



# 5. Consultation and Coordination

Jefferson National Expansion Memorial  
Environmental Assessment for Implementing CityArchRiver Initiative Elements



# Consultation and Coordination

The intent of NEPA is to encourage the participation of federal and state-involved agencies and affected citizens in the assessment process, as appropriate. Throughout the development of this EA, substantial coordination efforts have been undertaken to provide and solicit information from federal, state, and local officials, as well as the general public. This chapter provides a summary of the outreach and consultation activities associated with the proposed project, as well as a list of preparers and a list of the recipients receiving notification of the document's publication.

## COOPERATING AGENCIES

FHWA and MoDOT manage the highway infrastructure around the park and are completing a concurrent environmental assessment on the construction of the proposed structure over the depressed lanes of I-70 and other transportation infrastructure changes adjacent to the park. NPS and FHWA/MoDOT are simultaneously preparing NEPA documents which address CityArchRiver 2015 Initiative project components, and because of jurisdiction and/or special expertise, each agency requested the participation of the other as a cooperator. On October 7, 2011, NPS, FHWA and MoDOT signed a Memorandum of Understanding (MOU) formalizing that cooperation. Per this agreement, the NPS, FHWA, and MoDOT are coordinating to ensure that alternatives are fully explored, and impacts of the proposed projects are accurately assessed.

## HISTORY OF PUBLIC INVOLVEMENT

Coordination, consultation, and public involvement in this overall planning process began with the initiation of the GMP in 2008. The GMP public involvement process is detailed in Chapter 5 of the GMP on pages 5-1 to 5-7 and involved the publication of newsletters and press releases, public meetings and open houses, information posted to the park's planning website, public comment periods for the draft and final GMP, and agency consultation.

With the initiation of the CityArchRiver 2015 design competition, as recommended by the GMP, further public involvement occurred both during the design competition and after the winner was announced. In September 2010 the jury identified Michael Van Valkenburgh Associates (MVVA) as the winner of the design competition. After being chosen to move forward with their design, the design team coordinated with the National Park Service, the City of St. Louis and others, and this coordination is ongoing. The design team provided information to the public about the design's progress at public presentations in January 2011 and January 2012. MoDOT held a public meeting on the alternatives considered in the FHWA/MoDOT EA in April 2012, and on the FHWA/MoDOT EA in August 2012.

The public involvement activities described below for this plan/EA fulfill the requirements of NEPA and the NPS Director's Order 12 (NPS 2011a).

## THE SCOPING PROCESS

The NPS divides the scoping process into two parts: internal scoping and external or public scoping. Internal scoping involves discussions among NPS personnel regarding the purpose of and need for actions, issues, alternatives, mitigation measures, the analysis boundary, appropriate level of documentation, available references and guidance, and other related topics.

Public scoping is the early involvement of the interested and affected public in the environmental assessment process. The public scoping process helps ensure that people have an early opportunity to comment and contribute early in the decision-making process. Taken together, internal and public scoping are essential elements of the NEPA planning process. The following sections describe the various ways scoping was conducted for this EA.

### INTERNAL SCOPING

Internal scoping meetings were held at the park grounds maintenance building training facility on May 18, 2011. The meeting was held with the NPS Interdisciplinary Planning Team convened for this plan, as well as other park staff, design team members, CityArchRiver 2015 Initiative representatives, and MoDOT representatives. These personnel attended the meeting to define the purpose, need, and objectives of the plan, identify potential issues, discuss preliminary alternatives, define data needs, and discuss the project schedule and overall coordination. The results of the meetings were captured in a report now on file as part of the administrative record.

### PUBLIC SCOPING

A public scoping newsletter was published on July 22, 2011 for review and comment, and initiated an early opportunity to submit comments on the scope of the project. The scoping newsletter summarized the purpose, need, and objectives for this plan/EA, described the scope of the EA, and listed the proposed impact topics for the EA analysis.

The scoping newsletter and questions to initiate public comment were posted on the NPS Planning, Environment, and Public Comment (PEPC) website. Additionally, a postcard announcing the availability of the newsletter on PEPC was mailed to the project's preliminary mailing list of government agencies, tribes, organizations, businesses, and individuals. The scoping newsletter was also emailed to those on the mailing list with an email address. Hard copies of the newsletter were available at the park. NPS published a Notice of Intent to prepare this EA in the Federal Register on July 26, 2011.

