETERS, MISSOURI. AS FOLLOWS:

SECTION 1. The City of St. Peters supports the recommended alignment and location of the Missouri Highway and Transportation Commission's preferred corridor, Route D, known as the "Red Line," for the proposed Page Avenue Extension Project.

SECTION 2. That the Missouri Highway and Transportation Commission be encouraged to expeditiously pursue and implement every possible avenue to address present and future traffic conditions in St. Charles County.

SECTION 3. That a copy of this Resolution along with a letter detailing any technical issues of concern to the City be presented to the Missouri Highway and Transportation Commission at the public hearing to be held on June 28, 1990.

Read and adopted this 14th day of June, 1990.


Presiding Officer

Attest: 
City Clerk

Resolution supporting
the expeditious completion
of the Page Avenue Bridge and
Extension Project-----

Whereas continued commercial and residential growth of St. Charles County is essential for the welfare of the St. Charles City-County Library District;

and

Whereas road, bridge and infrastructure improvements are essential to this continued, orderly growth;

and

Whereas the Page Avenue Bridge and Extension Project will ease traffic conditions within the developed portion of the County and open the southwestern portion of the Golden Triangle to improved access and quality development;

and

Whereas the local arterial highway network has been planned to accomodate major bridge and highway improvements proposed by the Missouri Highway and Transportation Department.

Now, therefore,

Be it resolved that the St. Charles City-County Library District supports the expeditious completion of the Missouri Highway and Transportation Department's preferred corridor, known as the "Red Alignment" for the proposed Page Avenue Bridge and Extension Project.

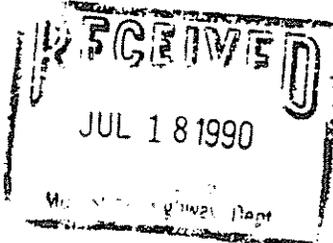
Resolution passed this 9th day of July, 1990 by the Board of Trustees of the St. Charles City-County Library District.



Pastor, V. Paul Heine, President

CARL R. SANDSTEDT - DIRECTOR
314-441-2300

Administrative Offices - 425 Spencer Road, P.O. Box 529, St. Peters, Mo. 63376-0529



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July 16, 1990

Missouri State Highway
and Transportation Department
District No. 6
329 South Kirkwood Road
Kirkwood, MO 63122

Gentlemen:

Enclosed is a Resolution passed at the July 9, 1990 St. Charles City/County Library District Board of Trustees meeting supporting the expeditious completion of the Page Avenue Bridge and Extension Project. We would like to have this resolution included in the Public Hearing documentation for the Page Avenue extension.

Thank you.

Sincerely,

Jan Rasch
Secretary to Carl Sandstedt

encl

Village of Cottleville

5339 Fifth Street
St. Charles, MO 63303

June 29, 1990

Mr. J.T. Yarnell, District Engineer
Missouri Highway and Transportation Department
District No. Six
329 South Kirkwood Road
Kirkwood, Missouri 63122

Re: Page Avenue Extension
Combined Route and Environmental Hearing

Dear Mr. Yarnell:

I had been asked by the Board of Trustees of the Village of Cottleville to speak on behalf of the Village at the June 28, 1990 public hearing for the Page Avenue Extension. Unfortunately, because of the number of speakers and the late hour, I was unable to speak. The Cottleville Board of Trustees strongly supports the "red route" for the Page Avenue Extension.

We have worked with the highway department for many years to facilitate this project. We urge you to proceed with this project as soon as possible. The Village Board also strongly supports the pilot program for hardship acquisition and protective buying. We believe this program is particularly important in the area of the second phase of the project which may not be constructed for some time.

On May 8, 1986 the Village passed a resolution declaring our intention to protect the Page Avenue Corridor from encroachment due to development. We are enclosing a copy of this resolution for the written records of the Page Avenue hearing.

We would like to thank Freeman McCullough and Gary Elmstead for attending our May Board meeting to preview the Page Avenue plans. The information presented at that meeting was critical in our decision to support this project. At that meeting we discussed with Mr. McCullough our need for an interchange in Cottleville. We ask that you consider the interchange we proposed at the intersection of the St. Peters-Cottleville Road extension to Page Avenue. We believe Cottleville needs this interchange for local access and smooth traffic flow. We urge you to review this situation and provide this interchange for local access to Cottleville in the final form of this report.

Mr. J.T. Yarnell
June 29, 1990
Page Two

Finally, we would again like to state our support for the "red route" alternative of the Page Avenue Extension and to urge you to continue with the pilot program for hardship acquisition and protective buying.

Very truly yours,

VILLAGE OF COTTLEVILLE



Donald Buchheit
Village of Cottleville Board of Trustees

Enclosure

cc: Board of Trustees
Planning & Zoning Commission
Freeman McCullough
Gary Elmestad
George Butler Associates, Inc.

RESOLUTION NO. 13

A Resolution Providing For Preservation
of the Page Avenue Corridor

Be It Resolved by the Board of Trustees of the Village of Cottleville, Missouri, as follows:

1. That the Board of Trustees hereby declares its intention to not grant any zoning amendments that would allow new construction or improvements in the areas proposed for the Page Avenue Corridor by the Missouri Highway Commission.

2. That the Board of Trustees hereby requests that the Board of Adjustment of the Village of Cottleville, Missouri, not grant any variances which would allow new construction or improvements in the areas proposed for the Page Avenue Corridor by the Missouri Highway Commission.

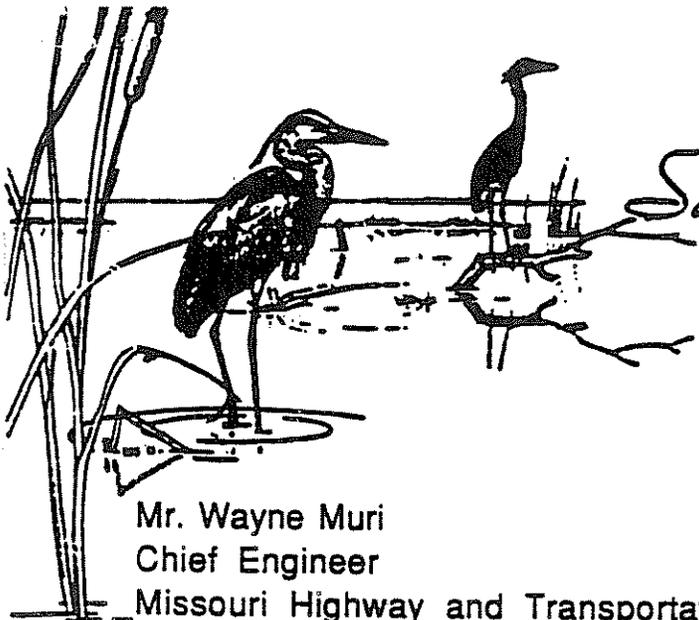
Read and passed this 8 day of May, 1986.

James L. Lidenmann
Chairman

ATTEST:

Sandra S. Barling
Secretary





Saint Louis Audubon Society

911 La Cherie Dr.
Ballwin, MO 63021
26 July, 1990

- Asst. Dir. Gen. Inv. & O
- Asst. Dir. Ext. & Int. Aff.
- Librarian
- Field Aid
- Planning Engr
- Photo Engr
- Archaeology
- C-Me
- Insulation Engr
- Mason Engr
- Urban Engr
- Asst. Admin. Genl.
- Env. Studies Coord.
- CADD Engr
- Vistas Engr
- Office Mgr
- P/B

Mr. Wayne Muri
Chief Engineer
Missouri Highway and Transportation Department
P. O. Box 270
Jefferson City, Missouri 65102

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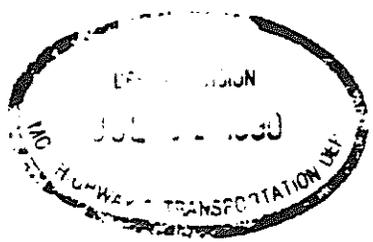
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Mr. Muri:

Representatives of the local chapter of the National Audubon Society have been very interested in the fate of the Page Avenue extension issue for quite some time. The concerns are wide ranging. Most importantly, however, are the ways the project will effect prime birding areas, specifically, and how the project will effect wetlands, generally. Aside, from these major concerns, the prevalent questions devolve upon the state of affairs 10 years hence, when enormous amounts of money and labor will have been used and expended. Given the type and location of growth in the metropolitan area, this type of project will yield no gains or losses as far as traffic patterns are concerned and we will find ourselves in the exact same situation in the near future. Given the inevitable energy crisis, alternative traffic control patterns, such as carpooling and mass transit must be encouraged lest the world we face becomes so unlivable that we will long for the easy problems that had to be solved in the late 20th century.

The local chapter of the Audubon Society has 2800 members. We are grateful for the opportunity to contribute to the Draft Environmental Impact Statement for the Page Avenue Extension project.



1 Our Conservation Committee has just perused a copy of the Draft EIS and was disappointed not to find a copy of the comments about wildlife/wetland habitat that were submitted to Dr. Dunstan of Biological Services of Western Illinois University by Missouri Conservation Department Urban Biologist, Dave Tylka. A copy of this letter and a bird checklist of the area (updated now to include 230 different species) are enclosed. Our committee, and other Audubon members concerned about this project, funneled our comments through Mr. Tylka at the request of Dr. Dunstan, who was collecting biological information on this project for Booker Associates, Inc. Why wasn't our information included in this EIS draft? Will a copy of the previously submitted information and a copy of this letter be included in subsequent project publications?

Members of the Conservation Committee of the St. Louis Audubon Society attended various meetings on this project and signed a sheet of paper requesting to be sent a copy of the draft EIS; however, none were sent to us. A long-distance phone call was placed to Jim Roberts in Jefferson City a couple of weeks ago to receive a copy. If there are other organizations and individuals that signed up for copies at the same meetings, they may have fared the same way. With many people on

2 vacation at this time of year, could the comment period be extended? Also according to our information, a public meeting was held in St. Charles County, but not in St. Louis County. Because of the potential impacts to St. Louis County residents, why can't there be a public meeting in St. Louis County?

3 There are some very basic planning issues that also need to be addressed more fully. By building another bridge over the Missouri River in the metro area, we are encouraging more horizontal development spread out from the urban core which uses up more of our natural resources (fuel for commuting longer distances to work, conversion of more foodlands and forests to residential properties, etc.). From a regional planning perspective, wouldn't we be better off encouraging habitation closer to the urban core? If indeed a bridge is fully warranted, would it be more justifiable to design it for public mass transit (light rail, restricted to high-occupancy vehicles, etc.)? We need to look past the fossil fuel era with the majority of people commuting by automobile and into the future with people communicating with the workplace via computer from home.

We also have specific technical concerns in this EIS Draft and proposed solutions that we would like to have addressed:

④ Concern #1. Inadequate Sampling Periods. It is stated in Section 3.7 labelled Birds, Mammals, Herptiles of this report that the census (sampling) was done at two seasons of the year. However, these two "seasons" are only 5-6 weeks apart during the months of June and July. Sampling only during these two months tremendously skews the census data, prevents detecting the presence or usage of the area by many groups of wildlife (neotropical migrant songbirds, ambystomatid salamanders, etc.), and results in inaccurate census data.

Proposed Solution: For accurate census data, re-schedule sampling periods to truly reflect seasonal usage and to correspond with migrations, breeding times, etc.

⑤ Concern #2. Inadequate Herptile Sampling Techniques. The sampling techniques described on pages 3-23/24, such as searching for aquatic forms by watching shorelines and open water, will not truly give a representative census.

Proposed Solution: Improve the herptile sampling by distributing and periodically inspecting snake boards in representative habitats, anchor basking logs in deeper waters to sample turtle populations, census amphibian egg masses in different types of water environments and consider operating drift fences around different water environments to sample salamander populations. Also, biological investigators should utilize the most recent herpetological distributional studies available for background data. Why use 1965 and 1968 Missouri herptile books when the 1987 book by Johnson and published by the Missouri Conservation Department is available?

⑥ Concern #3. Insufficient Data Reporting on Little Creve Coeur Marsh. Statements about Little Creve Coeur Marsh (presumably labelled as Upper Creve Coeur Lake in the EIS Draft) such as "Only a remnant of the original wetland acreage remains at the present time" is a misleading statement when wetland delineation according to federal regulations is determined by such factors as soil types and other related factors. Wetlands such as Little Creve Coeur Marsh go through wet/dry cycles (the sampling period was conducted through the harsh 1988-89 drought) and during wet times

this area is of significant size and provides substantial wildlife habitat. According to some of the more active birding members of our organization, this is the one of just a few birding "hot spots" of St. Louis. Many state rare and endangered birds have been recorded from Little Creve Coeur Marsh.

Proposed Solution: Use aerial photographs taken during wet years to see the real significance of this wetland area as part of the area wetland/bottomland complex. Interview reputable birdwatchers and other qualified area naturalists about this area.

7 Concern #4. Insufficient Data Reporting on State Rare and Endangered Species. On p. 3-24 it states, "No Federal or State threatened or endangered species of birds were noted breeding in the study area." In section 4.16 (Threatened or Endangered Species), no state endangered or threatened species are noted.

Why hasn't information supplied to Dr. Dunstan, who was responsible for collecting biological information on the area listed? A copy of this information is enclosed.

Proposed Solution: Incorporate the data from this letter into the appropriate sections of the EIS.

8 Concern #5. Omission of Fish and Invertebrate Sampling from Report. Why weren't fish included in the vertebrate sampling? Creve Coeur Lake is a significant fisheries resource that could be affected either directly or indirectly by this project. Why weren't invertebrates investigated in the draft EIS report?

Proposed Solution: Conduct fish and invertebrate studies in the project area.

9 Concern #6. Incorporation of All Biological Information and Subsequent Revision of Impacts, Mitigation, etc. Because much of the report is dependent upon data collection and biological sampling, results from a complete biological inventory needs to be incorporated.

Proposed Solution: After the noted shortcomings in samplings and data reporting are corrected, incorporate this data into drafting the Impacts, Mitigation, etc. sections of the EIS. Of special concern to the St. Louis Audubon Society on the subject of mitigation, if natural components of different parts of St. Louis County are consumed for public good,

mitigation measures should be done in St. Louis County and as close to development site as feasible. The mobile species of wildlife may do well in similar habitats located elsewhere; however, having these natural amenities in St. Louis County enhances our quality of life. Relocating these enhancements to other parts of the state does little to replace quality of life lost. Assign dollar figures to lost public open space and productive urban wetland and to the mitigation of each alternative.

Once again, we welcome the opportunity to contribute to the Draft Environmental Impact Statement for the Page Avenue Extension project.

Sincerely,



William J. Salsgiver
VP for Conservation
St. Louis Audubon Society

RESPONSE TO COMMENTS

Saint Louis Audubon Society - Letter of July 26, 1990

1. In Section 3.7.21, reference is made to the historic record of avifauna in the area. This information was based on the correspondence from Dave Tylka. A copy of the letter, information and checklist were submitted in the Biological Survey Technical Report.
2. The comment period was extended at the request of several reviewers, including the Missouri Department of Natural Resources and the U. S. Department of Interior.
- 2a. The one public meeting location was selected in St. Charles in order to provide a facility that would handle expected number of attendees and at a location that was easily accessible to residents and concerned citizens along the entire 20-mile project length. Previous scoping meetings had been conducted in both St. Louis and St. Charles Counties. There was only going to be one public meeting in order to have all the issues presented and discussed at one time and, therefore, it would occur in only one county which, in this case, was St. Charles County. Additional input from citizens, interest groups and organizations in St. Louis County occurred at coordination meetings conducted by MHTD prior to and following the public meeting in order to maximize the public input to the project design and impacts.
3. The regional transportation planning issue is beyond the scope of this document. Additional discussion concerning HOV and light rail has been included in Section 2.
4. The sampling periods and protocols were based, in part, on the length of time allotted for the DEIS as determined by MHTD. The reconnaissance level of level of sampling was utilized in order to assess the comparative flora and fauna within each of the alternative alignments. analysis.
5. See Response No. 4 above.

6. Aerial slides of the area provided by SCS for the years 1984, 1986 and 1987 and a video of migratory waterfowl at the site provided background as to the function of the area. At the time of the field study, the area had been drained and farmed, and represented as such on the vegetative cover map. Coordination with the Corps of Engineers has determined the jurisdictional wetlands within the project corridor.
7. On page 3-25, the sentence following the one quoted states, "However, the threatened or endangered species that were of concern for St. Louis and St. Charles Counties are listed in the biological studies technical memorandum." These have now been incorporated into the text.
8. The biological surveys were not conducted in the lake because the corridors surveyed included areas upstream of the lake but not the lake itself. Vegetative cover and vertebrates were used to define the type and quality of habitat along the corridors.
9. Various technical reports supported the sections of the DEIS and were mentioned in the appropriate section. These more detailed studies may have answered some of the questions from this organization. The mitigation plan has been developed and it adds over 600 adjacent acres to Creve Coeur Lake Memorial Park. See Section 6(f) Evaluation.

1a) The comment period allowed for this massive, if incomplete, DEIS is only about 45 days -- if you were on the list to receive it. If you had to request a copy after somehow learning of its release, your comment period is even shorter. Arriving as it did at the outset of the summer vacation period, the DEIS presents quite a challenge to citizens groups as many of their key volunteers or staff (if any) are likely to be away for some part of the allowed review period.

Given the limited distribution of the DEIS, given only one public hearing where little of the substantive issues of the DEIS were even discussed, and given the short review period for such an important project -- we hereby request the following:

1) That the review period be extended by at least another 60 days to allow citizens and other concerned parties more adequate time to review the DEIS.

1b) 2) A second public hearing should be held at a central location in St. Louis County, after appropriate notification.

3) Said hearing should be conducted in such a way as to give preference to those unable to attend the hearing in St. Charles and/or those with substantive comments on issues pertaining directly to the DEIS and the 4(f) and 6(f) evaluations.

Comments on the Draft Environmental Impact Statement

Our overall comment is that -- despite its bulk and attractive packaging -- the DEIS is woefully inadequate to allow for any meaningful analysis of all reasonable alternatives. The statement of need (for the proposed action) is based on assumptions contrary to contemporary tenets of professional planning and on facts not in evidence. The range of alternatives is neither complete nor reasonably so. And, the discussion of environmental consequences treats lightly or not at all some key potential impacts, especially cumulative impacts.

Looking at Section 1.0, Purpose & Need for Action, the reader is confronted with a standard highway department presentation of the "facts" -- namely, present service is congested and improved traffic flow will ease the congestion. This fairy tale should be preceded by "Once upon a time..." and end with "they lived happily everafter!"

The rapid growth that has occurred in St. Charles County has taken place without benefit of an adequate regional traffic plan and has thus created a situation that has demanded more and more expansion of traffic corridors from St. Charles County to St. Louis County. Thus, we have the new I-70 bridge plus the expanded lanes, the new bridge at I-64 (Route 40) and the new Route 115 Bridge and relocation. And, now comes Page Avenue! With all these "improvements", traffic flow has not measurably

improved -- nor is it likely too. Instead, the present proposal will only stimulate more development, resulting in yet more traffic. Recent studies in several countries have concluded that **more roads mean more traffic!** The DEIS confirms this on the bottom of page 2-24: ". . . even with the construction of the Page Avenue Extension, travel conditions within St. Charles County and between St. Charles and St. Louis counties will be no better than those experienced today."

At this point, we probably should stop -- as need for the remainder of the DEIS should be moot. The need is only expressed in terms of promised traffic relief. No where are the overall economic needs of the region discussed. There is an a priori assumption that traffic and economic needs are one in the same and that St. Charles County's desires are somehow consistent with the region's needs. But even traffic planning is inadequately discussed, and what there is is dominated by private, single-passenger cars and a build, build, build mentality.

1c So, our point one is that while a new bridge and highway might truly be desired by certain regional elements, no real need has been established and the phony need included will most certainly not be met by this project's "preferred alternative" (the red alignment).

2 Looking at Section 2.0, Alternatives, we find the mix of alternatives strange. That the red and green alignments come so close together (just west of Creve Coeur Lake) and then diverge in totally different directions seems arbitrary at best. Why for example was a combination of red/green not evaluated? Surely, the green route passing to the south of the lake could have easily been combined with the red route where the latter crosses the river into St. Charles County. We were, in fact, assured by folks from Booker and MoHTD at one of the previously-mentioned Elimestad meetings that such hybrid alternatives would be incorporated in the DEIS discussion.

3 Discussion of the "No Build", "Traffic System Management" (TSM) and "Mass Transit" alternatives is totally inadequate, so much so as to betray a predisposition to one of the "build" alternatives. Mass transit receives a scant two page treatment, and is dismissed primarily because the political climate is not right. As long as the federal and state governments continue to pour money into St. Louis/St. Charles counties for bridges and highways, the political climate for bus service or light rail will never be right. Ideally, these three alternatives should be combined and studied much more extensively before being dismissed.

4 In addition, should one of the "build" alternatives move forward, it should only do so with a mandatory TSM element, such as high-occupancy vehicle (HOV) lanes and/or structural adaptability for light rail.

Looking at Section 3.0, Affected Environment, we are concerned that biological field sampling was not conducted at enough different times of the year to present a

- 5 true picture of the area's seasonal fauna. Apparently, only mammals, birds and herptiles were inventoried. What about fishes? What about invertebrates?

Most of the detailed discussion of the affected environment seems limited to the particular corridors, with only passing reference to broader land use considerations. We do not see how this discussion can possibly help in determining cumulative impacts from this project.

- 6 Looking at Section 4.0, Environmental Consequences, we have numerous concerns. This section is, or should be, the heart of the DEIS. The land use implications of this project -- both direct, indirect and cumulative -- are enormous. The DEIS admits this in several places, but then fails to demonstrate the true scale of these impacts. Probably, no single land use change is of greater concern to us than the loss of prime farmlands and wetlands and the open spaces of the Missouri River floodplain, not to mention the impact to Creve Coeur Lake County Park which we will discuss under the 4(f) evaluation.

- 7 Despite MoHTD's desire to treat Page Avenue as a single project with no NEPA relevance to other projects, common sense and local history tell us otherwise. Booker Associates is also preparing a report for St. Louis County on an extension of the Earth City Expressway south from the Riverport development to Olive Street Road with a major interchange with Page Avenue on the Missouri bottoms. This local road project, long desired by certain elements of St. Louis County's leadership, will lead to the total development of what is left of the undeveloped floodplain in the county. According to Booker, the road will be built more or less at grade (a departure from the county's thinking just two years ago) with no flood protection. However, other forces -- including the county, no doubt -- are already at work promoting a levee to protect this road and open up the bottoms to commercial development.

The DEIS discussion of such cumulative impacts is entirely deficient.

- 8 The discussion of noise (pp. 4-58 to 4-72) fails to mention potential impacts to the recreational users of Creve Coeur Lake County Park.

- 9 Likewise, the discussion of air quality is poor, especially when you consider that the St. Louis area is a non-attainment area. The Clean Air Act prohibits FHWA from approving any activity that does not conform to approved "state implementation plans" (SIPs), yet in the 6-page treatment on air quality in the DEIS no mention is made of the Missouri SIP. In a recent GAO report (RCED-90-72, March 1990, AIR POLLUTION: EPA Needs More Data from FHWA on Changes to Highway Projects), it is noted that EPA and FHWA disagree on the need for air quality analyses for such projects and that EPA officials "are concerned that, in the long run, the increased capacity resulting from highway construction will encourage more driving, which could increase pollution." (p. 4)

10 The Impact Evaluation Matrix on pp. 4-122 and 4-123, which compares the costs -- both dollars and environmental -- of the four "build" alternatives is very misleading. Clearly, this matrix has been contrived to give the red alignment the economic edge. This is largely due: (1) to no dollar amounts being assigned to the public costs of using Creve Coeur Lake Park; (2) to the lack of any mitigation costs for loss parkland, farmland and wetlands; and (3) higher relocation costs for alternatives where no attempt was made at corridor preservation (thus the lower costs for relocation of residences along the red alignment is largely an artificial construct deliberately made over the years since this project was first planned).

