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19

# Final Supplemental Environmental Impact Statement Page Avenue Extension

(FSEIS)

St. Charles and St. Louis Counties, Missouri  
(Includes Section 6(f) Replacement Plan)



Prepared by:

National Park Service  
Midwest Regional Office

February 1995

Route D, St. Louis - St. Charles Counties, Missouri  
(Page Avenue Extension)  
Bennington Place Westerly to Route 40

Final Supplemental  
Environmental Impact Statement

Submitted Pursuant to Section 102(2)(c) of the National Environmental Policy Act of 1969 [42 U.S.C. 4321 et seq. and 42 U.S.C. 4332, as amended] and Section 6(f)(3) of the Land and Water Conservation Fund Act (Public Law 88-578, as amended).

by the

U.S. Department of the Interior  
National Park Service

Cooperating Agencies  
Federal Highway Administration  
U.S. Army Corps of Engineers  
U.S. Environmental Protection Agency  
U.S. Fish and Wildlife Service, U.S. Department  
of the Interior

2/9/95

Date of Approval

William W. Schenk

For National Park Service

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The proposed action addresses the impacts associated with the selection of additional replacement land pursuant to the requirements of Section 6(f)(3) of the Land and Water Conservation Fund Act, as amended, for the proposed use of land from Creve Coeur Lake Memorial Park by the Page Avenue Extension. Little Creve Coeur Lake is the selected alternative for providing additional replacement land.



ONLY PRACTICABLE ALTERNATIVE FINDING

Section 6(f)(3) of the Land and Water Conservation Fund Act (L&WCF), as amended, requires that any land funded with L&WCF monies and converted to a non-outdoor recreation use must be replaced with land of at least equal fair market value and reasonable equivalent usefulness and location.

In response to Secretary Babbitt's directive, the National Park Service (NPS) prepared a Supplemental Environmental Impact Statement (SEIS) to identify, evaluate, and select replacement land for that impacted by Page Avenue Extension in Creve Coeur Lake Memorial Park. The NPS Midwest Regional Director in his letter to David Shorr, Director of the Missouri Department of Natural Resources, indicated that "the greater emphasis should be given to lands that closely replicate the natural wetlands environment and recreation opportunities which are being converted. Alternative considerations should be compatible with the Statewide Comprehensive Outdoor Recreation Plan (SCORP) priorities for wetland acquisition and, at a minimum, meet the standard for public access, constitute a viable recreation area, and be accessible to the citizens of the St. Louis metropolitan area."

The Little Creve Coeur Lake area (LCCL), selected as the preferred alternative, meets the above criteria as identified by Secretary Babbitt and the Midwest Regional Director, and fulfills the requirements of Section 6(f) of the L&WCF Act. The LCCL, located directly west of the park, consists of prior converted cropland and upland with smaller tracts of wooded wetland, emergent wetland, and farmed wetland. The reservation of this 773.8 acres, adjusted to 464.8 acres for section 6(f)(3) consideration, and creation of a wetlands management area would ensure the preservation of a potentially unique area of biodiversity near an expanding urban area.

The selection of the LCCL alternative as "additional land" added to the initial replacement package submitted by the State of Missouri would result in a total of 723.28 acres of eligible section 6(f)(3) replacement land with an estimated value of \$3,379,820.

Based upon the above considerations, and for the reasons stated in the SEIS, the NPS, with concurrence of the State of Missouri and St. Louis County (L&WCF sponsor), determines that the preferred alternative, LCCL, is the only practicable alternative.

<u>2/9/95</u>	<u>William W. Schenk</u>	<u>Regional Director</u>
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## EXECUTIVE SUMMARY

In early 1993, the National Park Service (NPS) was requested by the Missouri Department of Natural Resources (DNR) to consider a proposal to convert approximately 184 acres of Creve Coeur Lake Memorial Park (CCLMP) from public outdoor recreation use. CCLMP is a county park which has received Federal financial assistance from the Land and Water Conservation Fund (L&WCF) grant-in-aid program.

Approval of the request would facilitate construction of a 10-lane elevated extension of Page Avenue across the southern tip of the park site, assuming all necessary coordination with other Federal agencies has been satisfactorily accomplished. The following map, Figure 1, illustrates the general area within which CCLMP and the Page Avenue Extension are located. Additional detail is provided in the Federal Highway Administration (FHWA) Final Environmental Impact Statement (FEIS).

Section 6(f)(3) of the L&WCF Act, as amended, requires that any conversion request must be in accord with the Statewide Comprehensive Outdoor Recreation Plan (SCORP) and subject to such conditions as are necessary to assure the substitution of other recreation properties of at least equal fair market value and reasonably equivalent usefulness and location. Development and management of these substitution properties must be for outdoor recreation purposes and in accord with the explicit purpose for which the properties are acquired.

The proposal to replace the converted acreage with approximately 265 acres of replacement property was reviewed by NPS and the Department of the Interior (DOI). Secretary of the Interior Babbitt stated in his May 18, 1993, letter to Senators Danforth and Bond that he did not intend to use his authority under section 6(f)(3) to block the construction of this highway project. However, the Secretary further indicated that ". . . it is necessary to identify a significant amount of additional lands to be included in the mitigation package."

The proposed replacement property, shown in Figure 2 (Areas A and B) did not, in itself, offer "reasonably equivalent usefulness," particularly in light of the scale and scope of this highway project. The proposed highway will be 10 lanes in width, 60 to 120 feet high with a 500- to 650-foot-wide right-of-way from the south to the north ends of the bridge, extending across the southern tip of Creve Coeur Lake. This will impact land on the southern end of the park where some passive recreation activities take place. This section is heavily wooded, containing a mixture of woodland and wetland habitats where area residents now enjoy relatively remote

Figure 1

# ST. LOUIS AND VICINITY

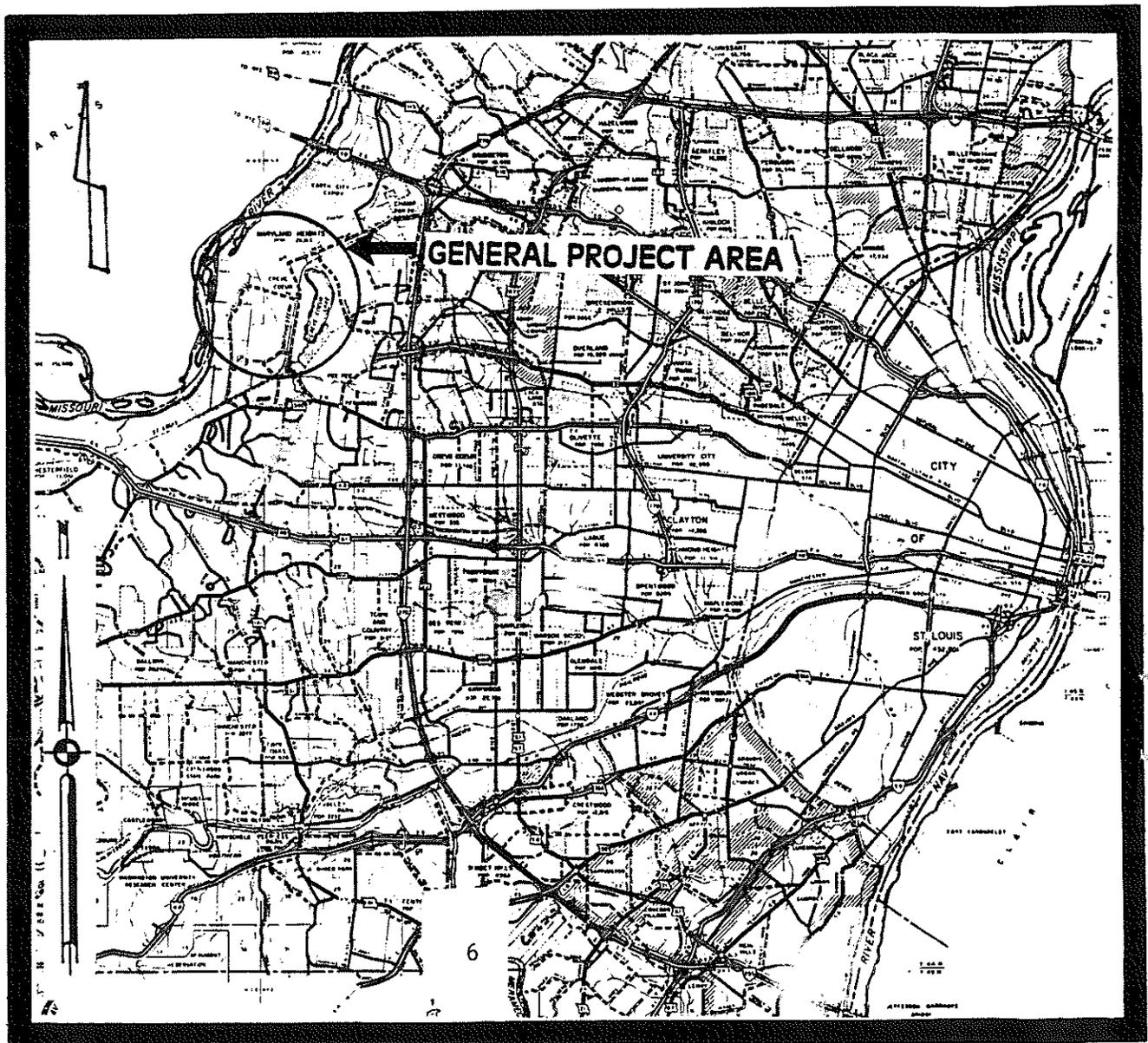
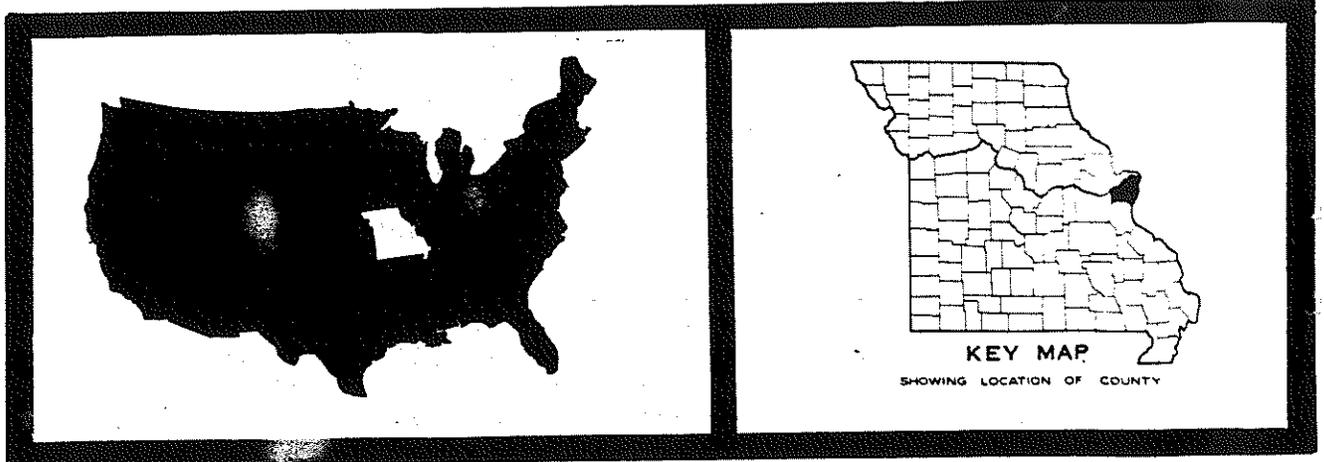
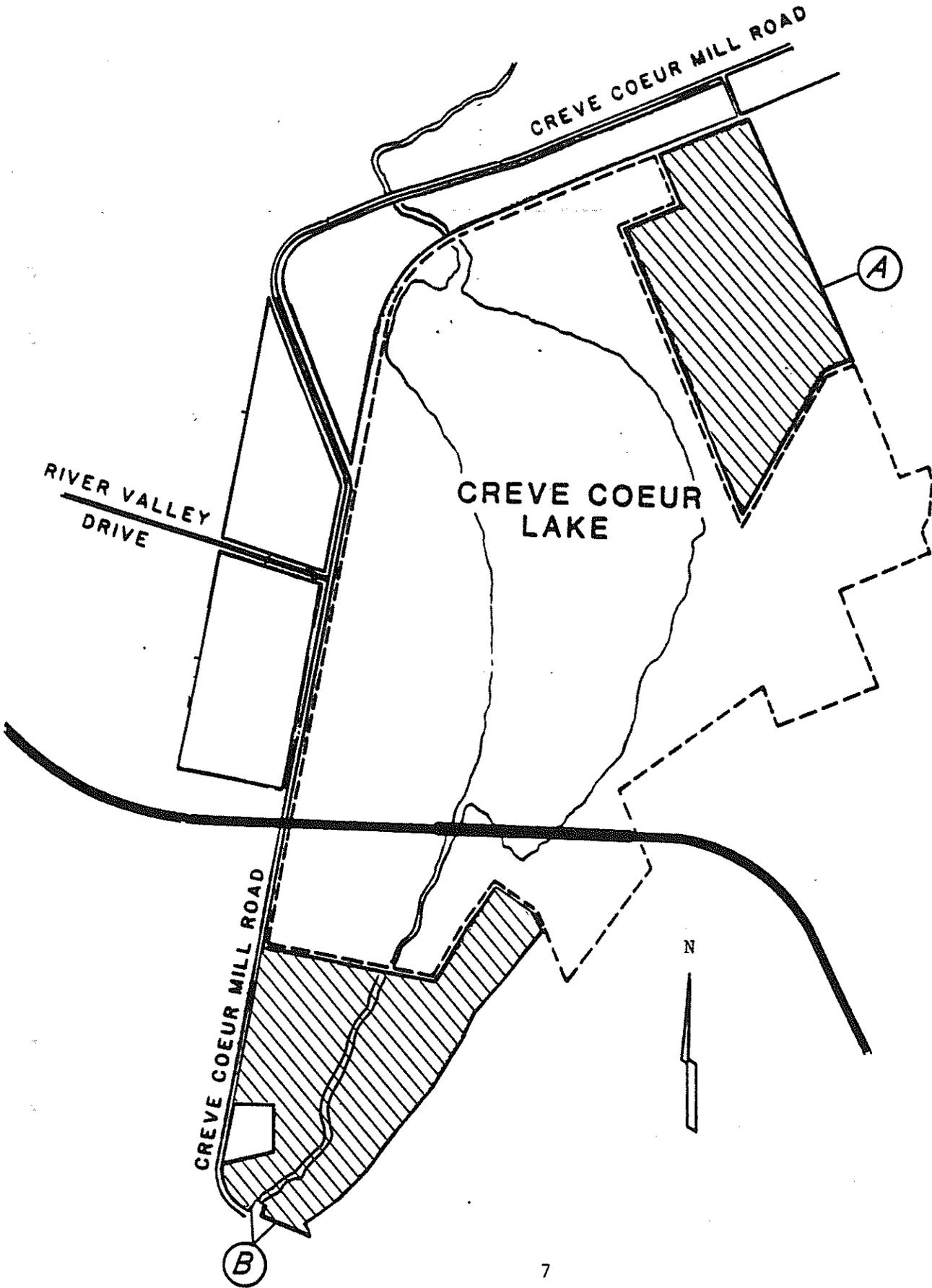


Figure 2



**Section 6(f) Replacement Land**

**265 acres (Areas A and B)**

A range of alternative land proposals, including total substitution, is considered in this SEIS. These alternatives analyze the "equivalent usefulness" of candidate replacement land parcels as well as impacts on natural and cultural resources, the socioeconomic environment, and current uses.

## **2.0. ALTERNATIVES**

### **2.1. ALTERNATIVE A: CURRENT LAND REPLACEMENT PROPOSAL ("NO ACTION" ALTERNATIVE)**

Alternative A represents a proposal of 264.78 acres of replacement land for the 183.4 converted acres, submitted by the State of Missouri in January 1993. In addition to this proposal, the State of Missouri, through the MHTD, will provide other accommodations pursuant to the "Pipeline Safety Act of 1992."

The "Pipeline Safety Act of 1992," Public Law 102-508, authorized the Secretary of Transportation to waive the requirement of section 4(f) for the designated Red Alignment if the following items are carried out:

1. Expansion of the CCLMP by at least 50 percent through acquisition and additions to CCLMP totaling not less than 600 acres of land.
2. Development of a walking and bicycle path that is not less than 10 feet in width that connects CCLMP to the Katy Trail State Park in St. Charles County, Missouri.
3. Construction of nature trails in the wooded upland portion of the additions to CCLMP, referred to above.
4. Development of a wetland wildlife area that includes lake areas and marshes, trails, observation points, and other environmentally compatible features in CCLMP or in one of the additions to CCLMP referred to above.
5. Dredging of Creve Coeur Lake to help remedy a chronic siltation problem and to promote fish and wildlife populations.
6. Construction of a new lake in one of the additions to CCLMP referred to above to help alleviate the recurrence of a chronic siltation problem in a manner that minimizes, to the maximum extent practicable and in accordance with Section 404 of the Federal Water

Pollution Control Act (33 U.S.C. 1344), the disturbance of any existing wetlands.

7. Design and construction of features to minimize the visual and physical impact of the project in the vicinity of CCLMP that are consistent, to the extent practicable, with recommendations of a design committee appointed by the Governor of Missouri.

8. Such other mitigation measures as the U.S. Secretary of Transportation may determine are appropriate to ensure that the environmental benefits of the project mitigation plan exceed the environmental damage associated with the project.

9. A monetary contribution by the State of Missouri necessary to implement the entire mitigation plan in an amount not less than \$6 million that includes the payment of not less than \$250,000 for facility improvements in CCLMP, with all funds to come from non-Federal sources.

The MHTD has indicated that it expects to exceed the requirements of Section 601 of the "Pipeline Safety Act of 1992." A minimum of 600 acres of land will be acquired by MHTD to expand CCLMP pursuant to the requirements of section 601.

In addition to the requirement above, Alternative A represents the initial efforts of the State of Missouri to fulfill the requirements of Section 6(f)(3) of the L&WCF Act, as amended. These initially proposed replacement lands were the result of extensive negotiations between St. Louis County and MHTD with the concurrence of the DNR. Although the lands offered various developmental possibilities for the county, the NPS determined that the proposed lands did not offer "reasonably equivalent usefulness" to the extent necessary to match the loss of this natural area. Therefore, "additional lands" were deemed necessary in order to fulfill the intent and requirements of Section 6(f)(3) of the L&WCF Act, as amended.

Section 6(f)(3) applies not only to land directly taken from outdoor recreational use but also to adjacent property protected under section 6(f)(3) which may be adversely affected. While adverse impacts may be difficult to determine, the adjacent areas must remain recreationally viable or be replaced as well.

The 183.4 acres of CCLMP initially identified for conversion are made up of the following:

1. 11.2 acres of permanent aerial easement.
2. 25.8 acres of right-of-way.

3. 141.9 acres of noise impacted area not included in numbers 1 or 2 above.

4. 4.5 acres of visually impacted area not included in numbers 1, 2, or 3 above.

The determination of the above 141.9 acres of noise impacted area, exclusive of actual right-of-way and permanent aerial easement, within CCLMP was originally made with certain assumptions relating to the future design of the Page Avenue Extension. As details of the roadway and bridge designs become more defined, and in response to comments received during the draft SEIS review period, MHTD has reevaluated the noise impact studies completed during preparation of the FEIS. This reevaluation has resulted in a refinement of the noise impact on CCLMP, increasing the impacted/converted area an additional 23.6 acres. Further information regarding this refinement of the noise impact is discussed in section 4.6. The newly determined converted area in CCLMP, as a result of this noise impact refinement now amounts to 207 acres.

The replacement land initially proposed by the State of Missouri constituted part of St. Louis County's long-range CCLMP expansion areas: Areas A and B are further identified in the FEIS. Each of these designated replacement resources has been determined to be beyond the areas of significant visual impacts predicted for the Page Avenue Extension's Red Alignment. In addition, the final adjusted replacement lands identified as Areas A and B will not be subject to noise levels exceeding 57 dBA as determined by the FHWA.

A total of 264.78 acres, made up of seven separate properties within Areas A and B, were proposed as a part of the replacement for the initial 183.4 acres of converted land. The appraised value of this replacement land has been determined to be \$1,823,200, while the value of the converted land is listed at 1,555,000. The reduction of the above replacement acreage by 6.3 acres resulting from the noise impact refinement and the subsequent adjustment of the value are further detailed in section 7.0, section 6(f)(3) Criteria Evaluation. With this reduction in acreage, a total of 258.48 acres will remain as acceptable replacement land in Areas A and B of this alternative.

Area A, the designated lands on the northeast side of the property, is now farmed bottom lands with scenic bluffs on the border and upland woods to the east-southeast. This area will be compatible with the future recreation development being proposed by the St. Louis County Parks and Recreation Department. The Area B lands will come from the area south of the existing park. This area most closely represents the majority of the converted area in natural appearance and usefulness. These parcels also

comprise nearly all of the wooded bottom lands associated with Creve Coeur Creek.

## **2.2. ALTERNATIVE B: LITTLE CREVE COEUR LAKE (LCCL) PROPOSAL**

This alternative, as displayed in Figure 3, includes a portion of the 300-acre U.S. Fish and Wildlife Service (FWS) Alternative C and consists of about 773.8 acres. Although the total area to be acquired consists of 773.8 acres, the actual area intended for dedication to section 6(f)(3) replacement would be 464.8 acres. This alternative is recommended by the State of Missouri and cooperating Federal and state agencies as the preferred alternative for additional section 6(f)(3) replacement land.

This acreage would encompass only that land of Alternative C that lies south and west of the proposed Page Avenue Extension. The alternative was conceived through intense coordination of several Federal, State, and local agencies. The LCCL Alternative is adjacent to the proposed Page Avenue Extension and extends southward to the Waterworks Road. The area is bounded on the east by the St. Louis Southwestern Railroad line. The western boundary follows existing property lines in an area which is largely composed of cropped fields.

## **2.3. ALTERNATIVE C: U.S. FISH AND WILDLIFE SERVICE (FWS) PROPOSAL**

This alternative, a subset of Alternative B and shown in Figure 4, encompasses 300 acres known as LCCL. It is located southwest of CCLMP and, with the exception of only the triangular area north of the Red Route Alignment and south of the existing River Valley Road, the area is encompassed by Alternative B. A portion of this alternative was identified in the FEIS for Page Avenue as a potential wetland mitigation area. The FWS expanded on that concept by suggesting a park replacement alternative that could be effectively managed as a wetland. The area was included to help ensure provision of an adequate water supply to LCCL. The FWS has indicated that they think inclusion of this parcel is necessary to develop a successful wetland site. However, the hydrology of the wetland area proposed in the LCCL Alternative could be sustained by surface runoff, and supplemented, if necessary, by groundwater withdrawals.

Once part of the Missouri River, the course of the river changed, and the remnants of the old river channel became Creve Coeur Lake and LCCL. In recent times, although LCCL is affected by low rainfall, it is believed that the lake area could support a wetland habitat. It has been pumped in

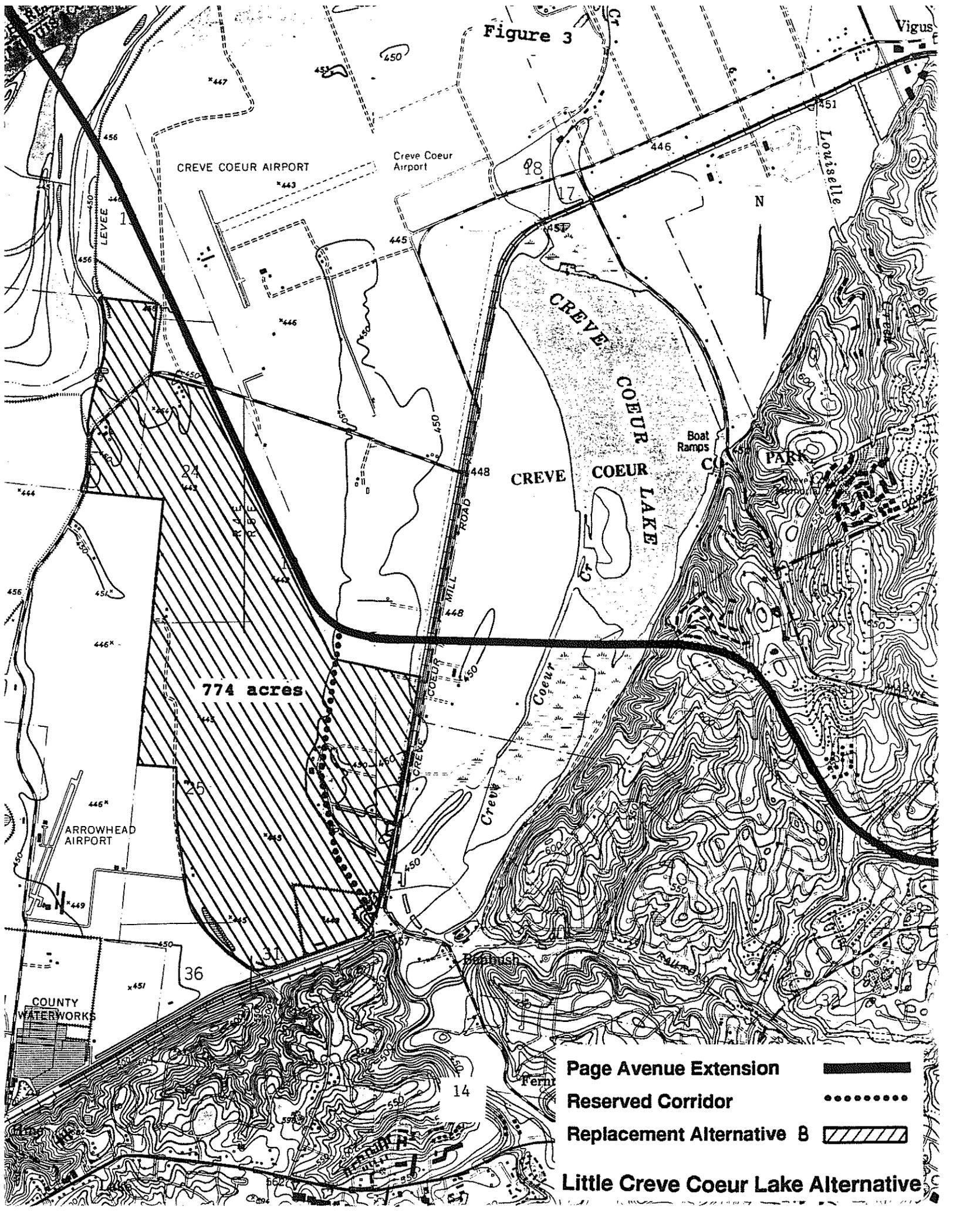


Figure 3

CREVE COEUR AIRPORT

Creve Coeur Airport

CREVE COEUR LAKE

Boat Ramps

PARK

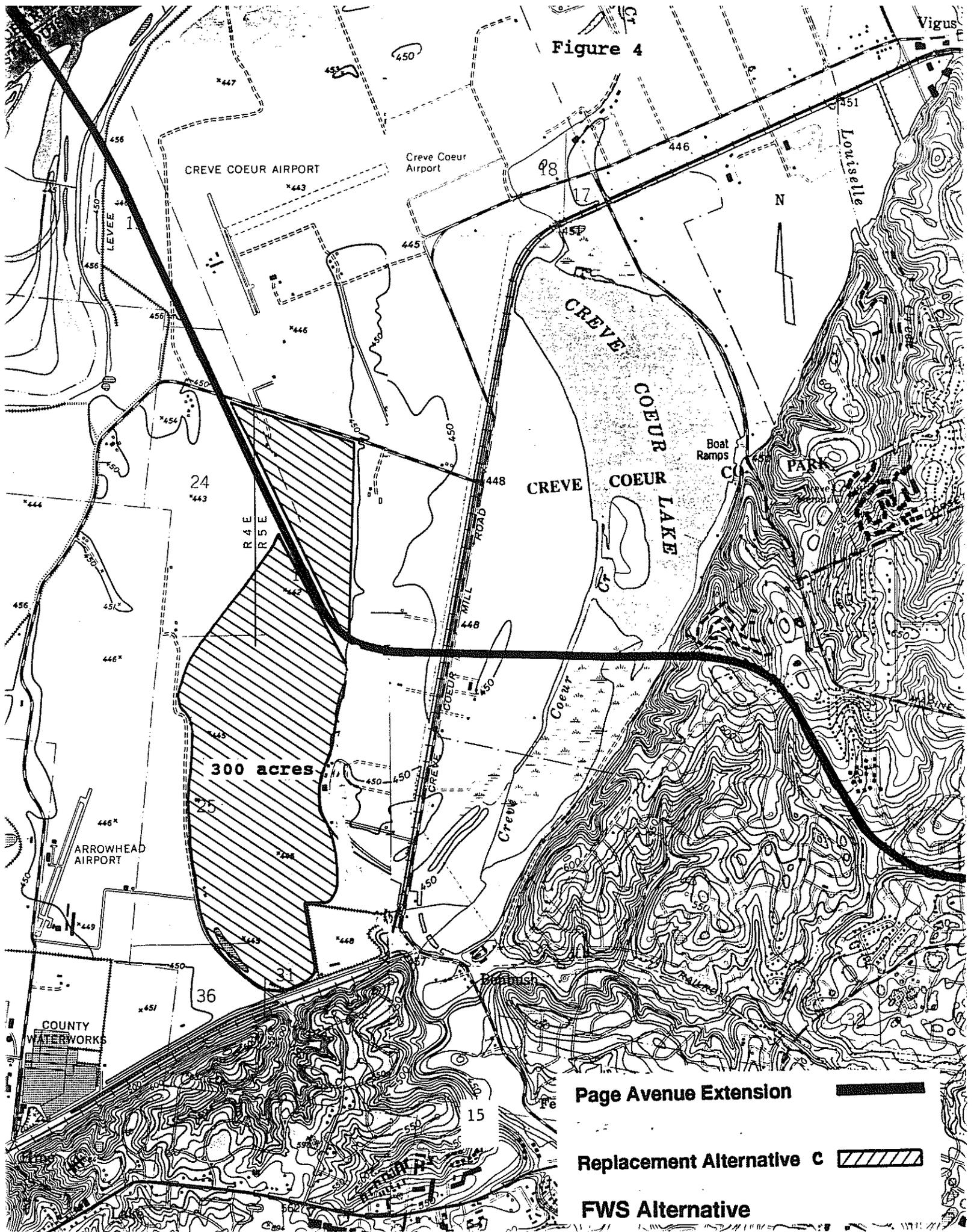
774 acres

ARROWHEAD AIRPORT

COUNTY WATERWORKS

- Page Avenue Extension
- Reserved Corridor
- Replacement Alternative B
- Little Creve Coeur Lake Alternative

Figure 4



Page Avenue Extension 

Replacement Alternative C 

FWS Alternative

wet years to facilitate farming activities. In wet years, when pumping has been avoided or minimized, LCCL is recognized as good habitat for waterfowl, shore birds, wading birds, and other avian species.

