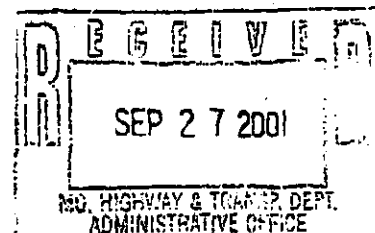




Ozark Chapter / Sierra Club



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 September 25, 2001

Mr. Kevin Keith, Chief Engineer
 Missouri Department of Transportation
 PO Box 270
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Mr. Don Neumann, Programs Coordinator
 Federal Highway Administration
 209 Adams Street
 Jefferson City, Missouri 65102

Re: I-70 Draft First Tier
 Environmental Impact Statement

Gentlemen:

On behalf of the Ozark Chapter of the Sierra Club, thank you for the opportunity to comment on the Draft First Tier Environmental Impact Statement for the cross-state I-70 corridor between St. Louis and Kansas City.

MoDOT is to be commended for undertaking this study for the entire 199-mile non-urban stretch of I-70 because there are strategic questions that should be addressed when considering possible reconstruction of a highway of this significance, and that can only be addressed in a study of this scope. On the whole, it appears that MoDOT and its consultants have done a fine job of addressing the questions they set out to address.

However, we suggest that much larger issues – issues that will have a direct bearing on the kind of transportation system and facilities that will be desirable in this corridor in 2030, the design year – have not been addressed. Nor have many of them even been acknowledged.

We acknowledge that this is simply part of the dilemma of trying to plan thirty years into the future when the future is subject to so many changes in local, state, national, and international situations, and in the social, economic, technological, and political realms.

Nevertheless, we see the fact that broader issues are not identified as a serious shortcoming of this study.

In the course of making these comments we'll cite several examples of major issues that we believe have either not been adequately addressed, or have not even been acknowledged.

1 - Fundamentally, the study is about one specific transportation facility, the I-70 highway. The study does not consider general transportation needs within the Kansas City / Columbia / St. Louis transportation corridor, except as such consideration is incidental to the highway facility. Nor does it give much consideration to transportation services, such as motor coach. The study is, in effect, a single-mode study, and should therefore be deemed deficient.

2 - The study identifies a preferred alternative - widening I-70, generally along its current alignment. We concur with that preference - except that widening should be the principal component of a "combination" preferred alternative that incorporates elements of TSM/TDM, improved passenger rail and motor coach service, improved freight rail service, upgrading of secondary routes along the corridor to attract shorter trips, and recommendations for county and local policies and actions to help reduce the growth of traffic within the corridor in the future.

3 - The study appears to assume that preferences for personal travel, along with the economic bases for those preferences (e.g., level of affluence, cost and availability of fuel, fiscal capacity of state and national governments, and perceived need to consider environmental factors such as air emissions) will remain much the same as they have been during the past half-century. One obvious result of this assumption is that traffic projections might turn out to be significantly higher than actual traffic levels a decade or two hence, and that highway capacity well in excess of our need - and our financial capacity to maintain - will have been built.

4 - Similarly, the study appears to assume a mode split for goods movement that is based on past experience and trends. This is done while acknowledging the problems inherent in mixing personal vehicles with heavy trucks on highways, and without considering alternative policies or actions that might shift more goods movement from trucks to other modes.

5 - The study does not discuss the most appropriate role for highways such as I-70 in the future highway network. Specifically, the study appears to accept as given that all of the kinds of trips that currently use I-70 must, of necessity, continue to use I-70, without regard for whether it serves our economy for this to happen. Short cross-town trips and much longer cross-country trips are apparently assumed to be equally appropriate uses of very costly I-70 capacity.

6 - A highway that promises high speed travel, as every Interstate highway does, and which is available to all without charge, will naturally attract much more traffic than a slower roadway, or one that charges a toll. This study considers a toll highway variant of the "new parallel facility" option, but it does not consider even a modest toll on a reconstructed I-70. A toll would almost certainly shift travel to other routes, and thereby reduce or postpone the need to add capacity on I-70, and also preserve existing and new capacity much further into the future. MoDOT does not currently have authority to operate a toll facility. However, such authority might be more readily obtained from the General Assembly if there is a clear example of its potential to produce cost savings on a highway such as I-70 and thereby free funds for improvements to highways in other parts of the state.

7 – The study does not appear to consider a strategy of improving secondary routes within the same general corridor to better serve local trips as a way of reducing travel demand on I-70. Such a strategy would seem particularly cost-effective within urban areas such as Columbia.

