

## APPENDIX C

### Sections of Independent Utility Technical Memorandum

#### 1.0 Introduction

The objective of this technical memorandum is to establish Sections of Independent Utility (SIU) for the Missouri Department of Transportation's (MoDOT) First Tier Environmental Impact Statement (FTEIS) project that involves improving I-70 within the Kansas City, Missouri metropolitan area from the Missouri-Kansas state line to east of the I-470 interchange.

The next step for this project will be to perform the Second Tier studies identified in the FTEIS. The Second Tier studies will be necessary to further define the improvements of the Study Area and would address the site-specific details on project impacts, costs, and mitigation measures. The limits and scope of these Second Tier studies need to be defined to layout the planned program for the continued analysis of the I-70 improvements discussed and analyzed in the FTEIS.

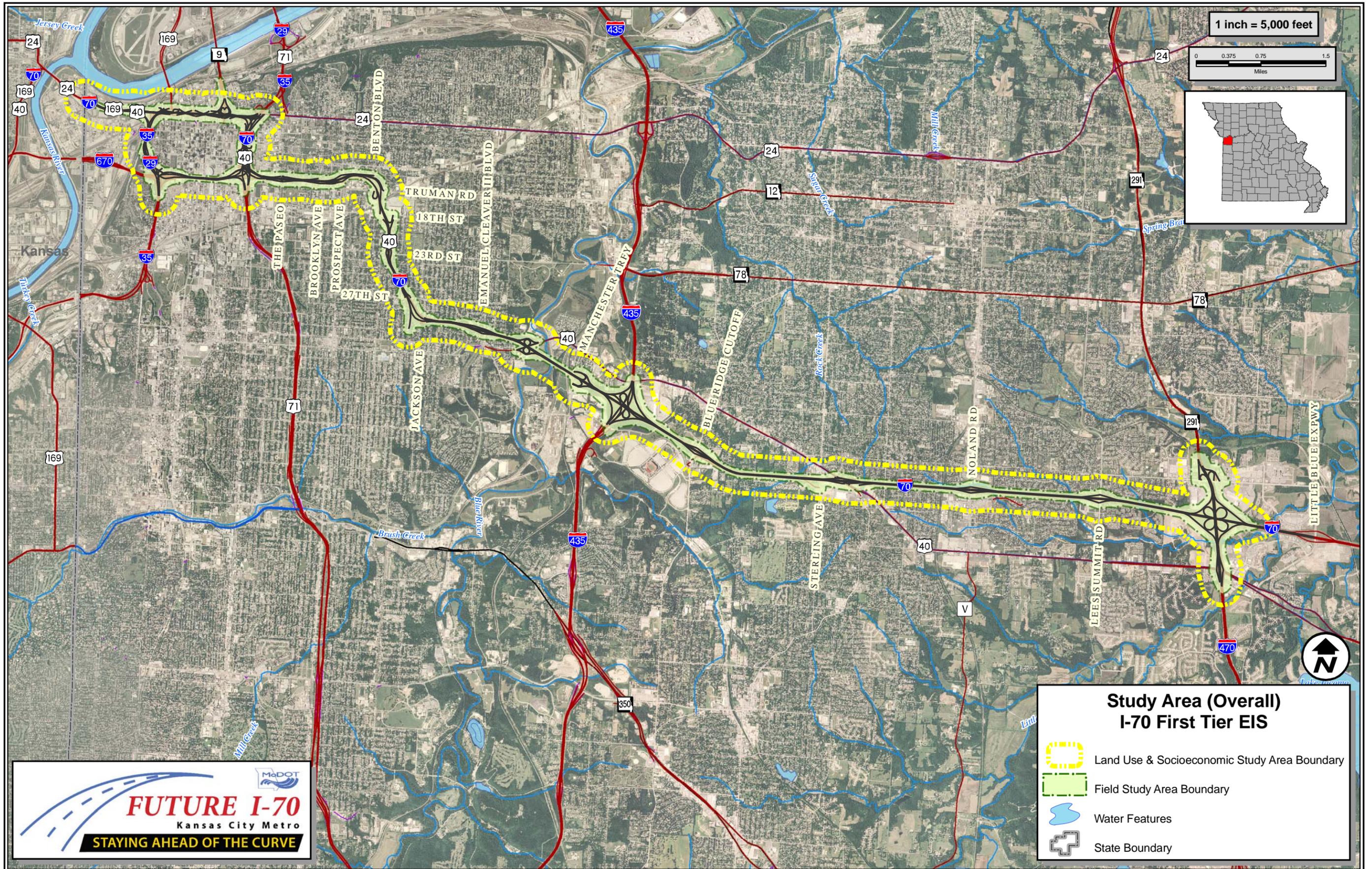
A practical approach to defining the limits and scope of the Second Tier studies is to undertake a series of projects which all fit into and are consistent with the overall purpose and need for the I-70 FTEIS. In order to begin the process of establishing the Second Tier studies' limits and scope, the Study Area needs to be broken into manageable sections for more detailed environmental studies. Each of these sections can be referred to as a Section of Independent Utility, or a SIU. Therefore, each section is independent and can function on its own without further construction on an adjoining road section. A SIU may be constructed and open to traffic for several years prior to the adjacent SIU being completed.