#### **2.4. ALTERNATIVE D: HOWARD BEND LEVEE DISTRICT (HBLD) PROPOSAL**

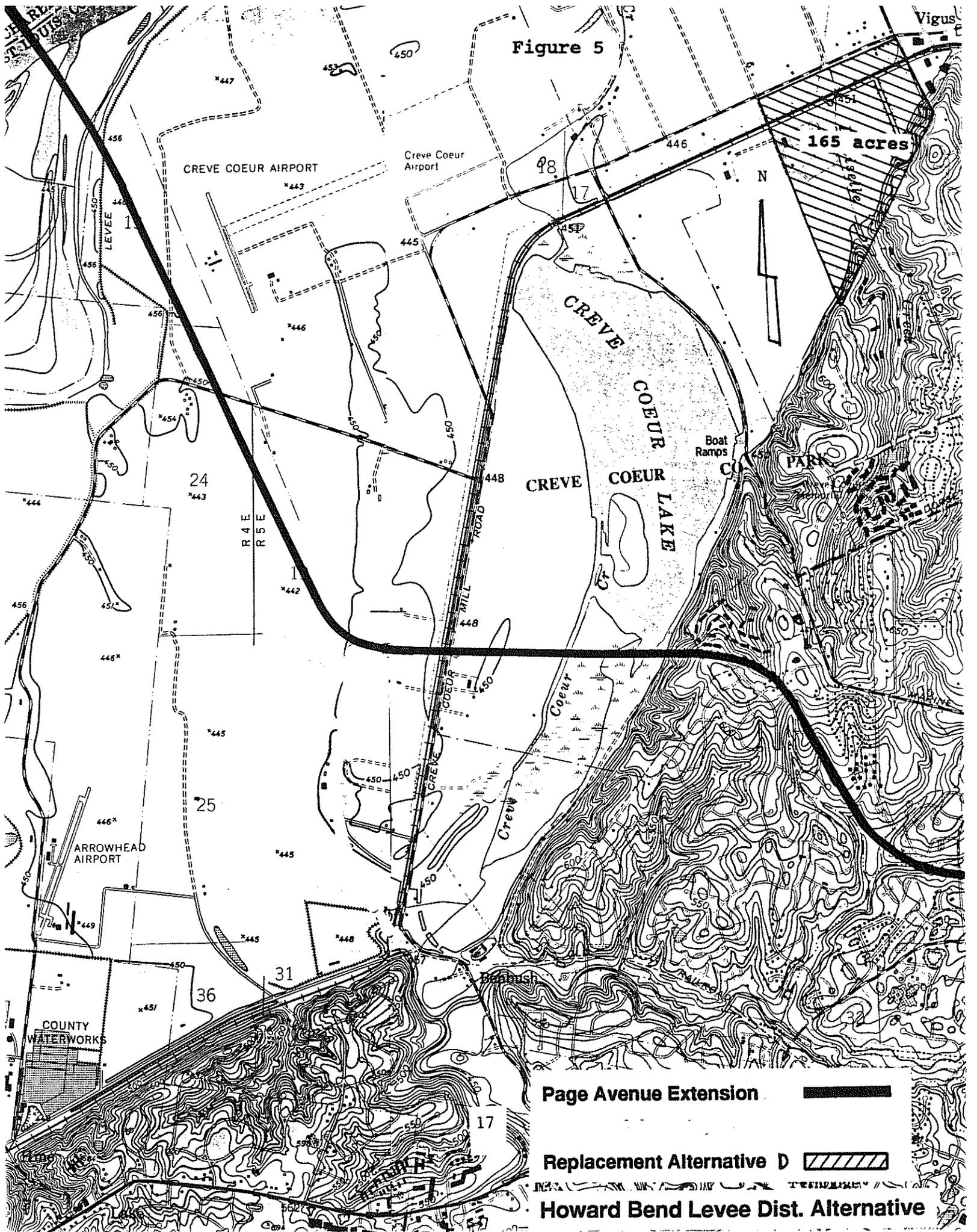
Located in St. Louis County and the city of Maryland Heights, this alternative, displayed in Figure 5, was identified at the July 1, 1993, scoping meeting. The 165-acre area, triangular in shape, is located along the bluff to the north and east of CCLMP. The area is bordered on the north by Creve Coeur Mill Road, on the south by a high bluff, on the east by the Deerwood Commerce Center, and on the west by other proposed mitigation land and the existing CCLMP. This proposal was suggested as a substitute for portions of the original section 601 mitigation package located west of Creve Coeur Mill Road.

The alternative can be described as largely undeveloped land, with the exception of an auto salvage yard located in the northwestern corner of the area, between the western boundary and the St. Louis Southwestern Railroad. The salvage yard occupies approximately 46.5 acres. A small amount of wooded land is situated atop the high bluff. The remainder of the acreage is flat, open land that extends away from the base of the bluff.

#### **2.5. ALTERNATIVE E: MISSOURI HIGHWAY AND TRANSPORTATION DEPARTMENT (MHTD) PROPOSAL**

Submitted by MHTD and shown in Figure 6, this alternative consists of 38.7 acres of land located directly southeast of CCLMP and a small part within Alternative D, HBLD. The land closely resembles park land impacted by the Page Avenue Extension. Comments received during the National Environmental Policy Act (NEPA) project development process for Page Avenue pointed out concerns that portions of the original plan would not have similar recreation values as the impacted park land. The impacted park land is mostly bottomland woods and wetlands, while some portions of the replacement land are characterized as flat, open farmland. A study of cover types within the impacted area of CCLMP and in the replacement land revealed a shortfall in the number of acres of upland woods, scrub wetlands, and open water. The 38.7 acres of new replacement land in this proposal would help to alleviate the perceived disparity by adding 30.9 acres of wooded upland and 7.8 acres of scrub wetland to the section 6(f)(3) replacement plan.

Figure 5



CREVE COEUR AIRPORT

Creve Coeur Airport

165 acres

CREVE COEUR LAKE

Boat Ramps

PARK

24

R 4 E  
R 5 E

25

ARROWHEAD AIRPORT

COUNTY WATERWORKS

31

36

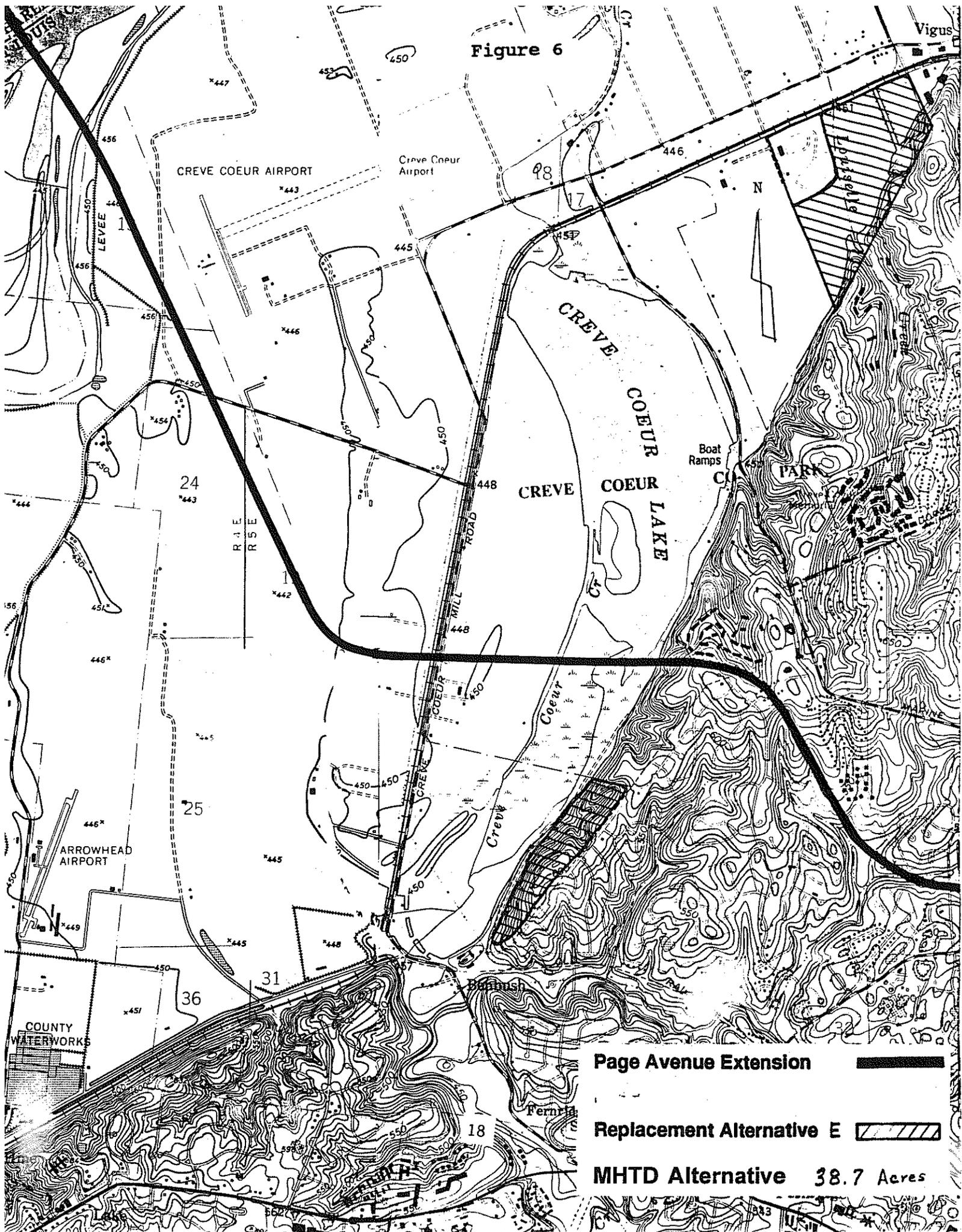
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Page Avenue Extension 

Replacement Alternative D 

Howard Bend Levee Dist. Alternative 

Figure 6



CREVE COEUR AIRPORT

Creve Coeur Airport

CREVE COEUR LAKE

Boat Ramps

PARK

Vigus

24

25

36

31

18

Page Avenue Extension

Replacement Alternative E

MHTD Alternative 38.7 Acres

COUNTY WATERWORKS

Fernida

## **2.6. ALTERNATIVES CONSIDERED AND ELIMINATED FROM FURTHER STUDY**

### **2.6.1. ADJOINING LAND**

This replacement proposal, presented at the July 1, 1993, scoping meeting, suggests that all privately owned lands surrounding the existing CCLMP should be evaluated as potential replacement land to be added to CCLMP. Much of the upland area that lies generally to the east of CCLMP is developed, residential neighborhoods. Land that lies primarily to the north and west of CCLMP is agricultural. Adjoining land south of CCLMP consists of floodplain woods, wooded wetland, and smaller areas of wooded upland.

Few areas of open space remain in the upland areas east of CCLMP. The expansion strategy for CCLMP has been to move away from the uplands where the core portion of CCLMP is located. Efforts to expand CCLMP have focused on land located in the floodplain west of the core park and away from the developed areas. This reflects the general lack of open space available for park expansion in the uplands.

Large tracts of agricultural land that lie north and west of CCLMP are open spaces that could be available for expansion of the park. MHTD's original section 601 mitigation package identified lands west of and adjacent to Creve Coeur Mill road as potential additions to the park. However, comments generated during circulation of the Page Avenue Extension FEIS and during the section 404 public hearing indicated the public perceived these lands as not accurately reflecting the type of land impacted within CCLMP by the Page Avenue Extension.

Wooded land located south of CCLMP was also included within the original section 6(f)(3) replacement package (Area B). This land is mostly wooded wetland and floodplain forest.

The major portion of the land that surrounds and is adjacent to CCLMP is either developed, has been deemed unsuitable as potential park land, or is included within the original section 6(f)(3) replacement plan. For these reasons, this alternative was not considered further.

### **2.6.2. FWS-CONFLUENCE**

The FWS submitted a 4,000-acre proposal, known as Confluence Park, for consideration as an alternative to replace the initially proposed replacement package. The area is located at the confluence of the Missouri and Mississippi Rivers in St. Charles County, includes Cora and Mobile Islands, and is approximately 15 miles northeast of CCLMP. Access to the

area from the nearest county road is currently restricted to unpaved farm field access roads.

CCLMP is located within and owned by St. Louis County. It is the desire of St. Louis County to replace park land impacted within CCLMP with land that is near the park and within the boundaries of St. Louis County.

This alternative is located outside the jurisdiction of St. Louis County approximately 15 miles from CCLMP. The area is much larger than is practical to appropriately replace the much smaller amount of impacted park land in CCLMP. The cost associated with the purchase of the Confluence area is considered excessive and burdensome due to the sheer size of the alternative. Also, access to the area is difficult. Because of these reasons, this alternative was eliminated from consideration.

#### **2.6.3. FWS-CATFISH ISLAND**

The FWS also submitted the Catfish Island Alternative during scoping. The 980-acre area is an island in the Missouri River between river miles 34 and 38. This proposal would replace the initially proposed replacement package. The Catfish Island is located within St. Charles County in the Greens Bottom area directly west and across the Missouri River from the LCCL Alternative. The area lies about three miles from CCLMP.

The preference that replacement land for CCLMP be located in St. Louis County and close to the existing park also applies to the Catfish Island Alternative. Additionally, the area has access only by farm field roads. These roads appear to be useable only when the water level in side channels of the Missouri River is low or the channels are dry. There is no bridging structure over the side channel that separates Catfish Island from the rest of the Greens Bottom area. Because of these reasons, the Catfish Island Alternative was eliminated from further consideration.

#### **2.6.4. HOWARD BEND LEVEE DISTRICT ALTERNATIVE II**

In response to the circulation of the Draft SEIS and public hearing held on August 3, 1994, the HBLD presented a new alternative (HBLD II), shown in Figure 7, to be considered as replacement land for that impacted in CCLMP by the Page Avenue Extension. It was proposed by the Levee District that this alternative constituted new and reasonable replacement land and should be considered as the preferred alternative.

St. Charles County

**HOWARD BEND LEVEE DISTRICT  
ALTERNATIVE II  
PAGE AVENUE EXTENSION**

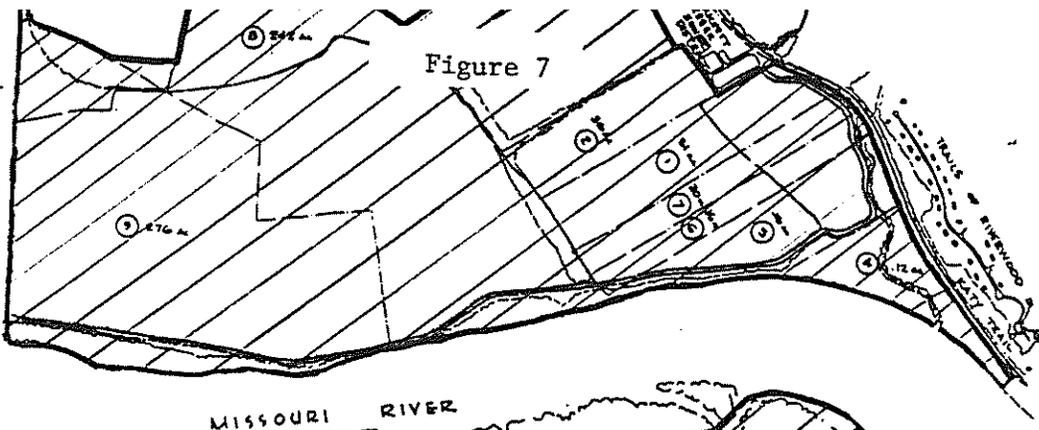
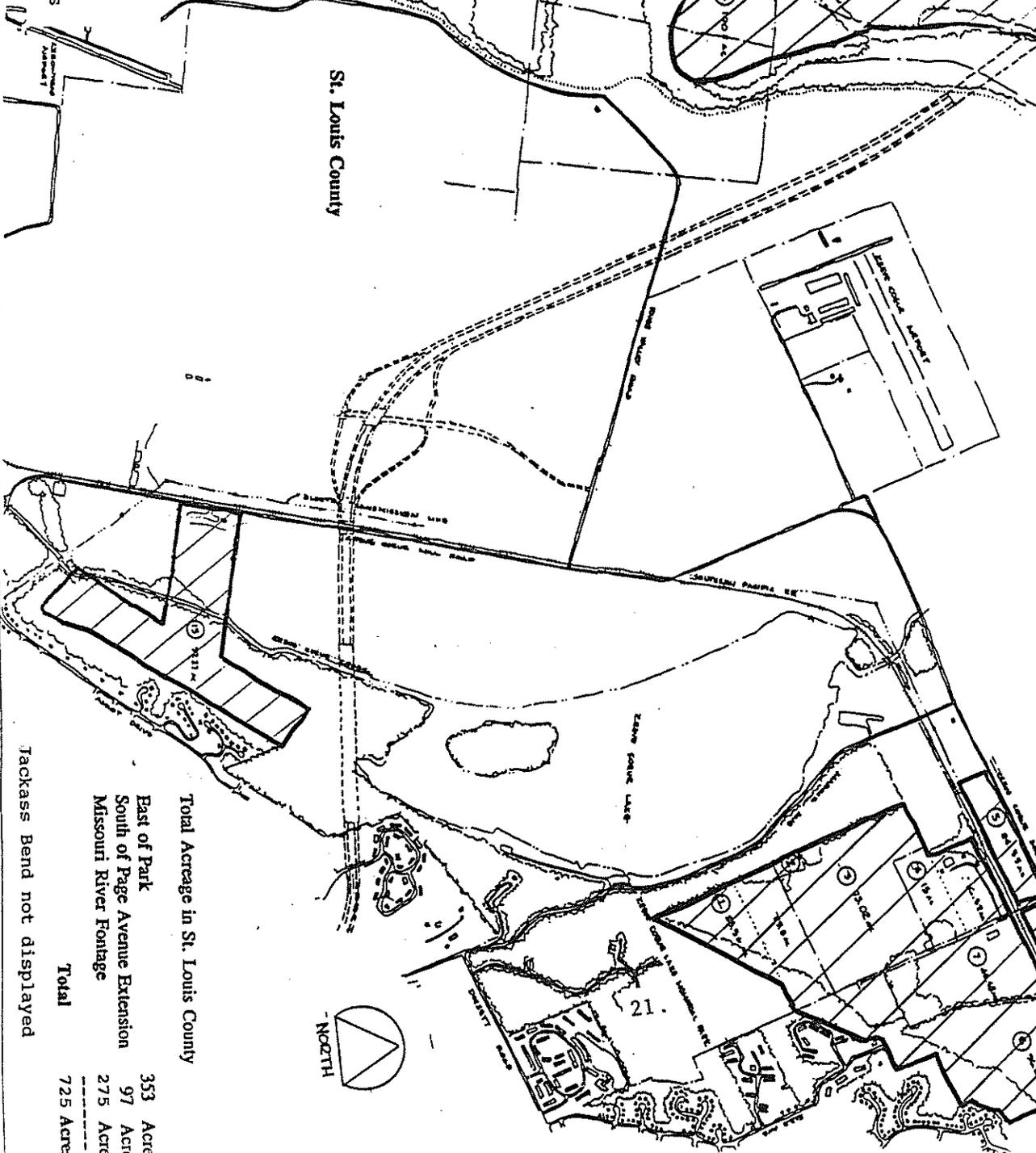


Figure 7

MISSOURI RIVER

St. Louis County



Total Acreage in St. Charles County

Catfish / Greens Bottom

746 Acres

Total Acreage in St. Louis County

East of Park  
South of Page Avenue Extension  
Missouri River Fontage

Total 725 Acres

Jackass Bend not displayed



The HBLD II proposal consists of approximately 1453 acres in the St. Charles and St. Louis County area and 475 acres known as Jackass Bend located on the Missouri River near Kansas City. An initial review of this proposal indicated that 878 acres of the HBLD II alternative had been previously identified and evaluated in the draft SEIS.

Parts of these 878 acres were rejected for various reasons described in later sections, while the remaining parts were already in an acceptable replacement package and did not constitute "additional land." Jackass Bend (475 acres) is eliminated due to its remote location and inability to more directly replace the loss of outdoor recreation land for the residents of St. Louis and St. Charles Counties. The remaining parts of the HBLD II proposal (575 acres) consists of the upper end of Greens Bottom in St. Charles County and Jane Downing Island in St. Louis County.

The "parcels northeast of park" includes land already identified as HBLD Alternative D and a part of Alternative A "no action" alternative. Alternative A consists of earlier proposed replacement land previously accepted and therefore should not be considered as new and reasonable replacement land. Land within HBLD Alternative D is an existing alternative, and therefore, also, should not be considered as new and reasonable replacement land.

The "parcels south of park" similar to the area above duplicate areas already evaluated and considered. These areas are included in the area identified as Alternative A. Since these parcels of the HBLD II proposal are already under consideration in other alternatives, they should not be considered as new and reasonable replacement parcels.

Catfish Island, discussed earlier under the same name, has been evaluated and eliminated from further consideration for such reasons as public access, management jurisdiction outside of St. Louis County, and excessive size/cost.

The Greens Bottom area of the HBLD II proposal is located in St. Charles County north of Catfish Island. The major portion of this acreage is used as cropland for the production of feed grains. The Natural Resource Conservation Service (NRCS) has identified approximately 51 acres as wooded wetland, one acre as emergent wetland, seven acres as farmed wetland, and one acre as open-water wetland. As a secondary land use, the cropped acres are used for land application of sludge from the Duckett Creek Sewer District treatment plant. The land is relatively level, with some woods on the northwest side near the Katy Trail and toward the southern end near Catfish Island. Much of the land near

the river was heavily damaged during the flood of 1993 and may be under several inches to several feet of sand.

The recreation potential of the Greens Bottom area would be greatest near the Katy Trail and close to the river. Since the trail is adjacent to the river, just north of the northernmost parcel included in this proposal, access to the river is not a significant benefit. The usefulness of the property within the levee structure north of the treatment plant could accommodate active recreation in the form of soccer and ball fields or could be used in a passive manner if the area was allowed to revert to a natural condition. However, the recreational usefulness, quality, and value of these areas could be adversely affected as a result of the extensive sand deposits in the area. This area presently exhibits only a few scattered and isolated wetlands. Wetland development continues to be a high priority for selecting appropriate replacement lands.

The Jane Downing Island, consisting of approximately 175 acres plus nearly 100 acres immediately south of the island, comprises the final part of the HBLD II proposed alternative. These 275 acres are located within an area bordered on the east by the levee and on the west by the Missouri River, with the northern tip crossing beneath the proposed Page Avenue Extension. Access to the island is through privately owned property to the south and east. A channel of water separates the island from lands to the east and south, with two rock dikes as the only access across the channel. The area has large sand bars along the western edge that could be utilized for various forms of recreation. However, only passive recreation could be made available due to the entire area being within the regulatory floodway of the Missouri River. The periodic flooding of this area would also make it extremely difficult to maintain an accurate delineation of the property boundary line and to maintain even basic development (e.g., parking lots, access roads, trails, and observation stands).

