



June 9, 2013

St. Louis County Department of Highways & Traffic, Division of Highway Planning  
Attn: South County Connector (John Hicks, Transportation Development Analyst)  
121 S. Meramec Ave.  
Clayton, Missouri 63105

Re: South County Connector - Draft Environmental Impact Statement comments

Dear Mr. Hicks:

We write to you with concerns about the Draft Environmental Impact Statement (EIS) associated with the proposed South County Connector project. A review of the summary of the Draft EIS for the \$110 million dollar project appears to indicate that while flooding and floodplain impacts have been identified in the Draft Environmental Impact Statement, water quality impacts have not yet been studied or addressed. Both the River des Peres and Deer Creek within the project limits are included on the official 303(d) list of impaired streams, and are therefore afforded the full protection of the United States Clean Water Act.

We are pleased to see that the EIS recognizes the need to prevent/minimize sediment pollution during construction by developing a Stormwater Pollution Prevention Plan (SWPPP) that conforms to MoDOT's specifications, Missouri Department of Natural Resources (MDNR) Solid Waste Management Program, and MoDOT's Sediment and Erosion Control Program, and adhering to this SWPPP during construction.

However, the EIS (section 4.5.3) does not adequately commit to full use of post-construction stormwater best management practices. We expect, at a minimum, that all impacted areas will include water quality and quantity practices designed in accordance with local standards set by the Metropolitan St. Louis Sewer District (MSD). However, we would also like to understand how the project will minimize specific pollutants of concern included on the 303d list (chloride and dissolved oxygen). For example, how will road deicing practices minimize the input of chlorides into the stream as these materials are not removed by typical post construction BMPs.

In addition, the EIS mentions that wetlands may be impacted, but these impacted areas are not located or quantified. We recognize that detailed quantification may not be performed until later in the process, but some approximation of the impacts to wetlands/waters of the U.S. is necessary for decision-making.

Our citizens know that clean water is essential not just for public health, but for a strong economy. Polluted rivers do not supply clean drinking water, build civic pride, attract the best employees, or encourage investment. Clean water is a fundamental element of any economy, whether it is used in food processing, manufacturing, or at the kitchen table in every American's home.

In summary, the River des Peres Watershed Coalition requests that the EIS be reviewed and revised to include a section on post construction stormwater management design to mitigate for stormwater pollution and runoff that also specifically addresses water quality for the Deer Creek Watershed.

Sincerely,

Eric Karch, Chair of the River des Peres Watershed Coalition

Cc: Mayor Felicity Buckley (Shrewsbury), 5200 Shrewsbury Avenue, Shrewsbury, MO 63119  
Mayor James White (Maplewood), 7601 Manchester Road, Maplewood, MO 63143  
Mayor Gerry Welch (Webster Groves), #4 East Lockwood, Webster Groves, MO 63119  
Tom Blair, Missouri Department of Transportation, Assistant District Engineer