Through August 30, 2011, the public was invited to submit comments on the scope of the planning process; the statements of purpose, need and objectives; alternatives; and potential impacts of the proposed project. The NPS accepted comments via the NPS PEPC website at [www.parkplanning.nps.gov/jeff](http://www.parkplanning.nps.gov/jeff), by mail, and by hand delivery to the park. During the scoping period 123 pieces of correspondence were entered into the PEPC system either via direct entry by the commenter, or by uploading emails and hard-copy letters that had been sent to the NPS.

**A correspondence is the entire document received from a commenter. It can be in the form of a letter, email, written comment form, note card, open house transcript, or petition.**

### PUBLIC SCOPING COMMENT ANALYSIS PROCESS

Comment analysis is a process used to compile and correlate similar public comments into a format that can be used by decision makers and the Jefferson National Expansion Memorial EA team. Comment analysis assists the team in organizing, clarifying, and addressing technical information pursuant to NEPA regulations. It also aids in identifying the topics and issues to be evaluated and considered throughout the planning process and the development of the EA.

The process includes five main components:

- Developing a coding structure;
- Employing a comment database for comment management;
- Reading and coding the public comments;
- Interpreting and analyzing the comments to identify issues and themes; and
- Preparing a comment summary.

A coding structure was developed to help sort comments into logical groups by topics and issues. It was developed using planning issues identified during internal NPS scoping, past planning documents such as the park's 2009 General Management Plan and the CityArchRiver 2015 design competition goals, and from the comments themselves. The coding structure was designed to capture all comment content rather than to restrict or exclude any ideas.

The NPS PEPC database was used for management of the comments. The database stores the full text of all correspondence and allows each comment to be coded by topic and issue. Analysis of the public comments involved the assignment of codes to statements made by the public in their PEPC entries, letters, and email messages. All comments were read and analyzed, including those of a technical nature; opinions, feelings, and preferences of one element or one potential alternative over another; and comments of a personal or philosophical nature. All comments were considered, whether they were presented by several people saying the same thing or by a single person expressing a unique viewpoint.

A Comment Analysis Report was then prepared that summarized concern statements as well as the full text of all comments corresponding to the appropriate concern statement. All scoping comments were considered to be important as useful guidance and public input to the public scoping process.

With regard to development of the plan/EA, comments in favor of or against the proposed action or alternatives, those that only agree or disagree with NPS policy, and those that offer opinions or provide information not directly related to the issues or impact analysis, such as for projects outside the scope of this EA, were considered non-substantive comments.

**A comment is a portion of the text within a correspondence that addresses a single subject. It could include such information as an expression of support or opposition to the use of a potential management tool, additional data regarding the existing condition, or an opinion debating the adequacy of an analysis.**

## PUBLIC SCOPING COMMENTS

After reviewing and categorizing all of the comments within each correspondence received during public scoping, 329 comments were identified and coded appropriately. The coded comments were released to the public on PEPC. Of these, 77 comments were considered substantive. The topic addressed by the majority of the comments was transportation infrastructure surrounding the park and in particular, the removal of the depressed lanes of I-70. Transportation infrastructure is being considered under a separate but concurrent EA being prepared by the Missouri Department of Transportation, and is outside NPS jurisdiction and the scope of this EA. Therefore, the comments were considered non-substantive for the NPS EA. The comments received by NPS pertaining to transportation infrastructure were provided to MoDOT to inform their EA process. Within the scope of this EA, topics that received comments considered substantive included: requests for a specific visitor experience and/or a particular visitor amenity or opportunity at the park; ideas or suggestions for new alternatives; and the need for greater connectivity in the vicinity of the park.

## AGENCY SCOPING AND CONSULTATION

The NPS has coordinated and consulted with local, state, and federal agencies and tribal governments during the NEPA process to identify issues and/or concerns related to proposed projects at the park and along the Central Riverfront. During scoping, these entities received a postcard and/or newsletter described under ‘Public Scoping’. In addition, certain agencies have specific consultation requirements that must also be met. These consultations are described in more detail below. Consultation is ongoing throughout the NEPA process and in some cases will continue after its conclusion.

### Section 106 and National Historic Preservation Act (Public Law 89-665; 16 U.S.C. 470 et seq.)

By passage of the NHPA in 1966, Congress established a comprehensive program to preserve the historical and cultural foundations of the nation as a living part of community life. Section 106 of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties either listed in or eligible to be listed in the National Register of Historic Places. The National Register includes districts, sites, buildings, structures, and objects important for their significance in American history, architecture, archeology, engineering, and culture. Historic properties listed in the National Register can be significant to a local community, a state, an American Indian tribe, or the nation as a whole.