Utilities: Electrical and telephone lines are located along the northwest boundary of the Greens Bottom area. Cuivre River Electric, Union Electric, and Southwestern Bell Telephone all have service distribution lines along the Katy Trail. The St. Charles and St. Peters Joint Venture water line crosses the Missouri River from St. Louis County and proceeds northwesterly across Greens Bottom. The water line lies approximately 48 inches below the ground surface. After crossing the river in St. Louis County (Jane Downing Island), the water line turns to the south and runs parallel to the St. Louis County shore to the Howard Bend Plant. No other utilities exist within these areas.

**Planning and Zoning:** The Greens Bottom area is located in an unincorporated area of St. Charles County with the existing land use characterized in the County's "Year 2000 Master Plan" as a mix of non-urban and agricultural uses. This area is zoned as F-P, Floodplain. The Jane Downing Island and vicinity are in the incorporated boundaries of the city of Maryland Heights. The city's zoning code indicates this area is zoned as non-urban. The Comprehensive Plan-1987 identifies the future land-use concept as planned use mixed development.

**Cultural Resources:** The cultural resources staff of the MHTD examined the Greens Bottom area and Jane Downing Island and vicinity for known sites and for the potential of encountering unreported cultural resources. Background research at the Archaeological Survey of Missouri, University of Missouri-Columbia, identified no new archaeological sites and no historic sites in the subject areas. Since nearly all of the subject area is located in the historic river channel, the probability of intact prehistoric sites in this setting would be extremely low. However, the existence of the old river channel raises the possibility of encountering shipwrecks in these areas. A map of recorded shipwreck sites on display at the Arabia Museum in Kansas City notes the possibility of five known shipwrecks in the area. The Greens Bottom area could contain four of the wreck sites, while Jane Downing Island is identified as a possible site of a shipwreck dating from 1860. The locations of these shipwrecks are approximations, and the possibility of being able to locate them is low.

**Other Considerations:** No additional threatened or endangered species in the HBLD II proposed area were identified beyond those discussed in the draft SEIS for the other alternatives. The evaluation of air quality and hazardous waste, already documented in the draft SEIS, also applies to this area. There are no standing structures in the HBLD II areas that have not been identified in the draft SEIS.

Although the HBLD II proposed alternative consisted of approximately 1453 acres plus 475 acres at Jackass Bend, the proposal is determined not to meet the criteria of "new and reasonable land" or that of "additional land" as prescribed in the June 3, 1993, letter from the NPS to the Director of the Missouri Department of Natural Resources. Jackass Bend, although possessing significant wetland characteristics, located in western Missouri near Kansas City, is beyond the legal jurisdiction of St. Louis County and would not provide the citizens of St. Louis and adjoining counties with replacement land to meet their immediate loss of land in CCLMP. St. Louis County has strongly expressed the desire

and commitment to locate and acquire adequate replacement land within the County to mitigate the impacted land in CCLMP. The two adjacent areas to the northeast and south of CCLMP are considered unacceptable because of their earlier identification and evaluation in other alternatives, thereby making these two areas unavailable as new and reasonable land. The areas of Catfish Island and Greens Bottom are considered unacceptable due to being outside the St. Louis County legal jurisdiction and for reasons detailed in the earlier section on Alternatives Considered and Eliminated From Further Study.

Jane Downing Island and vicinity, although possessing some wetland characteristics, is declared unacceptable for reasons of lack of public accessibility, limited size as the only remaining parcel of this alternative, natural limitations against any development, an unstable boundary line delineation due to periodic flooding, and the difficulty for St. Louis County to create a manageable recreation unit.

Appendix C further identifies the natural resources and environmental characteristics of the HBLD II alternative.

### **3.0. AFFECTED ENVIRONMENT**

#### **3.1. DESCRIPTION OF THE SECTION 6(f)(3) RESOURCE**

CCLMP, administered by the St. Louis County Parks and Recreation Department, represents more than 10.6 percent of the county's 10,746 acres of park land. The 1,140.87-acre park is mostly located on the Missouri River's floodplain, extending approximately 13,800 feet along Creve Coeur Mill Road and 7,200 feet along Marine Avenue. The park, with its 300-acre lake, provides outdoor recreation activities for the residents of St. Louis County, St. Charles County, and visitors to metropolitan St. Louis. CCLMP provides numerous outdoor recreation opportunities for both active and passive pursuits. Opportunities exist for activities such as picnicking, walking, sunbathing, sightseeing, bird watching, and fishing in a heavily wooded area with a mixture of woodland and wetland habitats. This natural setting may be one of the few remaining such areas in metropolitan St. Louis. The northern two-thirds of the park are primarily used for active recreation. Active recreation in this area includes such activities as archery, softball, tennis, sailing, rowing, sail-boarding, ice skating, disc golf, and jogging. Special events such as power boat racing take place at occasional times throughout the year. Swimming is not allowed in the lake due to excessive bacteriological conditions.

The St. Louis County Parks and Recreation Department, in August, 1989, entered into a 25-year lease arrangement with the Metropolitan Sewer District for 44.32 acres of land near the southern end of CCLMP. The leased area is used for polo and other field games with supporting public facilities.

CCLMP, including the above leased area, is an extremely popular and heavily used recreation area. The natural features, wide variety of activities, history, and location within a major metropolitan area makes CCLMP a high quality recreation facility. Any alterations of that character are viewed with concern by the community's outdoor recreation interests.

### **3.2. PROJECT AREA**

The Page Avenue Extension study area is located in western St. Louis County and eastern St. Charles County, Missouri. Generally, the area is bounded by Route I-270 on the east, Route 340 (Olive Street Road) on the south, Route 40/61 on the west, and Route I-70 on the north. The area includes the "Golden Triangle" area of St. Charles County, an active development area bounded by Route 40/61, Route I-70, and the Missouri River.

The Page Avenue Extension study comprises an area of approximately 85,000 acres or 133 square miles. The St. Louis County portion of the study area includes 15,799 acres or 24.7 square miles (18.6 percent of total). The St. Charles County portion of the study area covers 69,218 acres or 108.1 square miles (81.4 percent of total). A detailed description of the overall project area environment may be found in the FEIS.

### **3.3. GEOLOGY**

#### **3.3.1. "NO ACTION" ALTERNATIVE (ALTERNATIVE A)**

A description of geology for the "No Action" Alternative is further described in Section 3.0., Affected Environment, Volume 1, of the FEIS.

#### **3.3.2. LCCL PROPOSAL (ALTERNATIVE B)**

This is an area in which the Missouri Division of Geology and Land Survey has very little drill hole data. It is probable, however, that the thickness of alluvial material is in excess of 100 feet in this alternative near the river. The thickness will be a great deal less near the valley wall in the southeastern part. Alluvial materials, close to the river, will be similar to those in the Cora-Mobile Island area of St. Charles County. There will probably be more

fine-grained (silty) material at the surface in the area adjacent to the valley edge. In fact, it is probable that very little sand or gravel is present in the alluvial deposits near the valley wall.

Water levels in the alluvial material will be similar to those at the Missouri/Mississippi Rivers confluence and will fluctuate with river stage in much the same way. Measurements near the center of the area, made in 1968, indicated ground water levels at about 19 feet. However, in those areas where the materials are finer grained, response times will be longer due to horizontal and vertical permeabilities being much lower.

### **3.3.3. FWS PROPOSAL (ALTERNATIVE C)**

This area, since it borders on the previously discussed area, will have similar geologic and hydrologic conditions. However, since all of it lies in an area closer to the river, more coarse-grained material is probably present and geologic and hydrologic conditions will be more normal for alluvial settings than in the southeastern part of the previous area discussed in the LCCL Alternative. Although no drill hole information is available, the alluvial deposits will be a great deal thinner (20 feet) and will "feather out" at the edge of the alluvial valley. They will contain more fine-grained, silty, clay material. This material will have low vertical and horizontal permeabilities.

### **3.3.4. HBLD PROPOSAL (ALTERNATIVE D)**

The general geological configuration for this alternative may be inferred from examination of Section 3.0., Affected Environment, Volume 1, of the FEIS.

### **3.3.5. MHTD PROPOSAL (ALTERNATIVE E)**

The general geological configuration for this alternative may be inferred from examination of Section 3.0., Affected Environment, Volume 1, of the FEIS.

## **3.4. SOILS**

The LCCL Alternative, the FWS proposal, and the majority of the HBLD Alternative are shown on the NRCS general soil map of St. Louis County as Blake-Eudora-Waldron Association. This association is nearly level and somewhat poorly drained, with deep soils formed in alluvial sediment on the floodplains. This association consists of broad bottomlands on floodplains of the Missouri and Mississippi Rivers. Slope is generally less than 2 percent. There are three

predominant soils in this association: the Blake soils, the Eudora soils, and the Waldron soils. The Blake soils, which make up about 43 percent of the association, have a silty clay loam surface texture, are somewhat poorly drained, and are located on intermediate positions between the higher Eudora soils and lower Waldron soils. The Eudora soils, which make up 23 percent of the association, have a silt loam surface texture, are well drained, and occur mainly on low ridges or natural levees on the highest positions on the floodplain. The Waldron soils, which make up 18 percent of the association, have a silty clay surface texture, are somewhat poorly drained, and occur in low-lying slackwater areas and old slough channels. The Blake silty clay loam map unit is found on the bottom-land at the HBLD Alternative. Additional soil map units found at the LCCL site include Wilbur silt loam, Eudora silt loam, Booker clay, Waldron silty clay, and Sarpy loamy fine sand rarely flooded. Soils at these sites, which are listed on the SCS St. Louis County hydric soils list, include Blake silty clay loam map unit, the 10 percent Blake inclusions, which are considered hydric when frequently flooded for long duration within the Eudora silt loam map unit, the Booker clay map unit, and the 8 percent Booker inclusions and the 7 percent Blake inclusions which are considered hydric when frequently flooded for long duration within the Waldron silty clay map unit.

The MHTD Alternative and the bluff portion of the HBLD Alternative are shown on the SCS's general soil map of St. Louis County and St. Louis City, Missouri, as Menfro-Winfield-Urban Land Association. This association is gently sloping to very steep, well drained and moderately well drained, and deep soils formed in loess with urban land on uplands. This association consists of narrow drainageways and dissected, loess-capped ridges, and side slopes on uplands. Limestone sinks are in some areas. Slope ranges from 2 to 45 percent. The predominant soils in this association and their characteristics include the Menfro soils which make up 64 percent of the association, have a silt loam surface texture, are well drained and moderately sloping to very steep, and occupy the highly dissected uplands that extend several miles back from the Missouri River bluffs. The Winfield soils make up 24 percent of the association, have a silt loam surface texture, are moderately well drained, gently sloping to strongly sloping, and occupy ridgetops and upper side slopes on uplands. Urban land is occupied by structures and pavements. Soil map units found at the MHTD site include Menfro silt loam, 5 to 9 percent slopes; Menfro silt loam, 20 to 45 percent slopes; and Menfro silt loam, karst, 9 to 30 percent slopes. In addition to the map units found at the MHTD site, the HBLD site includes Menfro silt loam, 9 to 14 percent slopes,

and the Urban Land-Harvester complex, 9 to 20 percent slopes. None of the soils found at these sites are listed on the NRCS St. Louis County hydric soils list.

### **3.5. LAND COVER AND USE**

The following is a general description of land cover and use. More detailed information may be found in the 1982, "Missouri River Floodplain Atlas."

#### **3.5.1. "NO ACTION" ALTERNATIVE (ALTERNATIVE A)**

A description of land cover and use for the "No Action" Alternative (Alternative A) may be found in Section 3.0., Affected Environment, and Section 4.0., Environmental Consequences, Volume 1, of the FHWA FEIS.

#### **3.5.2. LCCL PROPOSAL (ALTERNATIVE B)**

This alternative, in addition to encompassing the major portion of the 300 acres of the FWS proposal (Alternative C), consists of a total of 773.8 acres. The land use is primarily cropland consisting of corn, soybeans, and wheat, and numbering 735.1 acres, with the remaining 38.7 acres in floodplain woodland.

Eighteen acres have been classified by the SCS as wooded wetlands. Six separate properties within the LCCL area contain structures. A total of three houses are located within the area, with only one presently occupied due to past flooding. The area also includes a golf driving range; a farm operation and assorted sheds, barns, and garages; three greenhouses; and other small structures. Baseball fields, concessions buildings, and a storage building complete the total of facilities presently existing on the LCCL area. Most of the above facilities have been heavily damaged as a result of the recent flooding of the Missouri and Mississippi Rivers. However, many of the above-noted facilities have been either completely or partially restored to their original condition.

#### **3.5.3. FWS PROPOSAL (ALTERNATIVE C)**

These 300 acres are primarily agricultural land. However, the area contains some relatively small tracts of forested and shrub-scrub wetlands, as well as emergent wetlands. The SCS has classified 15 acres as wooded wetlands in this alternative. Since the old river channel site normally has standing water, farming activities in wet years are possible only by pumping water from the area by the landowner. It is believed that even with pumping to remove surface waters, the area would support wetland habitat in

years of above average precipitation as well as years of average or less precipitation.

A one-story frame house (vacant) and three farm-related structures are present within this alternative. A barn and two grain bins have sustained damage during the June 1993 floods.

#### **3.5.4. HBLD PROPOSAL (ALTERNATIVE D)**

This 165-acre alternative is a composition of agricultural, forest, and commercial land uses. The agricultural land is made up of 75 acres of cropland and 25 acres of grassland. As previously mentioned, the cropping rotations typical of the Missouri bottoms are corn and soybeans with occasional plantings of wheat. The grassland would likely be used for hay and is not a typical land use in this area. The grass, conceivably, is a commonly used introduced forage species. The forest land consists of a 50-acre patch of floodplain woodland species and 29 acres classified by NRCS as wooded wetlands, all of which resemble the typical floodplain forest of the area. The remaining 60 acres are commercial property made up of structures and related land use. An area of approximately 46.5 acres within the boundaries of this alternative is presently being used as an auto salvage yard. The salvage yard has been in existence since the early 1960s and is presently in operation. As a result of the 1993 flood, this area has collected a large amount of debris, including hundreds of abandoned automobile tires.

There is a one-story frame house (vacant) and one metal outbuilding located within this alternative, both of which have sustained major flood damage.

#### **3.5.5. MHTD PROPOSAL (ALTERNATIVE E)**

This alternative consists of 38.7 acres of forest and wetland; a portion classified by the SCS as wooded wetlands closely resembles the park land being impacted. The forest is a wooded upland community bordering the park on the east side. The wetland type is scrub and amounts to 7.8 acres. A preliminary report issued by The Missouri Native Plant Society and statements from the Sierra Club contend that the area crossed by the Page Avenue Extension consists of a natural area of old-growth forest that dates to pre-settlement times. Irrespective of this claim, a corridor through CCLMP (Red Route) for the Page Avenue Extension has been selected, with the entire corridor (207.0 acres) already declared impacted and converted to a non-outdoor recreation use. Replacement land, as discussed throughout this document, will be required to meet the criteria in Section 6(f) of the L&WCF Act.

The upland portion of this alternative is located adjacent to the southeast boundary of CCLMP and contains two new subdivisions with 25 residences and approximately 100 persons. The remainder of the MHTD Alternative is contained wholly within the boundaries of the HBLD Alternative and is vacant land.

### 3.6. FARMLAND VALUES

Farmland values for Alternatives B, C, D, and E have been determined through the use of the Farmland Conversion Impact Rating (AD-1006) provided by the NRCS. That rating, including land evaluation criteria and site assessment, is further described in Appendix A.

### 3.7. WETLANDS AND HYDRIC SOILS

See Appendix A for a table of wetlands and hydric soils for the various alternatives.

### 3.8. FLOODPLAINS

Federal Emergency Management Agency National Flood Insurance program maps were used to determine areas of the regulatory floodways and floodplains. The Creve Coeur Creek/Creve Coeur Lake, Missouri River, and Dardenne Creek floodplains would be encountered depending upon the alignment or combination implemented. Within these floodplains are regulatory floodways.

The floodway is the channel of a river plus any adjacent floodplain areas that must be kept free of encroachment in order that the Base Flood (100 year) may be conveyed without causing an increase to the Base Flood Elevation.

#### No Action Proposal (Alternative A).

Entirely in Floodway Fringe for 100-year flood. Some parcels are in the regulatory floodway.

#### LCCL Proposal (Alternative B).

Entirely in Floodway Fringe for 100-year flood.

#### FWS Proposal (Alternative C).

Entirely in Floodway Fringe for 100-year flood.

#### HBLD Proposal (Alternative D).

Entirely in Floodway Fringe for 100-year flood.

#### MHTD Proposal (Alternative E).

Appears to be entirely out of Floodway and Floodway Fringe area.

### **3.9. THREATENED AND ENDANGERED SPECIES**

#### **Bald Eagle (Haliaeetus Leucocephalus)**

The only federally threatened species that may occur in the areas of all the alternatives is the bald eagle. The bald eagle frequents major streams and large bodies of water in Missouri during the winter, including the Missouri River and Creve Coeur Lake. The nearest active bald eagle nest occurs near Labadie, Missouri, along the Missouri River approximately 28 river miles upstream of the project site. During the 1994 mid-winter survey for this species in St. Louis County, 24 eagles were observed. None of the proposed replacement areas is likely to adversely affect this species.

### **3.10. UTILITIES**

#### **3.10.1. "NO ACTION" ALTERNATIVE (ALTERNATIVE A)**

A description of utilities for the "No Action" Alternative (Alternative A) may be found in Section 4.20., Utilities and Public Service Systems, Volume 1, of the FEIS.

#### **3.10.2. LCCL PROPOSAL (ALTERNATIVE B)**

The 345-kilovolt Sioux-Mason overhead electrical transmission line owned by Union Electric traverses the eastern edge of this alternative. The line runs roughly from north to south and parallels the St. Louis Southwestern Railroad line within an easement which is 275 feet wide. The line serves the western portions of St. Louis County. The presence of a high-tension line through this area would be classified as an environmental intrusion and limit recreation activities if Alternative B is selected as replacement parkland. However, as with any park facilities that have overhead utilities existing within the park boundary, it is suggested that professional judgements would be exercised in the planning and designing of activity areas away from such intrusions. The Metropolitan Sewer District main and the three water mains owned by the city of St. Louis described under the FWS proposal also traverse the LCCL Alternative. Although such underground utilities are not likely to detract from a park experience, above-ground structures and service roads would have an adverse effect on the recreation experience.

#### **3.10.3. FWS PROPOSAL (ALTERNATIVE C)**

Two major utilities traverse the extreme lower tip of this alternative. A St. Louis Metropolitan Sewer District sewer main and three large water supply conduits owned by the city of St. Louis are located there. The sewer main connects the

Creve Coeur Pump Station located on Creve Coeur Mill Road with the Missouri River Sewage Treatment Plant located in the area. The three large water mains (60-inch, 62-inch, and 72-inch lines) run from the city's Howard Bend Water Plant to a 100-million-gallon reservoir located in Stacy Park.

#### **3.10.4. HBLD PROPOSAL (ALTERNATIVE D)**

Union Electric's Sioux-Mason overhead electrical transmission line (described under the LCCL Alternative) lies within the extreme northwestern portion of this alternative. The line extends approximately midway between Creve Coeur Mill Road and the St. Louis Southwestern Railroad.

#### **3.10.5. MHTD PROPOSAL (ALTERNATIVE E)**

Union Electric's Sioux-Mason overhead electrical transmission line runs across the southern tip of the uplands area located adjacent to the southeastern boundary of CCLMP.

#### **3.11. ZONING/LOCAL PLANNING**

All primary alternatives are located within the city of Maryland Heights. The Official Zoning District Map, adopted by the city on April 24, 1989, identified the subject areas as Non-Urban (NU), with the exception of a small area of Alternative E (MHTD Proposal) located south and east of CCLMP. That area is zoned R-2, residential typified by large lots. Areas designated as NU should have as a principal use either agriculture or single-family dwellings on large-sized lots (3-acre minimum). Other permitted uses on such zoned land include parks for general recreation or for leisure and ornamental purposes, and play fields or athletic fields. Conditional land uses include petroleum pressure control stations, planetaria, and elementary schools.

The city of Maryland Heights developed a land-use planning document entitled "Comprehensive Plan-1987." Within that plan, two growth strategies were considered: a primary-use plan and a future land-use concept. The primary-use plan assumes that no additional protective levees will be constructed. The future land-use component assumes construction of a 500-year levee to protect the floodplain area of Maryland Heights located south of I-70 along the Missouri River. The primary land-use plan indicates the area is to remain predominantly for non-urban/agricultural use.

**3.11.1. "NO ACTION" ALTERNATIVE (ALTERNATIVE A)**

A description of zoning/local planning for the "No Action" Alternative (Alternative A) may be found in Section 3.13., Existing Planning, Volume 1, of the FEIS.

**3.11.2. LCCL PROPOSAL (ALTERNATIVE B)**

This alternative is located within the city of Maryland Heights.

Presently zoned: The entire area is zoned NU.

Requests for variances or conditional use permits: A request for variance was granted to the Creve Coeur Athletic Association enabling them to construct a picnic shelter on lands which they currently lease from Creve Coeur American Legion Post. This area is also included with the FWS Alternative. The picnic shelter is not considered detrimental to the possible establishment of this alternative as park land.

Primary land-use concept: Portions of the area are identified as park and recreational land and as non-urban agricultural land.

Future land-use concept: The area within the boundaries of this alternative is identified as a planned use mixed development, park and recreation facility and commercial use. An area is also identified for a highway interchange (Page Avenue Extension/Earth City Expressway) and for a potential transportation corridor south of Page Avenue Extension.

**3.11.3. FWS PROPOSAL (ALTERNATIVE C)**

Zoning and local planning are the same as for the LCCL Proposal (Alternative B).

**3.11.4. HBLD PROPOSAL (ALTERNATIVE D)**

Presently zoned: The entire area is zoned NU.

Requests for variances or conditional-use permits: There are no requests currently pending before the Maryland Heights Board of Adjustment for variances or conditional-use permits.

Primary land-use plan: The primary use of land within this alternative is presently non-urban/agriculture.

Future land-use concept: Mixed development.

### **3.11.5. MHTD PROPOSAL (ALTERNATIVE E)**

This alternative is located within the city of Maryland Heights.

Presently zoned: The uplands area located south and east of CCLMP is zoned R-2, single-family residential, typified by single-family dwellings located on large lots (minimum lot width of 100 feet at the building line). Permitted land uses include parks and playlots or playgrounds. Conditional uses include petroleum pressure control stations, play fields or athletic fields, and primary schools. The remainder of the MHTD Alternative is zoned NU.

Requests for variances or conditional-use permits: There are no requests currently pending before the Maryland Heights Board of Adjustment that would involve the MHTD Alternative.

Primary land-use plan: The uplands component of the MHTD Alternative is planned as low density residential. The remainder of the alternative is non-urban/agricultural.

Future land-use concept: The uplands area is shown as low-density residential. The remainder of the alternative is planned use mixed development.

## **4.0. ENVIRONMENTAL CONSEQUENCES**

### **4.1. IMPACTS ON LAND USE AND RECREATION UTILITY**

This environmental analysis includes an evaluation of potential changes in current local land use and recreation utility that would result from the addition of each parcel under consideration for the section 6(f)(3) replacement package. Some reiteration of local land use is necessary under the impact description for each alternative in order to allow descriptive conclusions to be drawn. A general survey of several categories of impacts is presented in each action alternative impact description as part of the summation of changes in recreation utility.

#### **4.1.1. RECREATION UTILITY EVALUATION CRITERIA**

The development of land for outdoor recreation opportunities is limited largely and primarily by cost and function. Therefore, subjective interpretation of potential recreation may be based on the creativity of the designer. It is proposed that any type of recreation opportunity may be developed on a site if it is affordable and meets the

overall function of the park site and the surrounding environment.

All the alternatives provide some potential for outdoor recreation development and subsequent activities. For the purpose of this evaluation, it will be assumed that all sites could be developed in a passive manner to accommodate a walking for pleasure theme within the overall concept of the park development. Walking is identified in the 1991-1996 SCORP document as the activity most often participated in by Missourians. Many of the trails could be designed to incorporate the natural features of the site and provide interpretive opportunities. Infrastructure, such as roads, parking, water and sewer, and rest room facilities, could also be developed.

In high demand and often mentioned by Missourians is the need to provide environmental protection and preservation. The participants of the 1992-1993 National Recreation Survey identified preservation of natural resources and protection and maintenance of Missouri rivers, streams, land, and forests as important and high priorities. The preservation of these resources should be accommodated by the purchase of environmentally sensitive lands that would include plant, animal, and fish habitats. In addition, natural habitats should be restored to reflect presettlement conditions, and wild areas should be created to restore biodiversity.

In addition to recreation potential, the presence of natural resources and other desirable recreation development traits are discussed for each alternative. The recreation potential of each site is evaluated against the following environmental concerns:

1. Existing land use
2. Surrounding land use
3. Water resources
4. Transportation network
5. Loss of wildlife habitat
6. Noise
7. Preservation of natural areas
8. Increased aesthetics
9. Reclamation of spoiled lands
10. Increased traffic
11. Potential recreation value
12. Cost to develop
13. Security

#### **4.1.2. "NO ACTION" ALTERNATIVE (ALTERNATIVE A)**

The recreation utility for the "No Action Alternative" (Alternative A) is of similar utility to the converted

lands. The designated lands on the northeast side of the property are now farmed bottom-lands with scenic bluffs on the border and upland woods to the east-southeast. This area will be compatible with the future recreation development being proposed by the St. Louis County Park and Recreation Department. The designated replacement property south of the existing park, identified as Area B, most closely represents the major portion of the converted area in natural appearance and usefulness. The Area B parcels comprise nearly all of the wooded bottom-lands associated with Creve Coeur Creek.

#### 4.1.3. LCCL PROPOSAL (ALTERNATIVE B)

This alternative is similar to the FWS Alternative C except for the additional acres added to the area. The addition of this acreage would encompass the larger portion of the area known as LCCL. The additional acreage encompasses larger areas of prior converted cropland and upland with smaller tracts of wooded wetland, emergent wetland, and farmed wetland.

Surrounding land use is agricultural to the north, east, and west and residential to the south. Water resources exist in the form of drainage ditches that eventually flow into CCLMP. Current use of the drainage ditch is for natural drainage and a pumping receiver for farm drainage operations. Access to the site includes Creve Coeur Mill Road, existing gravel county roads, and River Valley Road. Access could be provided from the residential area to the south. There would be an increase in available wildlife habitat in terms of both fish and wildlife species. Noise levels should be reduced by the loss in farming operations and the reversion to natural environment. The area, as a wetland, may also reduce noise levels by the absorption of ambient sounds being produced in the general area either by farming or airport operations. The creation of wetlands in the area would ensure the preservation of a unique area of biodiversity near an expanding urban area. Although aesthetics may be improved by the removal of farming and the reversion of the farmland to wetlands, any new roads could adversely impact the aesthetics of a park. Sections 4.6 through 4.8 further discuss the probable impacts of planned or proposed roads in the area of this alternative. There will be no reclamation of spoiled lands. Traffic in the area may increase at points of interest along the border of the wetland. A small amount of additional traffic may also be realized in the residential district to the south, since access would be available at this point.