11 The public deserves fully-funded mitigation as a prerequisite for project advancement.

12 Speaking of funding, one disturbing issue not raised by the DEIS but entirely relevant to any meaningful discussion is how is this project going to be paid for. Our understanding is that some state funds from a highway bond issue are available to match federal funds for the St. Louis County part of the project and the bridge, but that funding for the alternative routes in St. Charles County is not at present assured. Does it make sense to build the first part of this project with all of its resulting environmental damage when the area it is meant to benefit may not be able to complete the project?

Comments on Creve Coeur Lake County Park & Section 4(f) Evaluation

We find that no case has been made to show that crossing through Creve Coeur Lake County Park is justified and therefore should not be allowed. We take special note of the historic correspondence between the U. S. Department of Interior, the State of Missouri and St. Louis County included at the end of the 4(f) evaluation.

County officials have tried to maintain that they have preserved a corridor (the red alignment) which would have the project cross this major county park. [Federal land and water conservation funds were expended on this park.] They contend that it was always their intent that the park be so bisected, thus the project area should be exempt from 4(f) and 6(f) compliance. Indeed, it is clear that in 1971 Mr. Wayne Kennedy, then director of county parks, tried his best to obtain federal funds for the park while at the same time eliminating any legal encumbrances to crossing the park with a highway sometime in the future. He so stated to the state highway department citing recent Supreme Court rulings (i.e. the Overton Park case), in effect prejudging the need for this project and this alignment by some 19 years. We find such behavior to be not in the public's interest.

Fortunately, some federal officials were not so easily cowed. In a memo to Kennedy dated September 10, 1971, the regional office for outdoor recreation in the Department of the Interior told him quite clearly that any such highway project would have "to stand the test of Section 4(f)." Kennedy was urged to consider other routes

and was encouraged "to make every attempt to save the park land from conversion to highway use and assure the recreational benefits to the public."

13

Apparently no attempts were made. At least St. Louis County took no steps to preserve any highway corridor except for the one leading to the park. Even as late as a year ago, Mr. Kennedy was quoted in the press as saying the highway would be good for the park as it would separate the boaters and the bird watchers.

14

But, the county's duplicity on this project does not end there. Last summer (August 10, 1989) the county entered into a lease with the sewer company (MSD) to lease for "25" years a 44-acre tract of land south of Creve Coeur Park, smack in the way of the green alignment -- the original no public land alternative. This supposed polo field and model airplane area (which has no development other than a sign) was then touted as also being 4(f) land, causing the planners to develop yet another no public land alternative (the green-black alignment). This lease is a farce, put together by Kennedy after the DEIS studies were underway, with no obvious benefit other than to try to make the green alignment less attractive as a 4(f) alternative to cutting through Creve Coeur Lake Park.

15

Also troubling is the lack of energy by the county park department on aggressively seeking mitigation lands should the park be violated. With Kennedy's departure early this year, the department is being run by an "acting" director until the outcome of this fall's election for County Executive. By copy of this letter, we are urging the National Park Service and the Missouri Department of Natural Resources to reject the red alignment violation of this 4(f) property as not being in the public interest.

Conclusion

16

We repeat our request for more time and at least an additional hearing to review this DEIS. We have only been able to touch on a few of the many issues raised by this project. If, however, we are not afforded an additional opportunity to comment, we will conclude with these three findings:

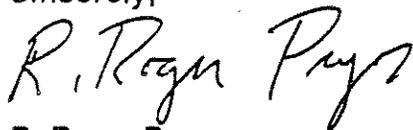
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- 1) **No case has been made for the need for this project in the first place; and even the preparers admit that the project will not improve the traffic conditions beyond what they are today.**
- 2) **The DEIS is deficient any many ways, but especially in its analysis of cumulative impacts of all sorts, on noise impacts and on air quality.**
- 3) **Under Section 4(f), no legitimate case has been made demonstrating that the violation of Creve Coeur Lake County Park is unavoidable.**

Thank you for the opportunity to express our comments.

- more -

Sincerely,



R. Roger Pryor
Executive Director
COALITION FOR THE ENVIRONMENT

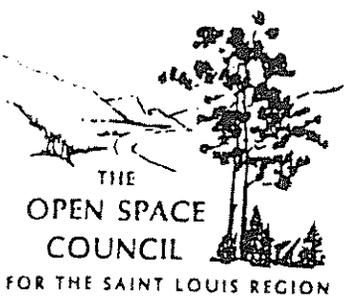
cc. Coalition Officers
U. S. EPA
U. S. Fish & Wildlife Service
U. S. National Park Service
Mo. Department of Conservation
Mo. Department of Natural Resources
Honorable Jack Buechner
Honorable Harold Volkmer
Honorable Jack Danforth
Honorable Christopher Bond
Honorable John Ashcroft

RESPONSE TO COMMENTS

Coalition for the Environment - Letter of July 27, 1990

- 1a. The 45-day comment period is the minimum time specified by NEPA regulations.
- 1b. The public hearing was at a facility that was central to the project and was well publicized, as demonstrated by approximately 1,100 persons attending the meeting.
- 1c. As pointed out in another comment, economic growth of large metropolitan areas such as Los Angeles, Boston, Atlanta, San Francisco and Chicago continue to prosper and grow even though traffic congestion is severe. That growth is caused by economic, social and geographic factors. New highways alone will not sustain such growth, nor will highway congestion alone constrain it. The need is determined by the deterioration of level of service able to be provided at the existing river crossings today and in the future.
2. The FEIS analyzes the Green-Black, Yellow-Black and Blue Alignments which connect to the Red Alignment west of Creve Coeur Mill Road.
3. Additional discussion on recent HOV and light rail studies for the St. Louis area has been included in Section 2.
4. See Response No. 3.
5. See Saint Louis Audubon Society Response Nos. 5 and 8.
6. Additional discussion concerning wetlands and floodplain development and impacts to Creve Coeur Lake Memorial Park have been included in the FEIS.
7. See U. S. Department of the Interior Response No. 24.
8. Noise measurements from the Section 6(f) Evaluation have been incorporated into Section 4.9.

9. Conformance with the SIP has been added to Section 4.8 of the FEIS.
10. The Impact Evaluation Matrix has been revised and identifies mitigation costs. The preserved corridor was accomplished with the primary concern of minimizing relocations and community disruption. Cost is always a factor.
11. The mitigation plan involves over 600 acres of land adjacent to Creve Coeur Lake Memorial Park, including a bikeway (wetlands along the right-of-way to the St. Louis County side of the bridge). This is included as part of project costs.
12. Funds for Phase I from Bennington Place to Route 94 in St. Charles County are in place.
13. In retrospect, the surest way to preserve the corridor through the park would have been to use federal money to purchase only park lands north of the corridor and, therefore, have a complete preserved corridor up to and adjacent to the park.
14. Following FHWA determination that the MSD lease to qualify as a 4(f) property, another park avoidance alternative was prepared, the Green-Black Alignment. In addition, in response to comments, two new alignments for St. Louis County, the Yellow-Black and Blue Alignments, have been analyzed and included in the FEIS.
15. See Response No. 11.
16. See Response 1a. Additional time was granted to several agencies and others that made a request to MHTD. MHTD is still receiving comments and responses are being prepared for several individuals with substantive comments.
17. As noted, the project will alleviate the increased worsening conditions on the existing Missouri River crossings that will occur by 2015. The continued demand will be such that by 2015, conditions at the Missouri River crossings will be similar to current conditions.



July 31, 1990

<input type="checkbox"/> Air Env Engg - L & B	<input type="checkbox"/> Design Engg
<input type="checkbox"/> Air Env Engg - Cont	<input type="checkbox"/> Environ Engg
<input type="checkbox"/> Utilities	<input type="checkbox"/> Econ Assn Engg
<input type="checkbox"/> Fed Aid	<input type="checkbox"/> Env Studies Cont
<input type="checkbox"/> Roads Engg	<input type="checkbox"/> CADG Engg
<input type="checkbox"/> Photo Engg	<input type="checkbox"/> Value Engg
<input type="checkbox"/> Archeology	<input type="checkbox"/> Office Mng
<input type="checkbox"/> C-Use	<input type="checkbox"/> File

Mr. Robert G. Anderson
District Engineer
FHWA Division Office
P.O. Box 1787
Jefferson City, Missouri 65102

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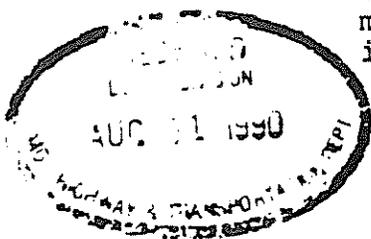
Mr. Wayne Muri
Chief Engineer
Missouri Highway and Transportation Department
P.O. Box 270
Jefferson City, Missouri 65102

Re: Draft Environmental Impact Statement - Page
Avenue Extension

Dear Sirs:

The Open Space Council for the St. Louis Region herewith submits the following comments on the DEIS prepared for the Department by Booker Associates, Inc. By way of introduction, we would note that the Open Space Council is a citizen's group founded in 1965 to promote the acquisition and preservation of open space within the metropolitan area and sound land use policies. The organization's particular interest in this project has to do with its projected impacts on Creve Coeur Lake Memorial Park, Spring Bend area, and the Missouri River floodplain. In order to address the DEIS in terms of the over-all costs and benefits that must be weighed in this proposal however, our remarks will touch some other aspects of the proposal.

The impacts on Creve Coeur Lake Memorial Park and Spring Bend area (which is going to be a park) of the proposed red line alternative favored by Booker Associates will be extremely damaging. Creve Coeur Park is one of the most popular parks in St. Louis County. The potential damage to that park, coupled with the fact that there is presently funding only for the St. Louis County portion of the project, suggest that it would be highly appropriate to have another hearing on the DEIS in St. Louis County, and to structure the hearing so that comments are properly concerned with the DEIS, and not simply the well managed expressions of boosterism for the proposal itself so evident at the St. Charles County hearing.



P. O. BOX 16122 / ST. LOUIS, MISSOURI 63105

We also suggest that the comment period be extended 60-90 days to permit many groups and persons who may be interested in commenting, but who have been out of the city during the vacation time of the year, to study the DEIS and comment.

Given the serious impacts of bisecting a public park with the extension, we feel that the DEIS is deficient in its consideration of both 1) alternatives to the proposed red line and 2) the nature, extent and cost of mitigation for this damage. We will address these two points in order.

With respect to alternative routes, we would note at the outset that planning for the Page Avenue Extension should have begun to take Creve Coeur Park into consideration when the Park was acquired in 1972. It was clear at that time that because land and water conservation funds were used, the route through the park should be avoided if at all possible. Comments made at the hearing to the effect that this is not so because the red line route was already being planned at the time the park was acquired are completely beside the point. A plan for anything cannot be equated with the accomplished acquisition of the park. Rather than consider alternatives at that time, the red line stayed in place, and while the DEIS contains many comments about the damage to the park, it completely fails to quantify these damages in its evaluation of the relative costs of the alternatives, so that Creve Coeur Lake Memorial Park serves to scuew the DEIS recommendation in favor of the red line by being in effect counted as free right of way in the numerical cost analysis. This despite the fact that the presence of the park is the primary legal factor forcing a consideration of alternatives. We think that this is a fundamental flaw in the DEIS analysis.

Furthermore, the rather incomprehensible lease by the St. Louis County Parks department of a patch of MSD ground astride the green line should not be given significant weight in devaluing this alternative. The lease is short-term, was entered into in August 1989 after the Department of Interior had advised you that it felt that alternatives to the bisection of Creve Coeur Park existed, and its purpose is so dubious that we have wondered if it was not entered into for the purpose of creating the same legal objection to this alternative as Creve Coeur Park presents to the red line. The potential damage to this rather fleeting, chimerical park receives undue emphasis in the DEIS.

We also think the proposed alternatives were unduly restricted. A line skirting Creve Coeur Park and then following the red line where it and the green line nearly intersect in the floodplain readily suggests itself as an alternative to be considered, simply by looking at the maps, and this possibility was readily conceded by highway department officials in

conversations we had with them while the DEIS was being prepared, yet the DEIS contains no consideration whatever of such a possibility.

3 The DEIS credits St. Charles County for preserving the red line from development on its side of the river, but Mrs. Knowles' letter makes it clear that citizens who have sought to preserve scenic and valuable land for public use and enjoyment can take credit for this. The Spring Bend area is worthy of more consideration than it receives in the discussion of alternatives, as well much more mitigation than the DEIS contemplates.

We will proceed to the second major point of consideration in our comments, the nature and extent of the damage to Creve Coeur Lake Memorial Park, and the mitigation this should require.

No one, but no one, wants this road in his or her back yard. Any public hearing on a proposal like this will produce reams of evidence of this attitude in its transcript. Our love for the automobile may produce a need for roads that must be met, but heavily traveled roads are obnoxious nuisances to their neighbors, and produce a need, more than perhaps any other significant feature of urban life when noise, air pollution and congestion are considered, for urban parks. A fortiori to the consideration of any affected resident along the proposed right of way must be the consideration of a large, beautiful and well used public park, which the community has set aside in its midst for the use and enjoyment of all. Depositing all that noise pollution precisely in space that has been set aside within the urban area to be free of it should be avoided if at all possible, but if not, should be mitigated in a most serious and extensive manner.

4 Bisecting Creve Coeur Park with this highway constitutes major damage to a major public asset, and simply elevating the road does not begin to mitigate this loss. The loss can be evaluated as both 1) a loss of the land under the right of way itself, and 2) the loss of a large and valuable portion of the beneficial value of adjacent portions of the park. The second factor is far more significant than the first, but receives no consideration whatever in the DEIS' recommended mitigation, consisting of roughly an acre of compensation for each acre taken by the right of way (since the fair market value of an acre of right of way in the Park cannot be expected to reflect in the least the damage to the other areas in the Park). Such a taking should require a major expansion of the park to compensate for the loss, and such an expansion, into the adjacent bottom land, is possible and should be insisted upon, if the red line or any similarly damaging route is selected. The mitigation proposed in the DEIS does not, in our opinion, adequately address the factors

which are supposed to be addressed in a taking of section 6(f) land.

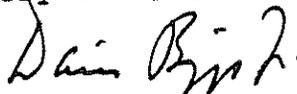
An additional factor calling for extensive mitigation will be damage to the wet land areas in the floodplain itself which the red line, and any alternative, will cause.

5 We think the foregoing considerations clearly indicate that if the red line is proceeded with, there should be mitigation in the form of the acquisition and preservation of thousands of acres of adjacent land in the floodplain, both as wet land and as park area.

6 We also note that the DEIS contains no recommendations for mass transit or multi-passenger or bus lanes. If the mistakes in Southern California and the Northeast - the building of roads to the extent that they impinge more and more on communities and that equally important aspect of urban infrastructure, public parks, without solving traffic problems - are not to be repeated in St. Louis, then a policy should be adopted insisting that, as part of the quid pro quo for every project like the Page Avenue Extension, bridges should be built to be able to accommodate future mass transit systems, and lanes on bridges and highways should be reserved for buses and/or cars carrying more than one person.

The DEIS goes through the formality of acknowledging the "no-build" alternative. We can see and understand as well as anyone that it is not being considered. We understand the highway department's view that this sort of wisdom is probably a generation or two away - in St. Louis, not Los Angeles. We do note the demographic statistics in the DEIS which confirm that the metropolitan area's population is not growing. This bridge is being built because of our love of the automobile and the greed of St. Charles County developers, and for no other reasons. We should all pause and reflect on this, and look forward to the day when the serious planning needed to have a livable city can consist of more than responses to such factors as these, with all the attendant damage to the parks that we will really be counting on a generation or two down the road to keep our cities livable.

Very truly yours,



Davis Biggs, Jr.
Vice-President

DBJr/dbj

RESPONSE TO COMMENTS

The Open Space Council - Letter of July 31, 1990

1. The evaluation in the FEIS includes costs for the mitigation plan.
2. See Coalition for the Environment Response No. 14.
3. Meetings have occurred with Mrs. Knowles and MHTD officials. The Red Alignment has been shifted north to minimize impacts to the extent possible.
4. The mitigation presented in the mitigation plan would add at least 600 acres to Creve Coeur Lake Memorial Park.
5. Wetlands will be mitigated by purchasing land west and south of Creve Coeur Lake Memorial Park that will be enhanced as wetlands. Additional wetlands mitigation will occur with the development of wetlands along the right-of-way and bike trail from Creve Coeur Mill Road out to the agricultural levee.
6. See U. S. Department of the Interior Response No. 24.



Ozark Chapter / Sierra Club

- Survey
- Planning
- Maps
- Recon Engr
- Photo Engr
- C-Me
- CAD Engr.
- Value Engr.
- Office Mgr.
- File

max Please reply to

NS

Richard Kutta
3 Colonial Hills Pkwy.
Creve Coeur MO 63141

September 3, 1990

Mr. Robert G. Anderson
District Engineer
FHWA Division Office
P.O. Box 1787
Jefferson City MO 65102

Post-It™ brand fax transmittal memo 7671		# of pages = 5	
To	W. MURS	From	R. KUTTA
Co.	MHD	Co.	SC
Dept.	ENGR	Phone #	314/432-3265
Fax #	314/51-6555	Fax #	

Mr. Wayne Muri
Chief Engineer
Missouri Highway and Transportation Dept.
P.O. Box 270
Jefferson City MO 65102

Re: Draft Environmental Impact Statement
Proposed Page Avenue Extension

Gentlemen:

This letter constitutes the comments of the Eastern Missouri Group of the Ozark Chapter of the Sierra Club on the DEIS for the proposed project. We appreciate the opportunity to provide these comments and thank you for extending the comment period to September 4, 1990.

SUMMARY:

Although justified as a remedy to alleviate the peak hours automobile congestion of I-270 and I-70 across the Missouri River to St. Peters, the underlying motive behind the proposed Page Avenue Extension (Red Alignment) appears to be to induce a massive land-use reorientation from agricultural, flood plain, park and wet-lands to urban, commercial and residential uses. The DEIS is inadequate in that it pays lip service to the environment but provides no substantial assessment of the environmental consequences of this induced land use conversion. The DEIS is essentially

Thomas Hart Benton Group
Kansas City

Osage Group
Columbia/Jefferson City

White River Group
Springfield



Eastern Missouri Group
St. Louis

Mr. Robert Anderson
Mr. Wayne Muri
Page 2

an elaborate comparison among two equally unsuitable roadway alignments. Finally, the DEIS is inadequate in that it fails to provide the fundamental data and assumptions used to establish the traffic demand projections which form the justification for the project but then proceeds to "analyze" alternative solutions without addressing the effect of the alternatives on these data and assumptions.

OBJECTIVES:

In studying the DEIS and preparing these comments, the Sierra Club was particularly interested in determining whether a "solution" could be determined that would satisfy several objectives:

- Minimize direct and indirect impacts on the ecosystem.
- Minimize pollution of air and water and consumption of energy.

We were interested in achieving the following specific goals:

- Avoid new transportation corridors that would induce conversion of land use to urban forms.
- Avoid conversion of parklands, wetlands and flood plains to residential and commercial uses.

To these ends we find the predisposition of the DEIS to construction of the Red Alternative of the Page Avenue Extension to be most unfortunate. The Red Alternative is the longest, costliest, converts the most acreage, induces the most future development, displaces the most farm, park, wet and flood plain land, and will generate the most pollution, noise and urban sprawl.

OBJECTIONS:

The Sierra Club notes the following deficiencies in the DEIS and requests corrective action in preparation of the Final EIS:

1. The DEIS fails to address the obvious Green/Red/Green alignment, thereby biasing the outcome through the comparison of two inefficient solutions. Following the Green alignment to the point where it tangents the Red

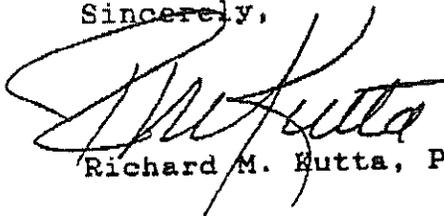
Mr. Robert Anderson
Mr. Wayne Muri
Page 5

9 of 3-1/2 to 4% annually during the last twenty years to 1% per year during 1990-2000 and 0.8% per year thereafter. Yet the traffic projections use 3% annually for the next 25 years. The DEIS fails to address this disparity. Why is bridge traffic increasing 2-1/2 times faster than the population, especially since only 60% of the St. Charles population is ages 18-60, which comprises the commuting traffic?

10. Although proposed as a solution to existing and projected traffic congestion, the 10-lane wide Page Avenue Extension will have greater capacity than I-70. As such, it is planned as the primary link between St. Louis and St. Charles County, designed to open remaining areas of both counties for development. The DEIS should evaluate it as such. The "companion" DEIS for the Earth City Expressway Extension should be combined with the Page Avenue Extension and then assess the cumulative impacts. The final, consolidated impact statement should be updated to use 1990 census data rather than 10-year old census data.

In closing, we regard it as fortuitous that the Page Avenue Extension has been delayed as long as it has. As inadequate as it is, the DEIS demonstrates that the project is no longer appropriate. Its impacts on the environment are so great as to disqualify it from further consideration. The mass transit option has come to St. Louis at the perfect time to obviate the need this dinosaur. The Highway Trust Fund is about to expire; there is opinion that it will be replaced with a fund that provides greatly increased funding for passenger rail and mass transit. It is time for the Missouri Highway and Transportation Department to modify their focus from "Highway" to "Transportation" and take the lead in developing alternative modes of transportation that are appropriate to the 21st Century.

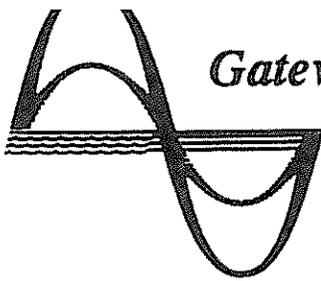
Sincerely,


Richard M. Kutta, P.E.

RESPONSE TO COMMENTS

Ozark Chapter / Sierra Club - Letter of September 3, 1990

1. Three alternates connected to the Red Alignment have been analyzed as part of the FEIS and Section 6(f) Evaluation. These include the Green-Black, Yellow-Black and Blue.
2. Other factors, in addition to residential use, are factored into projected ADT such as age and type of population, commercial activity along the route, commercial activity between St. Louis and St. Charles Counties, and flow-through traffic.
3. The jobs created could just as likely go to persons that would commute into St. Charles County for employment opportunities and therefore be included in the overall ADT.
4. The growth has and continues to occur at a high level of activity for St. Charles County. As noted in the DEIS, population increase in St. Charles County has increased dramatically without the Page Avenue Extension. The proposed project is in response to the growth, not an inducement. See Coalition for the Environment Response No. 1.
5. See Response No. 4 above. Assessing public policy of MHTD and EWGCC is beyond the scope of this document. That should occur as part of the state-wide and regional transportation plans.
6. See Coalition for the Environment Response No. 1.
7. The comment answers itself. Without the mechanisms in place for public transportation and no support of Bi-State, there is little or no hope for the development of mass transit alternates in St. Charles County. The County has just initiated funds to begin investigating light rail which, according to EWGCC, has potential along I-70, which will be a major undertaking that would exceed the \$250 million for the Page Avenue Extension and remove only 2,800+ vehicles from peak hour ADT. See Response No. 8.



Gateway Trailnet, Inc.

7185 Manchester Rd.
St. Louis, Mo. 63143

October 13, 1990

Mr. Robert G. Anderson
District Engineer
FHWA Division Office
P.O. Box 1787
Jefferson City, Missouri 65102

Mr. Wayne Muri
Chief Engineer
Missouri Highway and Transportation Commission
P.O. Box 270
Jefferson City, Missouri 65102

- Asst Div Engr
- Asst Div Engr *GWV*
- Utilities
- Fed Aid
- Recon Engr
- Photo Engr
- C-Me
- Engr *max*
- Engr
- Engr
- Office Mgr
- File

Re: Page Avenue Extension *Rte D, St. Chas - St. Louis Cos. Job # 6-U-803*

Dear Sirs:

This is a comment on the Environmental Impact Statement for the proposed extension of Route D (Page Avenue) from St. Louis County to St. Charles County. The job numbers for this project are 6-U-D-803B, 6-U-D-803C, and 6-U-D-803D. Gateway Trailnet strongly encourages the Highway Commission to add wide shoulders to the bridge that will carry Page Avenue over the Missouri River and to provide appropriate grading at both ends of the bridge so as to permit bicycle traffic to cross the bridge.

