FEDERAL HIGHWAY ADMINISTRATION
FINDING OF NO SIGNIFICANT IMPACT

FOR

MISSOURI ROUTE 70, ST. LOUIS CITY, MISSOURI

JEFFERSON NATIONAL EXPANSION MEMORIAL
PARK OVER THE HIGHWAY

JOB NUMBER J6I2413 & J6I2413B

The FHWA has determined that this project will not have any significant impact on the human environment. This finding of no significant impact is based on the attached environmental assessment, which has been independently evaluated by the FHWA and determined to adequately and accurately discuss the environmental issues and impacts of the proposed project. It provides sufficient evidence and analysis for determining that an environmental impact statement is not required. The FHWA takes full responsibility for the accuracy, scope, and content of the attached environmental assessment.

12-12-13
Date

Peggy J. Casey
Responsible Official

Prog. Dev. Team Leader
Title

Finding of No Significant Impact

23 CFR 771.121

Missouri Department of Transportation/Federal Highway Administration

Region	State Project No.	Project Title, Environmental Document Type
Missouri Division	J6I1436 & J6I1436B	Missouri Interstate 70, St. Louis City, Missouri Park Over the Highway Environmental Assessment

Decision

The Federal Highway Administration (FHWA), Missouri Division, approved the Missouri Interstate 70, St. Louis City, Park Over the Highway, Job Number J6I1436 & J6I1436B, Environmental Assessment (EA) on July 19, 2012. Notice of the EA's availability was sent to agencies and the document was made available at three locations in the St. Louis City area and electronically through the St. Louis district website at http://www.modot.org/stlouis/major_projects/ParkovertheHighway.htm.

The Selected Alternative to solve the transportation and pedestrian problems associated with I-70 in the project area is Alternative 1. The Selected Alternative will address these issues by constructing a landscaped pedestrian walkway over the depressed section of I-70, "flipping" the existing on and off-ramps at Washington Avenue, and "punching" through the existing concrete island barrier at the Martin Luther King Bridge. The Selected Alternative will result in the closure of some sections of both north and southbound Memorial Drive to incorporate the construction of the landscaped walkway.

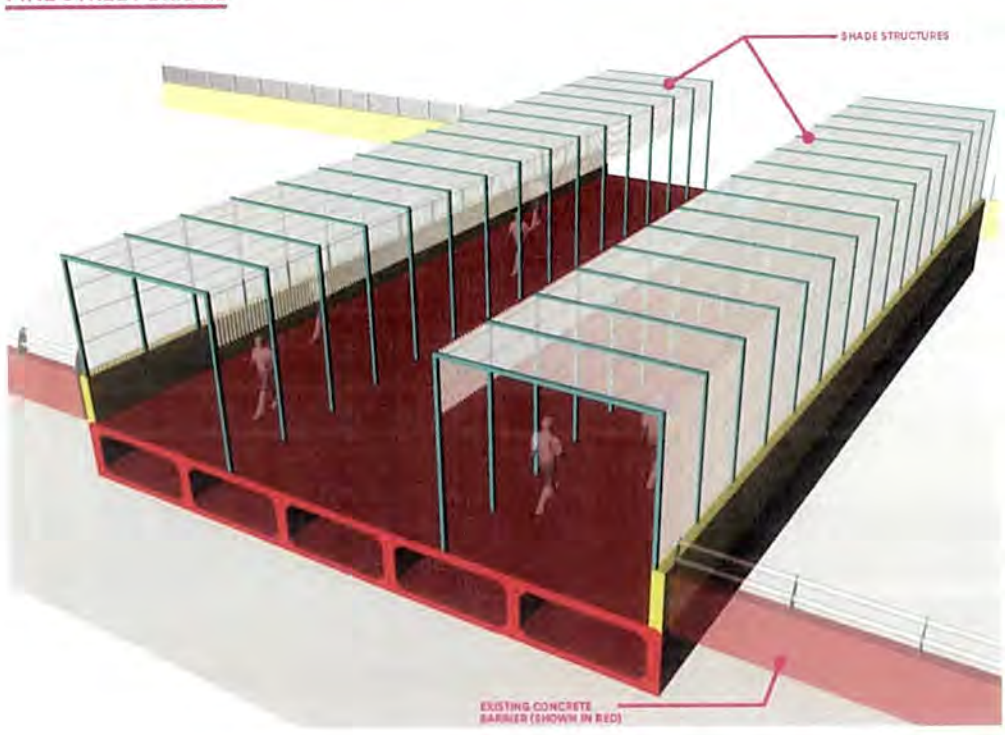
The Selected Alternative was identified through public and agency involvement and assessment of socioeconomic and environmental consequences. A public hearing was held on August 29, 2012 in accordance with established MoDOT procedures. The department has considered possible social, economic, and environmental effects of the proposed improvements and has found no additional impacts beyond those described in the original EA.