This site has high development potential. An educational wetland facility would be unique due to its close proximity

to an expanding urban population. The area could be a multi-purpose wetland facility providing numerous opportunities for people to interact with the environment in a passive manner. The size in overall acreage and the potential recreation diversity of the project could increase the cost over other alternatives. Security patrols could access the park from the residential area to the south, county roads, and Creve Coeur Mill Road. Security within the park would have to be provided through staffing of the facility.

This site would be adjacent to the proposed Page Avenue Extension on the north and could be bisected by a future transportation corridor on the east. Although the St. Louis County Transportation Department has conceptually recognized the Earth City Expressway, lack of funding and a low priority status has kept this project off all short- and long-range area transportation plans.

#### 4.1.4. FWS PROPOSAL (ALTERNATIVE C)

This alternative is predominantly upland (non-wetland) and prior converted cropland and is generally surrounded by upland and prior converted cropland. Drainage and some pumping are required to keep the area available for farming. Water resources are limited to storm water draining from surrounding farmland, generally to the east and west. Access to the site is from existing gravel county roads and River Valley Road. There would be no loss in habitat but rather an increase in available habitat as a result of improvements to the wetland area. Farming operations would be reduced, and this would allow the area to revert back to a natural wetland environment. Noise levels could be reduced by the reduction of farming operations. The reversion of the area to a natural wetland would preserve a natural area close to an urban environment. This preservation would ensure access to a wetland management area for residents of the area. The improvements that would be implemented could ultimately enhance the aesthetics by providing a wetland experience where before none existed. There will be no reclaimed spoiled lands. Traffic may increase to this area initially, since a portion of the alternative could be along the proposed hiking and bicycling trail that would connect the Katy Trail State Park.

This site, adjacent to the Page Avenue Extension, has high recreation potential as a wetland educational area. The area, when developed into viable wetlands, could include a boardwalk, pathways, interpretive signage, and waterways that would make access into the park available to park users. Portions of this site are identified as wetland in the National Wetland Inventory. The cost to develop could

be minimal since a wetland existed on both sides prior to farming. Security would have to be provided by county law officers or security officers during periods of operation.

#### 4.1.5. HBLD PROPOSAL (ALTERNATIVE D)

Currently, a portion of this site is occupied by an auto salvage operation. Agricultural land is located to the north and west. Bluffs line the southern border, and there is a small linear plateau along the top of the bluffs. Some commercial development exists to the east. The St. Louis Southwestern Railroad runs through the property to the north. The site is relatively level except for the bluff area. All of the level grounds are remnants of a changed river course. There are limited water resources on the property; wetlands are present and could be enhanced as a part of the park theme. These wetlands are identified in the National Wetlands Inventory. Access to this site is from Creve Coeur Mill Road to the north of the property. Future access could be provided via Rule Avenue to the south. In addition, some access is available to the area above the bluff through city streets adjoining the site and from trails currently existing from the bluff to the bottom land areas. There will be no loss of wildlife habitat, but rather an increase, since farming will be reduced and vegetation naturally reintroduced. Noise levels would diminish somewhat due to the removal of the salvage operation and the decrease in farming operations. There could be some increase in the noise level during special-use events and daily use of the site; however, levels should be generally consistent with other activities within CCLMP. Preservation of a wetland would be accommodated, since upon reduction of farming and removal of the salvage operation, the site could be managed as a wetland.

Plans to rehabilitate the site would preserve access to the bluff area and thus create an improvement in the overall aesthetics of the site. This alternative would also reclaim lands spoiled by an auto salvage operation since the 1960s. No increase in traffic is anticipated along Creve Coeur Mill Road as a result of park development. Traffic within the proposed site should diminish, since passive park design will only allow for parking along the outside border of the parcel.

This site has high recreation development potential. The area is located along the fringe of the floodplain and is not subject to continual flooding. The transition limestone bluff area between floodplain and higher ground provides an aesthetic quality for recreation developments on the lower, more level ground. Cost to develop the site could be substantial due to the removal of the salvage operation.

However, the large warehouse on the property might have some value for recreational use. Some hazardous materials may be present from automobiles that have been stored on the site for over 30 years. Security at this site would be good, since it is located close to commercial development where security is already present. The necessity for additional patrol could be easily accommodated by local police and county law officers. This site would not be impacted by the actual development of the Page Avenue Extension or the locating of a reserved corridor for future transportation.

#### 4.1.6. MHTD PROPOSAL (ALTERNATIVE E)

This alternative proposes to replace part of the original Section 601 mitigation land with acreage that more closely resembles the cover type of the area that will be converted to highway right-of-way. The parcel is basically the same as the HBLD proposal but excludes the auto salvage area. The MHTD Alternative also includes acreage along the southeastern boundary of CCLMP. This southern parcel is bluff topography similar to that of the HBLD Alternative.

Much of this alternative resembles the type of cover and plant material that is proposed for conversion. The surrounding land use of this part of the northern alternative is Creve Coeur Mill Road to the north, an auto salvage operation to the west, commercial development to the east, and bluff land property to the south. Surrounding land use of the southern parcel is CCLMP to the west, south, and north, and residential development to the east. Existing land use is currently agricultural row crop land (prior converted wetlands) on the northern site and bluffland on the southern site. Transportation to the site would be accommodated by the Creve Coeur Mill Road. The southern site could use existing residential streets for access and would also be accessed from the park since it will adjoin the park. There will be no net loss of wildlife but rather an increase in available habitat due to the reduction in row crop farming on the northern site and protection of the southern site from adjacent residential development. Noise could be reduced by a reduction in farming activities at the northern site and should not be increased substantially by increased pedestrian use at either site. Automobile use will be restricted to parking areas along Creve Coeur Mill Road and residential streets, and general access will be on foot for both sites unless bicycling paths are provided. Occasional access by machinery, equipment, or automobile may be necessary for maintenance purposes.

The development of the northern site as a park with a wetland theme would enhance the habitat by reducing farming

activities and protect the southern site from residential encroachment. Allowing the northern parcel to naturally revert back to a wetland would increase available habitat and biodiversity. The aesthetics of the northern site is similar to the southern parcel in the bluff area. Improvement in aesthetics could be from development of the site into a wetland observation area. No reclaimed spoiled lands exist at either site. Traffic may increase in association with each site becoming open to the public. Parking will have to be provided for each site.

The sites could be adaptable to recreation development and therefore provide a diversity of recreational opportunities. The cost to develop this alternative could be minimal since this part of the alternative does not include the auto salvage operation. Security would be similar to the HBLD proposal. This site would not be impacted by either the Page Avenue Extension or the locating of a reserved corridor for future transportation.

#### 4.1.7. RECREATION MATRIX

##### Category I

All alternatives are considered and scored using a Likert-type scale. Each of the 11 criteria areas in Category I are listed, and a number from 1 through 5 is assigned. Low recreation potential could indicate incompatible surrounding land uses, inadequate access, high ambient noise levels, traffic concerns, or an overall poor environment for recreation development. High recreation potential would reflect favorable existing and surrounding land uses, low existing noise levels, and an overall high potential for recreation use after development. The scoring is divided into two categories. Scoring for Category I is indicated by the following criteria:

- 1 = Low Recreation Potential
- 2 = Moderately Low Recreation Potential
- 3 = Moderate Recreation Potential
- 4 = Moderately High Recreation Potential
- 5 = High Recreation Potential

##### CATEGORY I

CRITERIA	HBLD Alt.D	MHTD Alt.E	FWS Alt.C	LCCL Alt.B
Existing Land Use	2	3	3	3
Surrounding Land Use	4	2	3	4

Water Resources	3	3	4	5
Transportation Network	4	4	5	5
Increase of Wildlife Habitat	4	4	4	5
Noise	3	3	4	4
Preservation of Natural Area	3	3	4	4
Increased Aesthetics	5	4	5	5
Reclamation of Spoiled Lands	5	2	3	4
Increased Traffic	3	3	3	3
Potential Recreation Value	3	4	4	5
=====				
<b>TOTALS FOR CATEGORY I</b>	<b>39</b>	<b>35</b>	<b>42</b>	<b>47</b>

#### Category I Summary

The application of recreation potential criteria to each of the four alternatives is helpful in determining which of the alternatives, when developed, could provide the highest quality recreation experience.

Scoring for recreation potential indicates LCCL has the highest potential for recreation development. LCCL is close to the existing park, has the most available area for recreation development, and is influenced the least by existing urban expansion. Water resource and wildlife habitat are good. Overall scoring for recreation potential in Category I is high because all lands are south of the new Page Avenue Extension and continuity with the existing CCLMP can be achieved with this alternative.

The FWS Alternative is somewhat lower in scoring because it is smaller than LCCL. This alternative includes property north of the Page Avenue Extension that would not be a part of the larger developed wetland environment south of River Valley Road and south of the Page Avenue Extension. The lower value for increase in wildlife habitat is due again to less acreage available with this alternate. Potential recreation value is lower due to the loss in continuity from the existing CCLMP boundary.

The other two alternates have lowered scores for several reasons. The HBLD Alternative is currently partially occupied by an auto salvage operation and is closest to existing urban developments. There are also existing noise

impacts and commercial business operations in close proximity to the alternative. This alternative scores high in both the increased aesthetics and reclamation of spoiled lands categories because removal of the auto salvage would be required for development.

The MHTD Alternative scores are lower due to development next to the auto salvage operation. This alternative would not remove the auto salvage operation. Again, close proximity to urban and commercial development and St. Louis County's desire to develop west rather than east are evidenced in the lower scores.

Category II

For Category II the criteria changes to reflect the cost of development and necessary security that would be required for safe operation of the facility. The scale is as follows:

- 5 = Low Cost
- 4 = Moderately low Cost
- 3 = Moderate Cost
- 2 = Moderately High Cost
- 1 = High Cost

**CATEGORY II**

<b>CRITERIA</b>	<b>HBLD Alt.D</b>	<b>MHTD Alt.E</b>	<b>FWS Alt.C</b>	<b>LCCL Alt.B</b>
Cost to Develop	1	3	2	2
Security	5	3	2	1
<b>TOTALS FOR CATEGORY II</b>	<b>6</b>	<b>6</b>	<b>4</b>	<b>3</b>

Category II Summary

The HBLD Alternative has high development costs due to the need to remove the auto salvage operation prior to development. The FWS and LCCL Alternatives are basically similar in development costs because most costs will be associated with the development of the wetland environment south of the Page Avenue Extension. Security costs for the HBLD and MHTD Alternatives are lowest since they are located closest to existing areas with security activity. Both the LCCL and the FWS Alternatives have high security costs due to the remoteness of the parcels and the size of the area requiring security.

Based on the Category II scale, the LCCL and FWS alternatives would require the greatest cost both to develop and secure. Although the HBLD proposal would require the removal and clean-up of the auto salvage operation, wetland development costs for the LCCL and FWS alternatives would be substantially higher.

#### **4.2. NATURAL RESOURCES IMPACTS**

Alternative B, LCCL, consisting of approximately 774 acres is located entirely in the floodplain. This area encompasses most of Alternative C and is primarily used for agriculture, growing mostly feed grains. Nearly 40 acres of the area are floodplain woodland.

Alternative C, FWS, consisting of 300 acres of wetlands is presently in agricultural use.

Alternative D, HBLD, is a composite of agricultural, forest, and commercial land uses. The agricultural land is made up of 75 acres of croplands, 25 acres of grasslands, and 5 acres of floodplain woodlands. The remaining 60 acres consists of commercial property made up of structures and surrounding land associated with the auto salvage operation.

Alternative E, MHTD, consists of 38.7 acres of forest and wetland, and closely resembles a portion of the park land being impacted. Approximately 31 acres of forest land borders the park on the east side, while nearly 8 acres consist of wetland scrub.

Additional data on natural resources in the proposed action alternatives has been summarized in the earlier sections on the affected environment. Inclusion of any of the action alternatives in the section 6(f)(3) land replacement package would preserve existing natural values and allow for further restoration of local ecosystems depending on the type and degree of development manipulation selected for implementation by local park management.

#### **4.3. CULTURAL RESOURCES IMPACTS**

The following was stated by the DNR in its memorandum of December 9, 1993, from Mr. Mark Miles of the Historic Preservation Program to Mr. Tom Lange, Office of the Director of the DNR, and others:

"A check of records at both the Archeological Survey of Missouri (ASM) and the Missouri Cultural Resource Inventory (CRI) finds no recorded sites for any of the five proposed alternative sites. Obviously, a more intensive investigation of any

of these sites may be required if one of these sites is selected and if ground disturbing activities are proposed."

#### **4.4. HAZARDOUS WASTE IMPACTS**

Six potential hazardous issues have been identified and reviewed as they might relate to the alternatives: an auto salvage yard, a truck repair business, farm buildings, a sanitary landfill, a railroad line, and Missouri River flood-deposited materials. Of these, only the auto salvage yard and flood-deposited materials may exist within the boundaries of the alternatives examined. The following resources were examined: August 1993, Comprehensive Environmental Response, Compensation, and Liability Information System list; December 1993, Missouri Solid Waste Disposal Areas and Processing Facilities list; June 1993, Missouri Hazardous Waste Treatment, Storage, and Disposal Facilities list; September 1993, Missouri Registry of Confirmed Abandoned or Uncontrolled Hazardous Waste Disposal Sites in Missouri. However, no hazardous waste sites were identified within the boundaries of the alternatives.

The DNR's Solid Waste and Superfund central offices and its St. Louis Regional Office indicated that their records did not indicate any current enforcement activities or problems associated with these issues in the areas of the alternatives.

Although no officially identified hazardous waste sites were discovered, the auto salvage yard in Alternative D could be a source of hazardous wastes. The inappropriate disposal of certain auto fluids and batteries over a period of years could result in the presence of hazardous wastes. A more in-depth study should be conducted of soil and ground-water conditions prior to final consideration of the area (Alternative D) for recreation development.

#### **4.5. AIR QUALITY IMPACTS**

At the present time, the Page Avenue project is located in an ozone nonattainment area and on the edge of a carbon monoxide nonattainment area (Defined in Missouri as that area enclosed within the boundaries of I-270.)

With respect to carbon monoxide, this defined area has not experienced a carbon monoxide violation since 1987. The State has been advised by the U.S. Environmental Protection Agency (EPA) to initiate the proper documentation to reclassify this area for carbon monoxide attainment. Therefore, the State agrees with FHWA that the designated

carbon monoxide nonattainment area will not be affected by the parkland replacement package.

Although biogenic emissions (produced by plant life) contribute to ozone formation, it represents an unenforceable control strategy. It is required to be removed from the ozone emission inventory. Ozone is formed when nitrogen oxides react with vapors from volatile organic compounds such as gasoline, auto exhaust, etc. This reaction is said to be photochemical because it requires the radiant energy of sunlight. The amount of biogenic emissions that are naturally released into the atmosphere is insignificant for this project. It is a moot point whether the land is used for the park replacement or left in private holding.

Based upon the purpose that the park replacement is to serve, there should be no significant increases in carbon monoxide or ozone-forming emissions.

#### 4.6. NOISE IMPACTS

The FWS and LCCL Alternatives are the only alternatives located in the immediate vicinity of the proposed Page Avenue Extension. Consequently, there would be noise considerations if either of the two alternatives were selected. In addition, the past identification of a possible future road improvement project through this area necessitates the recognition of potential noise impacts should the highway project become a reality.

The selection of the FWS or LCCL Alternatives will require the section 6(f)(3) boundary to be adjusted in the area of the proposed Page Avenue Extension along a line in which projected noise levels are not expected to exceed 65 dBA. Although the project sponsor (St. Louis County) would be required to acquire land to the highway boundary of the Page Avenue Extension, that area outside the highway boundary exceeding 65 dBA near ground level and approximately 431 feet from centerline would be excluded from the section 6(f)(3) boundary. This corridor between the highway boundary and the 65 dBA would be retained and managed by the project sponsor as an open-space buffer, which might also be utilized for recreational purposes. In addition, the same noise standard (65 dBA) would be applied to the reserved transportation corridor.

The FHWA standard for determining highway noise impacts on park and recreation related areas is 65 dBA. However, in recognition of the significant natural features and environmental qualities of CCLMP, the DOI, FHWA and State of Missouri negotiated and adopted a more sensitive noise

standard for determining the amount of land impacted by noise in CCLMP as well as for initial replacement land. The utilization of 57 dBA for this particular situation, fully recognizes and takes into consideration, the affect of external noises in a unique park setting. The adoption of the 57 dBA standard resulted in a larger conversion area as well as a more restrictive initial land replacement selection. However, in the identification and selection of "additional lands," the FHWA established standard for noise impact (65 dBA) related to parks and recreation areas was utilized. The proposed alternatives were subjected to individual and estimated noise analyses, with the standard of 65 dBA used as the acceptable criteria for defining these replacement lands. In addition, it was determined that these replacement lands impacted by a predicted dBA level exceeding 65 dBA would be excluded from section 6(f)(3) consideration.

The FEIS prepared earlier for the Page Avenue Extension considered the impact of traffic-generated noise within CCLMP. The discussion of these noise impacts related to the Red Route are found in Volume 1 of the FEIS and within the technical memorandum entitled Page Avenue Extension - Noise Impacts Assessment. As was discussed in Section 2.1 Alternative A, the original noise study was prepared with certain assumptions necessarily made regarding the future design of the Page Avenue Extension. Now, as details of the roadway and bridge designs become more defined, the noise impact studies have been reevaluated with a refinement proposed for delineating the impacted area within CCLMP. FHWA's STAMINA 2.0/OPTIMA noise level prediction program was run again on the Page Avenue Extension, using the most recent known parameters. The results of the study determined that an additional 23.6 acres of parkland within CCLMP would be subjected to noise levels exceeding 57 dBA. Therefore, the converted area impacted by noise and visual intrusions is increased from 183.4 acres to 207.0 acres. This 207.0 acres is now established as the area being converted and therefore will require appropriate and equivalent replacement.

In order to reasonably ensure that park land replacement alternatives for CCLMP presented within this document are protected from impacts of future roadway construction, the above reserved corridor has been identified within the LCCL Alternative and a portion of the FWS Alternative. The corridor, including the estimated noise impacted area at ground level, will not be included within the section 6(f)(3) boundary for either the FWS or LCCL Alternatives.

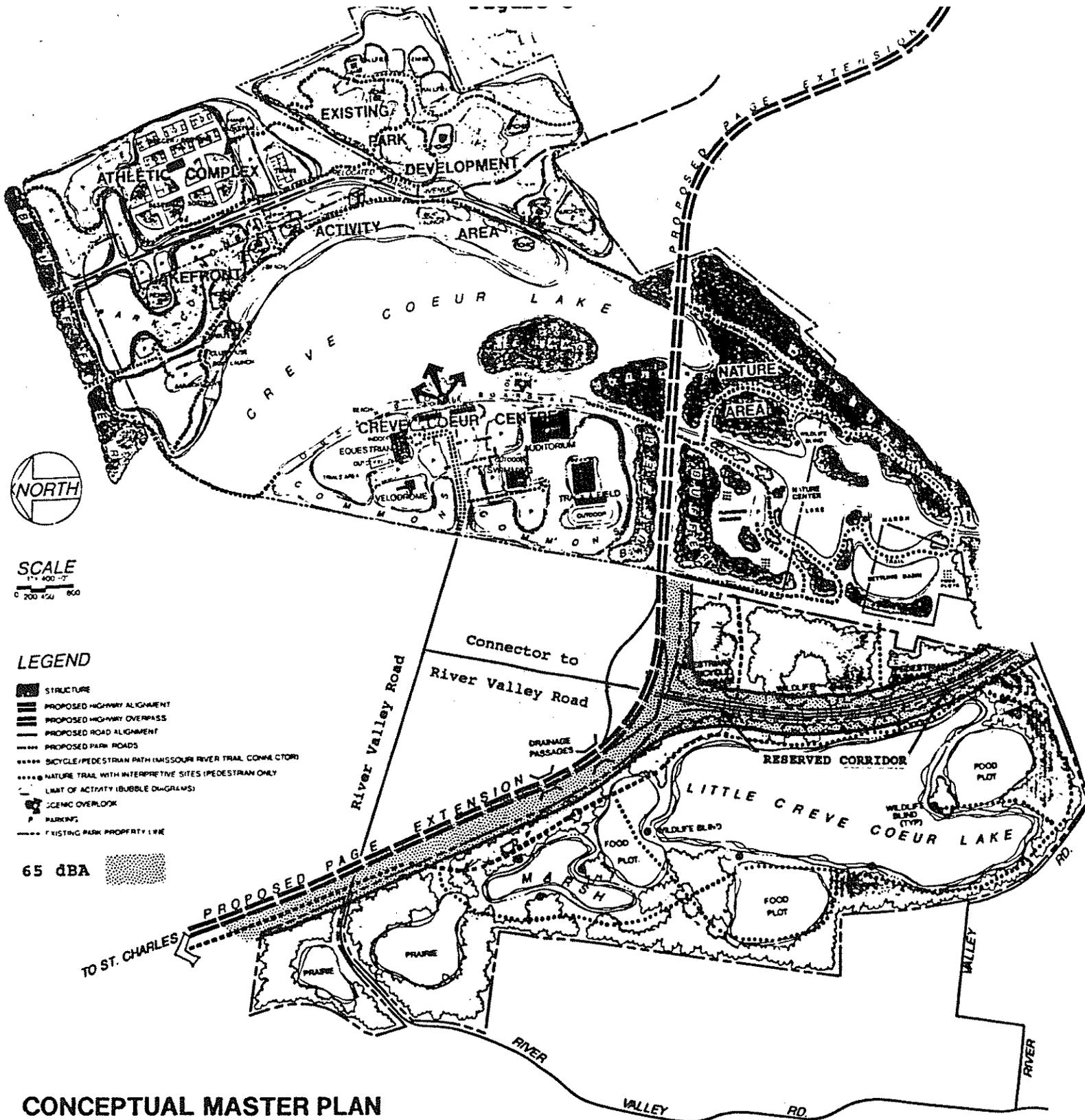
Several assumptions have been made about the type of roadway that could occupy the reserved corridor if St. Louis County

should decide to pursue funding and construction of a transportation facility. It is assumed that the facility would require an area of land for right-of-way purposes and that some degree of noise impacts would result if the facility is constructed. For purposes of this discussion, a four-lane expressway-type facility at ground level with concrete median barrier is assumed in order to address a "moderate case scenario" when anticipating potential noise impacts. A lesser facility, such as a two-lane roadway, would result in impacts of a lesser magnitude.

A noise-impacted corridor, as shown in Figure 8, lies along the westerly side of the Page Avenue Extension and on both the east and west sides of the reserved corridor. The FHWA microcomputer program STAMINA 2.0/OPTIMA was used to perform an analysis of the noise impacts. The approximate location of the 65 dBA contour was based on a moderate traffic noise scenario and with receivers placed hypothetically 5 feet above the roadway. Based upon the 65 dBA contour, traffic-generated noise levels of 65 dBA or higher can be expected over approximately 109 acres of the LCCL Alternative. This would constitute the reserved transportation corridor with an approximate 670-foot width and a narrow strip along the south and west sides of the Page Avenue Extension. Since the nearest boundary of the FWS Alternative is located farther to the west of the reserved corridor than the LCCL Alternative, projected traffic noise is expected to have a lesser impact on that alternative. The approximate eastern boundary of the FWS Alternative lies about 400 feet west of the centerline of the reserved corridor, placing it beyond the 65 dBA contour. A small portion of the FWS Alternative (about 16.5 acres) located south of the Page Avenue Extension is included within the area of predicted noise impact that exceeds 65 dBA of that facility. Potential traffic noise impacts were not modeled on the portion of the FWS Alternative located north of the Page Avenue Extension. A reserved corridor for future transportation purposes in that area has not been identified, and therefore noise impacts from future actions would be purely speculative.

#### **4.7. VISUAL IMPACTS**

The same moderate case scenario assumptions used in the preceding section regarding the recognition of a north-south reserved transportation corridor west of CCLMP are used in evaluating anticipated visual impacts. Within the reserved corridor, it is assumed that a four-lane, limited-access expressway would be constructed near existing ground level. The corridor would then merge with the interchange west of Creve Coeur Mill Road for the River Valley Road connection which will be a part of the Page Avenue Extension project.



## CONCEPTUAL MASTER PLAN

PREDICTED  
TRAFFIC NOISE LEVELS  
IN VICINITY OF  
LITTLE CREVE COEUR LAKE

South of the proposed Page Avenue Extension, the corridor may angle east and cross over Creve Coeur Mill Road.

Park user exposure to a reserved corridor from both alternatives would be hard to avoid since there is nothing to obstruct the view for several thousand feet. The use of trees to screen the corridor and a visually sensitive roadway design would help to lessen the impacts. Any side slopes of a roadway in the corridor should appear as gradual slopes to the roadway when viewed by the park user. In essence, the associated landscaping and ground contour of a roadway could reduce the degree of visual intrusion of the roadway and traffic and help, to some extent, blend the man-made environment into the natural environment.

#### 4.8. NOISE/VISUAL SUMMATION

Given the similar topography, man-made facilities, and vegetative cover exhibited in the area, noise and visual impacts may be considered as equally impacting the surrounding environment. Noise impacts require consideration when the enjoyment of a quiet setting and serenity of an urban park is a generally recognized feature or attribute of the site's significance. Visual impacts require consideration when the aesthetic features or attributes of a park that derives its value in substantial part due to its setting is impacted. A close relationship therefore exists between both noise and visual impacts.

In relation to the projected 65 dBA contour, sound continues to travel beyond the contour to some distant point but to a lesser degree. The same is true of visual impacts. As one moves further from the source of visual intrusion, the less the impact will be for the park user. Noise is quantifiable with the use of STAMINA 2.0/OPTIMA programs, while visual impacts cannot be quantified.

Noise and visual impacts from any facility built within a reserved corridor can be limited to provide a more agreeable environment for park users. Visual impact could be reduced within the noise contour by landscaping and, in turn, this vegetative buffer could reduce noise impacts. The provision of an aesthetically pleasing noise wall could also reduce visual impacts. Therefore, with both noise and visual impacts, the overall effect on the existing environment can be reduced with certain limitations. Based on this association between noise and visual impacts and for the purposes of projecting impacts of a tenuously proposed transportation facility corridor, the visual contour will be considered to correspond with the noise contour. Acquisition to the right-of-way of Page Avenue Extension, including the proposed corridor, by the project sponsor will

be required. However, as stated earlier, only that area outside the projected 65 dBA noise contour, which also includes the entire transportation corridor, will be placed within the section 6(f)(3) replacement land boundary. The balance of the area between the highway right-of-way and the 65 dBA will be retained and managed by the project sponsor and serve as an open-space buffer and specialized recreation activity area.

