



**BOARD OF ALDERMEN**  
**CITY OF SAINT LOUIS**  
**MISSOURI**

**SCOTT OGILVIE**, Alderman, 24<sup>th</sup> Ward

June 9th, 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,

The following is a response to a request for comment made by the St. Louis County Department of Highways and Traffic to the office of Alderman Scott Ogilvie, ward 24, City of St. Louis. It is our conclusion that the Draft Environmental Impact Statement (EIS) for the South County Connector project is based on faulty, substantially inaccurate assumptions and that it fails to address or acknowledge essential statutory questions for the section of the proposed roadway constructed inside the City of St. Louis. The Draft EIS also substantially understates the negative externalities of constructing the road. Therefore, this office stridently opposes the construction of the roadway and requests that the Draft EIS be rejected.

Below are components of the Draft EIS which are incomplete or inaccurate:

- 1.) The Draft EIS uses inaccurate or outdated information to predict future traffic levels and justify the project.
- 2.) The Draft EIS fails to mention or acknowledge an important component of the Charter of the City of St. Louis. Namely, Article 26, the 'Parks Protection Act'.
- 3.) The Draft EIS fails to mention or acknowledge current law in the City of St. Louis. Namely, the 'Complete Streets' policy codified in Chapter 3.110.065
- 4.) The Draft EIS substantially understates or fails to address the negative externalities of the project, including increased noise levels to adjacent properties and destruction of revenue and employment producing parcels and businesses.
- 5.) The Draft EIS does not adequately document the proposed interchange with Interstate 44.
- 6.) The Draft EIS does not address negative impacts to existing transportation assets, including the MetroLink Blue Line which terminates in the study area, and two existing greenway trails.
- 7.) The Draft EIS ignores less quantifiable, but still tangible quality of life aspects for residents in the study area.



**1.) Chapter 2 “Purpose and Need” The Draft EIS uses inaccurate or outdated information to predict future traffic levels and justify the project.**

Explicit in the justification to build this roadway are two assumptions: 1.) That traffic in the study area will increase over time, & 2.) That such traffic can only be “accommodated” by increasing roadway capacity.

**The calculation of future service levels is based on a glaring error.** All of the predictive data predates 2003, relying on the 2000 census. Declining level of service by the year 2040 is a primary justification for the project (Pages 2-1 & 2-7 Purpose and Need)

*“Future traffic volumes on the principal arterials and collectors are based upon projections made by a previous study prepared for the County: St. Louis County Arterial Study – Existing and Future Conditions. This study used census data, existing and projected land uses and existing and projected employment data to generate growth rates throughout the St. Louis County area. Growth rates for roadways in the current study area were averaged to determine a project-wide growth rate of 0.5% per year. This rate was applied to the South County Connector study area network to generate 2020 and 2040 traffic volumes.”* (Page 2-5, Purpose and Need)

The “Traffic will increase” assumption is the primary justification for the project. However, data gathered in the decade from 2003 to 2013 specifically contradicts this assumption. Four key points demonstrate this assumption is incorrect:

a.) Actual data on the St. Louis region’s vehicle miles travelled (VMT) shows a decline of both total VMT and individual VMT. From the years 2007 to 2011, total VMT declined 4.5% in St. Louis County and 5.5% in St. Louis City. (East-West Gateway Council of Governments)

b.) Population in all communities adjacent to the study area declined between the 2000 and 2010 census. The declines are as follows: Shrewsbury -5.9% Maplewood: -12.8% Webster Groves: -1% City of St. Louis: -8.3% St. Louis County: -1.7%

c.) A major light-rail transportation corridor was added after the 2003 study: ‘*St. Louis County Arterial Study – Existing and Future Conditions.*’ The MetroLink Blue Line, completed in 2006, terminates in the center of the study area, and has another station just north of the study area. Using traffic predictions from 2003 or prior ignores a major transportation investment recently made in the identical corridor that largely serves the same priorities identified in the Draft EIS Chapter 2 “Purpose and Need”

d.) A Greenway network is under construction through the area, including the River Des Peres Trail and the Deer Creek Trail. These trails will connect in the near future and form a meaningful means to navigate the area without using an automobile.

Given that data show automobile travel and population in this area are declining, and other major transportation investments have been made in an identical corridor since the Level of Service

predictions were made, the primary justification for constructing the 'South County Connector' is invalid. The Draft EIS should be rejected on this basis.

