



May 30, 2013

St. Louis County Department of Highways and Traffic  
Attention: John Hicks, South County Connector  
121 S. Meramec Avenue  
Clayton, Missouri 63105

RE: Environmental Impact Statement – Proposed South County Connector

To Whom it May Concern:

▼  
It is the opinion of the City of Maplewood that the Draft Environmental Impact Statement (EIS) for the South County Connector project is fundamentally flawed and the cost projections are woefully underestimated. Therefore, the City of Maplewood opposes the project in its current form and requests that the Draft EIS be rejected. At the very least, the Draft EIS should be revised to ensure it meets all requirements and provides accurate estimated costs.

Below are specific elements of the Draft EIS that City of Maplewood has determined to be flawed. These were determined with assistance by attorneys and engineering consultants.

**1. The Draft EIS completely ignores vital issues regarding the Union Pacific Railroad at Hanley Road.**

The area surrounding the Union Pacific Railroad Bridge is a key driving element in the design and feasibility of the entire project, but is lacking sufficient detail. Without more specific details of the project alignment and how the transition under, or over, the Union Pacific bridge will occur, the current evaluation of the project is meaningless. Depending on the work required, this connection could nearly double the estimated cost of the project but it appears as though it was glossed over.

Maplewood contacted numerous representatives from Union Pacific and could only determine that a single phone call approximately six months ago was made to Dave McKernan – the Local Manager of Industry and Public Projects. Mr. McKernan indicated that he had a brief phone conversation with St. Louis County and he informed St. Louis County at that time that Union Pacific has specific requirements that would have to be met and that it would be extremely difficult to add lanes under the bridge. Mr. McKernan added that St. Louis County did not ask for nor received the required specifications and no plans have been submitted for even a cursory review by Union Pacific.

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An additional contact at Union Pacific, Mr. Adam Studts, Senior Manager of Structures Design, stated that he was unaware of the South County Connector project, or any proposed work in the area. After reviewing the bridge alignment and project area, including a street view through Google Earth, Mr. Studts stated that it was “highly unlikely” that adding lanes under the existing spans would be possible and that a new bridge would probably have to be built to Union Pacific specifications.

The City of Maplewood measured the horizontal clearance between the pier cap and abutment of the bridge and there is only 26 feet between them when measured perpendicularly. This amount of room seems obviously too little to accommodate the necessary roadway width, shoulder areas, sidewalk/bike facilities, safety barriers, retaining walls and other necessary setbacks from the existing bridge’s supporting structure all with a proposed alignment that will be skewed to the bridge that will likely reduce even that minimal clearance. Furthermore, creating split lanes in this project will create a condition that is inherently unsafe, when compared with properly aligned and configured lanes, and is directly contrary to one of the stated purposes of this project which is “improved safety”.

It is also noted in the Draft EIS that the existing bridge provides less than standard vertical clearance and that with the skewing of the new roadway it will have to be lowered under the bridge in order to maintain this unsatisfactory vertical clearance. The drainage structure under the bridge is tied directly to Deer Creek and constitutes the low point of the roadway. As a result, the lowering of the new road profile and the proposed elevation of the South County Connector elsewhere through the Deer Creek floodplain will actually increase the flooding frequency of the road. What is the rationale used to justify the spending of tens of millions of dollars on a new road that will flood more often?

Considering that splitting the outside lanes around the existing railroad structure is “highly unlikely” and any work around this bridge would be extremely costly, a responsible planning agency must consider and explore alternatives more thoroughly and proactively, as well as including the associated cost estimates and environmental impacts of these alternatives in the Draft EIS. Moreover, in order to submit a meaningful cost estimate for this critical stage of the project, one would have to be aware of the Union Pacific building requirements, which St. Louis County is not.

St. Louis County merely acknowledges two alternatives to splitting the lanes, and again, provides few details:

- a) Constructing a South County Connector bridge over the Union Pacific Railroad
- b) Relocating and rebuilding the Union Pacific Bridge entirely

The City of Maplewood believes that a total project cost of \$110 million is a grossly underestimated amount if any of these alternatives are actually carried out. Moreover, even if the

split outside lane alternative is pursued, the City of Maplewood would like to see more details for how the County arrived at an estimate of \$560,000 for utility relocation for the project section where the relocation of a 54" sanitary sewer is necessary without having any build specifications.

## **2. Business Relocation Impacts are understated and out-of-date**

Current "access" points, as planned and foot-printed on page S-9, to the Deer Creek Center on the southwestern edge literally end at the front door of the Deer Creek Center's tenants. Including drive lanes for the parking lot that would have to be included in addition to the project's current footprint, the City of Maplewood estimates that no fewer than four businesses would have to be eliminated to accommodate the access points. Due to the nature of the lease agreements signed with the rest of the tenants at the Deer Creek Center, this option would void all remaining leases which would kill the center.