The historic preservation review process required by Section 106 is outlined in regulations (36 CFR Part 800, Protecting Historic Properties) issued by Advisory Council on Historic Preservation (ACHP), an independent federal agency established by the NHPA in 1966 to promote the preservation, enhancement, and productive use of our nation’s historic resources. The goal of the Section 106 review process is to seek ways to avoid, minimize, or mitigate any adverse effects to historic properties. Section 106 review ensures that preservation values are factored into federal agency planning and decision making, that federal agencies assume

responsibility for the consequences of their actions on historic properties and are publicly accountable for their decisions.

Federal agencies are responsible for initiating Section 106 review, much of which takes place between the agency, the ACHP, and state and/or tribal officials. The state historic preservation officer administers the national historic preservation program at the state level, coordinates the state’s historic preservation program, and consults with federal agencies during Section 106 review. Federal agencies also consult with officials of federally recognized American Indian tribes when tribal lands or historic properties of significance to such tribes are involved, as well as representatives of state and local governments, agencies and organizations, and the general public.

The NPS has identified historic properties listed in or eligible for listing in the National Register of Historic Places within the broadly defined area of potential effects of the revitalization of the Jefferson National Expansion Memorial. However, due to the relative uncertainty of the nature of potential projects or actions on park lands, the NPS and its consulting parties cannot yet fully assess the potential effects of these projects or actions on historic properties. Therefore, the NPS and its consulting parties entered into a programmatic agreement (PA), in accordance with 36 CFR 800.14(b), which records the terms and conditions agreed upon for review of site specific design as it becomes available. The NPS commits to complete Section 106 review for each project or action that may stem from the revitalization of the Jefferson National Expansion Memorial in accordance with the terms and conditions of this PA, which is included in Appendix D of this environmental assessment.

Great Rivers Greenway has pursued Section 106 compliance for the Central Riverfront improvements separately from the process for projects covered by the PA. Consultation and coordination between GRG and NPS are ongoing for this process, and documentation of the results will be included in the NEPA decision document.

### U.S. Fish and Wildlife Service

Pursuant to the Endangered Species Act, the NPS initiated informal consultation with the U.S. Fish and Wildlife Service by sending a memorandum to the Columbia Ecological Services Field Office and Marion Illinois Sub-Office on July 21, 2011 (see Appendix B). This memorandum documented the NPS determination that the project elements under consideration at that time were not likely to have an adverse effect on listed species, their habitats, or proposed or designated critical habitat.

Because of the addition of the Central Riverfront project and the time that has passed since the first letter was sent to USFWS, the NPS sent a follow-up letter to the Columbia Ecological Services Field Office and the Marion Sub Office, on August 28, 2012 (see Appendix B). Despite this addition, the NPS still determined that the project would have no effect on listed species, their habitats, or critical habitat, and is awaiting concurrence from the U.S. Fish and Wildlife Service.

### U.S. Army Corps of Engineers

Portions of the Central Riverfront project would be constructed below the ordinary high water mark of the Mississippi River. In addition, this project would require adjustments to the floodwall closure systems and floodgates in the vicinity of the park. As a result, consultations have been conducted with the U.S. Army Corps of Engineers—St. Louis District Regulatory Group regarding permits required pursuant to Section 404 of the Clean Water Act; and with the U.S. Army Corps of Engineers—St. Louis District Readiness Group regarding regulatory review of the floodwall changes.

### Tribal Consultations

The appropriate level of Tribal government has been consulted during development of this EA. Representatives from the Osage Nation and the Peoria Tribe of Indians of Oklahoma were consulted during scoping. A response was received from the Osage Nation

requesting a copy of the EA and from the Peoria Tribe of Oklahoma requesting to be added to all relevant mailing lists for the park and expressing an interest in consulting on the project (see Appendix C for a copy of these responses). In addition, numerous other tribes have been consulted as part of the Section 106 process described previously. These tribes (see “List of Recipients of the Plan/Environmental Assessment” on page 172) have all been notified of the availability of the EA.

### Metropolitan St. Louis Sewer District

The NPS and design team have met with the Metropolitan St. Louis Sewer District (MSD) to discuss the CityArchRiver 2015 Initiative and the planning and permitting necessary for implementing elements on park property. Issues addressed have included applicability of federal versus local guidelines, review process for connections to existing outfall systems, best management practices, and opportunities to use cost-effective, sustainable, and environmentally friendly infrastructure. The NPS and design team anticipate future coordination with MSD as the project moves into schematic design.