This bridge can connect the center of St. Louis County to the recently opened Missouri River State Trail. The bridge will pass directly over the trail. Adding bikable shoulders to the bridge will permit bicyclists safe access between the two counties and to the trail. Currently representatives of our corporation are meeting with Messrs. Keith McGowan and Freeman McCulloch of the Highway Department to discuss this matter and other bridges planned by the Highway Department.

Bicycling is an increasingly popular form of recreation. As fuel prices rise, it will become a more nearly common form of basic transportation. The cost of retrofitting bicycle routes in the future will far exceed the costs of designing them in now. We encourage the Highway Commission to do so.

Yours truly,
GATEWAY TRAILNET, Inc.

by: *[Signature]* RICHARD V. GILPIN
A citizens group promoting connected trails and greenways that highlight the transportation and river heritage of the St. Louis region.

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RESPONSE TO COMMENTS

Gateway Trailnet, Inc. - Letter of October 13, 1990

1. As part of the mitigation plan detailed in Section 601 of the Pipeline Safety Act, there will be a bikeway across the floodplain in St. Louis County and across the Missouri River Bridge to the KATY Trail.

RECEIVED
 JUL 23 1998
 Mo. State Highway Dept.

ST. JOHN BOSCO PARISH
 12934 MARINE AVE.
 ST. LOUIS, MO 63146-2234

July 19, 1998
 (Signature)

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OFFICE MGR	
PERSONNEL	
R/W	

Mr. J. I. Yarnell
 District Engineer
 Missouri Highway Department
 329 South Kirkwood
 Kirkwood, Mo. 63122

Dear Mr. Yarnell:

After reviewing the proposed plan of access to Page--at Amiot/Marine, as prepared by Crawford, Bunte and Brammeier, it is my opinion that the interchange is unwarranted as has already been indicated in studies by the Missouri Highway Department and the St. Louis County Highway and Traffic Department.

① The proposed interchange would place several hardships upon St. John Bosco Parish and its parishioners for the following reasons:

1. The safety of the parishioners would be compromised, especially that of our young people. With our playing field, gymnasium, and religious education program several nights a week, the increased traffic would present a serious hazard to our young people.
2. As the entrance/exit to our church property from Amiot would be eliminated, a traffic flow problem of an immense nature would result as only one entrance/exit would be available from Marine Ave. for our more than 850 families.
3. The increased pollution and noise would very much disturb the residential setting of the parish house at the corner of Amiot and Marine.

I appreciate very much your kind attention to these concerns.

Sincerely Yours,
 (Signature)
 Rev. Patrick J. O'Laughlin
 Pastor
 St. John Bosco Parish

CC: H.C. Milford
 John Saffa
 Todd Akin
 Frank Flotron

RESPONSE TO COMMENTS

St. John Bosco Parish - Letter of July 19, 1990

1. MHTD does not currently have plans for an interchange at Amiot.

CREVE COUER PARK, ST LOUIS COUNTY

WHEREAS the St. Louis Creve Coeur Park is one of the region's most popular parks providing diverse passive and active recreation opportunities for thousands of park users annually; and

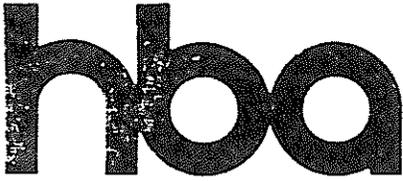
WHEREAS Creve Coeur Park contains one of Missouri's few "oxbow" lakes and high quality birding and wildlife habitats; and

WHEREAS much of Creve Coeur Park was acquired and developed with Federal Land and Water Conservation Funds which mandate that the lands remain park land for perpetuity; and

WHEREAS a plan by the Missouri Department of Highways and Transportation to slice through Creve Coeur Park with a 10-lane highway (Page Avenue extension) and bridge would consume nearly 22 acres of park land and drastically alter significant areas of natural beauty and solitude; and

WHEREAS such an encroachment on park lands acquired and developed with Federal Land and Water Conservation Funds is clearly a violation of public law and may set precedence for additional inappropriate park land conversions in other jurisdictions;

NOW, THEREFORE, BE IT RESOLVED that the Conservation Federation of Missouri assembled in Annual Convention in Columbia, Missouri this 3rd day of March, 1991 strongly encourages the Missouri Department of Highways and Transportation to explore all possible options for locating improvements outside the boundaries of Creve Coeur Park.



**home builders association
of greater saint louis**

Bonnie Aubuchon
June 28, 1990

Written Copy 06/28/90
Public Hearing Statement

DRAFT--PAGE BRIDGE COMMENTS BY HBA

MY NAME IS BONNIE AUBUCHON AND I AM HERE ON BEHALF OF THE HOME BUILDERS ASSOCIATION OF GREATER ST. LOUIS.

OUR ASSOCIATION HAS A LONG HISTORY OF SUPPORTING COMMUNITY NEEDS. AS IT RELATES TO STATE HIGHWAYS AND BRIDGES, WE WERE AMONG THE FIRST TO DEMONSTRATE SUPPORT FOR THE APRIL 1987 "PROPOSITION A" PACKAGE WHICH MISSOURI VOTERS APPROVED PROVIDING THE FUNDING FOR THE PAGE BRIDGE PROJECT.

WE CONTINUE TO RECOGNIZE THE SUBSTANTIAL SHORT-FALL OF FUNDS TO PROVIDE THE NEEDED ROADS AND BRIDGES IN OUR STATE. AND WE PLEDGE TO CONTINUE TO HELP WORK TOWARD SOLUTIONS SO THE ECONOMIC EXPANSION CAN OCCUR AND THE HEADACHE OF TRAFFIC CONGESTION CAN BE AVOIDED.

THE HBA ASKS THAT THE MEMBERS OF THE STATE HIGHWAY AND TRANSPORTATION DEPARTMENT RECOGNIZE THAT AN ACCELERATED SCHEDULE SHOULD BE A TOP PRIORITY. REGARDLESS OF THE PRECISE LOCATION AND DESIGN, IT IS THE ACCELERATION OF THE SCHEDULE THAT MUST BE STRESSED.

CITIZENS OF THIS COUNTY FACE A FUTURE OF SNARLED TRAFFIC AND LONG DELAYS IF THE STATE DOES NOT DO EVERYTHING IN ITS POWER TO COMPLETE THE PAGE BRIDGE PROJECT AT THE EARLIEST POSSIBLE DATE.

OUR MESSAGE TO YOU IS A SIMPLE ONE. ADHERE TO A STRICT TIME SCHEDULE FOR DECISIONS ON LOCATION AND DESIGN AND CONTINUE TO ANALYZE WAYS TO HASTEN THE DAY WHEN THE FIRST CARS WILL ACTUALLY DRIVE ACROSS THE BADLY NEEDED NEW STRUCTURE.

SOME PUBLISHED SCHEDULES HAVE INDICATED THE BRIDGE WON'T OPEN UNTIL 1998 OR THE YEAR 2000. THE BRIDGE WAS NEEDED FIVE YEARS AGO AND EVERY YEAR THAT GOES BY WITHOUT IT WILL CREATE ADDITIONAL TRAFFIC PROBLEMS FOR THIS AREA'S CITIZENS AND LOCAL ECONOMY.

IN SUMMARY, WE ASK THAT YOU BRING LOCATION AND DESIGN CONSIDERATIONS TO A SPEEDY CONCLUSION AND THAT ALL OTHER STEPS THAT NEED TO BE TAKEN TO BUILD THIS BRIDGE, BE REVIEWED AND TIME SCHEDULES ACCELERATED SO THAT WE CAN BE DRIVING ON THIS BRIDGE IN THE MID-1990s.

THANK YOU.



ST. CHARLES COUNTY BOARD OF REALTORS, INC.



The Voice for Real Estate™ in St. Charles County

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June 28, 1990

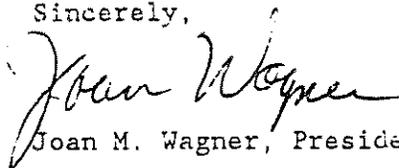
Missouri Highway & Transportation Dept.
329 South Kirkwood
Kirkwood, MO 63122

To Whom It May Concern:

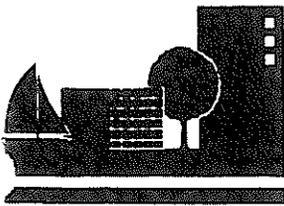
The St. Charles County Board of REALTORS hereby endorses the expeditious completion of the Missouri Highway and Transportation Department's preferred corridor, known as the "Red Line", for the proposed Page Avenue Bridge and Extension Project.

We feel this project is essential to improve the present traffic conditions throughout St. Charles County. We also feel it will improve the quality of life for St. Charles residents by eliminating traffic tie-ups and by providing better access to the southern part of St. Charles County. This will also allow for increased industrial and commercial development ultimately increasing the tax base which is vital to providing the resources necessary for the best possible education for our children.

Sincerely,


Joan M. Wagner, President

JMW/jg



MARYLAND HEIGHTS - WEST PORT

Chamber OF COMMERCE

RECEIVED
JUL 2 - 1990
Director
Mo. State Highway Dept.

	DIST ENGR.	
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	OFFICE MGR	
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	WATER	
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President
DENNIS DE SANTIS
Property Search, Inc

July 2, 1990

Vice President
WILLIAM L. CRONIN, LL.M., CPA
Attorney at Law

Mr. J.T. Yarnell
District Engineer
Missouri Highway Transportation Department
329 S. Kirkwood Rd.
Kirkwood, MO 63122

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Executive Director

CYNTHIA K. TUMEY
Office Administrator

Dear Mr. Yarnell:

On Behalf of the Maryland Heights - West Port Chamber of Commerce, we would like to thank you for all of the planning and work on the Page Avenue extension. We would also like to say that we support the Red Plan.

We would however ask that the Missouri Highway Department reconsider the Amiot interchange for the following reasons:

- 1) Upon completion of the Page Avenue extension much of the Dorsett Road congestion will shift to Page.
- 2) Without an additional on and off ramp at Amiot, Page will be overly congested as soon as it opens.
- 3) The Missouri Highway Department has a study that claims the ramp is unnecessary whereas the City of Maryland Heights has a study that says the ramp is necessary.

It is very unusual for a politician to endorse an unpopular issue, however I commend Mayor Saffa for his foresight and courage to support the on and off ramp at Amiot.

We would hope that the Missouri Highway Transportation Department will seriously reconsider the Amiot on and off ramp because it is necessary for both the residents and businesses of Maryland Heights.

Respectfully Submitted,

Dennis G. DeSantis
President
Maryland Heights - West Port Chamber of Commerce

cc: Mayor John Saffa Jr.
Burr Smith

REC'D FROM
UNION ELECTRIC

March 7, 1991

Mr. J. T. Yarnell
Missouri Highway and Transportation
Commission
329 South Kirkwood Road
Kirkwood, MO 63122

Dear Mr. Yarnell:

Sioux-Mason Right-of-Way
Page Avenue Extension

This letter is in response to your request for our review of the plans illustrating an alternate design of the Page Avenue extension which were recently submitted to us by your Mr. Randy Chang. The alternate route, which is shown south of Creve Coeur Lake, runs parallel to and also crosses our Sioux-Mason right-of-way and would affect both our existing and proposed future facilities. However, if this alternate route could be shifted approximately 100 feet to the south, it would only cross our right-of-way as opposed to using a portion of it. This would reduce relocation difficulties and costs.

Our Sioux-Mason right-of-way is presently used for a double circuit 345 KV transmission line, and we are in the preliminary stages of the design for an additional double circuit 138 KV transmission line which would parallel the existing line. A future double circuit 345 KV transmission line may also be required and could be accommodated along the existing right-of-way.

The following comments regarding the alternate route were provided by our engineers and were made under the assumption that a relocated right-of-way, at least as wide as our existing right-of-way, would be available and would parallel the highway extension.

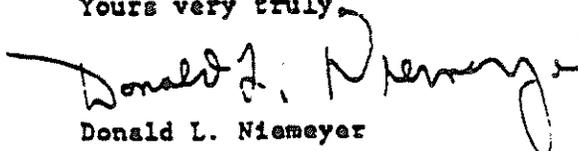
1. Any relocation of the existing and future transmission lines in this area must avoid conflict with the three water mains which run roughly parallel to the existing line. Therefore, a relocated right-of-way will need to be located far enough away from the water mains or be sufficiently wide in order to avoid conflicts with tower foundations.
2. The cost for relocating the existing 345 KV double circuit tower line to accommodate the proposed highway routing would be approximately \$2,100,000. This estimate is based on a preliminary review of possible alternative transmission line routes and on available information for building the existing transmission line updated to current construction

costs. A complete layout and design of one particular line relocation was not performed. Furthermore, the above cost estimate was made assuming that outages to facilitate construction could be obtained when required and the necessary permits could be obtained in a timely fashion.

3. Present plans call for two additional double circuit transmission lines along this right-of-way. The first of these future transmission lines is already under preliminary layout and design. If an alternate route in this area is identified and decided upon within the next 14 months, there would not be a significant increase in the cost of this future line. However, delays in any decision to relocate beyond that time frame would mean additional costs for the future lines as well. A worst case scenario would be if the proposed future line was already constructed through this area along the present right-of-way. The cost to relocate it would be approximately \$1,600,000.00, which is in addition to the \$2,100,000.00 already mentioned.
4. Our District engineers estimate that there would be approximately \$300,000.00 worth of distribution facility relocation work required in the alternate route for the extension of Page Avenue.
5. The above estimates do not include costs for obtaining alternate right-of-way to accommodate the relocations. The Real Estate Department has not performed a recent cost study of land values in the area of the extension and, therefore, is not in a position to provide you with this cost information.

If you have any questions concerning these matters or need additional information, please feel free to contact Mrs. Johanna Yovich of my staff at 554-2128.

Yours very truly,


Donald L. Niemeyer
Real Estate Agent

✓
JIY/cjm

cc: Mr. Randy Chang
Missouri Highway and Transportation Commission

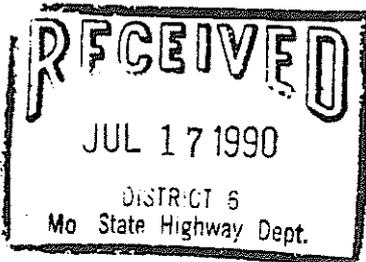
bcc: Messrs. J. G. Bizoff
M. J. Nealon
D. A. Whiteley

Citizen/Resident Comments



TRUSTEES OF SEVEN PINES SUBDIVISION

P.O. BOX 1461
MARYLAND HEIGHTS, MO. 63043



July 17, 1990

DIST ENGR.	
ASST DE DESIGN	
ASST DE OPER	6
ALL DEPTS	
CONSTRUCTION	
DESIGN	
DIST INVEST	
GARAGE	
LEGAL	
MAINT & TR	
MAT'L	
OFFICE MGR	
PERSONNEL	
R/W	
C-ME	
FILE	

Mr. J. T. Yarnell
District Engineer
Missouri Highway Department
329 South Kirkwood
Kirkwood, Missouri 63122

Dear Mr. Yarnell:

Enclosed with this letter you will find petitions containing approximately 1500 signatures of residents opposing the interchange requested by Maryland Heights at the intersection of the Page Avenue Extension and Amiot Drive.

These signatures represent the residents of the surrounding community who believe that the interchange will destroy their residential environment. This proposed interchange is 1.5 mile from Westport (the proposed receiving point in question) and the traffic carries by it would be required to flow through 1.5 mile of zoned residential neighborhood before entering the Westport complex. We feel this interchange is unwarranted (as indicated in studies by Missouri Highway Department and St. Louis County Highways and Traffic) and should not be allowed.

1

I appreciate your time and effort on behalf of the concerned citizens of St. Louis County.

Sincerely,

Carol Cullinane, Trustee
Seven Pines Subdivision

Chairman,
Marine/Page Action Group

cc: H. C. Milford
John Saffa
Todd Akin
Franc Flotron

RESPONSE TO COMMENTS

Trustees of Seven Pines Subdivision - Letter of July 17, 1990

1. MHTD does not plan to construct an interchange at Amiot.

13185 Royal Pines Dr.
St. Louis, MO 63146
July 10, 1990

Mr. Wayne Muri
Chief Engineer
Missouri Highway & Transportation Dept.
P.O. Box 270
Jefferson City, MO 65102

Dear Mr. Muri:

Enclosed please find a copy of the text of a statement and supporting material presented during the Page Avenue Extension Route Selection and Design Public Hearing which was held at the Columns Banquet Center in St. Charles, MO, on 28 June 1990. The presentation was made by Ms. Lili J. Cooper, Attorney & Counselor At Law, the Wallach Law Firm on behalf of the Board of Managers and residents of the Royal Pines Condominium Complex located in Maryland Heights, Missouri.

The presentation was designed to develop the following key points:

- ① (1) The Missouri Highway and Transportation Department (MHTD) has not developed an adequate comprehensive plan to support route selection and design of the Page Avenue Extension Project.
- ② (2) MHTD has not examined available and practical alternative routes for the Page Avenue Extension in St. Louis County which both avoid critical, protected Section 4f/6f parklands and avoid major residential complexes.
- ③ (3) MHTD has stated that the cost estimates used as a basis for route selection are outdated and low by approximately 50%. This is an unacceptable basis for route selection.
- ④ (4) An alternative route is available in St. Louis County which avoids parklands and minimizes residential relocation. We have identified it as the Yellow Route (see enclosed map). It uses existing road right-of-ways (Bennington Place/Fee Fee Road) and the Union Electric Utility right-of-way. It requires only one bridge (Missouri River but not Creve Coeur Lake). It would take only 45 homes in St. Louis County and would cost approximately \$50M less than the recommended Red Route even though some utilities would have to be relocated.

5 (5) The effectiveness of the proposed roadway in relieving congested traffic in the year 2000 time frame is grossly misrepresented in the supporting Draft Environmental Impact Statement (DEIS) documentation. The reason for this misrepresentation is that MHTD revealed at the 28 June 90 hearing that only three of the five lanes of the roadway will be constructed due to funding limitations.

6 (6) Therefore, both the benefits and costs of the proposed roadway are erroneous.

- o The roadway will cost 50% more than stated in the DEIS, and
- o The roadway will carry only 60% of the vehicles stated in the DEIS, as a result
- o The cost/benefit ratio for the road is 2.5 times (1.5/0.6) that presented in the route selection/design basis documentation.

(7) How can documentation with admitted errors of a factor of 2.5 (cost-to-benefit) be used to select the features of a major urban highway? We submit that the basic study assumptions and conclusions are erroneous and demand that the study be reworked examining:

- o Obviously superior routes
- o Using correct cost data, and
- o Using correct traffic estimates and road lane capacities

7 Additionally, for the record, we need to state that we are vigorously opposed to the recommended Red Route since it will severely damage our local and park environment as well as our property values. If the Red Route is constructed, however, we oppose the construction of the Maryland Heights proposed interchange at Marine and Amiot since residents of our complex will be denied access to the roadway westbound into St. Charles as well as entrance to our complex from the roadway eastbound from St. Charles. If the Page Red Route is selected we demand full visual/noise abatement from the road to all of our buildings using extended earthen berms which will limit noise to a level below the national standard of 67 dBA.

Thank you for consideration given these matters.

Eugene M. Schultz
Eugene M. Schultz
President
Royal Pines Condominium Association

RESPONSE TO COMMENTS

Mr. Eugene M. Schultz, President, Royal Pines Condominium Association - Letter of July 10, 1990

1. Planning for the extension of Page Avenue has occurred since the late 1950s. A Reconnaissance Study was completed in 1986 that reviewed 15 alternatives and combinations of same.
2. Additional alignment segments, the Yellow-Black and Blue, that connect to the Red Alignment west of Creve Coeur Mill Road are included in the Section 6(f) Evaluation and this FEIS.
3. Costs have been updated to 1991.
4. See Response No. 2.
5. Dedicated funding for only six lanes is currently available. However, MHTD feels funding for ten lanes will be in place at time of construction. Therefore, impacts were analyzed with the ten lane scenario.
6. See Response Nos. 2 and 5.
7. MHTD has no plans to construct an interchange at Amiot.

THE WALLACH LAW FIRM
ATTORNEYS AND COUNSELORS AT LAW
MANCHESTER/270 OFFICE CENTER
12444 POWERSCOURT DRIVE, SUITE 250
ST. LOUIS, MISSOURI 63131
314-965-4050
FAX 314-965-3568

<input type="checkbox"/> Asst. Dir. Eng. - C & D	<input type="checkbox"/> Design Eng.
<input type="checkbox"/> Asst. Dir. Eng. - Water	<input type="checkbox"/> Liaison Eng.
<input type="checkbox"/> Asst. Dir. Eng. - Urban	<input type="checkbox"/> Urban Eng.
<input type="checkbox"/> Asst. Dir. Eng. - Traffic	<input type="checkbox"/> Spec. Assn. Eng.
<input type="checkbox"/> Asst. Dir. Eng. - Planning	<input type="checkbox"/> Asst. Dir. Eng. - Planning
<input type="checkbox"/> Asst. Dir. Eng. - Photo	<input type="checkbox"/> CADD Eng.
<input type="checkbox"/> Asst. Dir. Eng. - Architecture	<input type="checkbox"/> Video Eng.
<input type="checkbox"/> Asst. Dir. Eng. - Office Mgr.	<input type="checkbox"/> Office Mgr.
<input type="checkbox"/> Asst. Dir. Eng. - File	<input type="checkbox"/> File

LILI J. COOPER

August 1, 1990

JEROME WALLACH AND ASSOC., P.C.

JWC

Mr. Wayne Muri
Chief Engineer
Missouri Highway and Transportation Commission
P.O. Box 270
Jefferson City, Missouri 65102

RE: Written Comments Pursuant to Site and Location
Hearing for Page Avenue Extension

Dear Mr. Muri:

Please find enclosed written comments submitted on behalf of Royal Pines Condominium Association.

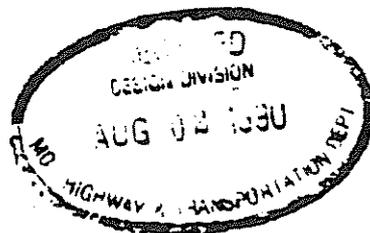
Please feel free to call me if you have any questions.

Very truly yours,

Lili J. Cooper
Lili J. Cooper

LJC/ju

Enclosures



WRITTEN COMMENTS PURSUANT TO THE PUBLIC HEARING ON THE
PAGE AVENUE EXTENSION HELD JUNE 28, 1990
SUBMITTED ON BEHALF OF ROYAL PINES CONDOMINIUM ASSOCIATION
BY:

THE WALLACH LAW FIRM

July 10, 1990

WRITTEN SUMMARY OF COMMENTS MADE AT PAGE AVENUE EXTENSION
LOCATION AND SITE HEARING ON JUNE 28, 1990

INTRODUCTION

In the Missouri Highway and Transportation Department's ("MHTD") Environmental Impact Statement ("EIS"), several alternatives for alleviating the mounting traffic congestion at the Missouri River crossings and improving the flow of traffic between St. Louis and St. Charles counties were identified. Three of these alternatives, the No Build Alternative, Traffic Systems Management and Mass Transit are identified, but virtually ignored in the analysis. The remaining two alternatives, identified as the Red Alignment and the Green-Black Alignment are both extensions of Page Avenue which would both require the construction of another Missouri River crossing. Both the Red Alignment and the Green-Black Alignment were proposed to eventually be a ten-lane highway connecting St. Louis and St. Charles counties.