Changes to the Selected Alternative

In addition to the work taking place as described above, a change to the Selected Alternative has been made based on input voiced by the public during the comment period and at the public hearing.

In the original proposed Preferred Alternative the Pine Street Bridge was scheduled to be removed and not replaced, through the comment period and the public hearing it was obvious this did not sit well with the public. The public felt that by removing the Pine Street Bridge, access to the north end of the Jefferson National Expansion Memorial (JNEM) was being cut off and pedestrians were being limited to one crossing from downtown to the park grounds. Because of these concerns and the good condition of the Pine Street Bridge, MoDOT has agreed to leave the bridge in place and convert it to a bike/pedestrian facility giving visitors to the park another access to and from the park and downtown. A rendering of what this proposed facility may look like is shown below in Figure 1.

Figure 1: Pine Street Bridge Pedestrian Retrofit



Public and Agency Review/Comment on EA

Public Comments

A public hearing was held on August 29, 2012 for the public to voice any comments or concerns that they have with the proposed Selected Alternative. The public hearing was also available online for those unable to physically attend. The comments that were received via the online public hearing as well as the comments that were received in person at the public hearing and the 30-day comment period are discussed below.

- Several of the unfavorable project comments expressed a desire to remove the section of future I-44 from the Poplar Street Bridge to the new Mississippi River Bridge.

  Because of the impact to regional roadways, MoDOT has no plans to build, or even study, replacing the lanes of I-70 downtown with a boulevard. If, in the future, regional leaders believe replacing I-70 is the right decision, the construction of the selected alternative will not preclude that from happening.

- Commenters expressed concerns that the work on the Park Over the Highway project had an undesirable impact on the city grid.

  During the design and assessment process, MoDOT and project partners considered the impact of various options on traffic patterns and flow, constructability, environmental and social impact, as well as many other factors. No major construction project can completely mitigate the potential impacts; however, the assessment process is used to determine the best choice from all available options. MoDOT firmly believes that the preferred alternative being designed is the best for the region and the downtown area. MoDOT and FHWA understand that other individuals or groups may disagree, because of the values they place upon what will be impacted.

- A commenter mentioned that I-255 was a third regional north-south route (in the assessment, MoDOT indicates that there are only two viable north south interstate routes in the St. Louis area).

  Although I-255 in Illinois is a third north-south route in the region, it only provides a somewhat viable option for the few people traveling to points along the Mississippi River. The majority of destinations in North St. Louis County are further in – such as Express Scripts, University of Missouri St. Louis and the airport.

- A commenter mentioned their disagreement with redesignating I-70 as I-44 once the Mississippi River Bridge opens and I-70 relocates.

  Right now, I-44 ends at I-55. Extending I-44 through the depressed lanes downtown makes more sense to general travelers than titling it something like I-570. Drivers on I-55 and heading west on I-70 will need to travel approximately 1 mile north on I-44 to connect with I-70 West. Drivers wishing to travel I-70 East will need to travel approximately 2 miles east across the Poplar Street Bridge before they would connect with I-70 East but in reality they will be traveling the same route they did in the past.

- A commenter discussed their disagreement with closing Washington Avenue alongside the Eads Bridge.

