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TO: Kevin Ward
Division Administrator
Federal Highway Administration

CC: James Gremaud, St. Louis District

FROM: Kyle Grayson *KG*
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SUBJECT: Design
Environmental Studies
St. Charles and St. Louis Counties, Route 64
Project No. J6P1436
Environmental Impact Statement Reevaluation and Amendment

A Final Environmental Impact Statement (FEIS) for the above mentioned project was approved by the Federal Highway Administration (FHWA) on August 27, 2004, with a Record of Decision (ROD) approved on November 5, 2004. Since that time, this project has been designated a design build project, which dictates that contractors work within the existing 2,000 foot corridor when developing their proposals. This approach also stipulates the removal of the 1930's westbound bridge due to its deterioration. The cost to rehabilitate the westbound bridge is prohibitive; the only alternatives are to close the bridge completely or rebuild it.

The above referenced FEIS encompasses a section of Route 64 in St. Louis and St. Charles Counties. The project area's termini begin at the east end near recent improvements, consisting of the addition of a westbound off-ramp and an eastbound on-ramp to and from Spirit Blvd, in Chesterfield Valley to the Weldon Springs at the western end as originally proposed. After screening for a wide variety of factors required by the National Environmental Policy Act (NEPA), the Preferred Alternate proposed a new bridge over the Missouri River, to be constructed upstream of the two existing bridges. This bridge would accommodate four lanes of eastbound traffic. The existing eastbound bridge, constructed in the 1980s, currently provides four lanes of eastbound traffic; under this proposal it would provide three lanes of westbound traffic. The existing westbound bridge, constructed in the 1930s, currently provides three lanes of traffic; under the previous FEIS proposal, it would provide one lane of westbound traffic and a bike lane from the Chesterfield Airport Road on-ramp.



Due to findings in recent bridge inspections, it has been determined that the 1930s bridge has deteriorated more rapidly than anticipated, and should no longer be considered as useable in any of the proposed build options. Because of this, the Preferred Alternative chosen in the FEIS is no longer valid. Two other options that were included in the FEIS involved the removal of the 1930's bridge; for this reason, those two alternatives, plus a newly developed modification of one of them, will be the only ones under consideration for this reevaluation. The two options in the 2004 FEIS now under consideration in this reevaluation and amendment are Alternatives A1 and B3.

Alternative A1, as described in the 2004 FEIS, proposed a new six lane bridge upstream of the existing eastbound bridge to accommodate four lanes of eastbound traffic and two lanes of westbound traffic. The existing eastbound bridge would carry two lanes of westbound traffic. Also included in this alternative was the removal of the existing 1930's westbound bridge.

Alternative B3, as described in the 2004 FEIS, proposed a new six lane bridge downstream of the existing westbound bridge, accommodating four lanes of westbound traffic and two lanes of eastbound traffic separated by a concrete median barrier. The existing eastbound bridge would accommodate two lanes of eastbound traffic. This alternative included the removal of the 1930s westbound bridge.

The proposed removal of the 1930s bridge from consideration has resulted in revising the A1 Alternative. As in the original A1 Alternative, the new bridge is to be constructed upstream of the two existing bridges to provide four lanes of eastbound traffic. The shared pedestrian/bike path has been added to the upstream side of the new eastbound bridge and will be separated by a concrete barrier. In addition, the 1980s bridge, which currently provides four lanes of eastbound traffic, will provide four lanes of westbound traffic instead. A design exception has been approved so that the structure can continue to accommodate four lanes. This alternative was chosen as the alternative that best serves the needs of the community with minimal impacts to the natural and social environment.

Since the 1930s bridge is eligible for the National Register of Historic Places (NRHP), removal of the bridge will be an adverse effect. Because of this, removing the bridge will require the completion of a Programmatic Section 4(f) document, the development of a Memorandum of Agreement, and Section 106 clearance from the State Historic Preservation Office. In addition to the bridge, there is another historic resource to consider: a previously recorded archaeological site located within the project area in St. Charles County. This site will be tested and evaluated to determine its significance and integrity. In 1979 this site was considered NRHP eligible. Archaeological surveys will also be necessary in the areas planned for right of way and temporary and permanent easements, including deep testing in the floodplain areas in St. Louis County to determine if any unrecorded archaeological sites are present.