#### 4.9. IMPACTS ON AIRPORTS

Concerns have been expressed that the development of a public wetlands management area (Alternative B, LCCL) might adversely affect the present operation and future expansion of the nearby Creve Coeur Airport. In a proposed Draft Federal Aviation Administration (FAA) Advisory Circular (AC) 150/5200, Wildlife Attractions, Paragraph 1-3,a, Wetlands and Paragraph 1-4, Siting Criteria for Wetlands, airport owner/operators are encouraged to oppose any measures to establish wetlands at sites located "within 10,000 feet of any edge of a turbine-use runway, within 5,000 feet of a piston-use runway, and, within five miles of a runway edge that attracts or has the potential to attract or sustain hazardous bird movements from feeding, watering or roosting areas into, or across the runways or approach and departure paths of aircraft."

It should be emphasized that the above Draft AC 150/5200 is a proposed revision to an existing FAA siting criteria that is also referred to as AC 150/5200. The present circular in effect, refers only to the siting of landfills as wildlife attractions and does not include consideration of wetlands. Although the more stringent guidelines have not been adopted at this time, it is important that the safety of the flying public be considered and that the necessary measures be taken to minimize any potential problems relating to these proposed actions.

The Aviation Section of MHTD's Transportation Division, in close coordination with the FAA determined that the management of the LCCL Alternative or other proposed alternatives in the immediate area will have no additional effect on existing or future airport facilities. In a letter from the Chief Engineer of MHTD and dated January 6, 1995, he states that "because it has been demonstrated that the existence of the LCCL poses no significant additional threat to aircraft from potential bird strikes, we believe that this section of FAA Advisory Circular 150/5200 for Wetlands and Siting Criteria does not apply." However, the Chief Engineer further suggests in the letter (Appendix B) that various management practices should be incorporated into the operation of a LCCL wetlands to minimize any potential problems of bird strikes.

Creve Coeur Airport, located north of River Valley Road, is a designated reliever for Lambert International Airport. There are currently several wetland and open water areas within the immediate area of the Creve Coeur Airport runway, including Creve Coeur Lake and farmed wetlands in the LCCL area. As a result of the present wetland characteristics of the area, waterfowl populations have been in abundance for years. The extensive areas of planted fields already serve as popular feeding spots for waterfowl and other wildlife throughout the river bottoms. Although the LCCL has been pumped dry in many years to allow for cultivation and has also been dry in years of sparse rainfall, the pumping has typically been after the fall migration of waterfowl. Therefore, the continuation of similar management practices for public education and outdoor recreation should result in little appreciable change in past and current waterfowl populations.

It is shown that most of the air traffic occurs during the warmer months. With prevailing winds generally from the south, the most actively used approach runway would be Runway 16. Departure from Runway 16 could be directed to avoid concentrations of waterfowl. Since concentrations of migratory waterfowl have been documented to be greatest in spring and fall in this area, there should be no conflict between migrant birds and the relatively heavier summer aircraft activity.

Improvements will be made to the LCCL to enhance the concept of a park for wetland interpretive purposes as well as other passive outdoor recreation. The improvements to LCCL and Creve Coeur Airport should be made with a goal of lessening any possible conflicts between the two facilities. For example, it would seem advisable and preferable, to locate food plots and such bird attractions toward the southern end of the LCCL area. This might enhance the management of the area as well as provide further separation between the airport and present or future expansions. The airport, in return, and in cooperation with the adjacent management area, could establish directives that would serve to provide avoidance guidelines to pilots regarding the LCCL area.

The Creve Coeur Airport is currently preparing an Airport Layout Plan (ALP) which addresses the proposed twenty-year development at the Airport. Among other proposed developments is the extension of Runway 16/34 and the conversion of Runway 7/25 from turf to concrete. It is anticipated that the protection zone for Runway 7/25 will extend approximately 200 feet southwest of the Page Avenue Extension and approach the far northern side of the LCCL area. All other proposed construction and area restrictions would occur over 400 feet to the north of Page Avenue Extension.

With the probability that the proposed airport expansion would occur north of the LCCL area, it is believed that the expansion would neither increase nor decrease the impact of a LCCL management area on the airport.

The Arrowhead Airport is a small private facility located near the southwest side of the LCCL. The airport receives no State or Federal assistance and was nearly destroyed by the recent flooding. Indications are that the airport may not rebuild after the extensive damage from the flood.

Although the existence of the Creve Coeur Airport, its proposed expansion, and the Arrowhead Airport may be incompatible with areas of large waterfowl populations, the locating of such facilities within the Missouri floodplain and a major migratory bird flyway suggests that, at least in this situation, it is both workable and acceptable. The proposal to acquire and manage the LCCL area in a manner similar to the present practice should not affect or appreciably change this relationship that has apparently existed successfully for years.

It is therefore determined that the selection of any of the alternatives, most particularly LCCL and subsequent proposed management, will not appreciably add to the probability of bird strikes in the vicinity of Creve Coeur Airport or Arrowhead Airport.

#### **4.10. SECONDARY AND CUMULATIVE IMPACTS**

Most of the land within the various replacement alternatives is located within the floodplain. The alternatives located in Maryland Heights (St. Louis County) have been considered for future land use predicated upon two basic scenarios. The first scenario, called the Primary Land Use-Plan within the "Comprehensive Plan," assumes that the level of flood protection afforded by the levee system currently in place (before the June 1993 floods) will not be increased by the construction of higher levees. The second scenario, referred to as the Future Land-Use Concept, assumes that protection provided by construction of a 500-year levee can be expected at some point in the future. The Howard Bend Levee District has recently made some preliminary contact with the COE for necessary approvals to raise the present levee to a 500-year elevation. Approval to construct a 500-year levee would significantly change the character of these Missouri River bottomlands and open the area for further urban development.

The Primary Land-Use Plan basically assumes that without additional protection from flooding, land use in the various replacement alternatives within Maryland Heights will remain relatively the same as it is now. However, the Future Land-

Use Concept assumes a level of development that is different from the current, predominantly agricultural use of the alternatives. The HBLD, FWS, LCCL, and MHTD Alternatives are now exhibiting mostly agricultural land-use practices. With a 500-year levee in place, the anticipated land use runs the gamut from mixed development to commercial use. The pressure to ultimately develop these areas is increasing as developable land within Maryland Heights becomes more scarce. If a passive-use wetland management area were to be established in these bottomland areas, an environmentally beneficial secondary impact of limiting or precluding future urban development in a natural floodplain could be realized. Also, establishment of a wetland management area in these flood-prone areas would help to preserve such benefits of floodplains as floodwater retention.

A secondary impact of establishing a park in any of the replacement alternatives is a possible increase in vehicular traffic as people begin to visit the park. This would not appear to pose any traffic problems in the Maryland Heights areas; CCLMP and other attractions already generate traffic, and a system of local roads already provides access to the area.

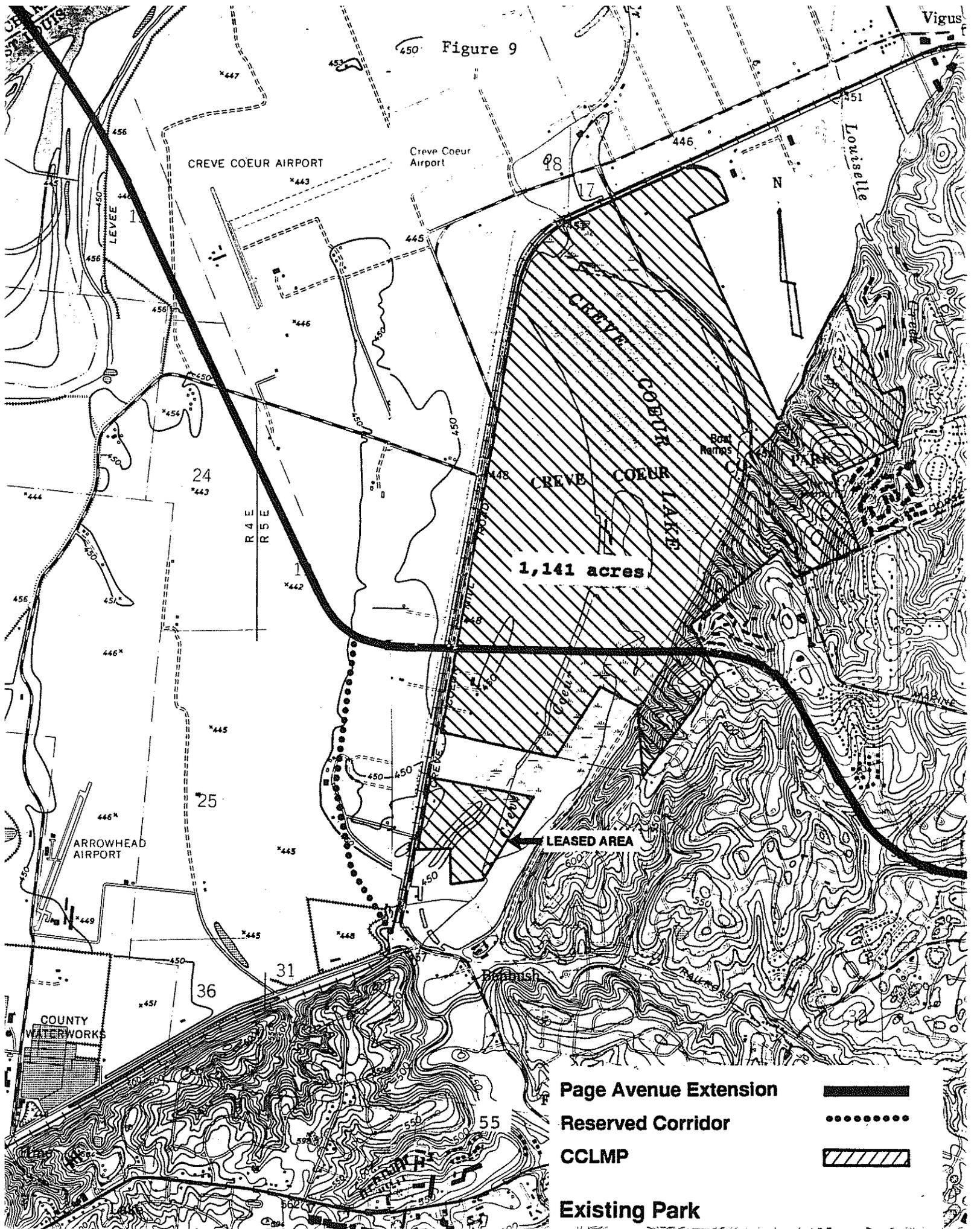
The acquisition of any of the park replacement alternatives would have the benefits of limiting or precluding development, preserving existing habitats including wetlands, and providing floodwater retention. The eventual establishment of a passive-use wetland management area is anticipated to provide additional wetland habitat and the associated benefits of improved water quality and floodwater retention.

A secondary impact could occur if a future roadway through the reserved corridor, shown in Figure 9, is constructed along the western side of CCLMP. That project would impact the LCCL Alternative previously described in this document.

During the early 1970s, the St. Louis County Department of Highways and Traffic in their Annual Reports identified a proposed extension to the Earth City Expressway. This conceptual roadway was one of several projects to be considered for funding from a taxation proposal presented to voters on February 7, 1989. That issue was defeated by the voters.

Although no evidence has been found to indicate that the county ever advanced this project beyond the conceptual stage, the city of Maryland Heights did discuss a similar road improvement project in their 1987 Comprehensive Plan. In an effort to capitalize on the environmental evaluation being done for the Page Avenue Extension, the county

450 Figure 9



- Page Avenue Extension
- Reserved Corridor
- CCLMP
- Existing Park

requested Booker and Associates (Page Avenue Extension consultants) to prepare an Environmental Impact Statement (EIS) for Earth City Expressway. As a result of a lack of funding for the project, the county later ordered Booker and Associates to terminate work on the Earth City Expressway EIS. The county has indicated that no further work is anticipated on the incomplete EIS in the foreseeable future. Further review of the proposed Earth City Expressway indicates that the highway improvement project is not presently identified in St. Louis County's short- or long-range transportation plan, the Region's Metropolitan Planning Organization's (MPO) 20-year Long-Range Plan or Transportation Improvement Program. MHTD's current Right-of-Way and Construction Program does not list any such north-south roadway extension as a project proposed to be built within the next 15 years. MHTD further stated in the FEIS that it has no intention to build, operate, or fund other local roadways in the vicinity of the Page Avenue Extension and CCLMP. No evidence was found to suggest that the construction of the Earth City Expressway would become a reality in the foreseeable future. In recent action by the MPO, the Earth City/Highway 141 Expressway failed again to be included in the MPO's long-range transportation plan. However, since the Expressway has been conceptually identified, it is prudent to recognize the potential impact of such a development even with the tenuous nature of the project and the absence of actual design and planning criteria.

A conceptual transportation corridor is identified near CCLMP that might serve as a future highway. It is suggested that the corridor, approximately 670 feet in width be reserved from near the southern end of CCLMP to the proposed interchange of the Page Avenue Extension and the River Valley Road. The corridor would define the outer limits of a projected noise limit of 65 dBA if the highway becomes a reality. It is fully recognized that impacts are dependent on many factors and may decrease or increase with changing conditions over an extended period of time. It is further understood that should a highway through this corridor be actively considered in the future, environmental impacts on the surrounding area (primarily the LCCL Alternative) would require extensive evaluation based on a more detailed design proposal. This evaluation could result in an increase or decrease in the presently estimated 109 acres of impact. If an increase of land impacted should occur beyond the estimated 109 acres, the proposal would once again be subject to section 6(f)(3) conversion/replacement requirements. The eventual construction of such a project would only occur after all environmental assessments and public input had been successfully completed and appropriate funding secured.

A great deal of concern was expressed during the draft SEIS review period of the noise and visual impacts of the proposed Page Avenue Extension and the reserved corridor on the preferred alternative (LCCL). These adverse impacts were taken into consideration and compared with the merits of establishing a wetlands management area within an urbanized area readily accessible to thousands of people. It is suggested that the anticipated recreational and educational opportunities that would become available through the establishment of this particular area, although admittedly not located in a pristine area, far exceed the disadvantages of noise and visual impact. For the purposes of section 6(f)(3) acceptance, it has already been noted that approximately 109 acres of anticipated noise and visual impact and construction area within the transportation corridor and a narrow strip along the Page Avenue corridor will be excluded from section 6(f)(3). This will allow a buffer between the transportation routes and the recreational activity area of the replacement land. Although a buffer is intended to minimize visual and noise impacts, that area may also be used for select recreational activities which are less sensitive to noise and visual impacts.

As indicated in previous sections, the local sponsor will acquire the total area of the LCCL Alternative (773.8 acres) and develop the area for wetlands management and open-space recreation as an addition to CCLMP. If a highway through the corridor never becomes a reality, the public will have obtained a valuable recreation area and discouraged further commercial development in the floodplain. Should the highway be constructed, extensive commercial development along the road would be discouraged, with the public still retaining a large area on both sides of the road as a buffer to and/or for recreation.

#### **4.11. THE RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY**

The local short-term impacts of the proposed action and the use of resources, including land-use modifications and recreation enhancement, are therefore deemed consistent with the maintenance of long-term productivity for the region. The St. Louis area has rapidly increased its population during the past 20 years and has developed a greatly increased socioeconomic need for additional recreation facilities. Projects, such as the proposed action which result in a net increase of available recreation land, will provide increased recreational outlets for an expanding population base and enhance the overall quality of life in the St. Louis area.

Short-term uses of project area resources during implementation can provide opportunities for enhancement and long-term gain for important quality-of-life issues related to sensitive environmental project concerns.

#### **4.12. IRREVERSIBLE OR IRRETRIEVABLE COMMITMENTS OF RESOURCES WHICH WOULD BE INVOLVED IN THE PROPOSED ACTION**

The proposed action will require the expenditure of human and fiscal resources and potential modification of natural and cultural resources. Personnel and fiscal expenditures are considered an irreversible commitment.

Section 6(f)(3) land as identified within the L&WCF Act, as amended, and used as addition(s) to CCLMP may not be converted to other than public outdoor recreation without the approval of the Secretary. Although not an irreversible commitment, the intent of the law is that property acquired or developed with assistance under this law remain in outdoor recreation in perpetuity.

#### **5.0. SUMMARY**

A total of eight alternatives, not including Alternative A (No Action), for consideration as "additional land" to meet the L&WCF section 6(f)(3) conversion requirements were identified through various public meetings and government agency participation. The "No Action" Alternative was evaluated in the FHWA FEIS, and those findings are made a part of this document. Each of the eight alternatives were evaluated to determine their potential for replacing the outdoor recreation opportunities lost through the conversion of a part of CCLMP. Three of the alternatives, FWS-Confluence, FWS-Catfish Island, and the adjoining land proposal were eliminated from further detailed evaluation as a result of the following preliminary findings: (1) residential development on most of the immediately adjacent land would render that land socially and economically undesirable for park and open space purposes; (2) permanent access to the Confluence and Catfish Island areas is not available, and temporary access is dependent on the status of Missouri and Mississippi flood waters; (3) the excessive size and subsequent costs of Confluence and Catfish Island; and (4) the desire of St. Louis County to mitigate within the boundaries of that county and not in St. Charles County make these alternatives impractical for the purpose of mitigating the impacted areas of CCLMP and for other reasons described further in the earlier sections of this text.

The HBLD II alternative, introduced during the Draft SEIS review period, was evaluated and found to be unacceptable as

a viable alternative for the following reasons: (1) lack of public access to Jane Downing Island and Catfish Island; (2) areas already a part of other alternatives; (3) Catfish Island, Jackass Bend, and Greens Bottom located outside the legal jurisdiction of the sponsoring agency (St. Louis County); and (4) limited recreation development opportunities, and other reasons identified in Section 2.6.4.

The remaining four alternatives selected for detailed evaluation include Alternative B (LCCL), Alternative C (FWS), Alternative D (HBLD), and Alternative E (MHTD). Each was evaluated for geology, soils, land cover and use, farmland values, wetlands, floodplains, threatened and endangered species, utilities, zoning/local planning, environmental concerns, recreation utility, natural resource impacts, cultural resources, hazardous wastes, air quality, impacts on airports, and secondary and cumulative impacts.

The size and utility of the HBLD and MHTD alternatives make these areas less desirable than the LCCL and FWS areas. The existence of an auto salvage yard and a size of 165 acres extending outward from the base of the bluff reduces the desirability of this area for park land. Although without the auto salvage yard, the MHTD Alternative contains potentially 38.7 acres and is of a similar landscape, it does not meet the criteria for significant "additional land." With the exception of the MHTD alternative, the remaining three alternatives are in the 100-year floodway fringe and are zoned non-urban, which includes park use. The MHTD has a small portion zoned R-2 residential, and the total area is entirely out of the floodway and floodway fringe. A minimal number of structures, with only a few occupied, exist on the four alternatives. A number of these have been seriously damaged during the recent flooding of the Missouri and Mississippi Rivers. Although the HBLD and MHTD Alternatives are located in areas which would receive less noise and visual impact as a result of the proposed "Red Route," the remaining LCCL and FWS Alternatives possess particular advantages including, but not limited to, size, utility, and accessibility that outweigh these impacts.

## **6.0. RECOMMENDATIONS**

It has been determined by the NPS and the State of Missouri that Alternative B (LCCL), as the preferred alternative, most closely meets the requirements of significant "additional land" for replacement of converted land at CCLMP. The size of LCCL (773.80 acres to be purchased, 464.8 acres for section 6(f)(3) purposes), accessibility, and utility make this alternative the preferable area for

mitigating the loss of land in CCLMP to the proposed Page Avenue Extension and adding to the recreational opportunities for the citizens and visitors of St. Louis County. The LCCL, located directly west of CCLMP, already encompasses a large part of Alternative C (FWS) thereby making it preferable to the smaller FWS area. It consists of prior converted cropland and upland with smaller tracts of wooded wetland, emergent wetland, and farmed wetland. Access is readily available from Creve Coeur Mill Road, existing gravel county roads, and the River Valley Road. The reservation of this area and creation of a wetlands management area would ensure the preservation of a potentially unique area of biodiversity near an expanding urban area.

The selection of LCCL would provide St. Louis County the opportunity to add significantly to the acreage of the CCLMP area and to the diversity of recreation within the county. It is proposed that the entire area of 773.8 acres be purchased for distribution in the following manner:

1. 464.8 acres to meet section 6(f)(3) requirements.
2. 200.0 acres reserved for future MHTD wetland mitigation.
3. 109.0 acres reserved for future highway corridor and noise-impacted area adjacent to the Page Avenue Extension.

The 200 acres would be utilized by MHTD for wetland mitigation for future highway projects in the region. The reserved corridor would be purchased and managed as a part of CCLMP until such time, if ever, a highway is constructed through the area. Although an expressway is not warranted at the present time nor under active consideration, its identification by the city of Maryland Heights in their 1987 Comprehensive Plan necessitates recognizing its potential for future consideration. It is further acknowledged that a 109-acre corridor may not constitute the full impacted area of a future highway project. Therefore, as with all long-range developments, any future project impacting parkland would be subject to all relevant environmental laws and regulations (including section 6(f)(3) requirements) in effect at the time of implementation.

The acceptance of 464.8 acres within Alternative B (LCCL), to meet the criteria of "additional land," added to 258.48 acres of already proposed replacement lands would result in a total section 6(f)(3) replacement package of 723.28 acres. The evaluation and eligibility of "additional lands" is further detailed in the following section.

## **7.0. SECTION 6(f)(3) CRITERIA EVALUATION**

This section of the SEIS will address those additional replacement properties identified as the proposed alternative pursuant to the Secretary of the Interior's letter of May 18, 1993, in which he requested significant "additional lands" as well as earlier proposed replacement lands discussed in Volume 4 of FHWA's FEIS.

Chapter 675.9.3.B. of the "L&WCF Grants-In-Aid Manual," states that:

"Requests from the project sponsor for permission to convert L&WCF assisted properties in whole or in part to other than public outdoor recreation uses must be submitted by the State Liaison Officer to the appropriate NPS Regional director in writing. NPS will consider conversion requests if the following prerequisites have been met:

- (1) All practical alternatives to the conversion have been evaluated and rejected on a sound basis."

An evaluation of the alternatives to the partial conversion of CCLMP has been detailed in the FEIS approved January 6, 1993, by the FHWA. In addition to a No-Build alternative, two basic alternatives with six combinations were evaluated. Following an extensive evaluation, the State of Missouri recommended and the FHWA approved the "Red Route" as the "most preferred and feasible alternative." Although other alternatives were environmentally preferable (with regard to avoiding CCLMP) to the Red Route, NPS concurred with this selection on the basis that increased dislocation and associated social impacts outweighed the environmental impacts.

This SEIS evaluated alternative replacements to meet the "additional land" requirements for section 6(f)(3). Not including Alternative A (No Action), eight alternatives were identified as possible additional replacement areas. Each of the eight was evaluated, with four selected for further consideration. An alternative identified during the Draft SEIS public review period by Howard Bend Levee District was subjected to a later, extensive evaluation. It was determined that the alternative, HBLD II, could not be accepted as "new and reasonable" and further, did not meet the requirements of "additional land." Therefore, Alternative B (LCCL) was selected as the most preferred alternative, with the other alternatives rejected for various reasons more detailed in earlier sections of this document.

"(2) The fair market value of the property to be converted has been established and the property proposed for substitution is of at least equal fair market value as established by a State approved appraisal (prepared in accordance with Uniform Appraisal Standards for Federal Land Acquisitions)."

The earlier FHWA FEIS replacement proposal of 264.78 acres of replacement land for 183.4 acres of converted land has been appraised, reviewed, and accepted for eligibility. However, as a result of the extended time from the date of the appraisals, updates will be necessary to insure compatibility among all appraisal results. The converted parcels were valued at \$1,555,000, while the replacement parcels were valued at \$1,823,200. As a result of the refinement of the noise impact, the acreage for converted land increased to 207.0 acres. Therefore, the estimated value of converted land becomes \$1,755,098. With a reduction of 6.3 acres of the initially proposed replacement land impacted by noise levels over 57 dBA, the initial replacement land total now amounts to 258.48 acres valued at an estimated \$1,779,820. Inasmuch as replacement value is concerned, the initially proposed replacement land has met the criteria of "at least fair market value" for this section 6(f)(3) conversion.

The "additional land" being proposed for acquisition includes parcels totaling approximately 773.8 acres. This total also includes a transportation corridor. However, 109 acres of potential future impacted land and an additional 200 acres are excluded from section 6(f)(3) boundary delineation. It is recognized that when or if a highway is programmed through this corridor, its impact on the adjacent land will be fully evaluated and could result in additional park land conversion. However, with the highway project presently not identified on area short- or long-range transportation plans, the project is not considered a reality in the foreseeable future. A breakdown of acreage is provided:

Proposed new addition (LCCL)	773.80
Less transportation corridor & Page Ave. Ext.	<u>-109.00</u>
Total eligible section 6(f)(3) lands	664.80
Less reserved for future mitigation	<u>-200.00</u>
Total new "additional lands" for section 6(f)(3)	464.80
Initially proposed and readjusted replacement lands	<u>258.48</u>
Total section 6(f)(3) replacement package	723.28

For the purpose of section 6(f)(3) replacement, the "additional lands" of approximately 464.8 acres have an estimated value of \$1,600,000. The value of this land added

to the value of the initially proposal and readjusted lands (258.48 acres) results in an estimated total replacement value of \$3,379,820 as compared with 207.0 acres of converted land valued at \$1,755,098.

"(3) The property proposed for replacement is of reasonably equivalent usefulness and location as that being converted."

The additional replacement parcels will exceed that which exists currently in the southern portion of CCLMP. When developed, the additional parcels will provide the following: (1) a trail linkage to DNR's Katy Trail State Park; (2) nature trails within the parcels, with an emphasis on wetland habitat; and (3) opportunities to recreate in newly developed open spaces in an urban area. The LCCL land is located directly west and adjacent to the southern end of the existing park. The usefulness of the additional land is discussed in detail in Section 4.1.1. of the SEIS.

"The property proposed for substitution meets the eligibility requirements of L&WCF assisted acquisition. The replacement property must constitute or be part of a viable recreation area."

The proposed additional area, shown in Figure 10, meets the eligibility for section 6(f)(3) replacement land. This additional area, when developed, will be a viable recreation area supporting but not dependent on CCLMP. The proposed development and management, shown in Figure 11, will include such things as trails, access roads, and parking and support facilities to enhance the use of a public wildlife management area. The proposed development of the area as a wetlands management area could also greatly expand the recreational opportunities for the citizens of St. Louis County. In conjunction with the CCLMP, the area will increase the viability of CCLMP by contributing significantly more acres and recreational diversity to the existing park. A detailed discussion of the recreational utility of the alternatives may be found in Section 4.1.1. of this document.

"(a) The replacement land was not originally acquired by the sponsor or selling agency for recreation."

The additional land has not been acquired at this time. Any properties acquired for this project that will be used for replacement of CCLMP will not have been originally acquired by St. Louis County, St. Charles County, DNR, or MHTD for recreation prior to purchase.