8 – The study does not address the strategic question of whether Missouri should want to have so much of its cross-state highway capacity “eggs” in this one Interstate highway “basket.” This question, of course, applies to other highways as well – and also to highways in other states – but it is one that must be addressed if we are to avoid making an unending series of incremental decisions that add up to a flawed overall system, because we are unable or unwilling to take a broader view. A key strategic question that, to our knowledge, has yet to be addressed, is a cost-benefit analysis of building a few thousand miles of four- or six- or eight-lane divided highways, compared with improving many more thousands of miles of routes as high-quality two- or three-lane facilities. Intuitively, aggregate travel distances might be less, route options might be increased, and the system as a whole might be much more “resilient” – less vulnerable to incident-related system failure – under the latter strategy. The implication for I-70 is that some currently planned new capacity might be postponed or avoided entirely if there were a more extensive system of high-quality two-lane highways in place. In addition, more of Missouri’s citizens and their communities might enjoy greater overall transportation benefit from such a strategy.

9 – The study does not consider the user-friendliness of a six-lane highway – much less the eight-lane highway ultimately envisioned. A highway expanded to six lanes will – by the study’s own admission – induce traffic. Since it can be anticipated that few, if any, additional exits will be provided, it stands to reason that traffic volumes will continue to grow at virtually every exit. The study does not address the impacts on the secondary roads and local streets that will receive this added traffic, nor the resulting impacts on quality of life in communities at or near such interchanges. Nor does the study address the added stress on drivers from driving on a facility where being passed on both the left and right is possible. We recommend that MoDOT affirm, as a matter of policy, that it will build no more than six lanes in this alignment, and will instead implement and/or promote state and local policies related to transportation and development so as to assure that the 7th and 8th lanes will never be needed.

10 – The study makes use of a statewide transportation model, but there is no indication that this model takes into consideration how Missouri’s highways connect with the national system. The model presumably treats cross-country truck traffic, for example, as originating just beyond the state line in Kansas or Illinois, and destined for just beyond the state line of the other state. It does not appear to allow for considering that I-80 in Iowa or I-40 in Arkansas might attract more cross-country truck traffic, were different operating parameters in place on Missouri’s stretch of I-70. A change in the fuel tax, or in the speed limit for trucks, might shift some portion of truck traffic and its attendant road damage and accident risk to routes in other states. The implied assumption is that Missouri wants all the truck traffic we can get – road damage and accidents and all.

11 – While this study does a better job of acknowledging non-highway modes than most previous such studies, this one still gives too little consideration to those other modes. Consideration of high-speed rail appears to focus entirely on the hypothetical possibility of high-speed passenger rail. No consideration is given to the potential for joint passenger and freight use of a proposed high-speed rail corridor, even though that might result in substantial improvements in freight service, and might be readily accomplished through full or partial

temporal separation of high-speed passenger from "high-speed" freight rail operating at a somewhat lower speed. Freight rail is mentioned as an alternative to trucks, but the calculations appear to be based on the assumption that rail service would be upgraded only within Missouri, and that therefore only 125 trucks per day would be diverted from highway to rail. The potential for multi-state rail improvement is not considered, even though such improvement might be highly desirable from the perspective of national economic efficiency and energy security.

12 - Anticipation of some undesignated additional mode within the wider median of a reconstructed I-70 is identified as a key feature of the preferred alternative. However, the study implies that the mode would be rail, and then acknowledges that grades and curvature at a large number of locations along the alignment would not be suitable for 110-mph rail. The implication is that high-speed rail (HSR) might have to transition in and out of the median a number of times, at unknown cost. Furthermore, the study does not identify even conceptually how HSR across the state might link with the existing rail networks in the urban areas. We view providing for HSR as a highly desirable feature, and believe that further exploration of how it might actually be implemented to be a prudent course of action as part of this study.


Finally, a couple of easy ones.

13 - We suggest that more rest areas (page II-36), rather than the same number or fewer, are highly desirable to serve the needs of travelers who prefer a park-like stop and don't want to have to negotiate the service station and fast-food scene - to say nothing of adding traffic to local interchanges - just to tend to "personal needs." If funding is an issue, joint development arrangements with private business, as well as with the Missouri Conservation Department and State Parks Division should be explored.