  At this time, the fate of Washington alongside the Eads Bridge is still being discussed. That determination must be made by the National Park Service and the City of St. Louis. However, the intersection between Washington, the Eads Bridge, and Memorial Drive becomes much simpler and efficient when the Eads Bridge directly connects into the downtown grid and MoDOT can manage traffic with signals at Washington and Memorial Drive.

- A few commenters asked how many vehicles were projected to use the I-44 lanes downtown after the new Mississippi River Bridge is opened.

  Right now, MoDOT projects upwards of 60,000 vehicles a day using I-44 in each direction through downtown once the new Mississippi River Bridge opens to traffic– the traffic projections are in the environmental assessment.

- Commenter expressed concern about the condition of the elevated portion of I-70, wanted to know when it could need to be replaced and how much it would cost.

  The elevated section of future I-44 is in very good condition. MoDOT anticipates having to replace the driving surface after another decade or so. That should cost somewhere between $10 million and $20 million, depending on the extent of the project. MoDOT does not project a complete removal and replacement of the elevated section for any time in the near future.

- Several commenters encouraged the department to make no changes to downtown until the new Mississippi River Bridge is opened so that the department could see how many vehicles would truly use the lanes in the new configuration.

  MoDOT uses the industry standard traffic modeling software to project the potential impacts of major projects such as the Mississippi River Bridge. MoDOT is very confident in the accuracy of projections for the downtown area after traffic has moved to the new bridge.

- Commenter felt that the preferred alternative was contrary to the plan presented by the winning architectural firm.

  The beautiful concepts presented by the architectural firms during the competition were exactly that -concepts to spur imagination. Those architects did not evaluate the potential impacts or options to mitigate said impacts. As MoDOT moves through the design and assessment process, the goal is to be as true to the architectural concepts as possible, while making reasoned decisions to balance the architectural vision with the reality of downtown traffic, bicycle and pedestrian traffic.

- Several comments stated that other urban environments were able to remove interstate like roadways (Chicago and Portland were mentioned)

  St. Louis is relatively unique because it has four interstates that converge and separate in the heart of downtown. This makes it very challenging to maintain regional traffic flow with roadways similar to the one(s) mentioned.

- Several commenters mentioned that the timelines for completing construction (October 2015) seemed arbitrary and should be eliminated

  The timelines established for the project were set by project partners and were intended to spur activity and momentum. Without establishing a timeline, this project would stagnate and suffer numerous delays. This timeline was also set to correspond with the 50th anniversary of the Arch.

- Many commenters offered suggestions for alterations to Leonor K. Sullivan Boulevard, the Jefferson National Expansion Memorial or other portions of the project outside MoDOT's responsibility.

  The suggestion is appreciated; however, it is out of MoDOT's responsibility for the project. The suggestion will be forwarded to CityArchRiver to pass to the responsible agency.

- A couple commenters felt that, with the changes due to the Park Over the Highway project, the section of interstate in downtown would merely become a way to bypass downtown, that there would be no access from the interstate into downtown.

  MoDOT's responsibility throughout this project is to retain regional connectivity – that means ensuring connections remain between North St. Louis, South St. Louis and the downtown area. Connections to downtown will be maintained from the future I-44.

- Commenter mentioned that this leaves only one access into LaClede's Landing downtown.

  MoDOT continues to work with the business community of Laclede's Landing to improve access to the landing. At this time, multiple entrances to Laclede's Landing from Memorial Drive are still planned.

- Commenter mentioned that they would like to see the CityArchRiver 2015 project modeled after Forest Park Forever.

  After the initial push to improve the connection between downtown St. Louis and the Arch, there is the possibility that a conservancy would evolve to help the Park Service maintain what has been built through this project.

- A couple commenters mentioned that the Park Over the Highway project would significantly impact Memorial Drive as an entry into the St. Louis downtown area.

  At this point, one of the major entries into downtown is Memorial Drive, though its benefit is somewhat limited, since traffic cannot fan through the downtown area well from Memorial. The city's Tucker Boulevard project, when combined with the new Mississippi River Bridge project and CityArchRiver roadway improvements, will make major improvements to the diffusion of traffic into and around the downtown area.