#### 2.0 Study Area

The I-70 FTEIS Study Area is located entirely in Jackson County. The Study Area includes I-70 from the last ramp termini east of the Missouri-Kansas state line to east of the I-470 interchange, including the entire Kansas City, Missouri Downtown Central Business District Freeway Loop. This portion of I-70 spans approximately 18 miles including the downtown loop. I-70 is a four- or six-lane divided and fully access-controlled interstate facility. The Study Area includes all land within 100 feet of the existing highway right-of-way along the corridor and within 300 feet of the existing highway right-of-way at interchanges along I-70.

An expanded Study Area consisting of 1,000 feet on either side of the highway including the downtown loop is being evaluated for land use and socioeconomic studies. The extended Study Area is needed for land use and socioeconomic evaluations to properly assess the potential impacts. The I-70 FTEIS Study Area is shown on **Figure 1**.

Figure 1 Study Area



### 3.0 Background

MoDOT, the Mid-America Regional Council (MARC), and the Kansas City Area Transportation Authority (KCATA) completed the I-70 Major Investment Study (MIS) in 2004. The Study Area spanned approximately 28 miles from Kansas City's Central Business District (CBD) on the west to the intersection of State Routes F/H in Oak Grove, Missouri on the east. The objective of the I-70 MIS was to identify a multi-modal investment strategy to address transportation needs in a manner consistent with regional policy goals. The I-70 MIS analyzed the transportation problems and looked at various potential options for addressing them including multiple roadway, transit, and pedestrian options. The study identified a recommended package of improvements that should move into a more detailed environmental analysis phase of study, which was the First Tier Environmental Impact Statement.

One of the recommendations of the MIS was to focus on the highway elements studied in the MIS when the project moved on to the next phase of the NEPA process. The MIS also indicated to focus on the portion of I-70 in the Kansas City metropolitan area from the Missouri-Kansas state line to the I-470 interchange in Jackson County as an individual NEPA document. MoDOT and FHWA completed a Draft First Tier EIS in March 2010 for this portion of I-70.

One of the primary objectives of the FTEIS was to establish why improvements are needed along I-70 in Jackson County. This was established by the Purpose and Need Statement summarized below:

- Improve Safety: Reduce crash rates and crash severity on I-70.
- Reduce Congestion: Remove key bottlenecks, improve freeway ramp operations, and improve multi-modal travel times in coordination with plans put forward by local and regional agencies.
- Restore and Maintain Existing Infrastructure: Improve bridge and pavement conditions on I-70.
- Improve Accessibility: Increase safe access across I-70 for non-motorized travel.
- Improve Goods Movement: Improve the efficiency of freight movement on I-70.

In addition, the I-70 FTEIS accomplished the following objectives:

- Examine the transportation issues that should be addressed along I-70 and in the Downtown Loop in Jackson County.
- Focus on broad issues, such as choice in transportation (automobile, transit, bike and pedestrian).
- Evaluate the initial improvement concepts developed during the I-70 Major Investment Study (MIS).
- Build from other studies that have been or are being completed in the project area.
- Explore the environmental and land use implications associated with the concepts.
- Narrow the list of concepts and create more specific improvement strategies.

- Develop a set of criteria to evaluate the strategies.
- Recommend a single preferred strategy.

The Draft FTEIS did recommend an Identified Preferred Strategy for improving the Kansas City metropolitan Area. In general, an Identified Preferred Strategy is a high level transportation improvement opportunity proposed to address the transportation issues along I-70. Strategies include a series of specific transportation improvements such as adding lanes, fixing existing pavement and bridges, improving interchange ramps, and/or transit projects. The Identified Preferred Strategy is not the Final Preferred Strategy. Resource agency and public comments on the Draft FTEIS may result in changes to the Identified Preferred Strategy. The Preferred Strategy will be approved when the I-70 FTEIS Record of Decision is signed by Federal Highway and MoDOT.

For the I-70 First Tier Condensed Final EIS, the Preferred Strategy is the Improve Key Bottlenecks Strategy in the downtown loop to east of I-435 (**Figure 2**). From east of I-435 to I-470, the Preferred Strategy is to carry either the Improve Key Bottlenecks Strategy (**Figure 2a**) or the Add General Lanes Strategy (**Figure 2b**) into the Second Tier studies.

## 4.0 Sections of Independent Utility

One of the key objectives of the FTEIS is to identify and prioritize sections of independent utility (SIU) in the I-70 corridor that will be studied in detail in the Second Tier studies. When establishing SIUs, per Federal Highway Administration (FHWA) guidance, a SIU must meet the following evaluation criteria to ensure that piecemealing and inappropriate segmentation do not occur:

1. Connects logical termini and be of sufficient length to address environmental matters on a broad scope.
2. Has independent utility or independent significance. Must be usable and be a reasonable expenditure even if no additional transportation improvements are made in the Study Area.
3. Does not restrict consideration of alternatives for other reasonably foreseeable transportation improvements.
4. Avoids creating further improvements with unforeseen impacts. A proposed improvement may cause a related improvement beyond the proposed termini.

Figure 2 Preferred Strategy