14 - We are concerned by the requirements for dramatically increased separation of ramp termini, and for longer separation from intersections with frontage roads. Such separations might be appropriate at interchanges where there is a high level of truck traffic - ironically, where the cost of achieving that separation might be very high. However, such separations introduce significant circuitry into trip lengths, and the impacts are especially great on non-motorized travelers. In addition, these standards create, in effect, "dead zones" of up to 0.6 miles in length that are hostile to and discourage non-motorized travel, especially for pedestrians. We ask that local conditions be considered and that the number of such "no-ply zones" be held to a minimum.

15 - During 2000, and particularly during the months of March through June, I had extensive dialogue via e-mail with Ms. Harvey, Mr. Keith, Mr. Mugg, Mr. Hungerbeeler, and others regarding the study. I request that those communications be made a part of this comment by reference.

Thank you.



Ron McLinden, Chairman
Transportation Committee, Ozark Chapter
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Subject: Last Call for HSR in I-70 Corridor???

Most of our passenger rail attention is focused on "higher-speed rail" in the Union Pacific corridor. However, the possibility of a true HSR line across the state has been raised in MoDOT's I-70 First Tier EIS. Decisions made in the near future will likely determine whether such a line will ever exist. Please consider the following:

DRAFT - November 7, 2001

MoDOT's "I-70 Final First Tier Environmental Impact Statement" has been released. "Strategy No. 3 (Widen Existing I-70) has been selected by MoDOT as the Preferred Strategy for the I-70 Study Corridor."

One of the "unresolved issues" identified (see following paragraphs from page 26 of the FTEIS dated October 29, 2001) is potential use of the I-70 median for high speed rail. (Underlining, paragraph breaks, and bracketed paraphrasing added.)

"Future Transportation Corridor -- With the construction of the [widened I-70] an extra wide median will be created. ... The extra-wide median is necessary [to serve construction sequencing]. [The median] was not conceived for the purpose of future construction of a high-speed rail system, but MoDOT has determined it prudent to allocate this space for a future, yet to be defined purpose. [Even if never used for transportation, the extra-wide median will] enhance the safety of the Corridor and is necessary for [construction staging].

"MoDOT is committed to the further consideration of this space by a future high-speed rail system, but is currently uncommitted regarding the reservation of this space for the specific purpose of high-speed rail. As stated in the Draft First Tier EIS, high-speed rail design criteria is [sic] more stringent than the respective criteria for an interstate highway. Consequently, a commitment of the median space for high-speed rail purposes may have unacceptable consequences on the I-70 improvements and their construction costs.

"As stated in the [DFTEIS], a significant portion of the Corridor does not currently meet the vertical grade criterion for high-speed rail and would likely require considerable retrofitting to comply with these requirements. Designing and constructing [I-70] to be fully compatible with high-speed rail would increase the necessary right-of-way and associated impacts for a significant portion of the Corridor. These impacts are beyond what has been conceptualized by this study.

"However, MoDOT is committed to a more detailed evaluation of this issue as part of the second tier studies. MoDOT will implement the I-70 improvements with all reasonable accommodations to meet high-speed rail criteria that do not adversely affect construction costs or the associated impacts to the adjacencies."

My reading of the above is that MoDOT considers HSR (at least in the conventional sense) in the I-70 median a dead issue. That should have been obvious from the outset, yet MoDOT clearly held out that possibility in written and graphic displays used at public meetings. (Of course some future transportation system that moves freight by some unconventional mode -- in capsules through a pipeline, for example -- might still be feasible using this space.)

There are, of course, segments of I-70 median that have curves and grades sufficiently gentle to support HSR. Segments in Callaway County come to mind. Where such segments already exist, or can be made to exist through relatively minor adjustment of the I-70 alignment, those segments should be preserved -- provided, of course, they would reasonably fit into a plausible cross-state HSR route.

If any realistic possibility of Kansas City - Columbia - St. Louis HSR is to be retained, MoDOT should consider "potential rail sections of independent utility" in its second tier studies. The "section of independent utility" (SIU) concept is already used in the FTEIS itself (see FTEIS pages 18-20). An SIU is described as being a segment that will "1) connect logical termini and be of sufficient length to address environmental matters on a broad scope; 2) have independent utility or independent significance, i.e., be usable and be a reasonable expenditure even if no additional transportation improvements in the area are made; and 3) not restrict consideration of alternatives for other reasonably foreseeable transportation improvements."

Point 3) is key. MoDOT has already identified SIU's for second tier studies. Protection of potential rail sections of independent utility should figure deliberately into the second tier studies. But first, it seems to me, we need a conceptual study to identify a feasible cross-state HSR route that might incorporate segments of existing rail rights-of-way and segments of I-70 median.