- Commenter stated that this project wasn't worth it and would take money away from other needed projects in the region.

  This project will not remove funding from any other roadway projects in the state. It helps fix several pavement, signal and traffic issues in downtown St. Louis.

- Commenter stated that this project needs more time to mature and develop.

  This project has been in the planning stages, in various formats, since 1998.

- Many commenters agreed with the project.

  MoDOT appreciates the support.

Agency Comment

The National Parks Service (NPS) submitted comments on the EA in a letter dated September 12, 2012. The letter consisted of three comments:

1. The artist rendering of a pedestrian overpass on page 16 in incorrectly attributed to the 2009 Jefferson National Expansion Memorial General Management plan.

The figure of the pedestrian overpass was incorrectly attributed to the National Parks Service General Management Plan. The artist's rendering was prepared for a previous study of possible options to address connections issues with the park and downtown.

2. In describing the Preferred Alternative on page 19 there is no reference to the slip lane from northbound Memorial Drive to eastbound Washington Avenue. There is, however, a graphic notation on page 20 of a "possible slip ramp to Washington Avenue." This lane is critical for vehicular access to the Arch Parking Garage and we believe it deserves more prominence in the alternative description.

At the time of the preparation of the EA, it was unknown if the Arch parking garage would be removed. MoDOT will construct the slip ramp as part of the "Preferred Alternative" unless it is determined by the NPS that the Arch parking garage would be removed and that the access to Washington Avenue would no longer be needed.

3. Since the Environmental Assessment was drafted, the decision has been made to reuse the Pine Street Bridge for pedestrian and bicycle access to the park. The analysis incorrectly identifies the bridge for removal.

The retention of the Pine Street Bridge as a pedestrian and bicycle facility has been added to the Selected Alternative above in the "Changes to the Selected Alternative" section of the Finding of No Significant Impact (FONSI) along with a figure showing how it will be utilized.

Summary of Impacted Resources

Farmland

The selected alternative in its entirety falls within the city limits of St. Louis. Therefore, it meets the Farmland Protection Policy Act (FPPA) definition of "land committed to other uses," and will not be further evaluated.

Community Impacts

There will be few social impacts associated with the Selected Alternative. The proposed action will not disrupt current land use patterns or community components, cause a considerable change in communities, or result in community segmentation. While people that regularly work or visit the area may need to slightly modify their normal way of travel, the overall patterns should remain very similar and the proposed action should improve current land use patterns, pedestrian access, and the visitor experience to the JNEM.

Wetlands and Waters of the U.S.

The Selected Alternative will not affect any water resources in the area. For this reason, a Section 404 permit from the U.S. Army Corps of Engineers will not be necessary for this project.

In accordance with Executive Order 11990, this project avoids to the extent possible long and short-term adverse impacts associated with the destruction or modification of wetlands. The proposed action includes all practicable measures to minimize harm to wetlands that may result from such action.

The Selected Alternative will have no permanent impacts to waters of the U.S. FHWA has determined that the selected alternative comprises the least environmentally damaging, practicable alternative that meets the project purpose.

Floodplain

The Selected Alternative will not impact the regulatory floodway or the (1%) base floodplain.

Threatened and Endangered Species

The Selected Alternative will have no impact to any federally or state listed endangered species.

Historic and Archaeological Sites

Architecture

There are eight properties listed on the National Register of Historic Places (NRHP) immediately adjacent to the project area, six are individually listed and two are historic districts. The individually listed resources are the American Zinc, Lead & Smelting Company Building, the International Fur Exchange Building, the Missouri Athletic Club Building, the J. Kennard & Sons Carpet Company Building, the Peabody Coal Company National Headquarters Building and the Gateway Arch. The two historic districts are the Laclede's Landing Historic District and Jefferson National Expansion Memorial.

The Selected Alternative will have no direct effects on any of the individually listed properties or on the two historic districts. The Selected Alternative will have no indirect effects on any of the NRHP individually listed or eligible buildings or on the Laclede's Landing Historic District.