Regarding hazardous waste issues, the sources reviewed by MoDOT's environmental section found no hazardous or solid waste sites within the project area. If the bridge work involves the removal of heavy metal based paint, the environmental section will ensure the contractor properly removes and disposes of the waste material. The removal of the 1930s bridge will require a ten day demolition notification to the Missouri Department of Natural Resources (DNR) as well as an asbestos inspection by a qualified inspector. If asbestos is found to be present in the structure, it will be properly removed and disposed of in accordance with federal and state laws and regulations.

The 2004 FEIS covered most issues involving Threatened and Endangered Species. Additional considerations will include the presence of migratory birds on the existing eastbound and westbound structures. Swallows frequently build mud nests on concrete structures (piers, pier caps, girders, and overhanging edges) on large river bridges. Currently, there are colonies of swallows nesting on both bridges. In Missouri, their general breeding season is considered to be between April 15 and July 15. Measures to avoid disturbing migratory birds during this time frame will be incorporated into demolition plans for the existing westbound bridge and any substructure cleaning, painting or repair on the existing eastbound bridge.

This project has been modeled for air quality conformity and is included on the East West Gateway Council of Governments Transportation Improvement Plan (TIP) for 2012-2015 and was considered a regionally significant project. It was determined that there will be no additional impacts to farmland, floodplains and FEMA buyout properties. With regards to wetlands, it does not appear that there will be a difference in impacts between the new alignment and the previous Preferred Alternative as described in the FEIS.

A public meeting was held for the project on May 11, 2010 at the nearby August Busch Conservation Area in St. Charles, Missouri. A total of 394 people attended the meeting; 82 in seat and 312 online. Based on comments received, potentially affected stakeholders in the area were very receptive to the proposed changes and supportive of the project in general. Some of the comments received were:

- Avoid closure of current bridges during construction of the new bridge
- A preference for a concrete girder over a steel girder bridge
- Replace the westbound bridge as soon as possible
- General support for the new proposed alternative
- Provide a connection to the Katy Trail from the proposed pedestrian/bike path

Included with this letter are project plans for the new proposed alternative and all comments received from participants attending the public meeting. We request your concurrence that the modification to Alternative A-Option 1 falls within the study area covered in the FEIS. A new Record of Decision will be prepared to document the findings associated with this proposed alternative for FHWA review and approval.

Attachments

This table shows the end of year maintenance costs for three truss bridges. These costs are just structural repairs needed to keep the bridge open.

Also, if bridge J1000 was kept open it would need to be painted, substructure repair, pier replacement bent 8, truss steel repair, and some minor deck repair. Our paint costs for Major Bridge Truss Structures have been increasing. The bridge was last painted in 1991, which was 20 years ago. Because of this length of time, it is doubtful that the bridge could be overcoated, so all the old paint would need to be removed, a new prime coat applied and a new finish coat applied. A safety span system would also need to be installed on the bridge before this paint removal and new prime coat and finish coat is applied. We estimate the cost for a major rehab to keep this bridge open for 15 years would be:

J1000 Bridge Rehab Cost for 15 year timeframe

Paint Bridge	
150 sq ft of Area per Ton	630000 sq ft area
Surface Preparation for Recoating (\$22 sq ft)	\$13,860,000
Field Application of Inorganic Zinc Primer (\$2)	\$1,260,000
System G (Intermediate Coat - \$2 per sq ft)	\$1,260,000
System G Final Coat - \$2 per sq ft)	\$1,260,000
Safety Span (included in sq foot cost above)	\$0
Total for Paint	\$17,640,000
Substructure Repair Pier 4	\$500,000
Replace Pier 8 (Pier is Leaning Cost From Location Study)	\$350,000
Remove Pier 8	\$100,000
Temporary Shoring for Pier 8 Replacement	\$500,000
Misc Repair of Steel	\$5,000,000
Deck Repair	\$100,000
Total	\$24,190,000