## **LIST OF RECIPIENTS OF THE PLAN/ENVIRONMENTAL ASSESSMENT**

Notification of the availability of this EA will be sent to the following agencies, tribes, organizations, and businesses, as well as other entities and individuals who requested a copy, are on the park's mailing list, or participated during the public scoping process.

### **FEDERAL DEPARTMENTS AND AGENCIES**

Advisory Council of Historic Preservation  
Federal Executive Board of St. Louis  
Federal Highway Administration  
Library of Congress  
National Trust for Historic Preservation  
U.S. Army Corps of Engineers  
U.S. Coast Guard  
U.S. Environmental Protection Agency  
U.S. Department of Interior  
    Fish and Wildlife Service  
    National Park Service  
    Denver Service Center  
    Harpers Ferry Center  
    Midwest Archeological Center  
    Midwest Regional Office  
    Ulysses S. Grant National Historic Site  
U.S. Department of Justice, US. Attorney's Office

### **STATE AGENCIES**

Bi-State Development Agency  
Illinois Department of Transportation  
Illinois Division of State Parks  
Illinois Historic Preservation Agency  
Missouri Department of Natural Resources  
Missouri Department of Transportation  
Missouri Division of Tourism  
Missouri State Archives  
Missouri State Emergency Management Agency  
Missouri State Historic Preservation Office

## **COUNTY AND LOCAL GOVERNMENTS**

City of East St. Louis-Mayor  
City of St. Louis Board of Aldermen  
City of St. Louis Fire Department  
City of St. Louis Office of the Mayor  
City of St. Louis Office of Special Events  
City of St. Louis Parks and Recreation  
City of St. Louis Planning and Urban Design Agency  
City of St. Louis Police Department  
City of St. Louis Port Authority  
City of St. Louis Street Department  
East West Gateway Council of Governments  
Great Rivers Greenway District  
Madison County Board  
Madison County Transit  
Metro East Parks and Recreation District  
Metropolitan St. Louis Sewer District  
St. Louis County Office of the Executive  
St. Louis County Parks and Recreation

## **NATIVE AMERICAN TRIBES**

Absentee-Shawnee Tribe of Indians of Oklahoma  
Delaware Tribe of Indians of Oklahoma  
Eastern Shawnee Tribe of Oklahoma  
Iowa Tribe of Kansas and Nebraska  
Iowa Tribe of Oklahoma  
Kaw Nation  
Kickapoo Tribe in Kansas  
Miami Tribe of Oklahoma  
Muscogee (Creek) Nation of Oklahoma  
Osage Nation  
Peoria Tribe of Oklahoma  
Ponca Tribe of Nebraska  
Quapaw Tribe of Oklahoma  
Sac and Fox Tribe of the Mississippi in Iowa  
Sac and Fox Tribe of the Missouri in Kansas and Nebraska

## **OTHER ORGANIZATIONS**

CityArchRiver 2015 Foundation  
Landmarks Association of St. Louis  
Missouri Preservation



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York, Jill

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## GLOSSARY

**Accessibility** — the design, construction and/or alteration of a building or facility that is in compliance with officially sanctioned design standards, and that can be entered, and used by individuals with a disability. The concept is used to ensure that programs, activities and opportunities provided to visitors and/or employees will be provided in such a way that individuals with disabilities are not excluded from, nor denied the benefits of, that program or activity. See also “universally accessible.”

**Action Alternative** — An alternative that proposes a different management action or actions to address the purpose, need, and objectives of the plan; one that proposes changes to the current management. Alternatives 2 and 3 are the action alternatives in this planning process. See also: “No-Action Alternative.”

**Affected Environment** — The existing environment which may be affected by the alternatives considered.

**Character-defining feature** — A prominent or distinctive aspect, quality, or characteristic of a historic property that contributes significantly to its physical character. Structures, objects, vegetation, spatial relationships, views, furnishings, decorative details, and materials may be such features.

**Code** — A grouping used to sort public comments by similar topics or issues.

**Comment** — A comment is a portion of the text within a correspondence that addresses a single subject. It could include such information as an expression of support or opposition to the use of a potential management tool, additional data regarding the existing condition, or an opinion debating the adequacy of an analysis.

**Concern** — Concerns are statements that summarize the issues identified by each code. Each code was further characterized by concern statements to provide a better focus on the content of comments. Some codes required multiple concern statements, while others did not.