The result would be the loss of 20 existing businesses in the Deer Creek Center alone and based on the commercial displacements listed on page S-11, it is clear that these impacts were either not considered at all or considered, but completely ignored. Note the aforementioned figure of 20 businesses lost as a result of the project do not include the potential loss of an addition 14 to 16 businesses that would be lost should the proposed South County Connector run through Big Bend Industrial Court. To not include these businesses in the Draft EIS is irresponsible and totally misleading.

What is most perplexing is the fact that St. Louis County staff has made no attempt to contact the owner of the Deer Creek Center with regards to right of way costs, linked lease agreements, parking requirements, or pedestrian/shopper safety issues. The City of Maplewood contacted Deer Creek Center owner, John Ross of Summit Development, and has been informed that the project costs associated with the recent renovation of Deer Creek Center is in excess of \$37 million. With the current leases tied to parking and linked tenants, the proposed South County Connector would kill the center and result in a total taking of \$37 million. Therefore, the estimated cost for right of way listed on page 3-39 of \$8.2 million for the Deer Creek Center as well as property along Big Bend Boulevard is completely inaccurate. Two attorneys who specialize in condemnation law in regards to acquiring public right of way concur with the need for a total taking.

Additionally, the project will not improve access to proximate businesses, and instead, will promote bypassing them. The existing roadways promote traffic patterns and volumes that may not be ideal, but are certainly amenable to the City of Maplewood and its businesses and are preferred over any proposal found in this Draft EIS.

Based on the current businesses within Deer Creek Center and businesses on Big Bend Boulevard and Big Bend Industrial Court that will be lost due to right of way acquisitions the

City of Maplewood estimates it will lose \$500,000 in revenues each year. This project would cripple the economic prosperity of the entire City, not simply close the dozens of businesses along its proposed route.

Should this project move into the design phase it will deter future businesses from locating within the project area, whether the project ever actually gets funded or not. Given the large number of unfunded projects currently in the design phase with St. Louis County, this effect would last for years and further cripple the economic potential of an otherwise vital area in our community.

**3. Constructing the South County Connector in the Deer Creek floodplain/floodway is NOT the only alternative.**

The Draft EIS states that there is “no practicable alternative” to the proposed encroachment into the Deer Creek floodway and floodplain. The City of Maplewood completely disagrees with this assessment.

The alternative to construct the roadway on the south side of Deer Creek, where it has no impact on the floodplain/floodway, was rejected without serious consideration and the advantages/disadvantages listed in the table on page 3-11 appear to have been inappropriately weighted to justify the elimination of the south side option from further consideration. Especially given the alignment and elevation concerns raised above with regards to the Union Pacific railroad bridge, the City of Maplewood must insist that a thorough evaluation of this build alternative be explicitly detailed in a revised Draft EIS.

Pursuing the aforementioned south alternative would allow the road to be constructed out of the floodplain and floodway. The City of Maplewood believes it is poor planning to construct a roadway within the floodplain and floodway when other alternatives, out of the floodplain and floodway, clearly exist and were inexplicably glossed over.

Flood studies for the two build alternatives have not been conducted and have been dismissed until the “Final Design” phase. The City of Maplewood considers these flood studies as integral components of the project and an Environmental Impact Statement because the results of the studies will ultimately dictate the construction cost, right of way costs, impacts on the environment, as well as impacts on other properties and infrastructure proximate to the floodway/floodplain. The City of Maplewood must issue the Floodplain Development Permit and, based on the Draft EIS, we are completely unconvinced of the suitability of the project and therefore would reject said permit application.

The roadway as purposed will not be elevated high enough to even take it out of the 10 year floodplain. How can you even consider spending tens of millions of dollars to provide an

alternative route to two roads currently subject to flooding and not build the road out of the 10 year floodplain?

- 4. The project study area is insufficient to study the full effects of the project. Page S-6 of the Draft EIS states: *“The project will increase traffic on Hanley Road, north of the study area, with a bottleneck forming at Interstate 64 regardless of which build alternative is selected.”***

The City of Maplewood questions the wisdom on spending tens of millions of dollars to shift one conflict traffic area to another location. Additionally, not including the above mentioned negative effects in the study area and ignoring them as a part of the traffic/accident evaluations undermines the proposed goals of the entire project which include reducing congestion, improving traffic conditions and improving safety. The Draft EIS should explain, comprehensively, all of the foreseen impacts of the project, not only those that are convenient to detail.

The City of Maplewood requests that the EIS include future traffic and accident analysis along Hanley Road through to Interstate 64 and Clayton or some other logical point in the “Central County”. Omission of this data completely ignores the proposed goals of the project and undermines the integrity of the Draft EIS and the project as a whole.