The Selected Alternative will have an indirect effect on the Jefferson National Expansion Memorial; it will remove the intrusion of the depressed interstate highway lanes from the NRHP listed district and will provide the continuous vista between the Gateway Arch and the Old Courthouse which was integral to the Saarinen/Kiley plan for the project.

Bridges

The three bridges to be removed at Chestnut, Market and Walnut are all 79 foot concrete box girder spans built in 1963. All are considered to be non-significant and do not fulfill NRHP eligibility criteria.

Archaeology

The removal of Memorial Drive and related improvements along the western boundary of the JNEM has the potential to affect significant archaeological resources. Depending on the location of existing utilities on Memorial Drive, archaeological testing may be required after pavement has been removed. Improvements to 3rd Street at the Martin Luther King Jr. Bridge may also require archaeological testing depending on the location of utilities. The need for archaeological investigations in previously unevaluated areas will be made in consultation with the National Parks Service.

Public Lands & Potential Section 4(f)/Section 6(f) Properties

The proposed project will be constructed entirely within an existing MoDOT easement on park property. Because this easement exists for transportation purposes, and no other park lands will be converted for such uses, there will be no Section 4(f) eligibility issues with the proposed project.

The subject site was purchased prior to the establishment of the Land and Water Conservation Fund Act (LWCF). Therefore, no LWCF money was used to purchase or make improvements on the site, rendering Section 6(f) a non-issue.

Construction Impacts

During the construction of the selected alternative, there will be some short-term impacts to the public due to noise, dust, and pollutants discharged by construction equipment as well impacts to motorized and non-motorized traffic and to businesses in the area. Visitors to the park will be exposed to additional noise during construction and access to the park would be limited across Memorial Drive/I-70. Some parts of the project area will likely be closed to the public and will impact visitors use and experience of the park. Although it would be virtually impossible to totally avoid the kinds of short-term impacts typically associated with the construction phase of a highway project, generally these are among the most readily mitigated impacts.

Pollution control measures outlined in the Missouri Standard Specifications for Highway Construction (http://www.modot.mo.gov/business/standards_and_specs/BEGIN.pdf) will be used to minimize impacts associated with the construction of the Selected Alternative; these measures pertain to air, noise, and water pollution as well as traffic control and safety measures. Best management practices will be employed to minimize or mitigate potential impacts.

Traffic Control/Safety

One of a contractor's first tasks on a construction job is to set up traffic control; that is, the warning signs, channelizers, and barricades needed to keep traffic safely in the right place and out of the way of the contractor's operations. The project would require controlling Interstate 70 traffic as well as traffic on the local city streets in the downtown area. Some disruption is inevitable; however, minimizing it and planning ahead is key to a successful project.

Constructing the bridges over I-70 as well as the roadway work associated with it will have some impact on traffic in the immediate area as the contractor's personnel work around the project site. Vehicles bringing materials in and out will add to the existing traffic in the area. A Traffic Management Plan (TMP) will be developed during project design. A TMP lays out a set of coordinated traffic management stratagies to manage the work zone impacts. Proposed stratagies for managing traffic on this project include staging construction to impact traffic as little as possible, conducting active public information and outreach, scheduling high-impact work for hours during off peak traffic times, installing temporary traffic control devices, and possibly enlisting the help of law enforcement if necessary.

Prior to each week's scheduled work, MoDOT will send a news release out to local newspapers and radio stations giving local commuters information about construction activities that could impact their dailey travels. MoDOT also publishes construction-related news releases and information on its web site at www.modot.org for those who have internet access. Work zone impacts and issues would vary through the different stages of construction, making these timely announcements a valuable part of the TMP.

Air Quality

Construction equipment used in highway construction uses diesel engines that emit exhaust gases that vary depending on the condition of the equipment, thus making it important to keep equipment in good operating condition. Emissions from construction equipment will be controlled in accordance with emission standards prescribed under state and federal regulations.

Under dry conditions, traffic or strong winds can cause dust from the soil to become airborne, resulting in impacts to air quality. Contractors are required to control this dust to ensure that it does not leave the project limits, just as they make effors to control soil particles that stormwater carries away. Contractors will water the area during dry periods to keep the dust down.