**2.) The Draft EIS fails to mention or acknowledge an important component of the Charter of the City of St. Louis. Namely, Article 26, the 'Parks Protection Act'.**

St. Louis County and the City of St. Louis are distinct, neighboring legal entities with territory that the Draft EIS study area crosses. The City of St. Louis is an independent city not inside of St. Louis County. On April 3rd, 2007, City of St. Louis voters, via an initiative petition, added article 26 to the City Charter. The article reads:

*Section 1 Real estate for use as a public park.*

*Any real estate, now or hereafter owned by the City or any agency or instrumentality of the City, which is principally used or held out for use as a public park, shall not be sold, leased, given away or otherwise disposed of, and shall be used only as a public park, nor shall any structure be built in any such park to accommodate activities not customarily associated with park use or outdoor recreation, unless such sale, lease, disposal, gift or structure is approved by a majority of the qualified electors voting thereon.*

*Section 2 Intention of board of aldermen.*

*The clerk of the board of aldermen shall certify to the board of election commissioners the intention of board of aldermen to authorize such sale, lease, disposal or change of use, together with the proposed ordinance for that purpose, to the board of election commissioners. Said board of election commissioners shall thereupon provide for submitting said proposed ordinance, in its original form, to the voters at the first election at which such submission may lawfully be had, but not less than thirty days after such certification to it by the clerk of the board of aldermen.*

The Draft EIS specifies that 2.6 acres of River Des Peres Park (A City of St. Louis park) would be utilized for the construction of the 'South County Connector'. Pursuant to Section I above, prior to entering into an agreement with St. Louis County to build and maintain the roadway, the City of St. Louis Board of Aldermen would have to authorize a public vote on the matter for the voters of the City of St. Louis. A simple majority would be required to approve or deny the project inside the boundaries of River Des Peres Park.

Approximately 25% of the length of the proposed 'South County Connector' would be built inside of a City of St. Louis park. Without an affirmative vote of the residents of the City of St. Louis pursuant to article 26 of the Charter, none of the alternatives envisioned in or prior to the Draft EIS could be built. Should the voters of the City of St. Louis not authorize the project, the Draft EIS would clearly be invalid. A new study area would need to be determined, and a new EIS developed.

**3.) The Draft EIS fails to mention or acknowledge current law in the City of St. Louis. Namely, the 'Complete Streets' policy codified in Chapter 3.110.065, City of St. Louis Code of Ordinances**

The City of St. Louis adopted by ordinance a 'Complete Streets' policy in 2010 for all new public works projects. The criteria in the ordinance are flexible and context dependent, but there are no limitations inside of River Des Peres Park that would prevent complete implementation. The Draft EIS makes no mention of the existing policy. The Draft EIS does not provide a level of conceptual detail for this portion of the project (Inside River Des Peres Park) to determine whether or not it meets the intent of Chapter 3.110.065, City of St. Louis Code of Ordinances.

**4.) The Draft EIS substantially understates or fails to address the negative externalities of the project, including increased noise levels to adjacent properties and destruction of revenue and employment producing parcels and businesses.**

The Draft EIS predicts noise levels will generally increase at all points measured inside the study area with either build alternative. While noise level will exceed the threshold for Noise Abatement Criteria at several locations (page 4-44), no noise abatement is proposed.

In a letter to John Hicks from Maplewood Mayor James White dated May 30th, 2013, the City of Maplewood estimates a loss of tax revenue of \$500,000 annually from business relocated due to right of way acquisition. I presume this estimate is based on losing property taxes from parcels in the new right of way. I believe the negative effect on business near the study area may be even greater, resulting in more lost revenue than Maplewood anticipates.

Page S-11 indicates either 19 or 21 business displacements via the two build options, (City of Maplewood predicts up to 36 business displacements) but no indication as to the number of employees that would be displaced. We are therefore left to speculate on the "negative multiplier effect" of what impact removing an unknown number of employees from the area will have on remaining businesses. It could be substantial. What is clear is that the 'South County Connector' would displace businesses, spend \$20 million on right of way acquisition (page 3-39) and reduce taxable parcels currently in use, without creating access to a single square foot of new taxable land for the communities effected. Is this is a good investment?

**5.) The Draft EIS does not adequately document the proposed interchange with Interstate 44.**

One of the most substantial infrastructure components proposed in the Draft EIS is a new highway interchange between Interstate 44 and the 'South County Connector' in the middle of the study area. However, inexplicably, this proposed interchange is not shown graphically in any of the exhibits in the Draft EIS. A picture is worth a thousand words, and for residents interested in or effected by the project, not seeing this proposed interchange obscures one of the major effects of the project. Exit ramps may essentially be in the back yards of residents on Kensington Ave. or Sutherland Ave., but this fact is impossible to ascertain without a detailed reading of the 700+ page Draft EIS. While we should expect municipalities to thoroughly review the Draft EIS, it is completely unreasonably to expect every resident to do the same. By not graphically depicting the interchange, many residents were unaware of its proposed existence. Even residents who attended the public meeting held May 23rd in Shrewsbury by the St. Louis County

Department of Highways and Transportation were confused by the location and impacts of the interchange.

**6.) The Draft EIS does not address negative impacts to existing transportation assets, including the MetroLink Blue Line which terminates in the study area, and two existing greenway trails.**

The MetroLink Blue Line Extension (previously known as the 'Cross County Extension') opened in 2006 at a total cost of \$686 million. The cost of the project was primarily funded through local sales taxes in St. Louis County and the City of St. Louis. The Blue Line therefore represents an unusually ambitious transit project to fund without federal aid. The Blue Line serves the same corridor as the 'South County Connector', creating an additional transportation option from the near southern part of the region into Clayton, the County seat.