Figure 10

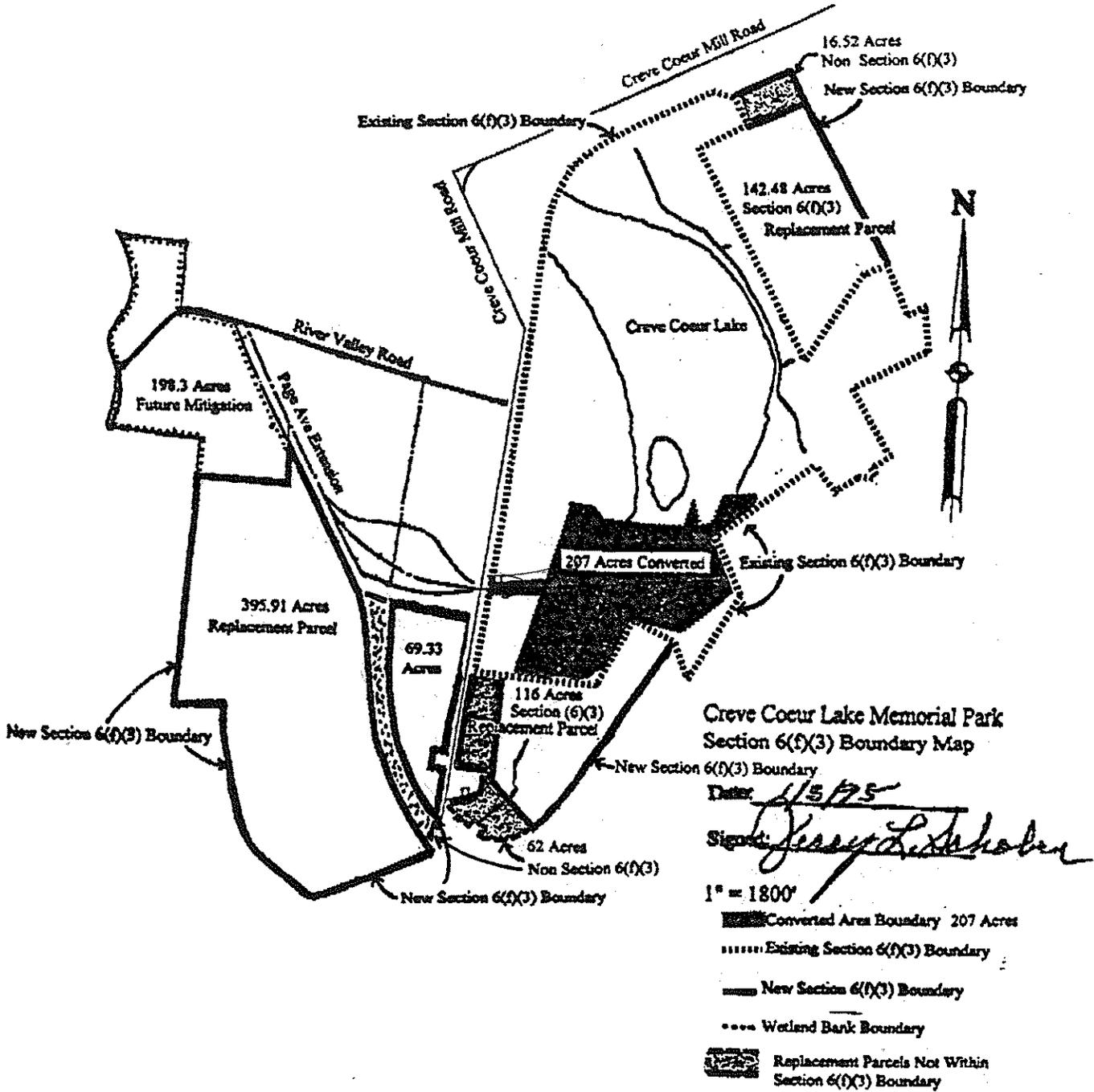
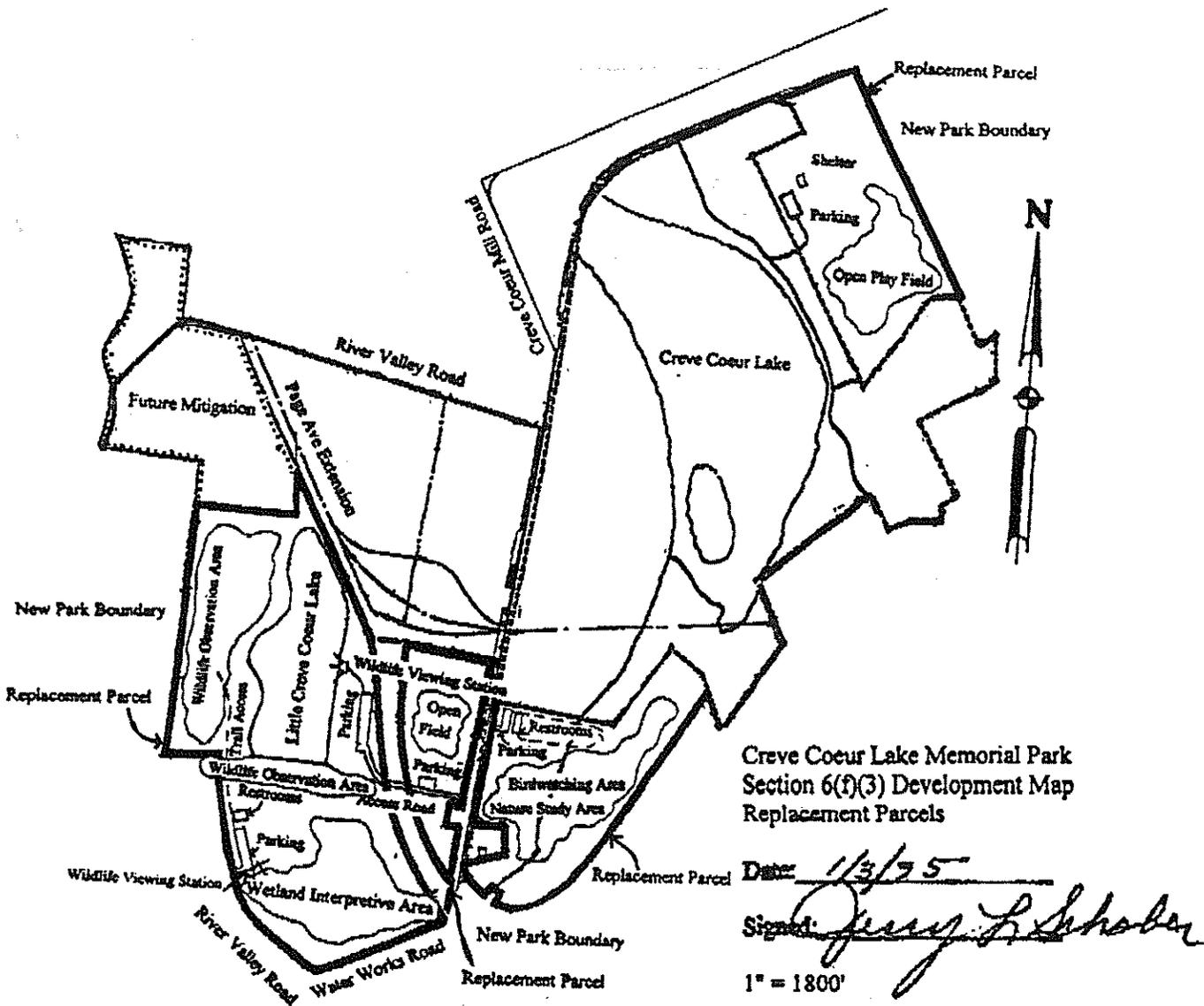


Figure 11



"(b) The replacement land has not previously been dedicated or managed for recreational purposes while in public ownership."

A small parcel of land within the acquisition boundaries is owned by the American Legion. They presently lease an area to a Little League baseball association that manages a youth baseball program. The county has indicated a willingness to consider land for the continuation of this program if the area is acquired as replacement land.

"(c) No Federal assistance was provided in the replacement land's original acquisition . . ."

No Federal assistance has been provided in the original acquisition of this property and none will be used in the purchase of the replacement for converted parcels in CCLMP. Section 601 of the Pipeline Safety Act of 1992 (Public Law 102-508) mandates a commitment by the State of Missouri to implement mitigation of not less than \$6 million that would include a payment of not less than \$250,000 for facility improvements to CCLMP. The \$6 million must come from State funding and is not Federal assistance.

"(d) Where the project sponsor acquires replacement land from another public agency, the selling agency must be required by law to receive payment for the land so acquired."

The land will be acquired by the MHTD with non-Federal funds and transferred to the County of St. Louis to manage as a part of CCLMP. The replacement parcel will be purchased at fair market value and in accordance with all Federal regulations, specifically the "Uniform Appraisal Standards for Federal Land Acquisitions" and the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended.

"(5) In the case of assisted sites which are partially rather than wholly converted, the impact of the converted portion on the remainder shall be considered. If such a conversion is approved, the unconverted area must remain recreational viable or be replaced as well."

The unconverted portion of CCLMP will remain viable and, in fact, will be enhanced by the addition of other park lands near CCLMP. The additional lands will not involve conversion of any additional section 6(f)(3) lands.

"(6) All necessary coordination with other Federal agencies has been satisfactorily accomplished."

All coordination necessary for this conversion has been provided by MHTD. While not complete, MHTD will continue to provide all documentation, appraisals, appraisal reviews, boundary maps, development maps, and pertinent information necessary for the completion of conversion documents. In addition, the acquisition of additional parcels will be subject to an intergovernmental review through Missouri's Office of Administration, Intergovernmental review process.

"(7) The guidelines for environmental evaluation have been satisfactorily completed and considered by NPS during its review of the proposed section 6(f)(3) action."

An FEIS has been completed and approved by the FHWA. The FEIS was accepted by the NPS for use in evaluating the proposed conversion of 183.4 acres of CCLMP. In addition, earlier sections of this SEIS have addressed those environmental concerns germane to the evaluation of these "additional lands." The U.S. Army Corps of Engineers (COE) continues to review the proposed Page Avenue Extension project in accordance with their responsibility under Section 404 of the Clean Water Act. It is anticipated that a decision will be forthcoming from the COE immediately following the completion of this SEIS.

"(8) Intergovernmental Review System (E.O. 12372) review procedures have been adhered to if the proposed conversion and substitution constitute significant changes to the original Land and Water Conservation Fund project."

Intergovernmental review of the original proposal has been completed. This replacement proposal will not require the conversion of any section 6(f)(3) lands that have been assisted with L&WCF. When additional mitigation lands are approved, they will be subjected to the intergovernmental review process as stated above.

"(9) The proposed conversion and substitution are in accord with the SCORP."

All of the proposed additional lands meet SCORP requirements as noted in Section 4.1.1. of the Page Avenue Extension FEIS. High-priority SCORP issues such as walking for pleasure; the need to provide environmental protection and preservation; the protection of Missouri's rivers, streams, land, and forests; and the purchase of environmentally

sensitive lands that would include plant, animal, and fish habitat are addressed by the inclusion of these additional parcels. In addition, SCORP recognizes and identifies the need to preserve, restore, enhance, and create wetlands.

#### **8.0. CONSULTATION AND COORDINATION**

Coordination for the proposed action began immediately after DOI Secretary Bruce Babbitt stated in his letter of May 18, 1993, to Senator John Danforth, that it would be "necessary to identify a significant amount of additional lands to be included in the mitigation package." The Secretary further indicated that "the best way to evaluate these additional lands would be through the completion of a supplemental environmental impact statement (SEIS)."

The Secretary's comments were reiterated by Buzz Westfall, St. Louis County Executive, May 25, 1993, at a public meeting on the Section 404 permit application to the COE. In a later meeting on May 26, 1993, representatives from the FWS, FHWA, MHTD, DNR, and NPS met and discussed the recent identification by Secretary Babbitt of requirements for satisfying section 6(f)(3) conversion requirements.

The items of discussion listed below relate to pertinent communications with various agencies, entities, and individuals in an effort to identify and evaluate additional lands for meeting the relevant conversion requirements.

#### **PUBLIC COORDINATION**

##### **July 1, 1993: First Scoping Meeting.**

This first scoping meeting was held in St. Louis, Missouri, for the purpose of introducing the project and for soliciting information for use in identifying additional lands as outlined in the above correspondence by Secretary Babbitt. The scoping process was to accomplish the following:

- a. Identification of alternative land proposals.
- b. Identification of potential impact topics and depth of analysis.
- c. Determination of potential formal and/or informal cooperating agencies and assignment of responsibilities.

Public comments were received during the hours of 1:00 p.m. to 8:30 p.m. from 45 persons. An additional 15 written

statements were received from others after the meeting and prior to the closing date of July 6, 1993.

As a result of the meeting and the written statements, six alternative land proposals were identified. The six alternatives are as follows:

- a. All private property currently adjacent CCLMP should be evaluated as potential mitigation land.
- b. A 165-acre tract located adjacent the park on the north and east side.
- c. An additional 38.7 acres consisting of wooded upland and scrub-shrub wetland immediately east of the park.
- d. Four thousand acres near the confluence of the Missouri and Mississippi Rivers.
- e. A 2000-acre tract on the Missouri River in St. Charles County known as Catfish Island.
- f. A 300-acre tract known as LCCL located southwest of CCLMP.

August 13, 1993: Second Scoping Meeting.

This meeting was held at the FHWA Regional Office in Kansas City, Missouri, with 17 representatives of various Federal and State agencies. The purpose of the meeting was to discuss the status of the SEIS and coordinate future actions in the NEPA process. Discussions centered on finalizing the identification of alternatives, selecting the alternatives for detailed environmental evaluation, identifying a method for collecting environmental data, and clarifying the NPS assignment.

It was reiterated at this meeting that the NPS, in fulfilling this particular assignment, would not be reanalyzing the FHWA FEIS and correcting deficiencies, if any so existed; re-evaluating land already identified and included in the conversion package (183 acres); or using the section 6(f)(3) conversion process to mitigate the total impact of the Page Avenue Extension on all natural resources.

The six alternatives were further discussed and comments were received regarding which ones should be selected for more detailed environmental evaluation. A seventh alternative was identified for further consideration. An expanded area of LCCL encompassing approximately 750 acres located south and west of the Page Avenue Extension corridor

was suggested as a viable alternative and one that deserved further consideration. It was determined that the DNR and FWS would meet with the MHTD and look at ways to revise the two larger acre alternatives (2,000 and 4,000 acres) to permit a more rational evaluation and to refine the new LCCL proposal.

It was agreed that although flood waters presently prevented on-site investigation of all the alternatives, MHTD would begin immediately to gather environmental information that was readily available. It was determined that MHTD would serve as the coordinator for obtaining and/or preparing baseline data for the development of the SEIS. The data would be compiled with the assistance of the Federal cooperating agencies and other State agencies and transmitted to the NPS for evaluation and incorporation in the SEIS.

**July 8, 1994:** Distribution of draft SEIS for public review. On the above date, the "Federal Register" announced the availability of the draft SEIS for public review and comments through a period ending August 22, 1994. The review period was later extended through September 9, 1994. Nearly 170 written comments were received, including petitions representing 1570 individuals. With the petitions, the vast majority of comments were against the preferred alternative and recommended developing another alternative. During this review period, HBLD and the City of Maryland Heights indicated their strong objection to Alternative B. HBLD, at a later public hearing, formally submitted their second proposed alternative for consideration in place of Alternative B.

**August 3, 1994:** Public Hearing.

An open forum public hearing was held in St. Louis, Missouri, to solicit comments on the draft SEIS and the preferred alternative (Alternative B, LCCL). The hearing drew nearly 200 persons and resulted in 87 written comments and 13 verbal statements. The vast majority of comments received from the public hearing were in favor of the preferred alternative/implementation of the highway project, with only 37 being in opposition to the above action.

#### INTERAGENCY COORDINATION

**August 26, 1993** - Meeting held at MHTD office in Jefferson City, Missouri. Representatives from MHTD, FHWA, DNR, FWS, and DOC were in attendance. Topics discussed included the following:

- Attendees agreed the Red Alignment was not the appropriate issue and would not be an item for discussion in that forum.

The discussion should focus on identifying alternatives to add significant additional land to the park mitigation plan.

- Discussion centered on interpretation of the term "significant additional land." Six parkland replacement alternatives were initially identified during scoping.

- Discussion of potential screening criteria to eventually apply to the alternatives initially identified during scoping. Suggestions for screening criteria included proximity to the existing CCLMP.

- It was suggested that a seventh alternative also be considered. The LCCL Alternative was identified by the meeting participants and is an expansion of the FWS 300-acre proposal located west of Creve Coeur Mill Road.

- Initial discussion of assignment of responsibility in gathering of baseline data on the replacement alternatives.

- DNR agreed to do a background records check for cultural resources on all the alternatives. MHTD would handle the cultural resources survey for the preferred alternative once it is identified with assistance from DNR.

September 3, 1993 - Meeting held in Jefferson City, Missouri. Representatives from MHTD, DOC, FWS, DNR, St. Louis County, and FHWA were in attendance.

The LCCL was further defined as an alternative.

Attendees discussed roles each agency will assume and expected target dates to provide input to the data collection process. It was agreed that MHTD and DNR would be the focal points for data collection.

September 10, 1993 - Meeting held in Jefferson City, Missouri. Representatives from MHTD, COE, FHWA, DOC, FWS, DNR, and St. Louis County were in attendance. Topics included data collection and discussion of the various alternatives.

September 24, 1993 - Meeting held in Jefferson City, Missouri. Representatives from MHTD, DNR, FWS, FHWA, St. Louis County, EPA, COE, and NPS were in attendance.

Attendees addressed the issue of deleting portions of the initial land replacement package that did not meet section 6(f)(3) criteria. Areas A and B were accepted by the NPS as meeting the section 6(f)(3) replacement requirement for value. Recreational utility will be addressed through acquisition of additional lands. Representatives from the NPS gave an update on their views regarding, time frame for completion of the SEIS.

October 8, 1993 - Meeting held in Jefferson City.

Representatives from MHTD, DNR, FWS, FHWA, St. Louis County, and COE were in attendance.

Attendees discussed the level of detail to be addressed in the various replacement alternatives. Consensus was that all of the alternatives would be given the same level of initial screening to obtain baseline data to include in the Draft SEIS. When a preferred alternative is identified, more specific data will be included in the Final SEIS for that alternative.

November 10, 1993 - Meeting held in Jefferson City.

Representatives from MHTD, EPA, DNR, FWS, FHWA, St. Louis County, and COE were in attendance.

The role each agency would assume in collection and review of baseline data on the various replacement alternatives was further refined. A breakdown of tasks by agency was developed. After this meeting, the EPA advised it could not assist in providing baseline information and would remain in a review capacity only.

Baseline data on the replacement alternatives was collected and forwarded to the NPS in two submissions made on January 3 and January 20, 1994. A completed Farmland Conversion Impact Rating Form (Form AD-1006) from the SCS was sent to the NPS on February 24, 1994.

August 4, 1994 - Following the conclusion of a public hearing on the draft SEIS, representatives from MHTD, DNR, FWS, FHWA, St. Louis County, EPA, COE and NPS met to discuss the results of the public hearing and to assign responsibilities for revising the draft. The new alternative, submitted in comments by the Howard Bend Levee District, was introduced at the meeting and scheduled for further evaluation and consideration.

AUGUST 18, 1994 - A meeting and field review were conducted in St. Louis with representatives of NPS, MHTD, FWS, and Howard Bend Levee District to further evaluate the newly proposed alternative.

SEPTEMBER 14, 1994 - A Federal and State Cooperators Coordination meeting was held in Jefferson City, Missouri, to review the present status of the SEIS process and to determine the incorporation of the HBLD II proposal into the final document. The attendees, including the Missouri Governor's Washington Office representative by telephone, expressed the position that the HBLD II proposal did not have sufficient merit as a viable alternative and unanimously endorsed the preferred alternative (LCCL) for the final SEIS. The consensus of the group was that the LCCL alternative had

been identified as a result of public meetings and numerous coordination meetings and evaluated and selected in compliance with NEPA regulations, as well as in accordance with Secretary Babbitt's directive; and that any deviation from that alternative without substantial justification would seriously compromise the NEPA process.

Responses to comments on the Draft SEIS and received during the public review period are displayed in Appendix C.

#### **9.0 PREPARERS**

This document was compiled by the NPS from data furnished primarily by the MHTD and in cooperation with the FHWA, the U.S. Army Corps of Engineers (COE), the EPA, and the FWS.

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- Mark Kross - Missouri Highway and Transportation Department, Environmental Manager
- Bill E. Graham - Missouri Highway and Transportation Department, Environmental Mitigation Coordinator
- David Vaught - Missouri Highway and Transportation Department, Parkland Specialist

**10.0 PAGE AVENUE EXTENSION SEIS DISTRIBUTION**

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Honorable Harold Volkmer  
United States House of Representatives  
2409 Rayburn House Office Building  
Washington, D.C. 20515

Honorable James M. Talent  
United States House of Representatives  
1022 Longworth House Office Building  
Washington, D.C. 20515

**Federal Government Agencies**

Colonel Richard H. Goring  
U.S. Army Corps of Engineers  
Kansas City District  
700 Federal Office Building  
601 East 12th Street  
Kansas City, Missouri 64106  
Attn: Regulatory Branch &  
Floodplain Management Branch

Mr. Gene Gunn  
U.S. Environmental Protection Agency  
Chief, EIS Section  
Region VII  
726 Minnesota Avenue  
Kansas City, Kansas 66101

Colonel Thomas C. Suermann  
U.S. Army Corps of Engineers  
St. Louis District  
1222 Spruce Street  
St. Louis, Missouri 63103-2833  
Attention: Regulatory Branch &  
Floodplain Management Branch

Mr. M.D. Jewett  
Chief, Regulatory Branch  
U.S. Army Corps of Engineers  
700 Federal Building  
Kansas City, Missouri 64106-2896

Mr. Jonathan P. Deason  
Director, Office of Environmental Affairs  
U.S. Department of the Interior  
Room 2024  
1849 "C" Street NW  
Washington, D.C. 20240

U.S. Environmental Protection Agency  
Attn: Office of Federal Activities  
EIS Filing Section (Mail Code A-104)  
Room 2119 Waterside Mall  
401 "M" Street SW  
Washington, D.C. 20460

Mr. Don L. Klima  
Executive Director, Advisory Council on Historic Preservation  
Old Post Office Building, Suite 809  
1100 Pennsylvania Avenue NW  
Washington, D.C. 20004

Centers for Disease Control  
Center for Environmental Health and Injury Control  
Special Programs Group  
Mail Stop F-29  
1600 Clifton Road  
Atlanta, Georgia 30333

Mr. Roger Wiebusch  
Bridge Administrator, Bridge Branch  
Second Coast Guard District  
United States Coast Guard  
1222 Spruce Street  
St. Louis, Missouri 63103-2832

Federal Railroad Administration  
Office of Economic Analysis (RRP-32)  
400 Seventh Street SW  
Washington, D.C. 20590

Mr. James E. Alexander  
Acting Director, Department of Energy  
Kansas City Support Office  
911 Walnut Street  
Kansas City, Missouri 64106

Mr. John A. Miller  
Regional Director  
Federal Emergency Management Agency  
911 Walnut Street  
Kansas City, Missouri 64106

Mr. Gary Frazer  
U.S. Fish and Wildlife Service  
Columbia Field Office  
608 East Cherry, Room 207  
Columbia, Missouri 65201

Mr. Mike Madrigal  
U.S. Department of Housing and Urban Development  
Kansas City Regional Office  
400 State Avenue  
Kansas City, Kansas 64101

Mr. Bruce Thompson  
State Soil Scientist  
U.S. Department of Agriculture  
Parkade Plaza, Suite 250  
601 Business Loop 70 West  
Columbia, Missouri 65203

Ms. Sandy Freeman  
Environmental Officer, Department of Housing  
and Urban Development  
St. Louis Office, Region VII  
1222 Spruce Street  
St. Louis, Missouri 63103

Mr. Volmer K. Jensen  
Administrator, Federal Highway Administration  
P.O. Box 419765  
Kansas City, Missouri 64141

Mr. G. J. Reihsen  
Administrator, Federal Highway Administration  
P.O. Box 1787  
Jefferson City, Missouri 65102

Mr. Leland W. Dong  
Project Development Specialist  
Environmental Operations Division  
Office of Environment & Planning  
Federal Highway Administration  
400 Seventh Street, SW  
Washington, D.C. 20590

## State Government Elected Officials

Honorable Mel Carnahan  
Governor of Missouri  
Office of the Governor  
State Capitol Building, Room 216  
Jefferson City, Missouri 65101

Honorable Francis Flotron  
Missouri Senate  
13043 Olive Street Road  
St. Louis, Missouri 63141

Honorable Ted House  
Missouri Senate  
3077 Winding River Drive  
St. Charles, Missouri 63303

Honorable Cindy Ostmann  
Missouri House of Representatives  
445 Knaust Road  
St. Peters, Missouri 63376

Honorable Jon Bennett  
Missouri House of Representatives  
151 Pralle Lane  
St. Charles, Missouri 63303

Honorable Don Kissell  
Missouri House of Representatives  
408 Sutters Mill  
St. Peters, Missouri 63376

Honorable Rich Chrismer  
Missouri House of Representatives  
25 Barkwood Trails  
St. Peters, Missouri 63376

Honorable Chris Liese  
Missouri House of Representatives  
1948 A Marine Terrace Drive  
St. Louis, Missouri 63146

Honorable Steve Ehlmann  
Missouri Senate  
2941 Wentworth  
St. Charles, Missouri 63301

Honorable Chuck Gross  
Missouri House of Representatives  
3019 Westborough Court  
St. Charles, Missouri 63301

Honorable Todd Akin  
Missouri House of Representatives  
305 Conway Hill Road  
St. Louis, Missouri 63141

Honorable Ilene Ordower  
Missouri House of Representatives  
2 Pine Manor  
St. Louis, Missouri 63141

Honorable S. Sue Shear  
Missouri House of Representatives  
200 South Brentwood Boulevard  
Clayton, Missouri 63105

#### **State Government Agencies**

Ms. Lois Pohl  
Coordinator, Missouri Clearinghouse  
Division of General Services  
P.O. Box 809  
Jefferson City, Missouri 65102

Mr. David Shorr  
Director, Department of Natural Resources  
P.O. Box 176  
Jefferson City, Missouri 65102

Mr. Jerry J. Presley  
Director, Missouri Department of Conservation  
P.O. Box 180  
Jefferson City, Missouri 65102-0180

Mr. Joe Mickes  
Chief Engineer  
Missouri Highway and Transportation Department  
P.O. Box 270  
Jefferson City, Missouri 65102

## Local Government Elected Officials & Agencies

Mr. Les Sterman  
Executive Director, East-West Gateway  
Coordinating Council  
911 Washington Avenue  
St. Louis, Missouri 63101

Honorable Sue Baum  
Mayor of Creve Coeur  
300 North New Ballas Road  
Creve Coeur, Missouri 63141

Honorable Michael T. O'Brien  
Mayor of Maryland Heights  
212 Millwell Drive  
Maryland Heights, Missouri 63043

Mr. Joe Ortwerth  
County Executive  
County of St. Charles  
118 North Second Street  
St. Charles, Missouri 63301

Mr. Steven Lauer  
St. Charles Planning and Zoning Commission  
205 North Second Street, Room 306  
St. Charles, Missouri 63301

Mr. Buzz Westfall  
St. Louis County  
Executive  
County Government Center  
41 South Central  
Clayton, Missouri 63105

Mr. Jerry Schober  
Director  
St. Louis County Parks and Recreation  
7900 Forsyth Blvd.  
Clayton, Missouri 63102

Ms. Geri Rothman-Serot  
St. Louis County Council  
41 South Central  
Clayton, Missouri 63105

Mr. Marty Macke  
Streets and Engineering Director  
City of Maryland Heights  
212 Millwell Drive  
Maryland Heights, Missouri 63043

Mr. Thomas R. Shrout, Jr.  
Executive Director  
Citizens for Modern Transit  
c/o RCGA  
100 South Fourth Street  
Suite 500  
St. Louis, Missouri 63102

Mr. Mark Kaufmann  
2437-A Rustic Ridge Drive  
Overland, Missouri 63114

Ms. Andrea Weiss  
8909 Ladue Road  
St. Louis, Missouri 63124

Mr. Douglas F. Wilburn  
Bryan Cave  
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St. Louis, Missouri 63102-2750

Mr. Rod Miller  
State Director  
Missouri Field Office  
Nature Conservancy  
2800 S. Brentwood Blvd.  
St. Louis, Missouri 63144

Mr. Bill Salsgiver  
Audubon Society  
911 La Cherie  
Ballwin, Missouri 63021

Ms. Jean Dean  
Environmental Quality  
League of Women Voters of St. Louis County  
6665 Delmar, Room 304  
St. Louis, Missouri 63130

Mr. Pete Lux  
13015 King Arthur Lane  
St. Louis, Missouri 63146

Mr. Gyo Obata  
Co-Chairman, HOK  
1 Metropolitan Square  
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St. Louis, Missouri 63102

Mr. Ted Curtis  
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349 Oakwood  
St. Louis, Missouri 63119

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Vice President  
Governmental Affairs and Transportation  
Regional Commerce and Growth Association  
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St. Louis, Missouri 63102

Mr. John E. Drake  
Manager, Government Affairs  
Novus International, Inc.  
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Ms. Edwina Conley  
89 Centre Pointe Dr.  
St. Charles, Missouri 63304

Ms. Diane J. Albright  
14615 Riolto Dr. #203  
Chesterfield, Missouri 63017

Mr. Greg Heaton  
2750 W. Washington  
Springfield, Illinois 62702

Mr. John H. Mullen  
Creve Coeur Airport  
225 Long Road  
Chesterfield, Missouri 63005

Mr. Warren Stemme  
110 High Valley Drive  
Chesterfield, Missouri 63017



## **APPENDIX A**

## APPENDIX A

### EXPLANATION OF TERMS

#### National Wetlands Inventory

PF01A - Areas classified on National Wetland Inventory (NWI) maps as palustrine forested wetlands (PFO) with broad-leaved, deciduous vegetation (1) and a temporarily flooded water regime (A). These areas may meet the jurisdictional wetland criteria used by the U.S. Army Corps of Engineers (COE).