Contractors will comply with all federal, state, and local laws and regulations. They will also work within the requirements of their operating permits issued through the Missouri Department of Natural Resources. Air quality during construction will be protected to generally accepted levels through project site monitoring and enforcement of these various requirements.

Noise

The most noticable noise generated during construction will occur during the construction of the pedestrian and Walnet Street bridges over I-70 and the installation of bridge pilings. The installation of the steel piles will require the use of a pile driver. Driving piles is much like ringing a bell, in that the sound travels long distances. For this reason, MoDOT will prohibit pile driving at night. In any case, pile-driving activity would be relatively short in duration, lasting days or weeks until the work is completed. Possible night time activities could include setting bridge girders over I-70 and pouring the concrete bridge decks.

Noise can also be expected from the operation of equipment such as bulldozers, trucks, and other large construction equipment. This type of noise tends to blend in with the normal sounds of a city such as St. Louis with significant truck traffic traveling through the area. To reduce the impacts of construction noise, MoDOT has special provisions in the construction contract requiring that all contractors comply with all applicable local, state, and federal laws and regulations relating to noise levels permissable within and adjacent to the project construction site.

Though it is not anticipated, the use of explosives may be used for the demolition of the bridges over I-70. These blasts would be expected to be limited in number and will be scheduled for daytime occurrence to avoid disrupting residential night time quiet.

Water Quality

During construction activities, the area in the immediate project vicinity will be reduced to bare earth. Because of this, the appropriate erosion and sediment control measures will need to be in place once construction begins to prevent and minimize pollutant and sediment loaded runoff from reaching surface waters and flood areas to ensure that water quality is maintained in the area.

The Missouri Department of Natural Resources (MDNR) regulates the control of runoff from land disturbances and issues a National Pollution Discharge Elimination System (NPDES) permit for the work to MoDOT. MoDOT's Pollution Prevention Plan ensures the design, implementation, management and maintenance of Best Management Practices (BMPs) in order to reduce the amount of sediment and other pollutants in storm water discharges associated with the land disturbance activities; comply with the Missouri Water Quality Standards, and ensure compliance with the terms and conditions of the general permit.

Commitments

The Selected Alternative has commitments that were identified in the Environmental Assessment (EA). The following is a list of MoDOT's proposed project commitments:

- Pedestrians will have an unrestricted/unimpeded means to travel from the downtown area to the park grounds.
- The proposed project will not cause the existing noise levels to rise. Minor increases in noise levels will occur during construction of the project.
- The project will utilize all applicable Best Management Practices (BMPs) to ensure protection to all waterways in the project vicinity.

- There will be no encroachment on to the JNEM park grounds outside of the existing transportation easement on park property.
- If any unknown hazardous waste sites are found during project construction, they will be handled in accordance with federal and state laws and regulations.
- Pollution control measures outlined in the Missouri Standard Specifications for Highway Construction will be used to minimize impacts associated with the construction of the Selected Alternative.
- A Traffic Management Plan (TMP) will be developed during project design to manage work zone impacts.
- Prior to each week's scheduled work, MoDOT will send a news release out to local newspapers and radio stations giving local commuters information about construction activities that could affect their daily travels.
- Emissions from construction equipment will be controlled in accordance with emission standards prescribed under state and federal regulations.
- Contractors will water the project area during dry periods to minimize dust.
- Contractors will comply with all federal, state, and local laws and regulations.
- Contractors will work within the requirements of their operating permits issued through the Missouri Department of Natural Resources. Air quality during construction will be protected to generally accepted levels through project site monitoring and enforcement of these various requirements.
- MoDOT will prohibit the driving of piles at night.
- The use of explosives may be used for the demolition of the bridges over I-70. These blasts will be expected to be limited in number and will be scheduled for daytime occurrence to avoid disrupting residential night time quiet.
- MoDOT will coordinate design and construction of the lid with the NPS to minimize the impacts to park resources and visitors.
- Archaeological testing will be conducted after pavement has been removed to determine if any eligible sites are in the project area.