ANALYSIS OF THE RED ALIGNMENT

The Red Alignment would extend Page Avenue in a northwesterly direction from Bennington through Creve Coeur Lake Park to Highway 94 and continuing westerly out to U.S. Highway 40. This alternative would require the construction of two bridges; one across Creve Coeur Lake and one across the Missouri River.

The Red Alignment is not an environmentally sound alternative because it will sever and destroy Creve Coeur Lake

Park. The park is the third largest in the St. Louis area and provides a habitat for all sorts of wildlife, including a large population of deer, owls and migratory birds. Construction of the bridge will require the actual taking of twenty-two acres of this valuable park land as well as the appropriation of air rights. The most detrimental effects of this taking will be the damages to the remainder including but not limited to the following: (1) a significant increase in air, water and noise pollution; (2) disruption of the natural habitat; (3) destruction of scarce wetlands surrounding the park; and (4) destruction of the aesthetic quality and the tranquil environment of the park.

The placement of a ten-lane bridge through the park will completely devastate the peace and tranquility of the natural setting. The noise, fumes and other automobile by-products will pollute the lake and the park. This will no longer be a place of quiet serenity, but will become another extension of urban sprawl. The taking of park land is neither beneficial to the community nor necessary in light of other alternatives.

The Red Alignment will require the appropriation of approximately 120 homes and the relocation of the same number of families in St. Louis and St. Charles counties. In addition to the aforementioned takings, the proximity of the proposed roadway to several developed subdivisions will negatively impact the quality of life as well as the property values of

1 | hundreds of residents. Many homes will be located within 150 feet of the proposed right-of-way and thereby made to suffer special damages caused by the excessive noise and air pollution. These damages will be reflected in lower property values but will not be compensated by the State in its condemnation proceedings. Moreover, the MHTD has not provided in its plans for constructing the Red Alignment a proposal for complete berming of all adjacent developed areas to mitigate the effects of the proximity of the roadway.

2 | In its opening remarks at the Page Avenue Extension Location and Site Hearing on June 28, 1990, J.T. Yarnell conceded that the Red Alignment is grossly underfunded. He stated that the project was only partially funded, so the roadway would be only six lanes rather than ten lanes wide and would only extend to Highway 94. No projection of when the remainder of the project would be funded was offered. The projected costs for construction do not include the costs of providing adequate interchanges along Page Avenue, and the existing interchanges are already severely congested.

3 | The estimates set forth in the EIS concerning traffic counts, Page Avenue Extension usage, population trends, construction and maintenance costs, and even the number of lanes are inaccurate and misleading. All of the estimates of the foregoing factors were based on the whole project being completed and each factor would be effected by the modified plan. The lack of funding makes the modified plan a short-term

solution which will likely be obsolete before it is completed.

4 | Mr. Yarnell also announced at the public hearing that
| the Earth City Expressway project is not currently funded. The
| Page Avenue Extension project has not been coordinated with
| other highway construction/improvement projects, such as the
| Earth City Expressway. This further skews projections of
| traffic flow and congestion. This short-term, "band-aid"
| approach is too expensive in the long run and far too
| misleading for the taxpayers of Missouri to accept.

5 | In addition to skewing results and misallocation of
| scarce resources, the underfunding of the Red Alignment will
| cause many property owners in St. Charles County whose homes
| are slated to be taken to suffer devastating precondemnation
| blight. Their homes will be virtually unsaleable for the next
| ten, fifteen, or more years. When the taking by MHTD actually
| occurs, those property owners will realize only a fraction of
| the current value of their homes.

6 | The Red Alignment is a short-term solution because it
| fails to allow for the future addition and/or modification of
| the Missouri River crossing to adapt it for light rail use.
| The EIS practically ignores the alternative of mass transit and
| does not address the future needs of commuters after the year
| 2015. However, it will be cost prohibitive to continue
| building more and more bridges across the Missouri River so
| that mass transit is the inevitable future alternative. In
| order to protect the future health, welfare and economy of this

community, plans must be long range and projections must account for probable future developments. The development and implementation of a mass transit system must be more thoroughly analyzed.

7 The negative impacts of the Red Alignment on the culture, history, aesthetics, health and economy of the community are significant. An archaeological site located near the Royal Pines Condominiums where ancient pot shards dating back to 800 A.D. have been discovered lies immediately in the path of the Red route and will be totally destroyed. The EIS did not address the destruction of this potentially important archaeological site.

8 MHTD has estimated that the homeowners of the Royal Pines Condominiums will be subjected to noise levels exceeding 70 dBA due to their proximity to the proposed Red Alignment. However, MHTD's own measurements at comparable sites indicates noise levels of up to 77dBA which is 10 decibels higher than the National Standard. Although MHTD has proposed constructing some earthen berms in an attempt to mitigate the noise pollution, this is not enough. Berms should be constructed to protect every building within 1000 feet of the proposed highway right-of-way.

9 Many homeowners, including the residents of Royal Pines Condominiums, received no notice and had no knowledge of the plans to extend Page Avenue when they purchased their homes. The majority of owners purchased their property at a premium price and now will be forced to suffer economic hardship

because their home value will dwindle as the plan for the Red route nears approval and commencement. More than one-third of the residents of Royal Pines Condominiums are over 65 years old and they are the ones upon whom the burden of the detrimental impacts will fall.

The neighborhood aesthetics and quality of life for the residents all along the corridor of the Red route will decline as previously peaceful residential neighborhoods are tragically transformed into noisy, busy, traffic-congested, unsightly and dangerous places.

Royal Pines Condominiums has been physically connected and has enjoyed a sense of community with the residential developments located south of it, such as Seven Pines, The Village of Seven Pines, and Sherwood Manor for many years. Now that connection, that community is to be severed by the proposed Red Alignment.

9a

ANALYSIS OF GREEN-BLACK ALIGNMENT

The Green-Black Alignment was formerly the Green Alignment, but the route was modified to avoid the taking of park land. The Green-Black route begins at the interchange of Page and Bennington, then travels in a southwestly direction approximately until it crosses Creve Coeur Creek, then proceeds northwesterly to the intersection with Highway 94 and finally joining Interstate 70. There is no rationale discussed in the EIS as to why the Red Alignment and the Green-Black Alignment

have different termination points, nor is it addressed as to why the Green-Black route does not trace the Red route after it circumvents Creve Coeur Lake Park.

The Green-Black route seems to seek the path of most resistance, or at least of most dense residential development. Although this route is approximately five miles shorter than the Red route, it will require the taking of more than 550 homes and the relocation of 550 families in the two-county area. Due to the large number of takings, the Green-Black route is slightly more expensive than the Red alternative. If this route were altered to trace the path of the Red route, the number of takings would be dramatically reduced.

The Green-Black alternate is more environmentally sound because it causes little, if any, impact to the park lands whether due to oversight or error, the Green-Black Alignment is unacceptable because as it is planned, the Green-Black route preserves park land at the great expense to over 500 homeowners in St. Louis and St. Charles counties. This alternative was planned to satisfy the letter of the law, but poor planning resulted in a route which controverts the intent of the law requiring an alternate route which avoids the taking of park lands. The intent of the law is to preserve and protect park lands because parks enhance the quality of the human environment and are especially important in urban areas to protect the habitat of wildlife. By proposing a poorly planned and unreasonably expensive alternative, the MHTD is attempting

to justify its choice of the Red Alignment. In so doing, they thwart the intentions of the legislature and have concealed their actions by providing misleading and inaccurate projections and estimates in the EIS.

ANALYSIS OF "YELLOW ALTERNATE"

11 | The Yellow Alternate, which was not considered by the MHTD, provides an environmentally sound alternative at a lower cost to the human environment than the Red Alignment. This alternative would begin at the Page/Bennington interchange and proceed southerly, generally along Bennington to Fee Fee Road. It would follow Fee Fee Road in a southwestly direction to the utility corridor and proceed westerly along the utility corridor approximately to the MSD Creve Coeur Pump Station. From there, it turns north and following the black line of the proposed Green-Black Alignment. Then, the "Yellow Alignment" traces the path of the Red Alignment.

The advantages of the Yellow Alternate include the following:

- (1) It avoids all park lands, so it would be environmentally sound and have no impact on Creve Coeur Park;
- (2) It requires the construction of only one bridge over the Missouri River;
- (3) It would result in far fewer residential takings (approximately 150) than the

Green-Black Alignment, (more than 550),
although it might result in a few more takings
than the Red Alignment. (Approximately 120).

(4) It would disrupt fewer subdivisions and
neighborhoods in St. Louis County because it
tends to follow present roadways and the
utility corridors;

(5) Although the utility relocation costs
would be greater than required by either the
Red or the Green-Black Alignment, the total
costs including relocations, right-of-way and
roadway/brdige construction would be
substantially less than either of the two
alternates. See attached Exhibit A for summary
and comparison.

Respectfully submitted,

THE WALLACH LAW FIRM

BY:


ELLI J. COOPER #35664
Attorneys for Royal Pine
Condominiums
12444 Powerscourt Drive
Suite 250
St. Louis, Missouri 63131
(314) 965-4050

EXHIBIT A - SUMMARY AND COMPARISON

FEATURE	RED	GREEN	GREEN-BLACK-GREEN	YELLOW-BLACK-RED	YELLOW-BLACK-RED
Length (Miles)	19.4	14.4	15	20	15
Terminus	RT 40/HWY K	RT 70/RT 79	RT 70/RT 79	RT 40/HWY N	RT 70/RT 79
Bridge over MO RIVER	3500 FT Main Channel)	8990 FT (1760 FT Main Channel)	8990 FT (1760 FT Main Channel)	3500 FT	8990 FT (1760 FT Main Channel)
2nd Bridge over Creve Coeur Lake/Cost	Yes (4500 FT) \$50 M	No \$0	No \$0	No \$0	No \$0
Impact on Creve Coeur Park	Yes (22 AC)	Yes (8.1 AC)	No (0 AC)	No (0 AC)	No (0AC)
Residential Relocations -St. Louis County	14	168	130	45	45
-St. Charles County	106	396	396	106	396
Relocation	120	564	526	151	441
Utility Relocation Cost	\$0	\$4.1M	\$7.3M	\$10.3M	\$10.3M
Right-of-Way Cost	\$25.0M	\$50.6M	\$47.4M	\$31.1M	\$38.6M
Construction Cost	\$212.5M	\$211.5M	\$212.3M	\$187.5M	\$212.3M
Additional Cost 4500 Ft. Creve Coeur Lake Bridges	\$25.0M	\$0	\$0	\$0	\$0
Total Project	\$262.5M	\$266.2M	\$266.0M	\$228.9M	\$261.2M

RESPONSE TO COMMENTS

Written Comments on Behalf of Royal Pines Condominium Association - Letter of August 1, 1990 (Lili Cooper)

1. Appropriate noise mitigation is planned for areas that meet abatement requirements. These areas have been identified in Section 4.9, specifically for the Red Alignment.
2. See Response No. 2 to letter from Eugene M. Schultz.
3. See Response No. 2 to letter from Eugene M. Schultz.
4. Impacts associated with the extension of the Earth City Expressway have been included in the FEIS.
5. An early buy-out program for residents along the Red Alignment in St. Charles County has been funded.
6. Additional information concerning the potential for light rail is included in Chapter 2.
7. The archaeological survey for the FEIS indicated all known and newly discovered sites in St. Louis and St. Charles Counties, including those along the Missouri River bluff and isolated finds. For the site in question, part of the site was disturbed by the construction of the Royal Pines Condominiums. The site is not eligible for listing on the National Register of Historic Places nor requires mitigation.
8. See Response No. 1.
9. Planning by St. Louis County had restricted and reserved the open corridor visible today for the Red Alignment. Coordination by St. Louis County occurred with all developers on adjoining properties, to the point where land from development packages was identified as preserved corridor and dedicated to that purpose. This was accomplished in the open. If the developer did not inform the prospective purchaser or the purchaser did

not seek information from local planning authorities is beyond the control of MHTD.

- 9a. Royal Pines Condominiums will have the same connection to those other residential developments. The road will remain as it is, with the Red Alignment below grade, beneath the road.
10. The FEIS analyzes impacts of the Green-Black/Red Alignment.
11. The FEIS analyzes the impacts of the Yellow-Black/Red Alignment.

August 2, 1990

Mr. Tolson	Mr. DeLoach
Mr. Casper	Mr. Callahan
Mr. Callahan	Mr. Conrad
Mr. Felt	Mr. Gale
Mr. Gandy	Mr. Rosen
Mr. Harbo	Mr. Sullivan
Mr. Hendon	Mr. Tavel
Mr. Jones	Mr. Trotter
Mr. Lester	Mr. Tele. Room
Mr. Quinn	Miss Holmes
Miss Gandy	

Mr. Wayne Muri
Chief Engineer
Missouri Highway and
Transportation Department (MHTD)
P.O. Box 270
Jefferson City, MO 65102

gde *n*

Dear Mr. Muri:

On August 1, 1990, in accordance with instructions contained in the Page Avenue DEIS Extension Draft Environmental Impact Statement (DEIS), the Royal Pines Condominium Association delivered to the Missouri Highway & Transportation Department office in St. Louis the following documents:

- 1) Specific Comments on the Page Avenue Extension DEIS.
- 2) Outline text of a presentation delivered by Ms. Lily Cooper of the Wallach Law Firm at the Page Avenue Extension Location & Design Hearing on June 28, 1990, with cover letter.
- 3) Written Comments Pursuant to the Public Hearing on the Page Avenue Extension Held on June 28, 1990, Submitted on Behalf of the Royal Pines Condominium Association by the Wallach Law Firm.

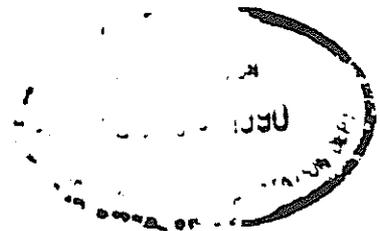
Please find enclosed a complete copy of the documentation including a corrected copy of item 1. No substantive changes have been made to item 1 beyond correction of typographical and grammatical errors.

If you have any questions, please feel free to contact Ms. Cooper of the Wallach Law Firm or myself regarding these matters.

Sincerely,

Eugene M. Schultz
President
Board of Managers
Royal Pines Condominium Association
13185 Royal Pines Drive
St. Louis, MO 63146

(314) 434-6935 (home)
(314) 925-6708 (office)



SPECIFIC COMMENTS ON PAGE AVENUE EXTENSION DEIS

Executive Summary (1.)

- ① The DEIS recommended that a 10-lane limited access highway be constructed. At the 28 June 1990 route selection and design hearing it was revealed that only 6 lanes will be constructed. The DEIS is therefore of minimal value since the impact and benefits of a 6-lane highway are not addressed. The DEIS should be reworked.

Executive Summary (2.)

- ② The DEIS claims to have included the no-build alternative, Traffic Management System (TMS) and a mass transit alternative. No substantial work was done in any of these three areas and no supportable conclusions can therefore be drawn. MHTD and its contractor Booker Associates did not satisfy the statement of work which governs the contract for preparation of the DEIS. Substantive work in this area is required by the contract statement of work, and the taxpayers deserve to be provided the results of this work.

The conclusion which stated "no substantial long duration benefit is possible without construction of the Page Avenue Extension..." is without basis and should be stricken from the report (or supported with data).

Executive Summary (5.)

The DEIS states that "the issue of the length of the roadway or fill material within Creve Coeur Lake Memorial Park has been addressed by lengthening the bridge structure to meaningfully reduce the quantity of fill material".

- ③ The DEIS recommends a 4500 ft. bridge over Creve Coeur Lake. However, the cost estimates in the report include only a 2800 ft. bridge. Additionally, the 28 June 1990 hearing displayed a design for a 2800 ft. bridge.

The DEIS approach with respect to this bridge is deceptive. It states that a long bridge is required, and it recommends construction of same. However, the design put forth for consideration is for the shorter bridge. All but the most probing taxpayer has therefore been deceived.

Executive Summary (6.)

The DEIS identified that "The primary unresolved issue is the necessary approval for the preferred Red alignment to proceed through Creve Coeur Lake Memorial Park." It refers to increased costs associated with a utility corridor in order to avoid parkland.

- 4 The use of the utility corridor is not the principal reason for increased cost associated with a parkland avoidance route. The principal reason for increased cost of the Green based routes is the totally unnecessary selection of a path thru the most densely populated portions of the Seven Pines and Old Farms subdivisions. Other less costly park avoidance routes exist which will avoid most of the homes identified for destruction. These other options will not require a costly and unnecessary bridge crossing over Creve Coeur Lake. (see additional submittal describing the "Yellow Route")

Section 1.7, page 1-8
Future Levels of Service

- 5 Table 1.7-1 estimates Missouri River crossing traffic to grow from 202,000 to 404,000 vehicles per day from 1989 to 2015. The same growth is projected with or without construction of the Page Avenue extension. This projection is absurd. The Page Avenue extension will cause some of this traffic growth. In view of the economic stagnation of the St. Louis Metropolitan area, serious consideration should be given to discouraging urban sprawl and the cost of same instead of encouraging such sprawl.

Section 2.0, pg 2-1
Alternatives

Alternative routes were described in this section. The alternative routes appear to have been identified to assure selection of the Red alternative. The Green-based routes proceed through heavily populated residential areas, unnecessarily. The Red and Green routes were constructed without common Missouri River bridge crossing and without a common termination point. This appears to have been done to confound the route selection process. MHTD should rework the DEIS using Red and Green routes with a common preferred Missouri River crossing and a common termination point and compare route cost, effectiveness and environmental impact to those applicable to the proposed "Yellow" route which avoids Creve Coeur Park and significantly reduces residential relocations.

6

Section 2.4.5.9

Summary

East-West Gateway Coordinating Council Plans

The DEIS concludes that "even with the construction of the Page Avenue extension, travel conditions within St. Charles County, and between St. Charles and St. Louis County will be no better than those experienced today."

It is clear that the Page Avenue extension is not the road of the future even if all 10 lanes were constructed. The road has no logical flow into St. Louis City. The cost of the road system is already 50% more than estimated in 1986, and its effectiveness will be only 60% of that advertised in the DEIS (6 lanes will be constructed; 10 lanes were used to show the effectiveness of the road).

7

The roadway is completely outdated before it is off the drawing board, and its costs are exorbitant. The options require reevaluation with a more futuristic view. Mass transit is the logical solution--not more roads/bridges for more cars.

Section 4.3, pg 4-17

Social Impacts

The DEIS states "that there are no known established concentrations of population by race, ethnicity, age, physical disability, etc. anywhere within the project area..."

8

The DEIS failed to identify high concentrations of the elderly in the Royal Pines Condominium complex where residents older than 65 years of age represent in excess of 35% of the complex population.

Section 4.3.1, pg 4-18
Decentralization

The DEIS states that "...the Page Avenue Extension would facilitate if not accelerate historical decentralization trends."

Most urban planners feel this decentralization is undesirable, particularly when expensive, unnecessary river/bridge crossings are required to implement this population relocation. We suggest reconsideration of any recommendation which would facilitate decentralization.

Section 4.3.2, pg 4-21
Neighborhood & Community Cohesion

In Maryland Heights services " would be hampered by eliminating access to Amiot Drive at Marine".

9

The Page Avenue Extension would sever Royal Pines from its neighboring communities. Property values would undoubtedly be greatly decreased. Properties would be essentially unmarketable for a decade until the roadway is complete. If the proposed Maryland Heights limited access interchange is constructed at Marine and Amiot, residents of Royal Pines would be denied convenient access to the road.

Section 4.3.4, pg 4-23
Community Services & Institutions

"...The red alignment would directly impact an estimated 22.0 acres of Creve Coeur Lake Memorial Park..."

10

This is a gross understatement of the impact of the road on this St. Louis County Park property. The road will degrade the entire park area which is 1137 acres (significantly larger than 22 acres). The park is historic and irreplaceable. Alternate acceptable routes which circumnavigate the park with minimal residential relocation are available (Yellow Route). The Red route must be rejected on the basis of section 4(f) and 6(f) law which precludes such development if reasonable alternatives are available. The "Yellow Route" is a park circumnavigation, low cost alternative to the Red Route, requiring only one bridge (Missouri River, but not Creve Coeur Lake). The Yellow Route is obviously preferred over the Red Route.

Section 4.3.5, pg 4-24
Safety Impacts

"The Page Avenue Extension would have only a marginal net impact upon highway and traffic safety and overall public safety."

- 11 | The safety of residents of Royal Pines would be substantially degraded by the roadway. The report inappropriately discounts this significant problem.

Section 4.3.6, pg 4-27
Social Group Impacts

"The estimated potential displacements impacts...would not appear to disproportionately fall upon...the disabled or elderly".

- 12 | The report states that 4.21% of St. Louis County's residents are age 65 or older. In Royal Pines the proportion of elderly exceeds 35%. Royal Pines is drastically impacted by the Page Avenue extension which will disproportionately impact the population environmentally and financially.

Section 4.4.2, pg 4-28 thru 4-36
Relocation Impacts

The Red Route will force relocation of 25 single family homes in St. Louis County compared to 130 single and multi family units for the Green-Black Route.

- 13 | This is the real basis for recommending the Red Route over Green-Black. However, it is clear that the best park avoidance route (Yellow Route) was not even considered. The route would avoid parklands and relocate only 45 families - obviously, the best of both worlds. It would be lower cost since only one bridge would be required (none over Creve Coeur Lake). The conclusion of the route selection study is therefore seriously flawed since a comprehensive assessment of a reasonable alternative was not performed. The study should be reworked to include reasonable alternatives such as the yellow Route.

Section 4.8.1.1, pg 4-54
Table 4.8.1

Vehicle Mix

Heavy duty - gasoline	0.7%
Heavy duty - diesel	2.0%
Light duty truck	1.3%

14

The study assumed that 4% (1 in 25) of all vehicles are trucks. No basis is provided for this assumption which obviously results in grossly underestimating noise and pollution problems.

Section 4.9, pg 4-58 thru 4-72
Noise Impacts

Table 4.9.1 estimates the noise level at receptor location No. 7 (near Royal Pines) to be 60 dBA in 1988 and 70/71 dBA in years 1995 & 2015 respectively.

The estimates were derived using a computer model which considers only restricted acoustic propagation modes. Errors as much as 10 dB are possible with such codes which do not incorporate acoustic diffusion.

At the request of Royal Pines Board of Managers MHTD selected a site comparable to Royal Pines and made acoustic measurements to compare to those predicted. The measurements of acoustic levels at the MHTD comparable site ranged from 59 to 77 dBA or as much as 6 to 7 dB higher than that predicted for Royal Pines.

15

The DEIS recommend No noise abatement in the area of Royal Pines in spite of the fact that some buildings are within 125 feet of the roadway and that "all sensitive noise receptors analyzed exceeded the 67 dBA criteria for residential areas and had an increase greater greater than 10 dB at most locations".

Noise pollution will obviously be a serious problem for Royal Pines if the Red Route is selected. In our judgement noise and visual pollution will make life at Royal Pines unbearable and will reduce the value of our properties by a substantial margin thus precluding sale of the properties. Condemnation is inevitable with a price tag of \$15 - \$25M. thus making the Red Route prohibitively expensive (175 families relocated).

If the Red route is constructed and in lieu of condemnation, significant noise abatement using earthen berms to mask line-of-sight to the roadway is required as a minimum.

Section 4.18.1, pg 4-93
Negative Visual Impacts

The Page Avenue Extension project will have a severe negative visual impact on the Royal Pines Condominium Complex to the extent of severely degrading the property values which in turn will make properties unmarketable.

Section 4.18.1.1, pg 4-94
Creve Coeur Lake Memorial Park

16

Section 4(f) and 6(f) Law prohibit recapture of Creve Coeur park for road use as long as reasonable alternative parkland avoidance routes are available. Such routes are available, specifically one designated by Royal Pines as the "Yellow Route".