**Correspondence** — A correspondence is the entire document received from a commenter. It can be in the form of a letter, email, written comment form, note card, open house transcript, or petition.

**Council on Environmental Quality (CEQ)** — Established by Congress within the Executive Office of the President with passage of the National Environmental Policy Act of 1969. CEQ coordinates federal environmental efforts and works closely with agencies and other White House offices in the development of environmental policies and initiatives.

**Cultural Landscape** — A geographic area (including both cultural and natural resources and the wildlife or domestic animals therein) associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values.

**Cultural Landscape Report** — A report that serves as the primary guide to treatment and use of a cultural landscape, and that prescribes the treatment and management of the physical attributes and biotic systems of a landscape, and use when use contributes to historical significance.

**Cultural Resources** — Prehistoric and historic districts, sites, buildings, objects, or any other physical evidence of human activity considered important to a culture, subculture, or community for scientific, traditional, religious, or other reason.

**Cumulative Impacts** — Those impacts on the environment that result from the incremental effect of the action when added to the past, present, and reasonable foreseeable future actions regardless of what agency (federal or nonfederal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time and can be adverse or beneficial (40 CFR 1508.7).

**Environmental Assessment (EA)** — An environmental analysis prepared pursuant to the National Environmental Policy Act that discusses the purposes and need for an action, and provides sufficient evidence and analysis of impacts to determine whether to prepare an



environmental impact statement or finding of no significant impact.

**Environmental Consequences** —

Environmental effects of project alternatives, including the proposed action, any adverse environmental effects which cannot be avoided, the relationship between short-term uses of the human environment, and any irreversible or irretrievable commitments of resources which would be involved if the proposal should be implemented (40 CFR 1502.16).

**Environmental Impact Statement (EIS)**

— A detailed written statement required by Section 102(2)(C) of NEPA, analyzing the environmental impacts of a proposed action, adverse effects of the project that cannot be avoided, alternative courses of action, short-term uses of the environment versus the maintenance and enhancement of long-term productivity, and any irreversible and irretrievable commitment of resources (40 CFR 1508.11).

**Executive Order** — Official proclamation issued by the President that may set forth policy or direction or establish specific duties in connection with the execution of federal laws and programs.

**Finding of No New Significant Impact**--A finding of no significant impact other than those already disclosed and analyzed in the environmental impact statement to which an environmental assessment is tiered (43 CFR 46.140(c); see also definition of tiering).

**Finding of No Significant Impact (FONSI)**

— A document prepared by a federal agency showing why a proposed action would not have a significant impact on the environment and thus would not require preparation of an Environmental Impact Statement. A FONSI is based on the results of an Environmental Assessment.

**Floodplain** — The flat or nearly flat land along a river or stream or in a tidal area that is covered by water during a flood.

**General Management Plan** - A plan developed to guide park management, usually for 15 to 20 years. The purpose of the plan is to ensure that each park has a clearly defined direction for decision making with regard to resource preservation and visitor use. It is developed in consultation with servicewide program managers, interested parties, and the general public, and is subject to NEPA.

**Human Environment** — The natural and physical environment and the relationship of people with that environment (40 CFR 1508.14)

**Mitigation** — Modification of a proposal to lessen the intensity of its impact on a particular resource.

**National Historic Landmark** — A district, site, building, structure, or object of national historical significance, designated by the Secretary of the Interior under authority of the Historic Sites Act of 1935 and entered in the National Register of Historic Places.

**National Register of Historic Places**

(**National Register**) — A register of districts, sites, buildings, structures, and objects important in American history, architecture, archaeology, and culture, maintained by the Secretary of the Interior under authority of Section 2(b) of the Historic Sites Act of 1935 and Section 101(a)(1) of the National Historic Preservation Act of 1966, as amended.

**No-Action Alternative** — The alternative in which baseline conditions and trends are projected into the future without any substantive changes in management (40 CFR 1502.14(d)). Alternative 1 is the no-action alternative in this planning process.

**Record of Decision** — The document which is prepared to substantiate a decision based on an analysis (e. g., an EIS). When applicable, it includes a detailed discussion of rationale and reasons for not adopting all mitigation measures analyzed.

**Scoping** — An early and open process for determining the extent and variety of issues to be addressed and for identifying the significant issues related to a proposed action (40 CFR 1501.7).