#### **5. Traffic data**

Table 2-4 on page 2-7 indicates that level of service (LOS) on the study area roads will generally not deteriorate and, in some cases, actually improve in the long term if the South County Connector is not built which begs the question, why this roadway is even being considered?

Between 2011 and 2040 – No Build Alternative (Table 2-4):

- AM Southbound traffic on Laclede Station Road will improve from D to C
- AM Southbound traffic on Big Bend Boulevard will improve from E to D
- All other traffic demands remain constant or reverse flow patterns between AM and PM

Given that delays graded D or better denote a delay of under 60 seconds, the City of Maplewood is unconvinced that such a costly and invasive project is actually needed at all, let alone a “high priority”.

The Draft EIS contains no information as to where the traffic originates from, or where it is heading to, and therefore we feel it is impossible to state with certainty that this project will actually alleviate any real problems or if the added traffic capacity will simply compound the problem or create a larger conflict elsewhere.

When comparing 2007 (before the I-64 closure project began) to 2010 (after the I-64 closure project ended), total accidents in the project area have decreased by 9.6%. Moreover, fatal and personal injury accidents in the study area have decreased from 76 incidents in 2007 to 42 incidents in 2010 – a 44.7% decrease. To suggest that the traffic and safety conditions are worsening is illogical.

Regarding roads within Maplewood specifically, we note that accidents on both Hanley Road/Laclede Station Road and Big Bend Boulevard have both decreased substantially between 2007 and 2010 – by 43.3% and 20.5% respectively.

Accidents are not the only thing decreasing in the study area, local population and the number of vehicle miles driven County-wide are also decreasing. With work from home policies and technology changing the work world, the need for this roadway will continue to diminish. The Draft EIS inexplicably does not consider these critical issues and utilizes dated predictive formulas that do not reflect the above referenced proven trends.

**6. Multi-modal transportation concerns in the region are severely lacking, and this project will at best have no meaningful effect and at worse create massive barriers to future progress.**

As a result of this project, the City of Maplewood stands to lose a much valued bike and pedestrian trail along Deer Creek and into Deer Creek Park.

Bike and pedestrian connections are already lacking in Maplewood and the St. Louis region due to large, heavily trafficked, arterial roadways that cut through our community. We have seen no details nor been given any meaningful assurances that this project would do anything other than bisect and segregate our community further. The City of Maplewood is currently working to implement its 2009 Walkable/Bikeable Community Plan and is pursuing a Bike Friendly Community Award. This project, as proposed, would cripple those efforts.

Portland Oregon has the best bike and pedestrian improvements in the nation, bar none. They accomplished this feat for only \$600 million over several years and through much cooperation. It now includes fantastic greenways, multiple bridges and on-road accommodations specifically catering to bike and pedestrian traffic. The same \$110 million budget, which we again assert is very low and inaccurate, could make the St. Louis region one of the premier bike and pedestrian friendly regions in the nation.

We believe that the No Build option was not properly vetted as an alternative and should be reconsidered on the basis that the same amount of funding put into bike and pedestrian improvements in the same footprint would accomplish the same goals of reducing traffic, promoting mass transit use, and improve safety.

The City of Maplewood insists that the EIS must provide some sort of meaningful assurances as well as explicit details as to how the project will benefit multi-modal transportation. Without these details, your claim of multi-modal consideration and the supposed benefits that the build alternatives provide over the no build alternative (page S-11) appears inaccurate.

## **7. Build alternatives are unpopular**

Page S-12 references the open house public meeting comments that showed support for neighborhood preservation, transportation alternatives, and minimal community impacts. A 9-lane by-pass (including turn lanes) is in no way a reflection of these opinions. Building more roads to accommodate more vehicle traffic is not a transportation alternative, nor does it preserve any sense of community. None of the four corridor alternatives received more than 10% of the first choice responses. Such a low level of support for any build alternative would indicate to a responsible planning agency that the plan and details of the plan are insufficient. It seems that in the case of this project the desires of the public are secondary to vague traffic statistics.

In conclusion, the Draft EIS does not come close to estimating the true cost of the project. The cost estimate falls tens of millions of dollars short in light of the known problems with the Union Pacific Railroad Bridge the estimated cost of acquiring right of way in the now fully occupied Deer Creek Center.

To state there are no alternatives to building the road in the flood plain is disingenuous at the very least, if not outright misleading.

Finally, the negative economic impacts as outlined in the Draft EIS are grossly understated.

Sincerely,

James P. White  
Mayor  
City of Maplewood

Cc: Scott Sifton, Missouri Senator 1<sup>st</sup> District  
Felicity Buckley, Mayor of Shrewsbury  
Scott Ogilvie, Ward 24 Alderman St Louis  
MODOT  
Ann Mack, Trailnet  
John Ross  
Gerry Carmody  
Steve Wolf  
Bill Berthold