Section 4.22.1, pg 4-111.
Historic Sites/Red Alignment

17

Significant archeological sites exist along the Creve Coeur Lake bluff tops. Such a site is located in the center of the Page Avenue Extension right-of-way at Royal Pines. The site dates to 800 A.D. Much of the land remains undisturbed by construction equipment, and evidence of historical significance has been found on the site within the past five years. The site was not identified in DEIS.

Section 4.26, pg 4-120
Summary of Impacts

The DEIS states that "the primary differences in the impacts associated with various alignments can be attributed to two main functional elements...the river crossing location and the termination of the alignment".

The DEIS is seriously flawed because no clear comparison of routes traversing and circumnavigating the most controversial area (Creve Coeur Park) have been analyzed -- those which use a common river crossing and a common termination point.

- 18 This was apparently done to confound the route selection process. What should be done is to select a preferred river crossing and a preferred termination point (say Rt N/Rt 40) and then compare the Red Route to the Green-Black route to the Yellow Route as they proceed from Bennington to a common river crossing.

Table 4.26-1, pg 4-122
Page Avenue Extension Impact Evaluation Matrix

- 19 A route similar to the proposed "Yellow Route" should have been included in this matrix. It would have shown that Creve Coeur Park could have been circumnavigated, thereby eliminating the cost of a 2nd bridge. Relocation costs significantly lower than the 130 units in St. Louis County associated with the Green/Black Route would be possible. Approximately 45 homes would be required to be relocated with the Yellow Route, thus making it an optimum choice in that Creve Coeur Park would avoid impact with only modest residential location and acceptable utility relocation costs.

Table 4.26-1, pg 4-122
Additional Comments

- 20 Costs quoted in this table are supposedly taken directly from the 1986 Reconnaissance Report. However in this reference the total cost of the Red Route is quoted as construction costs of \$212.5M plus \$26.88M right-of-way, which equal \$239.4M. Table 4.26-1 shows a Red route bottom line cost of \$212.5M; the total cost should be \$239.4M.

Additionally, all costs in the DEIS are admittedly low by at least 50% as per MHTD statements at the 28 June 1990 Route Location and Design Hearing.

As a result the study conclusions based on cost of the road are seriously flawed and require rework to correct significant costing errors. Additionally, the road environmental impact and traffic handling effectiveness estimates are erroneous since MHTD plans to only construct 6 of the 10 lanes analyzed in the DEIS.

The DEIS is therefore an invalid basis for road selection and road design and should be withdrawn and reworked.

Section 7.0
Comments and Coordination

21

In March of 1989 the Royal Pines Board of Managers officially requested in writing to Mr. Yarnell, MHTD, the opportunity to provide suggestions on development of the Page Avenue Extension options and its DEIS. Counter to the spirit of cooperation as indicated in this report, Mr. Yarnell officially denied the opportunity for Royal Pines to provide inputs. We respectfully request that MHTD publish our request for participation and MHTD's denial of such request in the final EIS document.

Section 8.0 Appendices
4(f) and 6(f) Evaluations

22

Section 3.1.1 identifies 1137 acres which comprise Creve Coeur Park. Virtually all will be impacted by the Red Route, not just the 22 acres defined on pg 1-11 as those suffering "physical transformation of parkway to road...."

Section 8.0 Appendices
4(f) and 6(f) Evaluations
Section 3.1.9, Pg 1-10, 1-11
Impacts to Creve Coeur Lake Memorial Park

23

This section identifies the 4500 ft. bridge (the extended bridge) which would be utilized to reduce direct impact to the parkland and which appears to be part of the basic design in section 3.4. A small increase in costs is associated with this long bridge option. However, the baseline cost in the DEIS does not include this option. Section 4(f) & 6(f) laws are hereby being side stepped to show reduced environmental impact, when in fact there is no plan for such environmental mitigation.

Rework of section 4(f) and 6(f) is required and inputs should include accurate and current costs as well as the Yellow Route option.

Section 3.1.9, pg 1-13

Noise

24

Existing noise levels in Creve Coeur Park are estimated at a very low and peaceful 47-59 dBA. The report predicts 67 dBA with the bridge present. Based on comparable measurements made by MHTD for Royal Pines, it seems as if levels as high as 77 dBA can be expected. These levels are difficult to predict as a result of unknown propagation conditions. Comparable bridge/water level/ bluff level measurements should be taken to support these predictions.

RESPONSE TO COMMENTS

Specific Comments from Royal Pines Condominiums - August 1, 1990, Corrected August 2, 1990

1. See Response No. 5 to Eugene M. Schultz letter dated July 10, 1990.
2. Additional information concerning the potential for HOV lanes and light rail is included in Chapter 2 of the FEIS.
3. The shorter bridge length is correct. The statement concerning 4,500 feet in Section 3.1.9 of the Section 6(f) Evaluation is correct as it stands. It pertains to the total length of the Red Alignment through the park lands, which includes a 2,800 foot bridge.
4. The Yellow-Black/Red, Green-Black/Red and Blue/Red Alignments are analyzed in the FEIS.
5. See Response No. 1 to Coalition for the Environment.
6. See Response No. 4.
7. See Response No. 3 to Eugene M. Schultz letter dated July 10, 1990.
8. The demographics were based on transportation zone areas and not specific block units; the impacts noted for special categories were primarily relative to relocation which would not affect Royal Pines Condominiums.
9. The same road connection that currently services Royal Pines Condominiums would remain over the Page Avenue Extension. MHTD has no plans to construct an interchange at Page Avenue with Amiot.
10. The sentence was constructed to define direct impacts. Secondary impacts are noted elsewhere.
11. No changes to access by fire or emergency service vehicles would occur as a result of the Page Avenue Extension.

12. The discussion relates to displacement, i.e. relocations which would not occur at Royal Pines.
13. See Response No. 4.
14. These are the observed percentages on the major state roadways. Most traffic is automobile and occurs during peak hours.
15. See Response No. 1 to Lili Cooper letter dated August 1, 1990.
16. See Response No. 4.
17. See Response No. 7 to Lili Cooper letter dated August 1, 1990.
18. See Response No. 4.
19. See Response No. 4.
20. Cost estimates have been revised.
21. MHTD declined to meet in response to Mr. Schultz's request and sent a letter stating a meeting would occur once information from the DEIS became available. Two meetings were held with Royal Pines Condominiums Association on May 17, 1990 and June 5, 1990, one of which was attended by Mr. Schultz.
22. See Response No. 10.
23. See Response No. 3.
24. Additional noise data has been included in the Section 6(f) Evaluation.

(832 337) ✓

11-E
DOT
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DOT

From: Mr. Mark R. Kaufmann
2437-A Rustic Ridge Dr.
Overland, Missouri 63114
Telephone: Work: (314) 935-6264; Home: (314) 427-0058

To: The President of the United States
The White House
1600 Pennsylvania Ave., N.W.
Washington, D.C. 20500-0001
White House Comments Line: 1-202-456-1111
White House Switchboard: 1-202-456-1414
White House FAX line: 202-456-2461

Date: October 6, 1992

Handwritten initials

Regarding: URGENT: unrelated and illegal provision attached to S. 1583

Mr. President:

With this letter, I ask you to veto the pipeline-safety bill, S. 1583. I ask you to veto it not because of the pipeline-safety legislation itself (which I know nothing about), but because of an amendment which was attached to this bill. (This amendment had also been attached to H.R. 1489, but I believe that this bill is now dead.) The amendment could not be more un-related to pipeline safety.

The amendment of concern, introduced by Senator John C. Danforth, authorizes the Secretary of Transportation to ignore statutory law (i.e. to break the law) and approve a freeway (Page Avenue extension) to be built through what is quite probably the best park in the St. Louis County, Missouri, system (Creve Coeur Lake Memorial Park).

As a native and 4th-generation St. Louisan, and someone who grew up a short distance from the Park and is intimately familiar with it, I have been quite actively involved in this issue, more as an individual than as part of an organized group. In particular, earlier this year I sent your Secretary of the Interior, the Honorable Manuel Lujan, Jr., numerous written documents, video-tapes, audio tapes, and mounted photographs. They show the Park as it is now and detail why a highway through this Park is unacceptable and is nothing less than a slap in the faces of those who will come after us, who have no choice but to inherit what some of us have done. I will not attempt to reproduce these mountains of details here, but instead I ask you to ask Secretary Lujan about them. He visited the Park on 30 March 1992 and we met and shook hands. At this time, the materials have been transferred to Mr. Don H. Castleberry, Regional Director of the National Park Service in Omaha, Nebraska, for future consideration.

At this point, I now see—beyond a reasonable doubt—that the Republicans and Democrats in Congress are not my fellow Americans, but rather they are an aristocracy who do not follow the same rules that they impose on worthless, ordinary-citizen, American scum like me. They pass laws that all of us are supposed to follow, then upon realizing it will be nearly impossible to approve their pet project under these laws, they pass a law which allows them to break these laws. I know this is the case, for I have a facsimile transmission of the amendment in my hands at this very moment, and I am familiar with legal language.

And, furthermore, they deliberately and intricately plan how to accomplish this without public knowledge, hiding it from citizens of the United States like me as if it is none of my business, and then finally vote on it at 5:00 a.m. when the chamber is almost empty. The three individuals—Senator Danforth, Senator Bond, and Representative Horn—have openly admitted all of this to the newspaper, almost as if they are proud of it! I am literally shaken by this. Is this what America has come to?

You can send me a signal that you are not a part of this aristocracy, that instead you are indeed my fellow American, by vetoing this bill. It is so highly unfortunate that the pipeline safety provisions are tainted by this absolutely unacceptable and utterly unrelated amendment. I thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark R. Kaufmann', with a large, sweeping flourish extending to the right.

Mark R. Kaufmann

Design

<input type="checkbox"/>	Mr. Tolson
<input type="checkbox"/>	Mr. DeLoach
<input type="checkbox"/>	Mr. Mohr
<input type="checkbox"/>	Mr. Bishop
<input type="checkbox"/>	Mr. Casper
<input type="checkbox"/>	Mr. Callahan
<input type="checkbox"/>	Mr. Conrad
<input type="checkbox"/>	Mr. Felt
<input type="checkbox"/>	Mr. Gale
<input type="checkbox"/>	Mr. Rosen
<input type="checkbox"/>	Mr. Sullivan
<input type="checkbox"/>	Mr. Tavel
<input type="checkbox"/>	Mr. Trotter
<input type="checkbox"/>	Tele. Room
<input type="checkbox"/>	Miss Holmes
<input type="checkbox"/>	Miss Gandy

W

From: Mr. Mark R. Kaufmann
 2437-A Rustic Ridge Dr.
 Overland, Missouri 63114-1641

To: Mr. Wayne Muri
 Chief Engineer
 MHTD
 P.O. Box 270
 Jefferson City, Missouri 65102

MC

RECEIVED
 AUG 1 1990
 MISSOURI HIGHWAY & TRANSPORTATION DEPT.
 CHIEF ENGINEER

RECEIVED
 DESIGN DIVISION
 AUG 02 1990
 MISSOURI HIGHWAY & TRANSPORTATION DEPT.

Date: July 29, 1990

Mr. Muri:

This letter regards the proposed extension of Page Avenue (State Road D, St. Louis County) from its present end at Bennington Place westward into St. Charles County, and is in response to the Draft Environmental Impact Statement (DEIS) prepared by Booker Associates, Inc., for the Missouri Highway and Transportation Department (MHTD) and the Federal Highway Administration (FHWA) and released in June, 1990. I must state my unequivocal opposition to the recommendation in the DEIS, which is to extend Page along the primary or "red" alignment.

I am a native of St. Louis (b. 1962) and was raised in a home in the Glenwood subdivision (1965-1985), now in the City of Maryland Heights. I now reside in an unincorporated area of St. Louis County just east of Lindbergh Blvd., and presently am a graduate student in physics at Washington University. I am quite familiar with the area of St. Louis County through which both the primary (red) and alternative (green) alignments would pass. I am writing this response as a member of the general public.

I would first like to point out some problems with the procedure of responding to the DEIS. The single public hearing (on both location and design), which I attended, came too soon after the DEIS was released to the public in early June, 1990. (The hearing was at 7:30 p.m. on June 28, 1990, at the Columns Banquet and Conference Center, 711 Fair Lane, St. Charles, Mo.) This single hearing should have been (and usually are) two separate hearings. The two were deliberately combined by the MHTD, by their own admission in order to knock a year off the completion time. This has the appearance of persons in government cheating in order to promote what they mistakenly think I want done with my tax money.

1

It also is not at all clear to me why there was a public hearing held in St. Charles County but not here in St. Louis County. St. Louis County will be hurt, while St. Charles County will be helped (see details below).

1a

The hearing is the first major (non-municipal) public hearing I have attended; maybe it is typical of all hearings, but it seems to me that the hearing turned out to be a rally for the bridge,

not an examination of the DEIS and comments on location and design. Most of those who were deliberately placed as the first speakers by the MHTD personnel had very little to say, instead engaging in generally insubstantial (and frankly quite boring) rallying (with the exceptions of Nancy Knowles and Maryland Heights Mayor Saffa). By the time this hand-picked list was finished, much of the audience had left. I don't believe it would have been a pep rally had a hearing been held here.

Furthermore, the MTHD hired a firm (Booker Assoc.) to undertake the DEIS, rather than doing it themselves, in order to shave even more time off the total time of the project. They probably also spent MORE public money by doing so than they would have by doing it themselves, since Booker, like any private enterprise, must make a profit from it.

1b It seemed difficult to obtain a copy of the DEIS. I visited the Kirkwood MHTD office soon after it was released, and after being told none were available, even for purchase (to cover costs), I examined a copy in person. I was kindly allowed to use the photocopy machine--but I feel that I should pay cash (or check) for the copies--the taxpayers should not have to subsidize me. If it wouldn't have been quitting time for the gentleman assisting me I would have insisted on it. It seems to me that some procedure should be made available so that interested persons can purchase or borrow a copy of documents that their tax dollars have been used to prepare and print. Eventually, I was able to receive a copy, unfortunately free of charge.

1c Finally, there was not enough time, in my opinion, even if one had a copy of the DEIS from the beginning, to respond in writing to the DEIS. In particular, I cannot respond in the detail and with the surety that I, trained as a physicist, would like. There was not even two months between the time of the release of the DEIS (early June) and the due date for written responses (August 1). This is simply unacceptable.

Furthermore, it seems to me that a transcript of the oral and written comments at the public hearing should be made available BEFORE the due date of written comments on the DEIS, not AFTER, which is the case here. Persons and organizations may wish to expound upon a point brought up by others at the hearing. The present scheduling tactic makes this difficult. The kind help of Mr. Bergman at the Kirkwood MHTD office alleviated this somewhat in my case, but I believe that my suggestion should be incorporated into the public hearing process.

All of these circumstances make it difficult, not only for private individuals but also for organized groups, to respond adequately to the DEIS and the FHWA and MHTD recommendation. All of these circumstances, some deliberately brought about for this project, give an appearance of "fishiness" to the project that it otherwise might not have. That is, there must be something wrong with the project given that persons in government are trying their best to speed it up.

In spite of the above problems, I would like next to attempt to point out what are, in my opinion, some problems with the recommended (red) alignment, problems with ANY extension at all, and deficiencies in and corrections to the parts of the DEIS that I was able to read in detail.

In summary, I strongly oppose the recommended red alignment, at least that part of it that lies in St. Louis County. I propose an alternative alignment below that, incredibly, was neither mentioned nor examined in detail in the DEIS. Ideally, though, I believe that the no-build

bridges (one of which has been significantly extended in length, with the attendant higher cost). In the red alignment, the two turns just east of Bennington Place seem quite sharp to me; the green alignment has no turns as sharp. Thus, a green-black/red combination seems to be a positive and viable alternative. It becomes difficult to compare this combination with the other alignments in great detail because the data collected for the DEIS are not arranged in such a way as to facilitate this.

5 I believe the DEIS is grossly deficient when it does not even mention this combination alignment and compare its costs and effects with those of the other alignments. In fact, I would describe the lack of its mention as nothing short of bizarre. When one looks at the maps of the alignments it stares one in the face. The fact that they have a "common terminus" is mentioned in the DEIS (e.g. Sect. 8.3.1.10, p. 1-14). This glaring omission must be corrected in the final EIS. (Also, although I would oppose it, a combination alignment starting with red and continuing with green should also be considered in the EIS. Of course, both combination alignments should receive the same level of detail as the red and green separately. This only amounts to rearranging already existing data.)

6 There could be a possibility of a third alternate route (the purple alignment?), more or less along Fee Fee Road, which would take fewer homes and yet not destroy the park environment? Ms. Lili Cooper of the Royal Pines Condominiums proposed a "yellow" alignment at the public hearing; from what few notes I could take and from what little I can recall, with the transcript being unavailable at this time, I believe that the proposal deserves reasonable examination.

From looking at the Creve Coeur Quadrangle map (U.S. Geological Survey), it is not clear to me why Page cannot more or less follow the creek directly across from the present end at Bennington Place (as it clearly must for the first 1/4 mile or so) and simply continue to follow it downstream to the Missouri Bottom. This differs somewhat from the green-black alignment. Possibly this would interfere too much with the utility corridor, but I would request that it be given a reasonable examination.

7 If an alternative alignment (i.e. not through the park) had been preserved, none of this would be necessary. I wonder why this was not done. As I recall from growing up in the area, the part of the park on the south and west sides of the lake was purchased in the early 1970's. At that time, I believe quite ample room existed for an alternative right-of-way where the Seven Pines subdivision and newer developments are now located. It looks like cheating to wait until everything is built up and then claim that there is only one way to go--through the best part of one of the better and most popular county parks, owned by almost one million people. In the future, neglect like this must be avoided by our public officials.

7a Also of concern is the land in St. Charles County near the Spring Bend of the Missouri River, owned by Nancy Knowles and family. Ms. Knowles has indicated the family's intention to donate their land to a public or private agency to be preserved for those who will come after us. Furthermore, she is seeking eligibility and listing of an 1837 farmhouse on the property on the National Register of Historic Places. It seems that everything possible should be done to minimize impact on this area.

I have read her letter(s) that were included in Section 7.0 of the DEIS. I wholeheartedly agree with some of her sentiments and rather than try to paraphrase them I will repeat her eloquent words here: "I have never known a city of any size to have enough bridges to eliminate all traffic congestion during rush-hour. To despoil our valuable land and heritage for four hours a day seems shortsighted and imprudent.... There is no doubt that we, and our farmer neighbors just to the north, are being penalized because we love the land more than the dollar [they have refused to sell out to land developers].... To put the bridge right in the middle of the one green area remaining, effectively destroys the whole property, disregarding its historic, botanical, and environmental value." The same may be said for the natural area of Creve Coeur Lake and Park. To place this highway directly above one of the few natural lakes in the State (and the largest natural lake in the State) and the only one in either County effectively destroys the whole property, owned by almost one million people. Of similar concern are other wetlands, especially within the designated river floodway, and the uncluttered (if unnatural) crop land of the bottomlands in general.

So much of our metropolitan area's land has been covered with buildings and artificial landscaping, planting, and monocultures (such as lawns and crops), that any significant space which contains native species growing naturally must be given higher priority than has been done in the past. In my opinion, if this project is to uphold a high standard of ethics, then the extension should go through ONLY those areas which have been totally developed and improved already! Obviously, displaced residents would have to relocate, possibly moving into a new home, thus placing even more land, in gross acreage, under development. However, one must weigh the qualities of the land under examination, not merely the quantities. The land in the "back area" of Creve Coeur Lake Memorial Park is of such high quality and so relatively uncommon that it must not be compromised in the future.

In St. Louis County, the green or green-black alignment would take more homes than the red and would split up Seven Pines subdivision. This is unfortunate, but I feel that these residents are late comers--that is to say, the park was established and owned by the public before most of their houses were even built, much less before many moved there. Thus they have no "seniority" over the Park. To the forest and wetlands themselves, they, and all of us, are TRULY late comers. None of us have "seniority" over this area.

There is also the question of "importance"--which is more important, a few dozen houses in a typical modern residential subdivision, of which there are hundreds in the area, or a unique natural area of woodland and wetland? The former affects a few dozen people for their lifetimes on Earth. The latter affects the present nearly one million owners of the property, and all those who will come after us, as well as the wildlife in the area (the highway noise will surely disrupt them and possibly make the area unusable to them, driving them "away" to some other similar habitat--where, I don't know). I claim that because so few such natural areas now exist in this metropolitan area, and because experiencing them is the ONLY way that those who come after us can understand and appreciate them, and because appreciating such things (the environment which does and will sustain all of us) should be of utmost importance in the education of children, such an area, unique in our region, MUST be preserved in a reasonably natural state. Thus,

The DEIS (Section 8.3.1.5, p.1-6) claims that sound volume from traffic on Marine Avenue sometimes is high "and the noise disrupts the otherwise quiet park setting." This is not so much true in the "back area" of the park--it is VERY quiet there during times of low human activity in the area, such as in the mornings, on weekdays, and during the winter. Limits are placed on noise from any boat on the lake (except for special events). Having a highway going through the park will make this regulation moot, at least as far as sound in the air (as opposed to in the water). The red alignment would ruin the quietest place in the park! (The green and green-black would definitely be audible there as well--p. 1-18, Sect. 8.3.2.10 gives a peak of 67 dBA at 300 feet from the green, but would be, to me, an acceptable alternative to building a highway through the park. By the way, it is not clear to me why noise is not listed as one of the impacts of the green-black alignment in Section 8.3.3.1, as it is in the analogous Sections 8.3.2.10 and 8.3.1.9 for the green and red. Changing from the green to the green-black will not magically turn off the noise. This error must be corrected.)

All of the above assumes that Page Avenue "must" or should be extended. But the reasoning behind the red extension OR ANY EXTENSION of Page Avenue in my opinion deserves second thoughts. Apparently, there are two causes of the desire to extend Page Avenue.

The first is that the officials in charge of the City of Maryland Heights, through which much of the recommended red extension would pass, want to develop the Missouri River flood plain. This is at best a questionable idea, for the following reasons.

(1) This region is under the risk of earthquakes from the New Madrid rift zone, and the greatest surface wave amplitudes occur on bottomland due to liquefaction of saturated alluvium during earthquakes. We were all recently reminded of this fact when we saw the major damage from the October 1989 Loma Prieta earthquake in the Marina district of San Francisco, which is built on artificial fill saturated by sea water, and the freeway (Embarcadero?) that collapsed, which was also built on saturated artificial fill. The shocking conclusion from some of the damage was not so much that earthquakes are the problem, but that persons, who either are not aware of such dangers or who choose deliberately to ignore the dangers for short-term gain, are the major problem. In short, it was not a natural-disaster problem so much as an ethical problem. If officials in Maryland Heights are so eager to develop the bottoms, they should take the initiative, "put their money where their mouth is," so to speak, and build their city hall down there first--but make sure it's not un-reinforced masonry.

(2) The costs of improved levees so that buildings would be feasible would be paid by the taxpayers--the present "agricultural" (100-year?) levees in the area would have to be improved to "industrial" (500-year) levees. What funding has been authorized for the Page extension would not pay for these improvements.

(3) Our area would lose the present high agricultural productivity on the rich alluvium, which is ideal for agriculture. (Unfortunately, these lands are rarely flooded by the river due to the levees which now exist, so they may lose much of their richness in the long run.)

(4) Besides the direct costs to the public of the land and highway and the levees and the infrastructure for development, there are other costs, but costs which will never show up on anyone's balance sheet (because modern economics is fundamentally flawed). For example, wetlands would be drained, with the deleterious effect on wildlife. Wetland environments are becoming rarer; any that remain become more valuable simply because they are wetlands. Even if replacement wetlands are created to compensate, artificial wetlands are not and cannot be as interesting and diverse and educational as natural wetlands. Other costs not included in the cost comparison of the alternative alignments (and rarely included in the cost of ANY project at all) are natural areas loss, wildlife and wildlife habitat loss, more air pollution, and the terrible noise pollution which will result from this project.