PF01C - Areas classified on NWI maps as PFO with broad-leaved, deciduous vegetation (1) and a seasonally flooded water regime (C). These areas may meet the jurisdictional wetland criteria used by the COE.

PEM1A - Areas classified on NWI maps as palustrine emergent wetlands (PEM) with persistent vegetation (1), and a temporarily flooded water regime (A). These areas may meet the jurisdictional wetland criteria used by the COE.

PEM1C - Areas classified on NWI maps as PEM with persistent vegetation (1), and a seasonally flooded water regime (A). These areas may meet the jurisdictional wetland criteria used by the COE.

PUBF - Areas classified on NWI maps as palustrine emergent wetlands (P) with unconsolidated (mud, sand, or gravel) bottoms (UB), and a semi-permanently flooded water regime (F). These areas are typically shallow ponds. These areas may meet the jurisdictional wetland criteria used by the COE.

PEM/SS1C - Areas classified on NWI maps as a combination of palustrine, broad leaved, deciduous scrub/shrub wetlands (PSS1) and persistent, palustrine emergent wetlands (PEM1) with a seasonally flooded water regime (C). These areas may meet the jurisdictional wetland criteria used by the COE.

PSS1A/C - Areas classified on NWI maps as palustrine scrub/shrub wetlands (PSS) with broad-leaved, deciduous vegetation, and either temporarily flooded (A) or seasonally flooded (C) water regime. These areas may meet the jurisdictional wetland criteria used by the COE.

R4SBCx - Areas classified on NWI maps as the stream bed (SC) of intermittent riverine wetlands (R4) are not considered jurisdictional wetlands but are considered "waters of the U.S." and are regulated by the COE under Section 404.

R2USA - Areas classified on NWI maps as the unconsolidated shore (US) of lower perennial riverine wetlands (R2) with a temporarily

flooded water regime (A). These areas may meet the jurisdictional wetland criteria used by the COE.

#### Soil Survey of St. Louis County, Missouri

**Hydric Soils** - These are areas where the predominant soil type is a hydric soil. Approximately 90 to 100 percent of these soil map units are hydric in St. Louis and St. Charles Counties. A hydric soil is a soil that is saturated, flooded, or ponded long enough during the growing season to develop anaerobic conditions in the upper part (National Technical Committee for Hydric Soils, 1991). The hydric portions of these areas may meet the jurisdictional wetland criteria used by the COE.

**Hydric Upland Complex** - These areas include a mixture of both hydric and non-hydric soil types that were so intermingled and of such small size that it was impractical to map the soil types separately. Approximately 50 percent of the map unit is hydric in St. Louis County. The hydric portions of these areas may meet the jurisdictional wetland criteria used by the COE.

**Partially Hydric Soils** - These are areas where the predominant soil type is not a hydric soil but small areas (inclusions) of soils which are hydric are included within these map units. The percentage of hydric soils included within these non-hydric soil map units ranges from 5 to 15 percent in St. Louis and St. Charles Counties. Not every map unit of this soil type necessarily has hydric soils. The hydric portions of these areas may meet the jurisdictional wetland criteria used by the COE.

**Non-Hydric Soils** - These areas are map units that lack hydric soils as described in St. Louis and St. Charles Counties. These areas would not meet the jurisdictional wetland criteria used by the COE unless the hydrologic criteria for hydric soils is met or determined to be by SCS.

#### Food Security Act Wetlands Inventory

**Wooded Wetlands** - Areas classified on Food Security Act (FSA) wetland inventory maps (prepared by the Soil Conservation Service) as WW. These areas may meet the jurisdictional wetland criteria used by the COE.

**Emergent Wetlands** - Areas identified on FSA wetland inventory maps as WE. These areas are not farmed in most years. These areas may meet the jurisdictional wetland criteria used by the COE.

**Open-Water Wetlands** - Areas classified on FSA wetland inventory maps as WO. These areas may meet the jurisdictional wetland criteria used by the COE or be considered waters of the United States and subject to Section 504 of the Clean Water Act.

**Farmed Wetlands** - Areas classified on FSA wetland inventory maps as FW. These areas are farmed when soil moisture conditions permit. These areas generally meet the jurisdictional wetland criteria used by the COE.

**Prior Converted** - Areas classified on FSA wetland inventory maps as PC. Generally, these areas are wetlands that were drained, dredged, filled, leveled, or otherwise manipulated, including the removal of woody vegetation before December 23, 1985, for the purposes of, or to have the effect of, making the production of an agricultural commodity possible and an agricultural commodity was produced at least once prior to December 23, 1985. These areas are generally considered as nonwetlands by the COE.

Table Wetlands and Hydric Soils

Acres of wetlands and hydric soils mapped by the Soil Conservation Service and U.S. Fish & Wildlife Service (National Wetlands Inventory) for Page Avenue Supplemental EIS mitigation alternative locations. Acreage estimates are rounded to the nearest whole number.

MAP INFORMATION		ALTERNATIVES					
Source Map	"No Action" Alternative A (MFL Areas A,B,C,D,E)	LLCL Proposal Alternative B	FWS Proposal Alternative C	HBLD Proposal Alternative D	MHTD Proposal* Alternative E	Areas A and B of EIS Proposal	
National Wetland Inventory							
PFO1A	25	14	13	11	9	20	
PFO1C	78	0	0	0	0	77	
PEM1A	0	15	17	0	0	0	
PEM1C	1	129	153	18	7	1	
PUBF	2	0	0	0	0	2	
PEM/SS1C	0	0	0	33	33	0	
PSS1A/C/F	1	14	26	0	0	0	
R4SBCx	0	0	0	1	0	0	
LIUBH	1	0	0	0	0	1	
R2USA, R2JBGx	0	0	0	0	0	0	
Total NWI Wetland Acres Mapped	107	171	208	61	50	101	
St. Louis County, Mo. Soil Survey							
Hydric Soils (90% to 100% hydric)	215	277	193	146	65	163	
Hydro-Upland Complex (50% hydric)	0	39	0	0	0	0	
Partially Hydric (5% to 15% hydric)	295	434	61	0	0	56	
Non-hydric Soils	118	24	46	19	45	118	
Food Security Act Wetland Inventory **							
Wooded Wetland (WW)	134	18	15	29	14	125	
Emergent Wetland (WE)	0	2	2	0	0	0	
Open-water Wetland (WO)	0	0	0	0	0	0	
Farmed Wetland (FW)	0	9	4	68	41	0	
Non-Wetland (NW or PC)	494	744	278	68	45	212	
Total FSA Wetland Acres Mapped	134	29	22	97	55	125.0	
Total Acres In Proposed Site	628	774	300	165	100	337.0	

\* Conceptual Plan -- actual land package would incorporate 38.7 acres of the 99.9 acres evaluated.

\*\* FSA acreage may include some acreage already accounted for by the National Wetland Inventory shown above.

# FARMLAND CONVERSION IMPACT RATING

<b>PART I (To be completed by Federal Agency)</b>		Date Of Land Evaluation Request <u>12/16/93</u>
Name Of Project <u>Page Avenue Extension J6U0803B</u>	Federal Agency Involved <u>FHWA</u>	
Proposed Land Use <u>Park</u>	County And State <u>St. Louis County, MO</u>	

<b>PART II (To be completed by SCS)</b>		Date Request Received By SCS <u>12-09-93</u>
Does the site contain prime, unique, statewide or local important farmland? (If no, the FPPA does not apply - do not complete additional parts of this form).		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
		Acres Irrigated <u>4060</u> Average Farm Size <u>160</u>
Major Crop(s) <u>Corn, Soybean, Wheat, Trk. Crops</u>	Farmable Land In Govt. Jurisdiction Acres: <u>143,451</u> % <u>38</u>	Amount Of Farmland As Defined In FPPA Acres: <u>122,176</u> % <u>32.8</u>
Name Of Land Evaluation System Used <u>St. Louis</u>	Name Of Local Site Assessment System.	Date Land Evaluation Returned By SCS

<b>PART III (To be completed by Federal Agency)</b>	Alt D	Alt E	Alt C	Alt B
A. Total Acres To Be Converted Directly	165.0	38.7	300.0	773.8
B. Total Acres To Be Converted Indirectly	0.0	0.0	0.0	0.0
C. Total Acres In Site	165.0	38.7	300.0	773.8

<b>PART IV (To be completed by SCS) Land Evaluation Information</b>				
A. Total Acres Prime And Unique Farmland	148.0	18.7	apprx. 100.0	769.8
B. Total Acres Statewide And Local Important Farmland	7.0	0	0	4.0
C. Percentage Of Farmland In County Or Local Govt. Unit To Be Converted	135	032.015	082	63
D. Percentage Of Farmland In Govt. Jurisdiction With Same Or Higher Relative Value	22	44	25	72

<b>PART V (To be completed by SCS) Land Evaluation Criterion</b>				
Relative Value Of Farmland To Be Converted (Scale of 0 to 100 Points)	88	76	75	60

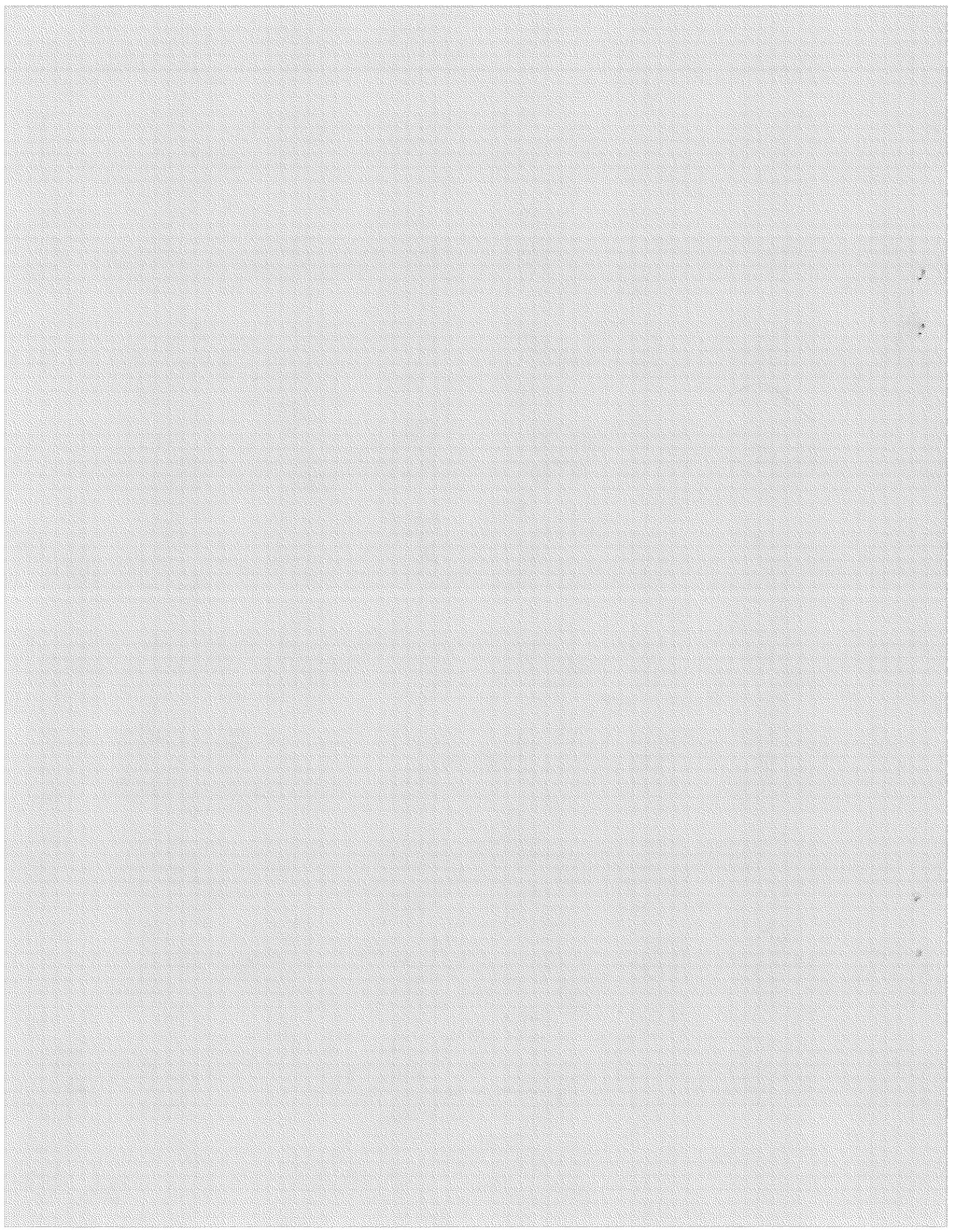
<b>PART VI (To be completed by Federal Agency)</b>	Maximum Points				
Site Assessment Criteria (These criteria are explained in 7 CFR 658.5(b))					
1. Area In Nonurban Use	15	10	7	15	15
2. Perimeter In Nonurban Use	10	10	8	10	10
3. Percent Of Site Being Farmed	20	10	0	20	20
4. Protection Provided By State And Local Government	20	0	0	0	0
5. Distance From Urban Builtup Area	15	0	0	5	5
6. Distance To Urban Support Services	15	0	0	10	10
7. Size Of Present Farm Unit Compared To Average	10	0	0	10	10
8. Creation Of Nonfarmable Farmland	10	0	0	0	0
9. Availability Of Farm Support Services	5	5	5	5	5
10. On-Farm Investments	20	0	0	20	20
11. Effects Of Conversion On Farm Support Services	10	0	0	0	0
12. Compatibility With Existing Agricultural Use	10	0	0	0	0
<b>TOTAL SITE ASSESSMENT POINTS</b>	160	35	20	95	95

<b>PART VII (To be completed by Federal Agency)</b>					
Relative Value Of Farmland (From Part V)	100	88	76	75	60
Total Site Assessment (From Part VI above or a local site assessment)	160	35	20	95	95
<b>TOTAL POINTS (Total of above 2 lines)</b>	260	123	96	170	155

Site Selected:	Date Of Selection:	Was A Local Site Assessment Used? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Reason For Selection:		



## **APPENDIX B**



### Comment Letters on the Draft SEIS

- 1.) Missouri Coalition for the Environment (August 3, 1994)  
Comments addressed by answers 1-7.
- 2.) Missouri Coalition for the Environment (August 23, 1994)  
Comments addressed by answers 2-5 and 10-14.
- 3.) Creve Coeur Memorial Post 397 (August 29, 1994)  
Comments addressed by answer 8.
- 4.) Creve Coeur Athletic Assn., Inc. (August 3, 1994)  
Comments addressed by answer 8.
- 5.) Howard Bend Levee District (June 30, 1994)  
Comments addressed by answers 7, 10-14, 17, 23.
- 6.) Coalition of West St. Louis County Mayors (June 7, 1994)  
Comments addressed by answers 3, and 14.
- 7.) City of Maryland Heights (July 27, 1994)  
No comments to address. Cover letter to Resolution  
opposing the "Preferred Mitigation Plan".
- 8.) Missouri Native Plant Society (August 3, 1994)  
Comments addressed by answer 9.
- 9.) Missouri Native Plant Society (June 2, 1994)  
Comments addressed by answer 3.
- 10.) Maryland Heights-West Port Chamber of Commerce  
Comments addressed by answer 4.
- 11.) East-West Gateway Coordinating Council (August 4, 1994)  
Comments addressed by answer 15.
- 12.) Daniel L. Human Public Hearing Remarks and Attachments  
Comments addressed by answers 4, 8, 15-17, and 18-21.
- 13.) Metro-West Mayors Transportation Coalition (August 22, 1994)  
Comments addressed by answers 4-5, 14-15, and 22-23.
- 14.) Mr. Mark R. Kaufmann (August 21, 1994)  
Comments addressed by answers 2, 4-7, 9, 14, and 24-29.
- 15.) Richard Lamonica (August 22, 1994)  
Comments addressed by answer 2.
- 16.) Earl and Betty Stolte (August 25, 1994)  
Comments addressed by answers 12, 14-15, and 20.
- 17.) Richard M. Kutta and Nancy A. Meyer (August 15, 1994)  
Comments addressed by answers 2, and 5.

- 18.) Warren A. Stemme (August 15, 1994)  
Comments addressed by answers 2, 5-7, 20, and 28-30.
- 19.) Kevin E. Rhoades Comments at Public Hearing  
Comments addressed by answer 31.
- 20.) Eugene M. Schulz (August 22, 1994)  
Comments addressed by answers 4, 9, 17, and 28-29
- 21.) Robert Goetz and Associates, LTD.  
Comments addressed by answers 3 and 4..
- 22.) Virginia Harris (August 20, 1994)  
Comments addressed by answers 4, 5, and 32.
- 23.) Steve Sorkin (August 23, 1994)  
Comments addressed by answers 2, 5-6, and 28.
- 24.) State of Missouri, Office of Administration (July 25, 1994)  
No comments to address.
- 25.) State of Missouri, Department of Natural Resources  
(September 9, 1994)  
Comments already addressed.
- 26.) James M. Talent, Congress of the United States, House of  
Representatives (August 19, 1994)  
No comments to address.
- 27.) Missouri Senate Letterhead  
St. Charles legislators.  
No comments to address.
- 28.) U.S.D.A. Soil Conservation Service (July 12, 1994)  
No comments to address.
- 29.) Green, Hennings and Henry (August 19, 1994)  
Comments addressed by answers 1, 4, 15, 16, and 28.
- 30.) Sierra Club (August 19, 1994)  
See letter number 14 for comment answers.
- 31.) St. Louis Audubon Society (August 17, 1994)  
Comments addressed by answers 4-5, 17, and 33-34.
- 32.) Department of the Army (August 22, 1994)  
Comments addressed by answers 20, 29, and 34-36.
- 33.) Open Space Council for the St. Louis Region (August 19, 1994)  
Comments addressed by answers 1-2, and 4-5.
- 34.) Crawford, Murphy and Tilly, Inc. (August 18, 1994)  
Comments addressed by answers 15 and 36.

- 35.) U. S. Environmental Protection Agency (September 8, 1994)  
Comments addressed by answers 2, 4-5, 14-15, 34, and 36.
- 36.) Diane Albright Comments from Public Hearing  
Comments addressed by answer 4.



## Responses to Comments

Similar comments regarding this topic): Lewis Green, Mo Coalition for the Environment, Open Space Council

### **1. Public Hearing format**

Several comments were critical of the open format style public hearing. It is our opinion that the public hearing is for the purpose of providing an opportunity for the public to learn about a project and provide comments if they so desire. To that end, the public exercised that opportunity and did so in a manner consistent with the NEPA-required review process. The open format public hearing does not provide for, nor encourage, open debate among the public attendees themselves. This format does allow for a frank interchange of information and ideas on a one to one basis between decision makers and the public which cannot occur in the traditional public hearing. In fact, the format allows for those to comment that might not be comfortable speaking to a large group. For those not wanting to speak publicly, they may use written and orally transcribed comments. The overall goal of garnering public comment on the Draft SEIS was fulfilled.

Similar Comments from: Kaufmann, Kutta & Meyer, LaMonica, Stemme, MC for the Environment, Sierra Club, Open Space Council, EPA

### **2. Amount of mitigation offered through the FEIS and the SEIS is and will never be sufficient to mitigate the damage to CCLMP.**

While the amount of land offered in mitigation is to some extent, a subjective evaluation, requirements of Section 6(f) does specify particular criteria that must be met. The intent of the Land and Water Conservation Fund land conversion regulations is to replace impacted parklands with land of equal value and recreation utility. The amount of land is not an issue under these regulations. In fact it is possible to impact a large acreage of little value and replace the parkland with considerably less acreage. It is also possible to impact a small acreage of high value and replace that area with a considerably large acreage. The key components are that the land is of equal value and recreation utility. In both cases, the regulations that govern the LWCF program do not require land that is identical in its composition of trees, lakes, rivers, or open spaces. The regulations allow for future development that will replace the recreation opportunities lost with the conversion. However, these replacement lands do not have to be mirror images of what was present before the conversion. In most cases the agencies that govern the parkland prior to

the conversion can provide even greater and more diverse recreation opportunities after the conversion occurs.

Specific to the conversion is the Secretary of the Interior's request for "significant additional lands". Beyond that directive, no further explanation was available as to what might constitute "significant additional land". It should also be noted that at the time of the Secretary's request the National Park Service had recommended acceptance of 264 acres as meeting the need for land of equal value and recreation utility.

The determination of what acres would be impacted was a cooperative effort of several state and federal agencies. Through this effort, it was determined that 57 dBA represented a noise level that would be present within a tranquil parkland environment. This level was supported by noise studies conducted in the park and near the proposed roadway. No other noise studies were conducted on site for any other proposed facilities.

**The assessment of impacts was flawed and the mitigation being considered is inadequate.**

The scope and purpose of the SEIS was to discuss LCCL and replacement land issues. The NPS accepted the assessment of impacts to CCLMP as presented in the FEIS. That impact assessment is not at issue in the SEIS. Additional mitigation in the form of "additional replacement land" over that originally proposed is an issue and the purpose for which the SEIS was developed.

Similar comments from: Native Plant Society, Coalition of West County Mayors, Mo Coalition for the environment  
**3. LCCL area is also impacted by highways.**

It cannot be over emphasized that CCLMP and the various parkland replacement alternatives are located in a dynamic urban setting, accompanied by all of the elements of that setting. The LCCL is being developed concurrently with future highways, airport and the expanding population of the area. The SEIS has addressed to the extent practicable, the noise and visual impact that could occur from adjacent roadways. The assessment was based on what is known about the design of the Page Avenue Extension and what is assumed about the design of a future roadway that may occupy the reserved corridor. The impact assessment criteria for the LCCL area and that which was used to measure anticipated impacts to CCLMP are different, because the two areas are different. CCLMP is an existing park. The LCCL area is potential parkland which will only become parkland through acquisition as mitigation resulting from the Page Avenue project. The LCCL area will be developed as parkland with

the full realization that Page Avenue and possibly other transportation facilities will be nearby. The LCCL area is not currently parkland, so the standards by which impacts were assessed to CCLMP should not be applied to LCCL. In addition, landscaping will be provided that will both reduce the roadway from view, and lower the noise levels that may be generated by the roadways. As the LCCL area is enhanced as parkland with a wetland theme, native plant species will be used in the mitigation development. Impacts to LCCL will be minimized by roadway design and mitigation design.

Similar Comments from: Shultz, Maryland HTS Chamber of Commerce, MO coalition for the Environment, Lewis Green, Holsen-Audubon, Open Space Council, Albright, EPA

#### **4. Earth City Expressway Revelation**

As stated under comment number 3, there are distinct differences between LCCL and CCLMP, in terms of an existing park compared to potential park. This reasoning is reflected in the criteria used to address noise and visual impacts within the respective areas. The MHTD's noise policy, approved by the FHWA, has established 65 dBA as the threshold for considering mitigation for noise impacts. However, in the case of CCLMP, an impact threshold of 57 dBA was agreed to by the MHTD, NPS and FHWA prior to the noise analysis being conducted. The decision to utilize 57 dBA was made realizing the nature of CCLMP as an established park. The decision to use 65 dBA as the threshold for considering noise impacts to LCCL was made with the realization that the area would be developed as parkland in concert with the construction of the roadway and that 65 dBA is MTHD's normal threshold for addressing noise impacts to sensitive receptors such as residences and parks.

Comments have suggested that the reserved corridor and existing roads such as Creve Coeur Mill Road will detrimentally separate the existing park from the mitigation parkland in LCCL. The LCCL fulfills the mandate to provide additional parkland which is adjacent or in the vicinity of CCLMP. Additionally, the proposed hiking/biking trail specified by Section 601 of the Pipeline Safety Act will act to physically tie the two areas together for the park user.