**Section 106 Compliance** — Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to take into account the effects of their proposed undertakings on properties included or eligible for inclusion in the National Register of Historic Places and give the Advisory Council on Historic Preservation a reasonable opportunity to comment on the proposed undertakings. The Section 106 review process seeks ways to avoid, minimize, or mitigate any adverse effects to historic properties.

**Soil amendment** — Material added to a soil to improve its physical properties, such as water retention, permeability, water infiltration, drainage, aeration and structure.

**Statement of Findings** — Separately identifiable document attached to NPS NEPA decision documents that explains why an action would adversely impact wetlands or floodplains, what alternatives were considered to avoid these impacts and why they are not suitable, mitigation measures to minimize adverse impacts, and what the effects on floodplain and/or wetland values would be. Preparation, review, and public disclosure of statements of findings are key elements of the NPS process for implementing Executive Order 11990, Protection of Wetlands, and Executive Order 11998, Floodplain Management.

**Stormwater** — Stormwater runoff is generated when precipitation from rain and snowmelt events flows over land or impervious surfaces and does not percolate into the ground. As the runoff flows over the land or impervious surfaces (paved streets, parking lots, and building rooftops), it accumulates debris, chemicals, sediment or other pollutants that could adversely affect water quality if the runoff is discharged untreated.

**Swale** — In the context of stormwater management, the term swale (a.k.a. grassed channel, dry swale, wet swale, biofilter, or bioswale) refers to a vegetated, open-channel management practices designed specifically to treat and attenuate stormwater runoff for a specified water quality volume. As stormwater runoff flows along these channels, it is treated through vegetation slowing the water to allow

sedimentation, filtering through a subsoil matrix, and/or infiltration into the underlying soils

**Tiering** - Refers to covering general matters in broader environmental impact statements (e.g., the GMP for Jefferson National Expansion Memorial) with subsequent narrower statements or environmental analyses (e.g., this EA) focused on specific issues; tiering to the programmatic or broader-scope environmental impact statement allows the preparation of an environmental assessment and a finding of no (or no new) significant impact for a proposed action, so long as any previously unanalyzed effects are not significant (40 CFR 1508.28; 43 CFR 46.140)

**Universally Accessible** - The design of products, communications, and environments to be simple and usable by people of all ages, size, and abilities (including disabilities), without the need for special adaptations or specialized design.

## ACRONYMS

ACHP: Advisory Council on Historic Preservation

ADA: Americans With Disabilities Act

ABAAS: Architectural Barriers Act Accessibility Standard

APE: Area of Potential Effects

BLS: Bureau of Labor Statistics

BMP: Best Management Practice

CEQ: Council on Environmental Quality

CFR: Code of Federal Regulations

CLR: Cultural Landscape Report

CVC: St. Louis Convention & Visitors Commission

dB: Decibel

DO: Director's Order

EA: Environmental Assessment

EAB EA: Emerald Ash Borer Environmental Assessment

EIS: Environmental Impact Statement

EO: Executive Order

EPA: Environmental Protection Agency

FEMA: Federal Emergency Management Agency

FHWA: Federal Highway Administration

FIRM: Flood Insurance Rate Map

FTE: Full-time equivalent staff position

GMP: General Management Plan

GRG: Great Rivers Greenway District

HVAC: Heating, ventilation, and air conditioning system

IDOT: Illinois Department of Transportation

IMP: Integrated Pest Management

JNPA: Jefferson National Parks Association

MDNR: Missouri Department of Natural Resources

MoDOT: Missouri Department of Transportation

MOU: Memorandum of Understanding

MSA: Metropolitan Statistical Area

MSD: Metropolitan Sewer District

MVVA: Michael Van Valkenburgh Associates

MX: Mercantile Exchange

NEPA: National Environmental Policy Act

NFIP: National Flood Insurance Program

NHL: National Historic Landmark

NHPA: National Historic Preservation Act

NPS: National Park Service

NWI: National Wetlands Inventory

PA: Programmatic Agreement

PEPC: Planning, Environment and Public Comment

RCP: Reinforced concrete pipe

ROD: Record of Decision

RV: Recreational Vehicle

SHPO: State Historic Preservation Officer

SLDC: Saint Louis Development Corporation

SOF: Statement of Findings

TAG: Technical Advisory Group

TDD: Telecommunications Device for the Deaf

TMDL: Total Maximum Daily Load

TRRA: Terminal Railroad Association

USACE: United States Army Corps of Engineers

USC: United States Code

USFWS: United States Fish and Wildlife Service

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