To this day it seems to me that these officials are holding reason in contempt in exchange for increases in the tax revenue of the City of Maryland Heights, and such "successes" (using the word loosely) as developing bottomland. The St. Louis County Department of Highways and Traffic (DHT) is considering extending the Earth City Expressway south to Woods Mill Road (Mo. Hwy. 141) at Olive Blvd (Mo. Hwy. 314). ANY of the Page Avenue extensions would encourage this, and both would (or could) bring about more and "better" levees, drainage of more wetlands, and construction of more buildings on the flood plain.

20 | The second apparent cause of the desire to extend Page Avenue is the old and tired claim that a new highway will ease traffic congestion on existing highways. I believe that the opposite will be true. Research (and my experience watching the suburban St. Louis area grow) shows that new highways can CAUSE traffic problems, not relieve them. New or improved freeways make it easier for people to travel by automobile, thereby causing more travel, contributing to more development in outlying areas, leading to congestion, which leads to improvements and extensions, which continues the cycle, all the while making people more and more dependent on the automobile. New highways generally encourage more automobile use, with the many and great deleterious effects that we all know about, from air and noise pollution and oil spills to generally wasteful use of non-renewable extracted resources (a car should last someone a lifetime). If there were good mass transit alternatives available here, then congestion on the freeways, rather than being harmful, would actually increase transit use, reduce air pollution, and reduce fuel consumption (by causing traffic to move nearer its maximally fuel-efficient speed (35-40 mph)). (References: Peter Newman, *Cities and Automobile Dependence*; P.W.G. Newman, J.R. Kenworthy, and T.J. Lyons, "Does Free-Flowing Traffic Save Energy and Lower Emissions in Cities?", *Search*, Vol.19, September/November, 1988; P.W.G. Newman and J. R. Kenworthy, "The Transport Energy Trade-Off: Fuel-Efficient Traffic Versus Fuel-Efficient Cities," *Transportation Research-A*, Vol. 22A, pp.163-174, 1988; and P.W.G. Newman and J.R. Kenworthy, "The use and abuse of driving cycle research: clarifying the relationship between traffic congestion, energy and emissions", *Transportation Quarterly*, Vol. 38, 1984, 615-635.)

21 | The new Page Avenue will ease traffic congestion on the other three bridges (I-70, Mo. 115, and U.S. 40) for just a few years, but the very presence of the new highway will promote more development and improvement along it, and urban sprawl in general, and more and longer automobile trips, eventually making it and the other three just as congested during peak periods as

the three it was meant to ease. This may happen even if the total population of the metropolitan area does not grow substantially, but only sprawls out. Why else would the home builders and land developers support this highway as strongly as they do?

22

The only way that extending Page Avenue will "solve" any traffic problem is if future development within a wide area along it and past the end of it is prohibited. This is the only way the traffic volume on Page will not grow with time and "necessitate" (so to speak) yet another new highway. Even highway planners admit they are "always playing catch-up." New highways do not decrease traffic problems, they increase them. How many lanes of traffic will we have crossing into St. Charles County in the year 2000? 2050? 2100? A car requires between 250 and 350 sq. ft. per parking space. In contrast, urban office/commercial spaces provide 100 sq. ft. per worker/customer (Highway Engineering, 4th ed., Oglesby and Hicks). Thus a city that intends to provide mass individual automobility must allocate more space just to park automobiles than for the activities people drive those automobiles to reach! In the greater Los Angeles, California, area, road and highway design have been given higher priority than in any other metropolitan area in the United States. Yet, the area regularly experiences traffic congestion and even gridlock during rush hour, and it is worsening! If this isn't an obvious lesson from which we all should learn, nothing can be.

23

A major shortcoming of the present plan is that future extension of a mass transit system, such as the light rail system just beginning here in our metropolitan area, as far as I can tell (again, given the very limited time allowed for responses), is not incorporated into the general extension plan. Reserving part of the bridge for a future light rail line seems like a good idea, at least on the surface. Our public officials must be able and willing to plan thoughtfully and ethically for the future, and light rail is part of the future.

24

Possibly, bicycle lanes and/or high-occupancy vehicle (HOV) lanes (car-pools, buses) should also be incorporated into the plans for this project. HOV lanes are better than nothing, but when implemented in the form of NEW lanes, they only add vehicle capacity to the road and encourage more driving. Only when EXISTING lanes are changed into HOV lanes (and when the lane restriction rules are enforced, expensive as that is) will there be significant gains in reducing low-occupancy vehicle use.

Generally, it appears to me, given the short time that I have had to examine the DEIS, that alternatives NOT involving highway construction, such as the traffic system management, mass transit, and no-build alternatives, were given inadequate discussion in the DEIS.

For that matter, if enough individuals were willing to have two people per car instead of one, it would virtually solve this whole traffic congestion problem, and the no-build alternative could be adopted with few problems. The people who chose to participate in urban sprawl and move to St. Charles County knew they would have trouble every morning and every evening commuting to work in St. Louis; they (and all of us in urban areas) should consider changing our own behavior instead of demanding that our present behavior be promoted, especially with public money.

Those who come after us will appreciate it if WE take the initiative and FAIL to extend Page Avenue, rather than passing on a WORSE traffic problem to them, while simultaneously

passing on LESS unlogged, undeveloped, natural land to them.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark R. Kaufmann". The signature is fluid and cursive, with a large, sweeping loop at the end.

Mark R. Kaufmann

RESPONSE TO COMMENTS

Mark R. Kaufmann - Letter of July 29, 1990

1. See Response 2a. to St. Louis Audubon Society.
- 1a. See Response 2a. to St. Louis Audubon Society.
- 1b. Over 100 copies of the DEIS were prepared and distributed to reviewing agencies at the federal, state and local level. In addition, copies were made available for public review at the MHTD offices and several public libraries. The purpose of the public review copies was to allow as many people access to the DEIS as possible. If you were to have copied sections of the DEIS at the public libraries, you would have had to pay for photocopies.
- 1c. The federal requirements for and regulations governing implementation of the National Environmental Policy Act (NEPA) mandate certain review periods in order for the process to proceed in a reasonable manner. The 45-day review period is established by NEPA as a minimum. The scoping process for this project was initiated on February 24, 1988 and from that time on, many of the issues and impacts of the project were discussed publicly in newspapers, correspondence with natural resource agencies, additional scoping meetings with environmental organizations and more than 50 meetings with individuals who resided near the various alignment alternatives.

In addition, although the official comment period was until August 1, 1990, several government agencies requested and received additional review time to respond, most notably, the Missouri Department of Natural Resources and the U. S. Department of the Interior.

2. This problem of noise intrusion is common to park settings in large urban areas. They do not remain as isolated, quiet reserves because of surrounding activities on the ground and overhead that are part of the urban activity. The wooded area is not totally without background noise as noted.

3. The U. S. Department of the Interior - National Park Service (NPS) is a cooperative agency in the preparation of the FEIS. We are coordinating our proposed action.
4. The area impacted has been modified to include noise impacted areas.
5. Additional alignments have been addressed in the FEIS.
6. Additional alignments have been addressed in the FEIS.
7. As noted in the correspondence reviewed and included in the Section 6(f) Evaluation, the roadway alignment was proposed in the mid-1960s around development that already occurred directly west of the terminus of Page Avenue and prior to the purchase of the expanded portions of Creve Coeur Park. The historical setting has been amplified in the final Section 6(f) Evaluation.
- 7a. Coordination has occurred with MHTD officials and Ms. Knowles and as a result, the Red Alignment was shifted northward to minimize impacts to the property and historic sight. In addition, this property is also the subject of coordination with the State Historic Preservation Officer and MHTD in order to minimize any impact to this property.
8. The Page Avenue Extension will be constructed at a level one foot above the 100-year flood level. MHTD road construction funds are not allowed to be used for levee construction. This condition will, in fact, delay or prevent floodplain development.
9. Route I-270 southbound and/or Westport have been noted as key destinations of persons projected to use the Page Avenue Extension. This would alleviate the traffic from Route I-70 and Route I-270 interchanges but not change the amount of vehicles on Route I-270, only disperse access to St. Charles County, thereby improving traffic flow.
10. The St. Louis County Department of Parks and Recreation has stated that with the addition of at least 600 acres to Creve Coeur Lake Memorial Park as part of the mitigation plan, the park will be better. This is better

in the sense of increased opportunities for active recreation uses on the north and passive recreation opportunities to the south.

11. The funding is only in place for the Phase I section from Bennington Place to Route 94. However, extension west to Route 40-61 is included in long-range planning projections. Corridor preservation funds are currently being assembled to purchase and protect the corridor in St. Charles County.
- 11a. As noted, the toll road option is not feasible at this time. Federal funds were allocated to this project as part of the authorization as a demonstration project for traffic relief for congested areas. The gasoline taxes collected are used to fund projects on a priority basis according to need across the State of Missouri.
12. See the mitigation program required by Section 601 of the Pipeline Safety Act in the Section 6(f) Evaluation. Section 4(f) has been waived by the Section 601 provisions.
13. See Response No. 12.
14. The costs for the mitigation plan have been added to the appropriate figures.
15. Increasing the side barriers to 42 inches from the normal 36 inches will reduce the expected noise levels. The Design Committee required by Section 601 will resolve impact issues through the park.
16. See Response No. 15.
17. See Response No. 15.
18. Background noise measurements in Creve Coeur Lake Memorial Park at the location where the Red Alignment bridge would be located are in the range of 47.8 dBA near the Blue Alignment crossing to 63.6 dBA near the dripping spring.

- 18a. The technical report for noise is available from MHTD. Noise model results are included for the new alignments - the Blue, Yellow-Black and Green-Black.
19. Noise levels for the Green-Black, Yellow-Black and Blue Segments are included in the FEIS.
- 19a. The purpose of this project is not for development of the Missouri River floodplain, but for the transferring of persons between St. Louis and St. Charles Counties. Several hurdles relating to flood protection and access would have to be surmounted to develop the area, and then only if the economics are suitable and the demand for such land is present.
20. See Response No. 1 to Coalition for the Environment letter dated July 27, 1990.
21. See Response No. 1 to Coalition for the Environment letter dated July 27, 1990.
22. See Response No. 1 to Coalition for the Environment letter dated July 27, 1990.
23. Additional information concerning HOV lanes and light rail is included in Section 2.
24. See Response No. 23.

From: Mr. Mark R. Kaufmann
2437-A Rustic Ridge Dr.
Overland, Missouri 63114-1641

To: Gerald J. Reihsen, Division Administrator
Region 7, FHWA, USDOT
P.O. Box 1787
Jefferson City, MO 65102

Date: December 22, 1990

RECEIVED	
DEC 27 1990	
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COPY to
Mark Knoll
12-27-90
RKH

Dear Mr. Reihsen:

This letter concerns the proposed extension of Page Avenue (State Road D) in the Missouri counties of St. Louis and St. Charles (Project No. 6-U-803). I was pleased to read that the U.S. Department of Interior (USDOI) has formally objected to extending the freeway through St. Louis County's Creve Coeur Lake Memorial Park, part of which was purchased and improved with Federal funding through the Land and Water Conservation Fund Act. I am a life-long resident of St. Louis County and have visited this Park many times.

I would like to make it known to you that officials in the Missouri Highway and Transportation Department (MHTD) may not be making known to the appropriate Federal officials an alternate route for the extension that exists. The MHTD, for whatever reason, did not include this alternative in their draft Environmental Impact Statement (EIS) for the project.

As you may know, the MHTD has proposed two routes--the so-called red alignment, which goes through the Park, and the green-black alignment, which avoids the Park. The people of St. Charles County, who will be most served by this highway extension, clearly desire the red route over the green-black, but only within St. Charles County. The MHTD recommended the entire red route for approval.

The MHTD makes it appear that there are two and only two choices: (1) the red route, giving St. Charles County what it wants but destroying St. Louis County's very popular and most unique park, or (2) the green-black route, avoiding park destruction but giving St. Charles County a less-than-optimal route. This is incomplete--there is a third possibility that offers the best of both worlds.

Because the red and green-black routes share a common point of intersection within St. Louis County, a combination route is possible. This would begin along the green-black route (thus avoiding the park), pass through the intersection point, then continue on along the red alignment (thus satisfying St. Charles residents).

I would like to ask the Interior Secretary to continue the USDOI's commendable objection (under the LWCFA) to the destruction of Creve Coeur Lake Memorial Park, to urge the Transportation Secretary (under the DOT Act) and the E.P.A. Director (under the NEPA) to adopt the

same position, and to request that all three agencies consider adopting the combination red/green-black alternative described above as their official decisions.

Enclosed is a draft version of an article which I was asked to write for publication in the newsletter of the Missouri Coalition for the Environment based in St. Louis, which gives further details. For a map of the relevant area, I refer you to Figure 3.2.1 of the draft EIS (photo-copy enclosed).

Please feel free to forward this communication to the official who is most directly involved in this decision. I will be happy to answer any questions concerning this matter. Thank you.

Sincerely,



Mark R. Kaufmann

Enclosures

A copy of this letter and enclosures was sent to:

The Secretary of the Interior, USDO, Washington
Director, Office of Environmental Project Review, USDO, Washington
The Secretary of Transportation, USDOT, Washington
Division Administrator, Region 7, FHWA, USDOT, Jefferson City, MO
EIS Filing Section, Office of Federal Activities, U.S. E.P.A., Washington

RESPONSE TO COMMENTS

Mark R. Kaufmann - Letter of December 22, 1990

1. Several park-avoidance alternatives have been discussed in the FEIS and Section 6(f) evaluation. These include the Yellow-Black/Red Combination and the Blue/Red Combination.

From: Mr. Mark R. Kaufmann
2437-A Rustic Ridge Dr.
Overland, Missouri 63114

To: Ms. Jo Gallo, Editor
Coalition for the Environment
6267 Delmar Blvd.
University City, Missouri 63130

Date: November 9, 1990

As many of you know, the Missouri highway department is planning to extend Page Avenue (Hwy. D) across the Missouri River into St. Charles County. Although another bridge might bring temporary relief to St. Charles County commuters, the recommendation unfortunately calls for the 10-lane extension to pass through Creve Coeur Park, one of the more popular St. Louis County parks.

Many people, including me, question the claim that yet another bridge will relieve traffic jams in the long run. Given the strong support for the extension by the home builders and land developers, the new highway will promote development along its route, and will become congested within a few years anyway. For that matter, if enough individuals were merely willing to car-pool, it would significantly decrease traffic congestion, and yet another bridge would not be needed. In spite of such fundamental doubts, this article assumes the highway will, in fact, be built. The question then becomes, how should its route be chosen? After a brief history of the planning, the Coalition's involvement, and a description of the affected Park area, I will describe the major issue involved, and suggest action that can be taken.

The extension of Page Avenue westward across the river has been planned by various government officials for quite some time. By 1971, when land surrounding the Creve Coeur Lake was purchased to expand Creve Coeur Lake Memorial Park, a corridor had already been set aside to be kept free of development specifically for a future Page extension. This corridor passed over both the lake and the newly-purchased land. The U.S. Department of the Interior insisted at that time that when the Page project came to fruition, the entire environmental review process would have to be carried out. Soon after, a several-year-long project to dredge up much of the sediment from the lake bottom was begun. The purpose was to deepen the lake, thereby enhancing its recreational value. Federal funds from the Land and Water Conservation Funds Act (LWCFA) were used for both the land purchase and the dredging. Now it is proposed that Federal funds also be used to extend Page. So Federal money would be spent on a project that would ruin a past project also paid for with Federal money.

1 Federal law states that LWCFA land shall not be converted to other than public outdoor recreation uses unless (1) it fits a statewide recreation plan and (2) equivalent land can be purchased. In addition, no public park shall be used for highways unless (1) "there is no feasible and prudent alternative" and (2) the highway minimizes harm to the park.

Eventually, some Federal funding was authorized by Congress, and the Missouri Highway and Transportation Department (MHTD) began the actual preparations and design for the project. In June, 1990, the draft environmental impact statement (DEIS) for the project was released, and a public hearing was held (in St. Charles County). I, along with the Coalition and other groups, submitted written responses to the DEIS. The final EIS, which is supposed to incorporate all the suggestions, is now being prepared.

The planned extension would pass over the most desirable part of the park, from an environmental standpoint. The Creve Coeur Lake is an oxbow lake, and the largest natural lake in Missouri. The shallow wetlands at the southern end of the lake attract migrating waterfowl and other wildlife.

The largest uncleared and unimproved area within the Park is located south and east of the lake. Admittedly I have no formal training in forestry, but the area appears to be at least a mature woodland, and probably even old-growth. Both upland and bottomland species are represented. Many of these trees are particularly old and large, compared with those found in other area parks. Some of the trees have grown in gruesome shapes in order to maximize the amount of sunlight that reaches them (the phototropic effect). The area is generally very peaceful, and is an outstanding location to discreetly observe the fauna and flora.

2 It is interesting to visit the area during each of the four seasons. The spring brings thick undergrowth. The closed forest canopy seen here in summer is becoming harder to find. The autumn colors can be spectacular, and formations of migratory waterfowl visit the lake almost continuously. In the coldest periods of winter, the so-called "dripping springs" waterfall is transformed from a steady trickle of water to a massive and magnificent formation of ice. I consider this unimproved area to be the best part of Creve Coeur Park. The Page extension would proceed smack through the middle of this area and directly over the shallow wetlands at the end of the lake. Its location simply could not be worse.

Two routes for the extension have been proposed, called the red and green alignments. The red alignment, recommended by the MHTD, is the one that would pass through the park. (See map.) This route follows the reserved corridor mentioned above. It would enter park land, emerge from a deep gouge in the bluff, proceed over the lake on a bridge, gradually descending to the floodplain, and continue to the main bridge crossing the river. The park land under the first bridge would be cleared of its trees and vegetation. Although the area of land directly impacted is rather small, the highway would indirectly impact much more land than that by its visual presence and, worse, by its noise. Litter and vehicle exhaust will also negatively impact the area. In summary, two bridges would be needed, very beautiful public park land would, in my opinion, be utterly ruined, and, even with the reserved corridor, 26 residences would be taken.

The alternative, or green, alignment, avoids the park, passing directly through the Seven Pines subdivision, then down to the flood plain and across the river. Although the green route may not be visible from the Park, it will still be audible. Only one bridge is needed. However, a larger number of residences, 130, would be taken, and Seven Pines, a fine neighborhood that I am familiar with, would be divided in two.

The people of St. Charles County overwhelmingly support the red over the green, at least WITHIN St. Charles County. But the red and green alignments have a common point of intersection in St. Louis County (see map). The extension could begin along the green alignment up to the common terminus, then continue along the red alignment into St. Charles County. Very surprisingly, the DEIS did not even mention this combination. This makes it difficult to compare the monetary costs and impacts of this green/red route with the other two.

Without considering monetary costs, the choice boils down to taking 104 additional residences and dividing a neighborhood or passing a highway through and over a natural area of a public park.

There are many Seven-Pines-like subdivisions; there is only one Creve Coeur Park and Lake. The park is owned by the nearly one million residents of St. Louis County. Since these natural communities are publicly-owned and since they are becoming rare in urban areas, do they have some right to be left as they are, even if only a few people are interested in seeing them? How about no one? Taking Seven Pines affects a few dozen people for their lifetimes on Earth. Taking the park affects everyone in the area, and all those who will come after us. Wildlife will be affected as well.

Understanding and actually experiencing natural areas are prerequisites to appreciating them. Appreciating the environment which sustains us should be of the utmost importance in the education of children. I still recall taking a very interesting and educational field trip to Creve Coeur Park in elementary school. Is it a selfish act toward those who will come after us to harm such a place?

I asked myself the question, "If I lived in Seven Pines where the green route would go through, what would I say at the public hearing?" I know what I would say, but each person should decide for himself or herself.

3 There are many other factors which have not been mentioned yet. Following is a list of some of them.

The MHTD combined what is usually two public hearings into one. This single hearing was held in St. Charles County, and it turned out to be a pep rally for a new bridge across the river. A hearing should also be held in St. Louis County.

At the hearing, pamphlets were passed out which showed only the red alignment and did not even mention that there was an alternative.

4 The county parks department leases a small cleared area that is used as a polo field. The green alignment would pass through it, so a green-black alignment was substituted. In the DEIS, MHTD treats this field as if it deserves the same consideration as the area that the red alignment would pass over, making it appear that both alignments would impact important park land. This is a farce.

Why was a second corridor not set aside? It seems like cheating to wait until everything is built up and then claim that there is only one way to go--through the park. Our public officials must do a better job than this.

5 Under Federal law, equivalent replacement land must be purchased if the red alignment through Creve Coeur Park is chosen. Adjoining the park are privately held wooded areas similar to the area that the red route would impact. Yet, the recommendation of the county parks department is to purchase already-cleared fields suitable for "active" recreation such as competitive athletics. Furthermore, the cost of such land is not even included in the DEIS comparison of costs between the alignments!

6 Noise suppression is highly desirable for either red or green. Yet, noise abatement measures planned for residential areas do not apply to the Park, because its visitors and its wildlife are not considered to be "sensitive receptors."

Maryland Heights municipal officials would be pleased to see the extension promote the development of the flood plain, notwithstanding the facts that the area is ideal for agriculture, the shaking from earthquakes is strongest on bottomland, and insufficient levees now exist.

7 The Page extension would encourage a southward extension of the Earth City Expressway, further compromising the large open space of farmland that now exists in the flood plain.

An extension of the Metro Link light rail system into St. Charles is not incorporated into the Page Avenue bridge plans.

St. Charles politicians are complaining that routing around the Park would delay the project, and are seeking to avoid any and all delays.

In spite of all this, the cause is not lost. Under Federal law, the Secretary of the Interior makes the final decision, and in a significant move, the U.S. interior department last month formally objected to routing Page through the Park. Also, Joan Kelly Horn, the apparent winner of the 2nd District Representative seat, stated in a guest column written before the election (Post-Dispatch, 16 Oct. 1990) that the "extension should be rerouted around Creve Coeur Park and lanes should be designated for cars carrying several passengers." Hopefully, Ms. Horn will articulate and urge this position in the U.S. Congress.

The only suggestion I can offer at this time is to write a letter in your own words and send a copy to each of the officials listed at the end of this article. I urge everyone concerned to do this. Letters from St. Charles County residents would be especially helpful. If we cannot stop persons in government from destroying a public park, then what CAN we stop them from destroying?

I would like to close with an eloquent quotation from a letter by Nancy Knowles that was included in the DEIS. It regards impacts to the historic Spring Bend property just across the river in St. Charles County, which her family owns, but I believe it can just as well be applied to Creve Coeur Park. "I have never known a city of any size to have enough bridges to eliminate all traffic congestion during rush-hour. To despoil our valuable land and heritage for four hours a day seems shortsighted and imprudent.... There is no doubt that we, and our farmer neighbors just to the north, [because we have refused to sell out to land developers,] are being penalized because we love the land more than the dollar.... To put the bridge right in the middle of the one green area remaining, effectively destroys the whole property, disregarding its historic, botanical, and environmental value."

About the author: Mark R. Kaufmann is a native of the St. Louis area, and was raised in Maryland Heights. He has visited Creve Coeur Park many times throughout his life. He graduated from Parkway North Senior High School in 1980. He is presently a graduate student in physics at Washington University, seeking a Ph.D. degree, in the field of ultrasonics. He has been a member of the Coalition for about one year.