The Shrewsbury MetroLink station in the study area is the busiest station on the Blue Line Extension and also serves as a bus terminal. Increasing road capacity through the corridor is likely to reduce ridership, undermining a recent, major local transportation investment designed to serve a similar function. The Draft EIS does not include an analysis of ridership from the Blue Line Shrewsbury station in either of the build options. Such an analysis is an important piece of data for the community and the transit agency Metro to understand before the 'South County Connector' would be built.

Additionally, while the Blue Line currently terminates at the Shrewsbury Station, the alignment was designed to eventually extend further southeast. Building the 'South County Connector' reduces the possibility of that occurring in the future. Building the 'South County Connector' therefore undermines a more complete regional transit network. In short, how many major transportation new investments will realistically be made through this single corridor surrounded by a shrinking population?

Should the 'South County Connector' be built with an 80% federal funding component, a federal expenditure will undermine the success of the large local investment in the MetroLink Blue Line. The Draft EIS suggests that building an Interstate interchange with I-44 in the proximity of the Shrewsbury Blue Line station could increase ridership. **This is a fundamental misunderstanding of what drives transit ridership.**

In addition, the Draft EIS shows the 'South County Connector' right of way being constructed for much of its length in place of recently constructed and planned greenway trails built by Great Rivers Greenway. The River Des Peres Trail runs from the junction of the Mississippi and the River Des Peres at the south end into the study area on the north end, and will extend north to Forest Park in future phases planned for construction in the next handful of years. The Deer Creek Trail will connect with the River Des Trail from the west in an upcoming future phase. Given the generally poor condition or absence of on-street bicycle facilities in St. Louis County, and the many nearby streets that lack sidewalks, these are critical trails for safely walking or bicycling through the study area.

In addition to transportation options, the trails provide excellent recreational and exercise opportunities for residents of the area. The Draft EIS only briefly mentions that these displaced trails will be re-constructed. Rebuilding trails that currently run through parks as side paths on a limited access roadway with 40+ mph traffic is not an equivalent reconstruction. In addition, while there may be space in the study area to reconstruct River Des Peres Trail where it has been displaced, it is not at all clear, and no work has been done to determine whether Deer Creek Trail could be rebuilt or whether the planned eastward extension could be built along the north Deer Creek bank. What is abundantly clear is that the final product will result in a substantially degraded trail network. This is another example of federal funding for the roadway project undermining locally funded investments.

The Draft EIS makes a “de minimis” determination of impact to parks and trails. (Page 26, Appendix H) This is clearly an inaccurate conclusion. The ‘South County Connector’ may make it impossible for the Deer Creek Trail to join the River Des Peres Trail. Rebuilding the trails next to the new roadway, rather than in the parks, will clearly “adversely affect the activities, features and attributes” of the trail network. The users of the trails will be subject to increased noise, dramatically altered view sheds, reduced park land, potentially reduced access, and increased roadway crossings which could decrease safety. Without the “development and review of avoidance alternatives” the Draft EIS does not meet the requirements of federal law for Section 4 (f) lands. The Draft EIS should be rejected on this basis.

#### **7.) The Draft EIS ignores less quantifiable, but still tangible quality of life aspects for residents in the study area.**

The St. Louis region has not ignored the transportation needs of people in and around the study area. Indeed, just the opposite has occurred. Over \$700 million local tax dollars have been spent in the last decade to bring light rail and quality bike trails into the study area. Simultaneously, miles travelled by car in the St. Louis region have decreased.

The Draft EIS is the type of planning that promises a modestly reduced travel time through an area at the expense of residents already living in or using the area. The implied assumption is that this is an area to “get past” rather than to “be in”. People driving through the area will perhaps enjoy a few seconds less delay at some intersections along the route, (although this may be a temporary result, as the demand induced by the new roadway will add vehicles into the area, and return the intersections to their previous delay) but people who live, work, or recreate in the area will see the negative impacts both described and ignored in the Draft EIS.

Residents in the area can expect more traffic noise, less park space, a degraded, less enjoyable trail network, business and residential displacements, a damaged stream, declining local tax revenue, and a new, partially elevated barrier in their community. The St. Louis region already has one of the most extensive road networks per capita in the nation. There is no compelling reason to bisect the mature communities in the study area with another limited access road.

The Draft EIS for the ‘South County Connector’ should be rejected for failing to demonstrate need, using substantially faulty data to attempt to demonstrate need, failing to predict real legal

barriers to its construction in a City of St. Louis park, and failing to show a benefit to the communities it would bisect.

Respectfully submitted,

Scott Ogilvie  
24th Ward Alderman  
City of St. Louis

1200 Market St. Room 230  
St. Louis, MO 63103

cc: Senator Claire McCaskill  
Senator Roy Blunt  
Representative William Lacy Clay  
Missouri Senator Scott Sifton  
Missouri Representative Gina Mitten  
County Councilman Pat Dolan  
County Councilman Steve Stenger  
Mayor Felicity Buckley  
Mayor James P. White  
Aldermen Joe Vaccaro  
Alderman Donna Baringer  
Alderman Larry Arnowitz  
Alderman Fred Wessels  
Ed Hassinger, MODOT  
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