Draft Environmental Impact Statement

Page Avenue Extension
St. Charles and St. Louis Counties, Missouri

Approximate Scale 1" = 2000'



NORTH

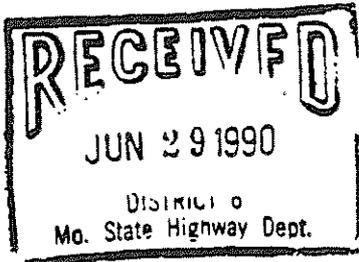
Project Alignment and Features

Figure 3.2.1

RESPONSE TO COMMENTS

Mark R. Kaufmann - Letter of November 9, 1990 to Coalition for Environment

1. Replacement land has been coordinated in the mitigation plan associated with the Red Alignment. Issues relating to Section 4(f) have been waived by Section 601 of the Pipeline Safety Act.
2. The Red Alignment is south of the lake and away from the dripping spring.
3. See Response 2a. to the St. Louis Audubon Society.
4. The determination was made by FHWA. As a result, three other park-avoidance alternatives have been developed and analyzed.
5. As part of the over 600 acres to be purchased as part of the mitigation plan associated with the Red Alignment, land of at least equal value and reasonably equivalent utility will be acquired as replacement lands.
6. Noise suppression has been included in the bridge design by proposing to increase the sidewalls to 42 inches, to assist in containing more of the noise closer to the roadway. Such considerations will be addressed by the Design Committee required by Section 601.
7. As a result of no funds nor new taxes to build the Earth City Expressway Extension, it is unlikely that St. Louis County would proceed with this project within the year 2015 time frame being analyzed for this project.



S. Hori
 2050 King Arthur Court
 St. Louis, MO. 63146
 (Greenfield Village, Polo
 27 June 1990

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Mr. Y.T. Yarnell, P.E.
 District Engineer
 Missouri Highway and Transportation Commission

Dear Mr. Yarnell:

The original plan for the St. Louis County portion of the **Route D Extension** seems reasonable in that apparently a right of way has already been set aside for that purpose. Implementation of this plan would minimally disrupt current neighborhoods and people, and would probably be the most economical approach. I am, however, UNEQUIVOCALLY OPPOSED to the proposed **Alternate Location**, which makes no sense at all!

The proposed **Alternate Location** would entail significant economic, environmental, and social costs above and beyond those which would be encountered by implementation of the original plan. These costs include the following:

ECONOMIC COSTS

1. Destruction of over one hundred homes, converting valuable assets into scrap...a great economic waste.
2. Compensation to owners whose homes have been condemned.
3. Loss of investments made by owners to improve their homes.
4. Dismantling portions of existing infrastructure systems, e.g., systems for electricity, water, gas, telephone, sewer, cables; and scrapping of some of the materials from these systems.
5. Re-design and reconstruction of those infrastructure systems to accommodate the remaining homes.
6. Destruction of local streets.
7. Re-designing and constructing new local streets to accommodate the remaining houses in close proximity to the Route D Extension.
8. Decreased property values of homes remaining in close proximity to the Route D Extension.
9. Search for suitable replacement housing for those uprooted from their current homes.
10. Moving from the condemned homes to the replacement homes.

11. Purchasing and installing appropriate interior (e.g., carpets, draperies, wallpaper, etc.) and exterior (e.g., patios, fences, flower beds, etc.) items which make a house a home.

ENVIRONMENTAL COSTS

1. Destroyed houses represent additional trees that have to be cut for replacement houses, a needless additional deterioration of the environment.
2. Destruction of houses and infrastructure require significant expenditure of energy, including the burning of fossil fuels in trucks, earth moving and other equipment, resulting in the production of excessive pollution of the air. This would not occur if the original plan would be implemented.
3. Destruction of large numbers of trees and shrubs in the neighborhoods of Seven Pines, Old Farm and Polo Run.
4. A highway running through the middle of three neighborhoods degrades the living environment for those people with noise, pollution and unsightly appearance.
5. Recreationists may argue that a highway across the south shore of Creve Coeur Lake would degrade the recreational environment. I would counter-argue that most of the recreational activity takes place along the north shore, so the effect would be minimal. Also, the effect would apply for a small fraction of the time in the lives of those coming for recreation. But the **Alternate Location** would seriously degrade the living environment for people, in the neighborhoods affected, 100 percent of their time, 24 hours a day, every day of the year.

SOCIAL COSTS

1. The Greenfield condominium was specifically selected by its residents for the benefits of condominium living, and for its excellent layout of homes, green spaces and facilities. These will be lost to all residents, both those who remain as well as those who are forced out.
2. Relocation is a labor intensive, time consuming and disruptive activity for those involved. When it is involuntary, these social costs are incurred without any redeeming benefit.

CONCLUSIONS

1. The **Alternate Location** for the Route D Extension would entail significant economic, environmental, and social costs without any redeeming value.
2. The **Alternate Location** for the Route D Extension is therefore totally UNACCEPTABLE!

Yours truly,



June 25, 1990

Mr. J. T. Yarnell
District Engineer, Design
Missouri Highway and Transportation Department
329 South Kirkwood Road
Kirkwood, MO 63122

Dear Mr. Yarnell,

Attached you will find copies of signed petitions regarding the proposed route of the "Page Avenue Extension" through St. Charles County, and through the Timberwood Trails Subdivision. As concerned property owners, tax payers, residents of the Timberwood Trails Subdivision, and registered voters, we wish to ask for your help.

We are in agreement with the need for the "Page Avenue Extension." However, we are opposed to any route which would enter the Timberwood Trails Subdivision. We further ask that you help us by supporting the redirection of the Page Avenue Project, to run outside of the Timberwood Trails Subdivision. These petitions total 511 signatures, representing 385 households in the Timberwood Trails Subdivision. We began this petition drive 6-17-90 and completed it 6-24-90. Thank you for your help in this matter.

Sincerely,

Martha L. Manes

Martha L. Manes
Trustee
Timberwood Trails

RECEIVED
 JUL 2 - 1990
 DISTRICT 6
 Mo State Highway Dept

Highway Department,
 General Office,
 329 South Kirkwood Road,
 St. Louis, Mo., 63122.

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Gentlemen:

We will present petition signatures of all the Willowick Estates Subdivision in a few days of the homeowners of this subdivision. We are all in favor of the original Red Route as designed and planned by the Highway Department of St. Louis County long before the construction of Sherwood Manor where Page Avenue is to continue at Bennington.

I was prepared to speak on the evening of June 28, 1990 however when it became so late I was of the belief that the meeting would end before my time would come. I do understand, however, that I was eventually called late in the evening.

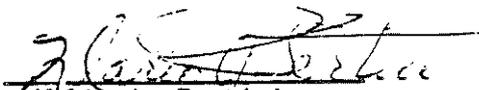
I do appreciate the interest by the Environmental Organization, but no matter whether the Red or Green route is recommended there still remains an environmental problem, but at the same time it is understandable that Page Avenue must be continued.

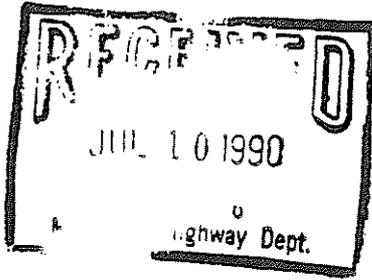
My other thoughts and compassion go to the home owners and the senior citizens who may lose their residence and forced to locate elsewhere. This, of course, is most unfortunate, but the Red Route is certain (in our opinion) to do less harm than the Green Route. It is essential that traffic flow must be considered for the future therefore we must take the line of least resistance and that would be the Red Route.

Even though I did not speak, my thanks for the opportunity, and may I at this time thank the Highway Department for the great work they have been doing for these many, many, years.

Very sincerely,

Willowick Estates Subdn.


 Mario A. Pertici,
 Treasurer-Trustee
 12826 Wenlock Drive,
 St. Louis, Mo., 63146



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July 2, 1990

LETTER IN SUPPORT OF DESIGNATION AND CONSTRUCTION
OF RED LINE ALIGNMENT TO ROUTE D (PAGE AVENUE EXTENSION)

Mr. J. T. Yarnell
District Engineer
Missouri Highway & Transportation
Commission
329 S. Kirkwood Road
Kirkwood, Missouri 63122

Dear Mr. Yarnell:

The purpose of this letter is to express my support of the designation and construction of the Red Line Alignment (sometimes referred to as the "Red Route") to the Route D extension of Page Avenue from St. Louis County to St. Charles County.

The proposed Alternate Route (i.e. "Green Route") would create significant and extreme economic, environmental and social costs and hardships to all of the residents of Greenfield Village, a subdivision of Polo Run, as well as to other adjacent subdivisions and neighborhoods. The reasons for my opposition to the Alternate "Green" Route include, but are not limited to, the following:

1. More than 150 homes, many of which have been recently built or are still under construction, would be destroyed.
2. More than 150 households (families) would be forced to relocate to a new community or neighborhood away from their local schools, churches, businesses, etc.
3. Carefully-designed and planned residential communities which have made St. Louis County an attractive place to live and raise families, would be destroyed or severely altered.
4. Many homeowners would lose their investments made to improve their homes.
5. Residents of the community who are not forced to vacate their homes would suffer a tremendous decrease in the value of their homes.

Mr. J. T. Yarnell
July 2, 1990
Page 2

6. The proposed Green Route has already created, and will continue to create, a "chilling" effect on the ability of current homeowners to sell their homes. (No one wants to buy a home at fair value with the "cloud" of condemnation hanging over their heads.)

7. Streets, sidewalks, utility lines, etc. would be destroyed or severely altered.

8. A major highway running through the middle of newly constructed subdivisions would not only produce an unsightly appearance but would also greatly degrade the living environment of those communities as a result of increased noise and pollution.

The Greenfield Village Community was specifically selected by its residents for the benefits of condominium living, and for its excellent layout of homes, green spaces and facilities. All of these amenities will be lost to the residents who remain as well as those who are forced to relocate if the Green Route is selected.

The Alternate Green Route has absolutely no redeeming value to those residents directly affected or to the surrounding community. The Red Route on the other hand is clearly the most economically and socially feasible alternative for the Extension of Page Avenue. I urge you and the members of the State Highway Transportation Commission to approve the construction of the Red Route.

Sincerely,

Robert Chazyant

13033 King Center Spur
Address

SR 63146

RFD/dt

cc: H. C. Milford
St. Louis County Executive

Honorable T. Akin
Missouri State Representative

RECEIVED
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 No. 14-987897 11/1/90

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Missouri State Highway Dept.
 329 South Kirkwood Rd.
 Kirkwood, Mo. 63122

Attn: Mr. J.T. Yarnell
 Chief District Engineer

Dear Mr. Yarnell:

We the undersigned residents of Wood Glen Estates, would like to inform you that we are opposed to the current proposed route of the Page Avenue Extension.

Recent brochures that were submitted to one our residents, indicate that our homes and property are in the direct route of the proposed extension.

We would like you to reconsider the route that the Timberwood Trails residents are in favor of --- the route that would go South of the cemetery. We, too, feel that this route is much more advantageous for the State, as there are fewer homes in this area and the total value of these homes would not be nearly as great as the value of the homes affected in the Timberwood Trails and Wood Glen areas.

Shouldn't the residents of Wood Glen Estates been advised or informed of your change of plans concerning the proposed Second Phase of the Extension?? None of us were made aware that this Second Phase was going to directly affect our homes and property.

We would like to know what we, the residents, can do to get together with the appropriate parties concerned to suggest possible alternatives to this route which would not have the adverse effects upon our homes and our community as the current proposal does.

Please contact any, or all, of the undersigned at your earliest convenience.

Sincerely,

The Residents of Wood Glen Estates

cc: Mr. Joseph Ortwerth,
 State Representative
 Mr. Robert A. Perkins,
 Western District Commissioner

July 6, 1990

Missouri State Highway Commission:

RE: PAGE AVENUE EXTENSION

Please consider the attached information as our written input to be added to our lawyer's presentation at the Public Hearing on Thursday, June 28. We understand this will be added to the official minutes.

Also we are attaching the petitions gathered opposing the alternate Green Route. These were obtained from:

Sherwood Manor
Parkway Estates
Willowvck
Willowvck Addition
Springdale Village II
And a few relatives and close associates who are
deeply concerned for us.

Respectfully,


Mary Walter

Trustee Sherwood Manor Homeowners' Association

July 3, 1990

Missouri State Highway Commission

Gentlemen,

At the Public Hearing conducted last Thursday, June 28, regarding the Page Avenue extension, the Red Route seemed to receive overwhelming support. But we must remember environmentalists have many months ahead to bring opposition, even after your commission makes its decision later this month.

As a Trustee of Sherwood Manor subdivision I speak for 100% of our homeowners who strongly continue to oppose the Green Route. Sherwood Manor is a subdivision of single-family attached homes, which is situated at the very end of Page Avenue at Bennington. Even though the Green Route is said to be only an alternate route, and your department prefers to build the long-planned Red Route, we are deeply concerned.

If the Green Route should be built, our subdivision of 45 homes will be devastated. At least 25 homes will be condemned, and those homes left will be devalued - actually unsaleable. The exit/entrance will be gone, we will need to travel a great distance for egress, and our condo subdivision financial structure will be seriously affected. The highway, which you have stated will be heavily traveled, will be within 100 ft. of many of our homes, creating unacceptable noise and pollution. Many of us, including myself, have invested our life's savings in these homes, and cannot afford such a loss at our age. We had planned this to be our last move.

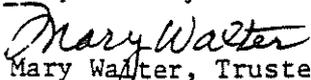
This subdivision is not yet 2 years old. When each of us bought our home, we were assured by Taylor-Morley-Simon, our builder, that the Page Avenue extension would completely by-pass us and take none of our homes.

As you well know, the original Red Route, for which land has been dedicated for 10 years, will only condemn 15 homes this side of the Missouri River. The Green Route (Alternate) will destroy 170 homes and be in very close proximity to many more homes in nearby subdivisions. Are 500+ people to be displaced rather than birds?

We respectfully request that you build the Red Route as the Page Avenue extension, keeping us aware of what we need to know, and discarding the Green Route as being contrary to the well-being of the community in general.

Thank you for all the work you have done on this project.

Respectfully submitted,


Mary Walter, Trustee

Sherwood Manor Homeowners' Association

TRUSTEES OF SEVEN PINES SUBDIVISION

P.O. BOX 1461
MARYLAND HEIGHTS, MO. 63043

July 7, 1990



Mr. J. T. Yarnell, District Engineer
Missouri Highway Department
329 South Kirkwood
Kirkwood, MO 63122

Dear Mr. Yarnell:

As Trustees and Representatives of Seven Pines Subdivision, we have a responsibility to respond to the Draft Environmental Impact Study and the Public Hearing held June 28th on the proposed Page Avenue Extension:

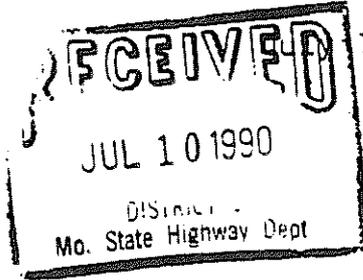
Based on meetings with our residents and with representatives of the Missouri Highway Department, Seven Pines will support the "red" preferred alignment of the Page Extension as presented to us. This includes adequate noise and pollution abatement for our subdivision, and also no interchange at the intersection of Page Extension and Amiot.

We are in agreement with the State Highway Department that such an interchange is unwarranted and would detrimentally affect the quality of life of our residents. We disagree with Mr. Saffa's allegations of the necessity of an exit at Amiot on the grounds that all noise and pollution abatements promised will be negated by the on and off ramps, plus the fact that more homes and land will be taken in Seven Pines. We believe that an interchange of this type is out of character in a residential neighborhood and could encourage industrial development along Marine Avenue which in turn will generate additional traffic through Seven Pines.

We strongly oppose the "green" Alternate alignment on the premise that it will completely devalue our property and will be detrimental to the quality of life in our entire community. We feel that the impact on the wildlife environment with the red alignment would not be as great as the impact on the human environment with the green alignment.

TRUSTEES OF SEVEN PINES SUBDIVISION

P.O. BOX 1461
MARYLAND HEIGHTS, MO. 63043



7, 1990

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Mr. J. T. Yarnell, District Engineer
Missouri Highway Department
329 South Kirkwood
Kirkwood, MO 63122

Dear Mr. Yarnell:

As Trustees and Representatives of Seven Pines Subdivision, we have a responsibility to respond to the Draft Environmental Impact Study and the Public Hearing held June 28th on the proposed Page Avenue Extension:

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We strongly oppose the "green" Alternate alignment on the premise that it will completely devalue our property and will be detrimental to the quality of life in our entire community. We feel that the impact on the wildlife environment with the red alignment would not be as great as the impact on the human environment with the green alignment.

Mr. J. T. Yarnell

July 7, 1990

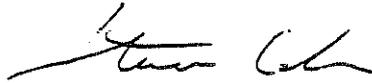
Page Two

We are organizing a petition drive against the interchange and these signatures will be forwarded to you within the next ten days.

We do thank you, Mr. McCullah, Mr. Bergman and all of the members of your staff for the time and effort put forth on our behalf.

Sincerely,

THE TRUSTEES OF SEVEN PINES



Stuart Cohen

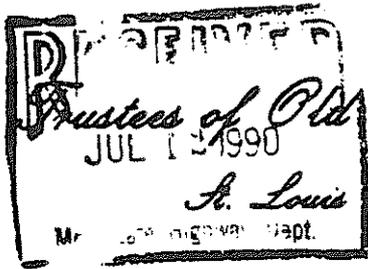


Carol Cullinane

Mark Ehret



cc: Mr. Freeman McCullah, State Highway Department
Booker Associates, Mr. Greg Knauer
Mrs. Ellen Conant
State Senator Franc Flotron
Representative Todd Akin
St. Louis County Executive H.C. Milford
Mr. Jan Paynton, Director Highways & Traffic



Old Farm Estates Subdivision

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Mr. Freeman McCullah
 Assistant District Engineer - Design
 Missouri Highway and Transportation Department
 329 South Kirkwood
 Kirkwood, MO 63122

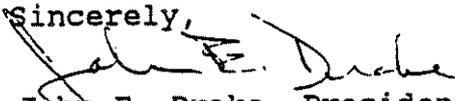
Dear Mr. McCullah:

For nearly a year, residents of Old Farm Estates and neighboring subdivisions have participated in a variety of public meetings relative to the proposed Page Avenue Extension. Their comments support the current "RED" route and no interchange at Amiot Drive.

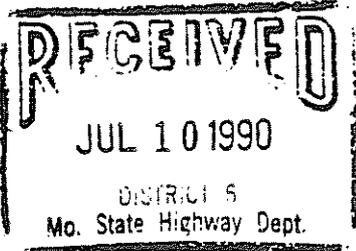
The proposed RED route was apparently selected as having the least disruptive right-of-way as it crosses northwest St. Louis County. Old Farm Estates is vitally interested in this routing as the alternative "GREEN" route passes directly through the middle of our subdivision. If this routing were used for the Page Extension, it would not only destroy our common ground and swim club, but a major subdivision street and numerous residences. Its effect on Old Farm Estates would be similar to the A-Bomb on Hiroshima. Old Farm Estates encourages you to finalize your design with the current RED routing.

Several months ago we were very pleased by H.C. Milford's recommendation that no interchange be placed where Page would cross Amiot Drive. The current efforts by the City of Maryland Heights to reverse the decision on the Amiot interchange are self-serving and show absolutely no concern for the needs of area residents, most of whom are County not Maryland Heights residents. The residents of Old Farm Estates are unequivocally against any effort to construct any interchange at this location.

I would appreciate the opportunity to review this matter with you. Thank you for your consideration of our thoughts.

Sincerely,

 John E. Drake, President
 Old Farm Estates Trustees
 13135 Greenbough Drive
 St. Louis, MO 63146
 314-434-4683 (home)
 314-694-2761 (work)

cc: Honorable Ellen R. Conant, St. Louis County Council
 Jan H. Paynton, Director, St Louis County Highway Dept.



TIMBERWOOD TRAILS



July 9, 1990

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Mr. J. T. Yarnell
 District Engineer
 Missouri Highway and Transportation Department
 329 S. Kirkwood Rd.
 Kirkwood, MO 63122

Dear Mr. Yarnell:

This letter is to serve as a follow-up to my remarks at the Page Extension public hearing on June 28, 1990. I would like this letter to become a part of the public hearing transcript.

As I stated at the hearing Timberwood Trails residents are in agreement that highway improvements are necessary, however, we are opposed to the routing of this highway through Timberwood Trails. In the following paragraphs I will outline a change that will take this highway out of the subdivision and be of benefit to all concerned.

The current path of the highway destroys 11 homes and takes property from 11 other homes in the Timberwood subdivision. In addition homes in Westwood and Greenwood Acres will have large portions of their lots taken for the highway and right-of-way.

A shift to the south as the highway meets the subdivision would cause an alignment that would miss the subdivision entirely. The use of adequate noise abatement measures would further mitigate the environmental impact on the subdivision. This shift would also assist the Highway Department by not requiring the destruction of properties in the Wood Glen subdivision across from Timberwood on Motherhood Rd.

The changes are suggested for the following reasons:

1. The homes in Westwood and Greenwood Acres are 20 years of age or older and have probably reached their maximum value. These homes are not serviced by the gas utility company or the sewer district. The homes are in generally uneven condition ranging from deplorable to well maintained. The affected homes in Timberwood are only 4 years old and their greatest economic potential is still to be achieved.
2. The current plan of taking 200' or more from the homes in Westwood and Greenwood Acres will not leave a large enough field for their septic tanks. This will require the State to expend more funds for sewer hook-up.

TIMBERWOOD
TRAILS



3. This proposal would not require radical changes in the highway engineering or another environmental impact study as it is in the same corridor. Other suggested route changes would require more work and cause delays in the start of this project.

I would also like to bring to your attention that in May 1986 I appeared at one of your hearings and presented a petition signed by 449 Timberwood residents who were opposed to the incursion of this highway through the subdivision. Discussions held later with Highway Department representatives, state officials, including State Representative Joe Ortwerth, and county officials indicated that this section of the route would be modified.

Please consider this request, as it directly affects 385 families. We are in favor of progress, but let's consider a realignment of the highway to the south so we can continue to raise our families with the quality of life which we've all worked so hard to maintain in Timberwood Trails.

Please advise me of the route recommendation that will be forwarded to the Highway Commission and their final decision.

I would like to commend your staff, especially Mr. Freeman McCullah, for their assistance and patience in answering our questions. Their professionalism has been instrumental in creating a cordial working relationship. I look forward to continuing this effort.

Sincerely,

Michael W. Wooldridge
404 Country Ridge
St. Charles, MO 63303

c: Mr. Freeman McCullah

July 10, 1990

District Engineer
Missouri Highway & Transportation Department
329 South Kirkwood Road
Kirkwood, Missouri 63122

Dear Sir:

The residents of Westward Manor Subdivision would like the following comments and proposals added to the record for the public hearing held regarding the Page Avenue extension Phase II.

It has come to our attention that the subdivision of Timberwood Trails is lobbying to move the proposed route out of their subdivision and into Westward Manor subdivision. In a meeting with the Westward Manor neighborhood the following comments were discussed and should have some consideration in the determination of where the road is to be placed.

First of all, Westward Manor has been in existence for 25 years or more and has been paying property taxes into this county for at least that long. Many of the homes in Timberwood have been paying taxes for less than three years.

Second, the homes in Timberwood were built knowing full well that the extension could be coming through that area. The homes were constructed and sold anyway.

Third, the subdivision of Westward Manor is a circular subdivision and will be broken into two dead end roads. This may stop school busses from coming into our subdivision and possibly trash collectors because there will be no place for their vehicles to turn around.

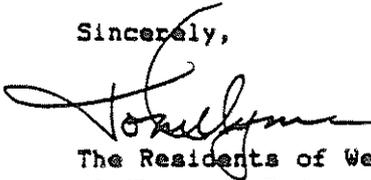
As a general group the residents would like to make the following proposals, the first being the most preferable the last being the least preferable.

- 1.) That the extension avoid both subdivisions altogether and proceed down 94 or go west of Timberwood Trails.
- 2.) That if the extension is moved completely into the subdivision then the entire subdivision should be bought out.
- 3.) That the extension be left where it is and allowances be made for sound abatement, pollution control, school bus access and Garbage truck access. We also feel that some type of tax abatement should be put into effect in order to compensate

for the loss in property value due to the proximity of the proposed highway. This devaluation has already taken effect simply due to the planning and hearings.

We respectfully submit these comments and proposals as part of the public record.

Sincerely,

A handwritten signature in cursive script, appearing to read "Thomas Wynn", written over the typed name.

The Residents of Westward Manor
41 Cheyenne Drive
St. Charles, Missouri 63303
Atten: Mr. Thomas Wynn

(see attached)

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LETTER IN SUPPORT OF DESIGNATION AND CONSTRUCTION
 OF RED LINE ALIGNMENT TO ROUTE D (PAGE AVENUE EXTENSION)

Mr. J.T. Yarnell
 District Engineer
 Missouri Highway & Transportation
 Commission
 329 S. Kirkwood Road
 Kirkwood, Missouri 63122

Dear Mr. Yarnell:

The purpose of this letter is to express our support of the designation and construction of the Red Line Alignment (sometimes referred to as the "Red Route") to the Route D extension of Page Avenue from St. Louis County to St. Charles County.

The proposed Alternate Route (i.e. "Green Route") would create extreme economic, environmental and social burdens and hardships to all of the residents of Greenfield Village, a subdivision of Polo Run, as well as to other adjacent subdivisions and neighborhoods. The reasons for our opposition to the Alternate "Green" Route include, but are not limited to, the following:

1. More than 150 homes, many of which have been recently built or are still under construction, would be destroyed.
2. More than 150 households (families) would be forced to relocate to a new community or neighborhood away from their local schools, churches, businesses, etc.
3. Carefully-designed and planned residential communities which have made St. Louis County an attractive place to live and raise families, would be destroyed or severely altered.
4. Many homeowners would lose their investments made to improve their homes.
5. Residents of the community who are not forced to vacate their homes would suffer a tremendous decrease in the value of their homes.

Mr. J.T. Yarnell
July 11, 1990
Page 2

6. The proposed Green Route has already created, and will continue to create, a "chilling" effect on the ability of current homeowners to sell their homes. (No one wants to buy a home at fair value with the "cloud" of condemnation hanging over their heads).

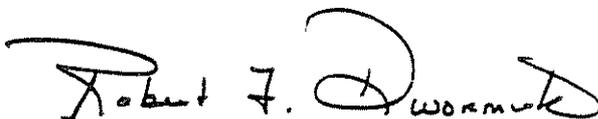
7. Streets, sidewalks, utility lines, etc. would be destroyed or severely altered.

8. A major highway running through the middle of newly constructed subdivisions would not only produce an unsightly appearance but would also greatly degrade the living environment of those communities as a result of increased noise and pollution.

The Greenfield Village Community was specifically selected by its residents for the benefits of condominium living, and for its excellent layout of homes, green spaces and facilities. All of these amenities will be lost to the residents who remain as well as those who are forced to relocate if the Green Route is selected.

The Alternate Green Route has absolutely no redeeming value to those residents directly affected or to the surrounding community. The Red Route on the other hand is clearly the most economically and socially feasible alternative for the Extension of Page Avenue. We urge you and the members of the State Highway Transportation Commission to approve the construction of the Red Route.

Sincerely,



Robert F. Dwornick
1927 King Arthur Court
St. Louis, Missouri 63146

Representative for the Residents
of Greenfield Village Subdivision

RFD/ln
cc: H.C. Milford
St. Louis County Executive
Honorable T. Akin
Missouri State Representative

July 11, 1990

Missouri Highway and Transportation Department
Mr. J.T. Yarnell
329 South Kirkwood Road
Kirkwood, MO 63122

Re: Page Avenue Extension

Dear Mr. Yarnell,

This letter is written as a response to the latest preliminary plans of the Page Avenue Extension into St. Charles County, recently presented at a public hearing on June 28, 1990 in St. Charles. More specifically, the general area of concern is the interchange with Page Avenue and Highway 94. The Kolkmeier family presently owns three tracts of land in this vicinity all of which will be affected by the extension. This property has been in the Kolkmeier family since the mid 1800's with four family members each presently residing on separate parcels within one of the tracts. After a review of the preliminary plan, it can easily be said that the Kolkmeier family will be drastically affected by the proposed extension. This is shown in the fact that right of way will be required from all three tracts which include five homes as well as an estimated 40-45 acres. This will not only be a physical burden in relocating, but an emotional blow in realizing that a family farm of 150+ years will be destroyed and lives changed forever. With this in mind we cannot support the proposed route but also feel that voicing any opposition to the proposed route would be met with little response due to local support of the project. We are therefore requesting that the M.H.T.D. would consider recommendations we have in the way the extension may affect the Kolkmeier property.

One suggestion we would like to make is to consider moving the relocated Old Highway 94 further west by using a sharper curve where it leaves the existing roadway near McClay Road. (See enclosed sketch.) It could still intersect at Wilshire Valley in the proposed location but it may eliminate the possibility of having a piece of property which would be too narrow for good use between Page and Old Highway 94. This also may give a better vertical alignment in that it may require less "cut". Our other suggestion would be that the M.H.T.D. not require all the right-of-way needed to meet existing grade but acquire temporary grading easements where it is beneficial to the adjoining property owners.

If you have any questions or concerns please contact Orville at 314-447-2108 or at the address below. Any cooperation will be greatly appreciated.

Sincerely,

Mr. & Mrs. Edward A. Borgen
2669 Harvester Road
St. Charles, MO 63303

Idelle Kolkmeier Borgen
Edward A. Borgen

Mr. & Mrs. Herbert O. Buenemann
2661 Harvester Road
St. Charles, MO 63303

Bernice Buenemann (Kolkmeier)
Herbert O. Buenemann

Kolkmeier Heirs
2601 Harvester Road
St. Charles, MO 63303

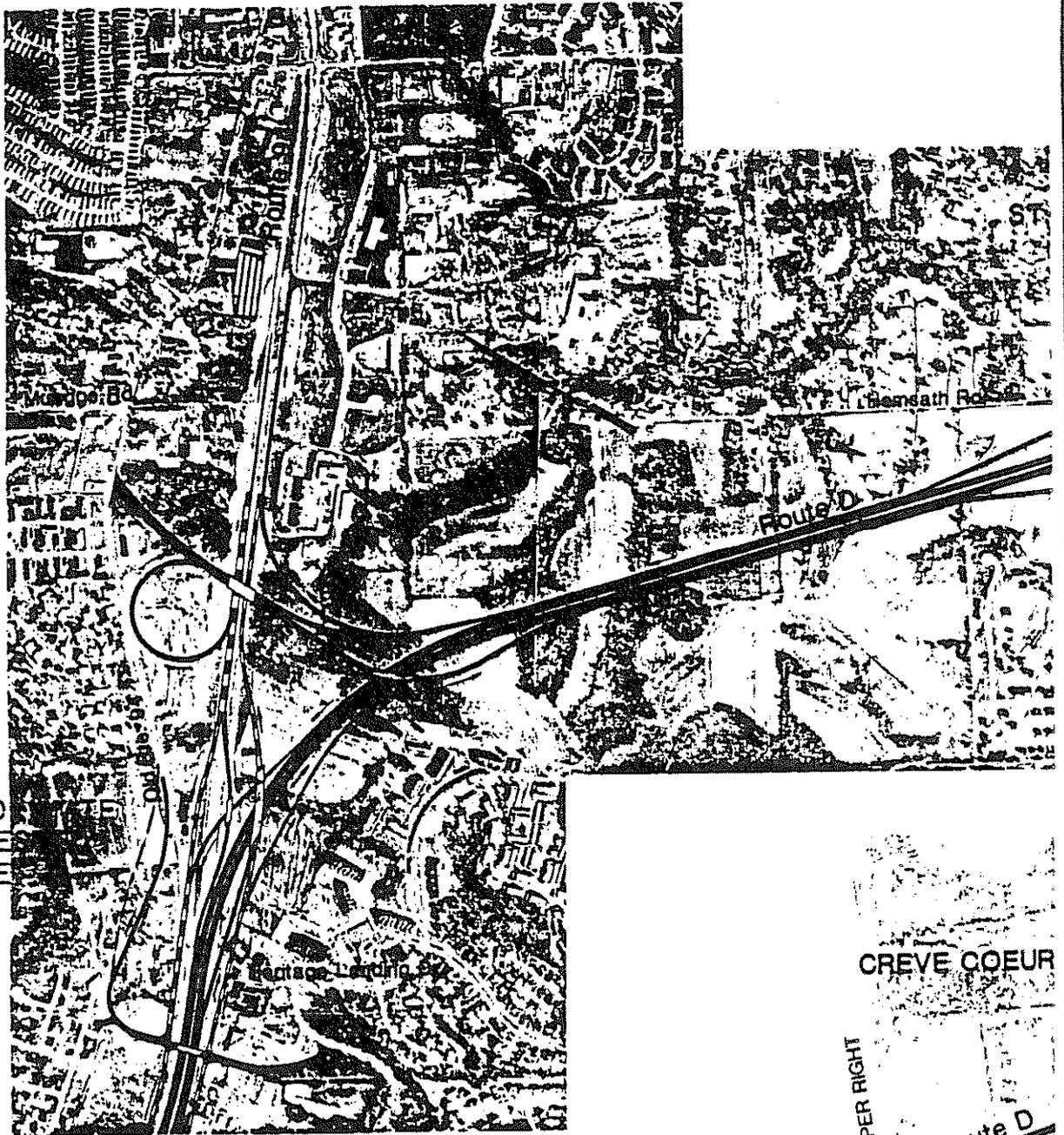
All of the Above Parties

Mr. & Mrs. Orville R. Kolkmeier
2595 Harvester Road
St. Charles, MO 63303

Orville R. Kolkmeier
Loetta Kolkmeier

Mrs. Dolores C. Owens
2659 Harvester Road
St. Charles, MO 63303

Mrs. Dolores C. Owens (Kolkmeier)

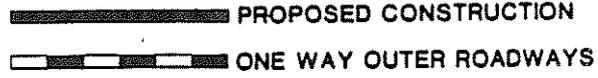


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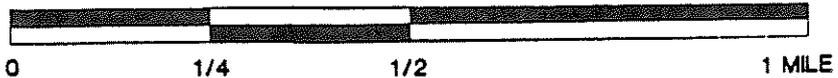
CONTINUED FROM UPPER RIGHT

Route D



PROPOSED CONSTRUCTION

ONE WAY OUTER ROADWAYS



 0 1/4 1/2 1 MILE

PROPOSED LOCATION
ROUTE D, ST. LOUIS COUNTY AND ST. CHARLES COUNTY
RTE. 94 TO BENNINGTON PL.

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RECEIVED
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July 8, 1990
57 Lazy Ridge Court
St Charles, Mo

Missouri
State Highway Dept

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Mr. J. T. Yarnell
State Highway and Transportation Department
329 South Kirkwood Rd
Kirkwood, MO 63122

Dear Mr. Yarnell:

I would like to summarize the remarks that I made at the public hearing on the Page Avenue Extension on July 8, 1990.

The area known as the Golden Triangle is an area bordered by Highway 70 to the North, Highway 94 to Southeast and Highway 40 to the Southwest. This area is largely residential with some light industry to the North. It has convenient shopping centers in St Charles and St Peters and ready access to one in Chesterfield. There is excellent potential for park development at Busch Wildlife across Highway 40 and along the Ravlee Trail by the Missouri river.

Why, then, is an expressway needed to connect Highway 94 (itself a four lane highway) with Highway 40? The residents are not asking for it; the proposed highway has no obvious destination. One can only conclude that self serving statements are being made by people hoping to prosper from development along a new highway.

We believe (and you would be surprised that many others agree) that the area would be best served by running the Page Avenue extension down existing Highway 94, where it could then meet Highway 40. This route offers the following advantages:

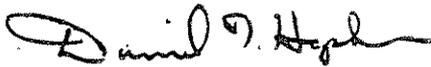
1. Through an improved interchange the bottleneck at Highway 94 and 40 would be eliminated. (The interchange could be made by running Highway 94 in back of the St Charles Bank, eliminating much of the traffic through Nelson Spring.)
2. This route would be less expensive since most of the right of way along Highway 94 is already purchased. Highway 94 is already four lanes, so road construction would be less costly.
3. This route would only add about 7 miles more, a negligible amount, to the route from Heritage Landing to the intersection of Highway 40 and Highway N.
4. The environmental impact on the entire area would be less. When assessing the environmental impact of the part of Page Avenue Extension from west of Highway 94, we believe you must consider the effect of two freeways, highway 40 and the

Extension. There will be two freeways, never more than two and one half miles apart, and running for the most part less than two miles apart. Two parallel freeways this close together will have an impact on the area between the roads. Probably it means light industry rather than a rural residential area developing. Again this will have an adverse effect on Bush Wildlife area, one of the jewels of St Charles county.

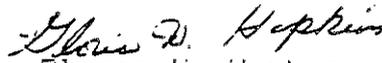
5. The 1987 St Charles Transportation Study concluded that with the Red Line option, in the year 2000 there would 53,300 cars on the new highway where it follows Highway 94 before branching off. Then the extension would carry only 26,500 cars, and Highway 94 would carry 21,200. Why not carry all 47,700 cars ($26,500 + 21,200 = 47,700$) on a freeway running along the present Highway 94, making it a freeway?

In conclusion, it makes sense to run the Page Avenue Extension along the present path of Highway 94 and maintain the integrity of the Golden Triangle. We urge you to publicly announce the study of such a plan.

Sincerely,

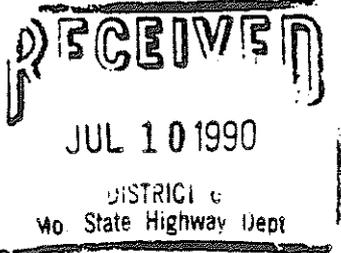


Daniel T. Hopkins



Gloria W. Hopkins

cc Mr Robert Perkins, Western District Commissioner
cc Honorable Fred Dyer
cc Honorable Craig Kilby



July 6, 1990

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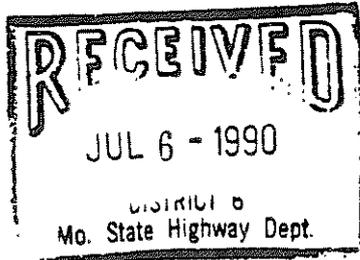
Missouri Highway and Transportation Department
District Number 6
329 South Kirkwood Road
Kirkwood, Missouri 63122

Gentlemen:

Your office has probably been inundated with calls and letters regarding the Page Avenue extension proposal. I'm writing this note to implore the Missouri Highway and Transportation Department to preserve the integrity of the Creve Coeur Lake area and the Missouri River wetlands and flood plain area. These wet areas support a variety of water fowl, fish and land animals. These areas also provide for a bit of scenic beauty for the human population. Please do not make environmental concerns "low priority." You have the power to nurture or to destroy a part of the living habitat. Thriving natural habitat ultimately supports all life forms, including people and cities...Please protect the environment. Please protect people from their own destructive motives and habits...

Sincerely,

Laura Marler
#9 Marine Lane
Maryland Heights, Missouri
63043



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LETTER IN SUPPORT OF DESIGNATION AND CONSTRUCTION OF THE RED LINE ALIGNMENT TO ROUTE D (PAGE AVENUE EXTENSION)

Mr. J. T. Yarnell
 District Engineer
 Missouri Department & Transportation Commission
 329 S. Kirkwood Road
 Kirkwood, Missouri 63122

Mr. Yarnell:

This letter is to express my support and endorsement of the designation and construction of the Red Line Alignment (sometimes referred to as the "Red Route") to the Route D extension of Page Avenue at Bennington, to Highway 94 in St. Charles County. The Red Line Route must be chosen, and construction started as soon as possible, to alleviate the predicted area traffic congestion problems of the future.

The only modifications to the Red Line Route that have any merit are considerations for the Spring Bend property in St. Charles County, which I understand your staff is working on. Also, the Timberwood Trails subdivision must not be divided, and a review of these properties should be done to determine if the highway can be routed to go around this area prior to construction funding for that portion.

The requested Amiot access is an unwanted and unnecessary added expense. It would only serve to invite trailer truck traffic from the industrial area north of Westport Plaza Drive and south of Dorsett. These heavy vehicles would then want to use Marine Avenue to access the Red Line Extension at Amiot. This, in the future, would lead to more expense to modify and maintain Marine Avenue to carry the heavy vehicle traffic, not to mention what damage the vibrations and pollutions of this type traffic can do to residential structures.

The proposed "Alternate Route" (i.e. Green Route) would create significant and extreme economic, environmental and social costs and hardships to all of the people who would be displaced and those left in the near proximity. Reasons for my opposition to the alternate "Green" route are not limited to, the following;

1. More than 150 homes have been recently constructed

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or are still under construction, would be destroyed.

2. The same number of households (families) would be forced to relocate to a new community or neighborhood away from their chosen local schools, churches, businesses, etc..
3. Planned residential communities which have made St. Louis County and St. Charles County an attractive place to live and raise families, would be destroyed or severely altered.
4. Many homeowners would lose their investments made to improve their homes.
5. Residents of the communities not being displaced would suffer a tremendous decrease in the value of their homes.
6. Streets, sidewalks, major utilities, etc. would be destroyed or have to be severely altered at great expense.
7. The "Green" route, a major highway running through existing and newly constructed subdivisions, would not only produce an unsightly appearance but would also greatly degrade the living environment of the communities as a result of increased noise and emissions pollution. These pollutants would also affect the wildlife that reside in the wooded area immediately adjacent to the south of this route between Hasbrook and Old Farm. This wildlife consists of wild Canary, Bluebirds, Deer, etc. Also, there are parks and recreation areas where small children would be subjected.

The alternate "Green" route has absolutely no redeeming value to anyone directly, or indirectly, affected or to any of the surrounding communities. The Red Line Alignment on the other hand is clearly the most economically and socially feasible designation for the Page Avenue extension.

I urge you, the members of your staff and the State Highway Transportation Commission to approve the selection and construction of the Red Line Alignment.

I also wish to express my appreciation to you and your staff for the dedication and considerations given to the task of developing the Red Line route proposal. The endorsements given by the local, county and state officials during the hearing at The Columns, in St. Charles on Thursday, 28 June 1990.

Last, but not least, let's get on with the job at hand and make the Red route a reality. Delay's can only, and will, cost all taxpayers more through normal inflation increases.

Sincerely,

John C. Young
Sandra K. Smith

Address: 13002 King Arthur Lane
ST Louis, Mo. 63146

- cc: H. C. Milford
St. Louis County Executive
- cc: Honorable T. Akin
Missouri State Representative
District 85
- cc: Honorable F. Dyer
Missouri State Senator
District 2

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July 9, 1990

Mo State Highway Dept.

LETTER IN SUPPORT OF DESIGNATION AND CONSTRUCTION

OF RED LINE ALIGNMENT TO ROUTE D (PAGE AVENUE EXTENSION)

Mr. T. J. Yarnell
District Engineer
Missouri Highway and Transportation Commission
329 S. Kirkwood Road
Kirkwood, Missouri 63122

Dear Mr. Yarnell,

This is to express my support for the designation and construction of the "Red Line Alignment" (sometimes referred to as the "Red Route") as the best available alternative for the extension of Page Avenue through St. Louis County into St. Charles County.

The proposed Alternate Route (i.e. "Green Route") would create extreme economic, environmental, and social costs and hardships for all of the residents of Greenfield Village, a subdivision of Polo Run, as well as the adjacent subdivisions and neighborhoods, with no significant counteracting benefits. My opposition to the Alternate "Green" Route is based upon, but is not solely limited to, the following:

1. More than 150 homes, some recently completed or still under construction, would be destroyed.
2. More than 150 households would be forced to locate to new neighborhoods away from their chosen schools, churches, businesses, and other social and civic associations.
3. Carefully designed and planned residential communities, which have made St. Louis County an attractive place to live and raise families, would be destroyed or severely degraded.
4. Many homeowners would lose the investments made in improving their homes.
5. Residents not forced to vacate would suffer tremendous decreases in the value of their homes and a living environment severely degraded by an unsightly major highway with its attendant noise and pollution.
6. Streets, sidewalks and utility lines would be destroyed, disrupted, or severely altered, at significant expense and inconvenience.

The Greenfield Village Community was specifically selected by its residents for its excellent layout of homes, green spaces, and facilities, and they have worked diligently to maintain and enhance the quality of their neighborhood. These amenities will be lost to those who remain, as well as those forced to relocate, if the Green Route is selected.

Further, the proposed Green Route has already created, and will continue to create, a "chilling" effect upon the ability of current homeowners to sell their homes or adequately finance property improvements. This will continue until the "cloud" of condemnation is disbursed.

I am fully aware that maintaining and expanding a transportation infrastructure which will meet the needs of a growing state is not without cost, both economic and social. But in this case the Red Route appropriately balances the benefits and costs while the Green Route does not.

The Alternate Green Route has no redeeming value to those residents directly affected or to the surrounding community. Nor do its presumed benefits to St. Louis County as a whole outweigh the enormous cost to State taxpayers and the affected residents. The Red Route is clearly the most economically and socially feasible alternative for the extension of Page Avenue. I urge you and the members of the State Highway and Transportation Commission to expeditiously approve construction of the Red Route.

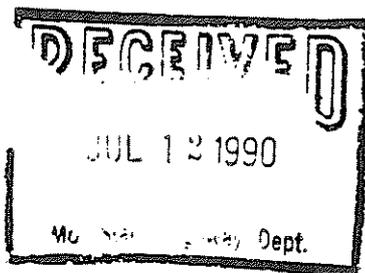
Sincerely,



Rick A. Cherye
2009 King Arthur Ct.
St. Louis, MO 63146

cc: H. C. Milford
St. Louis County Executive

Honorable T. Akin
Missouri State Representative



July 11, 1990

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Mr. Freeman McCullah, P.E.
Missouri Highway and
Transportation Department
329 South Kirkwood Road
Kirkwood, MO 63122

RE: Page Avenue Extension

Dear Mr. McCullah:

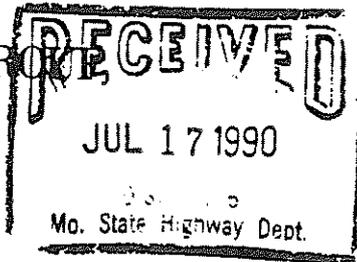
This letter is in reference to your public hearing held on June 28, 1990. As I expressed at the hearing, I do not feel the proposed red route through St. Louis County ONLY is in the best interest of the residents of St. Louis County and St. Charles County.

First, the residents of St. Louis County will lose the serenity of Creve Coeur Park. It seemed as though the only views expressed were those by the people of Seven Pines Subdivision. Many of these people have a direct interest in the Page Avenue Extension taking the red route since 130 homes would be taken out of their subdivision with the alternate green route. It is very understandable that they would be at the meeting in full force. However, there are thousands, if not tens of thousands of residents countywide who enjoy and utilize Creve Coeur Park and would be opposed to a highway going through any portion of it.

Your Environmental Impact Statement (DEIS) showed there would be very little cost difference in building the large bridge versus taking out 130 homes. Additionally, a bridge of any sort requires substantial maintenance. The green route would require none. It therefore seems that there would be no need to destroy this portion of Creve Coeur Park or disrupt the area wildlife and woodlands.

Second, this route exposes St. Charles residents coming to and from St. Louis to two very sharp turns located in St. Louis County with the proposed red route. You can expect in rush hour traffic from time to time, traffic stopping on the highway. There is no way drivers can see around banked turns and 15 foot retaining walls. The green route does not have these highly dangerous curves. This

MONETA GROUP



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July 13, 1990

Mr. Freeman McCullough, Dist. Engineer
Missouri State Highway Dept.
329 South Kirkwood
Kirkwood, MO 63122

Dear Mr. McCullough:

I am a long-time resident of Seven Pines Subdivision and am very disappointed that Page Avenue will go through our subdivision. There is nothing I can do about this, however, I do know that there are two routes being proposed for the Page extension. The one route, called the Red Route would be the preferred route in my opinion. I would prefer not to see an interchange at Amiot as it has been proposed by some persons. This would place our subdivision into a state of a secondary highway in my opinion. I would appreciate your taking my thoughts into consideration.

Sincerely,

Bruce J. Glazier

BJG/rr