The reserved corridor was devised as a contingency to address the possibility of future transportation facility impacts on the parkland mitigation. The fact that a reserved corridor is being considered does not imply that the SEIS is facilitating advanced approvals for any future roadway. The establishment of a reserved corridor is a proactive response to avoid future park impacts. It is not meant as an endorsement of the concept of a future roadway by MHTD or the NPS. The relative merits and impacts of any future roadway project are expected to be addressed in the

appropriate venue, be it NEPA, Clean Water Act or other means of public disclosure and compliance with all other applicable federal and state laws. Considering the full range of impacts from this or any other unconfirmed future action in the area is beyond the purpose and scope of the SEIS. The SEIS appropriately considers the selection of additional parkland and considers other reasonably foreseeable actions as they may effect potential replacement land. The SEIS has attempted to address, as they may relate to the selection of replacement land for CCLMP, those actions in the area that are truly reasonably foreseeable.

The size of the reserved corridor itself was established based on an assumption or what type of transportation facility would likely be constructed in the future. Those assumptions were: A four-lane urban arterial with a concrete median barrier, built at grade, not on berm. An impact footprint of 109 acres was estimated based on right of way necessary for a four-lane arterial and noise and visual impacts. It is unreasonable to assume that a local roadway would consist of more than four lanes and there is no basis on which to make the assumption that the facility would be constructed to have more than four lanes. The facility would most likely be a local urban arterial, not an interstate. This is all that can practicably be done to address impacts on a facility that is not on any transportation authority's long range plan or program of projects as a planned improvement. The project does appear on Maryland Heights land use plan, but it is doubtful that Maryland Heights will be the project sponsor that will actually plan, design, finance and construct the facility.

Similar comments from: Mo Co for the Environment, Sorokin, Human, Kaufmann, Kutta & Meyer, Sierra, Audubon, Open Space Council, EPA

**5. The SEIS should better address the 500-year levee and floodplain development impacts.**

The provision of a 500-year levee in the area of CCLMP will not have a detrimental effect on the LCCL Alternative. Also, the establishment of a park within the LCCL area will not preclude the future construction of a 500-year levee. The two concepts can mutually coexist. Hydrology to sustain a wetland interpretive area at the LCCL would not be impacted by the development of a levee. Ample recharge capacity is present to LCCL without floodwater contribution and, also, the inflow to Creve Coeur Lake (CCL) from surface runoff would also still be present. Granted, flood recharge would not be available, but surface runoff would be present and is currently the main source of water for the LCCL and CCL. Enhanced levee protection for the area could have the benefit of providing a high degree of assurance that

improvements to the area, such as wetland habitats, visitor parking, and trails would not be significantly and periodically altered from damaging floods.

The establishment of the LCCL parkland replacement alternative and the reserved corridor will have a beneficial effect on the floodplain. The LCCL alternative will set aside 774 acres of open space in an area that is coming under increasing levels of development pressure. The purpose for setting this land aside from future development is to provide parkland mitigation. A secondary consideration would be the effect of minimizing development in a floodplain periodically susceptible to damaging flood waters. Some comments have conjectured that the prevention of development is the real purpose behind selection of the LCCL Alternative. Other overriding factors such as location, wetland development potential and proximity to CCLMP were the prime considerations for selection of the LCCL, not to preclude development.

The LCCL Alternative, considering the available resource of the shallow lake, its ability to be sustained by available hydrology and its proximity to the existing CCLMP makes the selection of that area as park replacement viable. That viability is not diminished and takes on even greater value when placed in the rapidly expanding urban context of the area.

Some comments have suggested that any future transportation facility occupying the reserved corridor within the LCCL will impact the floodway by virtue of being constructed on a berm. It is assumed in the Draft SEIS and reiterated here that the basic assumption for any future local roadway is that it would be constructed at grade, with no berms across the floodplain. Therefore, under that scenario, it is assumed that the reserved corridor will not impact the floodplain.

Similar comments from: Sorkin, Stemme, Mo Coalition for the Environment, Kaufmann, Sierra, Lewis Green

#### **6. Noise impacts in the parkland replacement alternatives**

Noise levels within the LCCL Alternative attributable to Page Avenue and the reserved transportation corridor was adequately addressed within the Draft SEIS. Some comments suggested that the SEIS should consider noise impacts from other sources, such as airports in the area. At this time, no data is available that addresses potential noise impacts from the operation of airports in the area. Creve Coeur Airport (CCA) is the only aviation facility in the area that has remained in operation since the flood of 1993. Arrowhead Airport, located southwest of the LCCL Alternate has never re-opened since the flood and there are apparently

Comments by: HBLD

**11. Comments advocate Jane Downing Island should be part of the replacement land package.**

Some of the reasons why Jane Downing Island is not considered viable for additional park replacement land are:

- Difficulty in maintaining control and tenure of lands on the river side of the levee along the Missouri River. Flooding and river maintenance could affect the boundary and thereby the size of the parcel.

- Inability to access Jane Downing Island during periods of high water.

- Lack of public access

- Possibility of landowner and levee district opposition to visitors to the area, primarily due to concerns about the security of the levee.

- Limited ability to provide security to the area due to its relative remoteness.

- The island is located in the regulatory floodway of the Missouri River. This would limit the provision of even the basic support facilities. FEMA regulation generally prohibits structures within the regulatory floodway that could become an obstruction during flooding.

Comments by: HBLD

**12. Implementation of the LCCL alternative will result in the loss of cultivated acres.**

Currently the LCCL water surface area occupies about 127 acres south of River Valley Road and 90 acres south of the proposed Page Avenue Extension. This represents approximately 12% of the LCCL mitigation package that is not available for cultivation without pumping. Approximately 114 acres is currently uncultivated and used as a baseball complex and a golf driving range, 73 acres are either wooded or unsuitable for cultivation, 11.9 acres are in other uses and 52 acres are located outside the levee. Therefore, nearly 45 percent of this land is uncultivated. It would appear that only an estimated 425 acres within the LCCL alternative is currently available for farming without the necessity for pumping. Of the nearly 6000 acres in the HBLD system, the LCCL alternative would remove about seven percent from active farming.

It is agreed that there would be some loss of cultivated acres due to the implementation of LCCL as the Preferred

Alternate; however, the loss of cultivated acres should be seen as minimal. In addition, given the Maryland Heights development plan which has identified all the land in the area as commercial, loss may be inevitable. Once land is deeded to St. Louis County it will be beyond the control of MHTD. Based on preliminary St. Louis County design for recreation development, it is possible that farming operations might cease. However, if wildlife food plots are considered, a certain amount of cultivated acres may be needed to provide for the plots. It is assumed that St. Louis County would enter into a farming arraignment similar to the one that exists for current farming operations within CCLMP.

Comments by: HBLD

**13. Comments advocate that the 165-acre triangular area located NE of CCLMP should be part of any mitigation package.**

The 165-acre alternative offered originally by the Howard Bend Levee District (Alternative D) has some unfavorable attributes. Although the area is adjacent to the existing CCLMP and contains a variety of vegetative covers, including a narrow, elongated area of upland woods, the area exhibits negative aspects as well. A 46.5-acre salvage yard is located within that alternative as well as an abandoned quarry operation. Also, considerable flood debris such as metal drums, tires and other flotsam is trapped along the base of the bluff. These blighted aspects of the alternative represent an uncertainty about the extent and cost of an inevitable cleanup of the area to be suitable for parkland purposes. The negative aspects tend to outweigh the positive ones in this area.

Similar comments from: Coalition of West St. Louis County Mayors, Metro West Mayors

**14. The Draft SEIS does not take into account the Chesterfield Valley connector.**

Some comments contend that the SEIS is deficient because it did not discuss what is termed the Chesterfield Valley or Route 109 connector. The Maryland Heights land use planning document eludes to this route being possibly considered for future location in the vicinity of CCLMP. This idea for a roadway is considered speculation since it does not appear on any approved long range plan of projects of any entity that could include it within that entity's responsibilities and jurisdiction for its construction. Until a proposed action becomes part of the intention of an entity such as the East West Gateway Coordinating Council, St. Louis County or the Missouri Highway and Transportation Department, as documented through a long range plan of projects, extensive consideration of such action should be considered

questionable.

Similar comments from: East-West Gateway, Human  
**15. Concern that since the LCCL alternative lies within 5000 feet of the Creve Coeur Memorial Airport existing and future expanded runway facility, it would pose a hazard to aircraft from a waterfowl attractive nuisance standpoint.**

The Creve Coeur Airport was designated as a reliever for Lambert International Airport in 1991. Since this designation, the privately owned airport has been working towards obtaining federal funding for an airport expansion project. Since the airport and the Page Avenue Extension are being reviewed for cumulative impacts, the issue of bird strikes has been raised if LCCL were developed as a wetland. It is important to note that LCCL and CCLMP are both currently available for waterfowl and both support populations during the fall and early winter months. The enhancement of the LCCL will not significantly increase populations of waterfowl, but rather diversify available habitat for many avian species. The main pool of the LCCL wetland area will be nearly 3000 feet from the runway restriction zone (RPZ) and object free zone (OFZ) for Runway 34. Flight operations should not be affected by birds using the LCCL regardless of the season, weather conditions or type of aircraft using the airport. Based on information available, the airport, LCCL and CCLMP have coexisted for over 30 years. While an increase in flight operation is predicted with the proposed airport project, the amount of possible interaction with bird populations should be minimal given the seasonal nature of flight operations, lack of precision instrument approach capabilities, prescribed right hand pattern for arrivals and departures, and distance between the proposed wetlands area and the RPZ's.

Similar comments from: Human, Lewis Green  
**16. Concern that the LCCL Alternative is separated from the rest of CCLMP by highway development.**

Design plans for the Page Avenue Extension call for eventual placement of wildlife and pedestrian underpasses for Creve Coeur Mill Road and any other proposed future roadway that might separate CCLMP with LCCL. It should be noted that Marine Avenue, a major thoroughfare currently bisects CCLMP.

The inclusion of a reserved corridor as an area that will be excluded from the protection of Section 6(f)(3) of the LWCF Act could be used as parkland until such time as a roadway might be built. It should be noted that this acreage will not be protected in the same manner as those acres under Section 6(f)(3). Development could occur if so desired by St. Louis County. At this time it appears likely that St.

Louis County will keep the area available for outdoor recreation and may use a portion of the land for parking and access to LCCL. The separation of LCCL and CCLMP would also be accommodated by the Katy Trail State Park linkage that would go between CCLMP and St. Charles County. Although the existence of roads, railroads, utility lines and a reserved corridor in the area are not considered enhancements to a park setting, the establishment of a park in an urban setting is often met with similar distractions. As with other such developments, landscaping, buffers, locating of facilities, selection of activity areas and other means will be used to minimize the impact of the above environmental intrusions.

The requirement for "additional land" to meet 6(f) criteria does not make adjacency to CCLMP mandatory.

Similar comments from: Human, Audubon

**17. Cost of preferred is higher than HBLD II**

The development of a wetland and a park simultaneously will be a cooperative effort. Both will feature facilities that will cohabit in a manner suitable for wetland wildlife and park users. This concept has been developed to accommodate both features and thus the term passive recreation. It should be noted that the acceptance of mitigation parcels A and B by the NPS fully complied as necessary compensation for the impacted 183 acres. The additional acreage required by the Secretary of the Interior does not consider a value criteria. The key component in the selection process was the mitigation parcels ability to provide a quality wetland environment and recreation usefulness. The most recent HBLD II proposal offers less opportunity to develop wetlands comparable to those affected by the project and has few small wetlands already in the area. As selected, the LCCL mitigation will result in no net loss of wetlands due to the Page Avenue Extension.

As to whether or not the LCCL Alternate will come at a higher cost than the new HBLD proposal, this is not substantiated for several reasons. First, we are not aware of any willing sellers available in St. Charles County. HBLD did indicate that willing sellers were present in St. Louis County but none were identified in St. Charles County, however, 280 of the 337 acres identified by the new HBLD proposal has already been accepted by the NPS. These acres should not be considered as available since they are already identified as replacement. Finally, the cost of cleanup for the auto salvage is not available without additional studies of the area. It is possible cleanup costs could be high.

Comments by: Human

## **18. "Dry" wetland**

Comments suggested that the LCCL is a "dry" wetland and should not be considered as a potential site to sustain a wetland interpretive park. The LCCL has been an identifiable terrestrial feature of the area for some time. The shallow lake has its origins as an old meander of the Missouri River, and is thereby similar in origin to Creve Coeur Lake. Since the area has been used intensely for cultivation purposes, the LCCL area has to be pumped in many years to keep the area dry enough for agriculture. If the LCCL was not pumped, but allowed to retain water, which the area will readily do, the area will exhibit the desired wetland characteristics. The depth to water table is not a factor in sustaining the supply of water to the area, as has been suggested by comments. Surface runoff is the primary source of hydrology for the LCCL. Overall, runoff from the LCCL area will decrease after the area is allowed to revert to wetland because of more permanent cover. Runoff quality from the area should greatly improve for land converted from cultivation. The acreage within the LCCL Alternative that will be deemed as wetland will be determined by appropriate methods. Determination of what is wetland will follow all existing COE and NRCS guidance and will be approved by the appropriate agency.

Comments by: Human

**19. Comments suggest that the real intent of establishing the LCCL as parkland replacement is to thwart economic development potential in the area.**

It is not the intent of MHTD, NPS or any other agency involved in the SEIS to impede progress in western St. Louis County. It has always been St. Louis County's desire to mitigate within the general area of CCLMP. It is believed that this unique parkland opportunity will not stifle progress but will enhance the quality of life and community attributes. LCCL will be developed in concert with Page Avenue and thus facilities will be planned, designed and constructed to provide the highest quality of recreation experience possible.

It should also be noted that a great many other issues must be resolved, such as the height of the levee, numerous floodplain development regulations, zoning, area transportation, etc. before commercial development of the LCCL area could become a reality.

Similar comments from: Human, Stolte, Stemme, COE, EPA  
**20. Comments claim that it is inappropriate to provide for mitigation in St. Louis County for impacts to lands outside of St. Louis Co. (200 ac extra parcel)**

The issue of where to mitigate is directly tied to where and under who's jurisdiction the converted lands lie. In the case of CCLMP, it is counter to the wishes of St. Louis County to mitigate outside their jurisdiction. For this reason, that concern became a part of the criteria for selection of additional replacement land for CCLMP. However, it is appropriate for the Missouri Department of Conservation (MDC) to receive mitigation (BUSCH) anywhere within the state, because MDC's jurisdiction is statewide in scope.

**Loss of lease rights/capital investment to farm leased areas by use of mitigation land for parkland**

It is an unfortunate fact of tenant farming that a lease arrangement is a temporary situation and is entered into with the full realization of that fact. As the urban environment presses in on this area of the Missouri River floodplain, the continuation of farming activities will likely become more difficult due to a decline in support facilities such as implement and fertilizer dealers. Considering the fact this land is within the city limits of Maryland Heights and the city's future land use concept for this area is one of planned use mixed environment, it is also likely that, at some point in the future, the desire to continue to farm will be outweighed by the pressure to sell the land for other purposes.

Comments by: Human

**21. Mitigation sites proposed by HBLD II are better natural resources than LCCL.**

This comment is somewhat subjective since the determination of these sites being better as natural resources is not substantiated. Although some of the sites display characteristics of a wetland nature, other factors such as accessibility, location/jurisdiction, previously considered in other alternatives, and those further identified in this document detract from the acceptability of the HBLD II alternative. The cooperating agencies who participated in the SEIS process looked at the whole spectrum of land available in the vicinity of CCLMP. The consensus of these agencies was that the LCCL alternative was the most preferred for meeting the criteria of significant additional land exhibiting wetland characteristics in an interpretive park setting, being located near the existing park, and for other reasons identified in the SEIS.

Comments by: Metro West Mayors Coalition

**22. Tax Role Reduction caused by removing productive farmland from the tax roles.**

The tax revenue from the 774 acres in the LCCL alternative, as with any conversion of private land to public use, will be reduced. However, the conversion of private agricultural land to public use would be minimal compared to the loss of commercial developed areas. Agricultural land is likely taxed at or near the lowest tax rate. One would expect that as the remaining areas of undeveloped land are developed, the increased valuation of the developed land will more than offset lost tax revenues from the LCCL Alternative. Additionally, a portion of the lost property tax revenues could be offset by park and recreation users seeking associated services while in the area.

Comments by: Metro West Mayors Coalition

23. The HBLD alternative presented at the NPS public hearing held on Aug. 3, 1994 has willing sellers and more land than the LCCL alt.

There is an assumption that all the property identified in the new HBLD proposal has willing sellers. Based on initial information, it does not appear that landowners in St. Charles County are willing to sell. HBLD identified those landowners within the District (St. Louis County) as being willing sellers. However, they did not thoroughly determine the availability of the St. Charles County parcels. Further inquiries by MHTD indicate that many St. Charles County residents are not, in fact, willing sellers. MHTD did determine that a relationship existed in St. Charles County between the Duck Creek Sewer Treatment Plant and those landowners identified by HBLD as willing sellers. In discussion with Duck Creek officials however, it was learned that the sewer facility uses a considerable portion of the surrounding land for disposal of sludge. The loss of this arrangement with local landowners, if farmlands were converted to parklands, would create a burden for the sewer district that would be passed on to St. Charles County customers.

Regarding the claim of more land, it has been determined that with the St. Charles County parcels eliminated, Jackass Bend removed, the 280 acres already accepted by the NPS and therefore, not new land, the remaining acres in the proposed alternative are considerably less than the proposed 774 acres of LCCL.

Similar comments from: Kaufmann, Sierra

24. Comments question if the LCCL complies with the provisions of Section 601 of the PSA.

The Design Committee which was mandated by Section 601 of the Pipeline Safety Act and appointed by the Governor of Missouri is charged with addressing specific mitigation

concerns as set out in Section 601. The Design Committee is a cross-section of public, private, and professional/business community members. The Design Committee's recommendations will go to the Secretary of Transportation who will then review and approve their recommendations or, if deemed necessary, add to or modify the recommendations. Although the Secretary will make that final decision, an important consideration in the selection of LCCL was that in addition to meeting Section 6(f) requirements, the alternative also met the criteria as outlined in Section 601 of the PSA.

Similar comments from: Kaufmann, Sierra  
**25. Who makes the decision regarding the Section 6(f) replacement?**

The National Park Service's Regional Director is delegated the authority to approve section 6(f) replacements. However, the Secretary of the Interior, Bruce Babbitt retains the prerogative to intervene in any project he deems appropriate. In this instance, the Secretary determined that the initial replacement package submitted by the State did not offer lands of a "reasonably equivalent usefulness" in light of the scale and scope of this highway project. Therefore, he directed the NPS to prepare a SEIS to identify, evaluate and select appropriate "additional lands" to satisfy L&WCF 6(f) requirements and his directive. The final decision on acceptance of replacement lands will be made by the NPS Midwest Regional Director unless the Secretary again chooses to exercise his direct authority over this matter.

Similar comments from: Kaufman, Sierra  
**26. Quantity vs Quality**

Quantity in the form of equal value replacement property has been previously accepted by NPS. It was the reasonable usefulness that has driven the need for the SEIS process. That need specifically addresses wetlands impacted by this process and the need to replace them. Based on that fact, this is not an issue of quality versus quantity. The selection of replacement wetlands for those that are being impacted could only be acceptable if the quality was at least equal to or better than what existed. This wetland, when developed, will be a managed, unique, high quality facility capable of sustaining wetland habitat, hydrology and wildlife that can be easily accessed and enjoyed by the public. Regardless of the amount of acres, the quality of the property could be enhanced. Smaller parks may have equally rewarding recreation potential as do large parks.

Similar comments from: Kaufman, Sierra  
27. Comments suggest that the intent of Section 4(f) of the DOT Act is to preclude the use of parkland with no other considerations.

Section 4(f) of the Department of Transportation Act is not to stop highway projects but to insure that no other feasible and prudent alternatives exist that would avoid or lessen impacts to a park. The Section 4(f) issue, as it relates to the Page Avenue Extension, became moot with passage of Section 601 of the Pipeline Safety Act. However, that did not completely exclude issues that are pertinent to Section 4(f) such as mitigating impacts. Section 601, in fact, extended the value of mitigation beyond what was required for compliance with Section 6(f)(3) of the LWCF Act.

Similar comments from: Kaufmann, Sierra, Shultz, Stemme, Sorkin, Lewis Green

28. Reasonable equivalent usefulness as it relates to Section 6 (f) (3).

Based on LWCF regulations, considerable flexibility is provided in determining usefulness, thus the term "reasonable". While land of equal value and recreation utility requires value for value replacement, usefulness allows communities to determine what will best fulfill their needs. In this case, it has been determined by St. Louis County that a passive recreation complex having a wetland theme would be the most beneficial to park users. Facility development will not occur all at once and will not be extensive. St. Louis County park planners will design and construct facilities with park user interests, maintenance, access, and other factors so that reasonably equivalent usefulness will be far exceeded. The ultimate facility will be improved to allow greater access, better interaction with the environment, and more opportunities for quality recreation experiences.

Similar comments from: Kaufmann, Sierra, Stemme, Shultz  
29. The visual impacts assessment presented in the FEIS is flawed.

The NPS has accepted the assessment of visual and noise impacts that was presented in the FHWA's Final Environmental Impact Statement. The visual and noise impact assessments for the LCCL area were conducted based primarily on the location of the 65 dBA noise level contour. Assessment of visual impacts is a very subjective activity and, as such, impact areas can be difficult to delineate, especially in floodplain areas that possess inherently unobstructed views. In order to be able to assign a quantity value to visual

impacts, the 65 dBA contour was employed.

Comment by: Stemme

**30. How will future levee system repairs be handled if LCCL approved?**

The levee system will not be within the boundaries of the park. In addition, the levee will not be under the protection of Section 6(f)(3) of the LWCF Act and therefore, access to the levee by HBLD will not be restricted.

Comments by: Rhoads

**31. Comment favors the MHTD Alt.**

The primary reason for the rejection of the MHTD Alternative as the preferred alternative was that it failed to meet the Secretary's directive for a "significant amount of additional lands". Although the area included favorable natural resource characteristics, the small acreage simply did not represent an amount of land significant enough to appropriately mitigate the land impacted in CCLMP.

Comment by: Harris

**32. Preferred Alt - LCCL- How is it that the selection of the preferred alternate was not open to public input?**

The identification, evaluation and selection of the preferred alternative (LCCL) has been open to public input. With the start of the process in July of 1993 with a public scoping meeting, through acceptance of comments along the way, to formal review and comments of the draft, the public has had input in the SEIS process. Although the selection of the Preferred alternative was not done by way of a public election, it was recommended by the Governor's Office, supported by agency representatives and the responsible local sponsor (St. Louis County), after other suggested alternatives, some by private citizens, were evaluated and considered. In addition, the draft SEIS and this present document have been, and will be, subject to review and comments by the public. Substantial comments will be appraised on a factual basis and if shown to identify detrimental aspects of the preferred alternative, appropriate adjustments or revisions will be made.

Comments by: Holsen (Audubon Society)

**33. Comments make a comparison of River Valley interchange and I-270 interchange, concluding that the River Valley Road interchange impact area has been downplayed or is incorrect.**

There is a distinct difference in the operation of the I-270

interchange at Page Avenue when compared to the proposed interchange with River Valley Road. The interchange at I-270 and Page accommodates an interstate six-lane and an urban four-lane facility. The proposed interchange at River Valley Drive connector will accommodate relatively small local movements from the eight through lanes on the proposed Page Avenue Extension to and from a two-lane local roadway. Therefore, the direct comparison cannot be made between the two facilities. A comparison of the River Valley Road interchange and the I-270 and I-70 interchange is even less culpable.

Similar comments from: Holsen - Audubon, COE, EPA  
**34. Run-off effects/FWS Alternative not in package.**

It is difficult at this time to predict the design of any future roadway that might occupy the reserved corridor through the LCCL Alternative. Therefore, it would be only speculation to assume what runoff effects from that facility would be or what if any mitigation would take place. It is known that roadway runoff from the Page Avenue Extension will be collected and treated in grassed waterways and detention systems. This design is specific to this project and is not typical of highway design. Roadway runoff will be kept separate from other surface waters. Existing hydrology will be maintained by providing culverts to allow the passage of water through the Page Avenue Extension. A hydrological connection to the north side of Page will be accommodated by a box culvert. This will help to insure a supply of water to LCCL. It does not appear that the area above LCCL could or would be converted to a use that might prevent it from providing runoff to the LCCL area. The box culvert should facilitate the flow of water from one side of Page to the other. Should the area north of Page become subject to development in the future, remaining surface runoff should be adequate to sustain the LCCL.

**Comment regarding our statement in the DSEIS that the area is instrumental to protecting the water flow of the LCCL and CCLMP.**

See revised text in Section 2.3 of the Final SEIS.

Comments by: COE

**35. Archaeological sites not appropriately identified.**

In a December 9, 1993 memo from the Missouri Division of Historic Preservation, stated that "A check of records at both the Archeological Survey of Missouri (ASM) and the Missouri Cultural Resource Inventory (CRI) finds no recorded sites for any of the five proposed alternative sites. Obviously, a more intensive investigation of any of these

sites may be required if any one of these sites is selected and if ground disturbing activities are proposed."

The above information was provided MHTD after requesting concurrence of the Department of Natural Resources under Section 106 of the Historic Preservation Act. After further review and investigation, it was determined that some archaeological sites did exist in the area. These sites will be more closely inspected and coordinated through the Missouri Division of Historic Preservation if ground breaking activities are proposed. Section 106 of the Historic Preservation Act will be fully complied with in the identification and preservation of any cultural resources in the area.

Similar comments from: COE, EPA

**36. What are the proposed improvements to Creve Coeur Airport?**

Creve Coeur Airport sponsors propose to improve the airport over the next five years. The improvement includes lengthening Runway 16/34 to 4,500 feet and increasing the width to 75 feet. Runway 7/25 will be lengthened to 2,800 feet and widened to 60 feet. Runway 7/25 is currently a turf runway. The project will require the acquisition of 145 acres. Non-precision instrument approach will be added for Runway 34. Other improvements include 100-year levee protection, taxiways, terminal area apron, visual glide slope indicators, vehicle parking, entrance road, non-directional beacon, and T-hangers. The airport improvement will require the completion of an Environmental Assessment and must be in compliance with the National Environmental Policy Act.

A letter from MHTD in this document further outlines the suggested impact of a wetland management area in the vicinity of the airport. In particular, the proposed impact of waterfowl on air traffic in the area.



# Missouri Coalition for the Environment

6267 Delmar Boulevard, Saint Louis, Missouri 63130

(314) 727-0600

August 3, 1994

Mr. N. Clay McDermeit  
Recreation Assistance Programs  
Midwest Regional Office  
National Park Service  
1709 Jackson Street  
Omaha, Nebraska 68102

RE: "Public Hearing" on Page Avenue Draft Supplemental Environmental Impact Statement

Dear Mr. McDermeit:

We intend to submit more substantive comments on the draft SEIS at a later date, but at this time, we want to lodge an official protest over the form of today's "public hearing."

This open house format where people just sort of drop in and fill out a card or talk to an agency representative is a far cry from a true public hearing. What value is there to this format over just sending in written comments?

A true public hearing allows interested parties to hear different views on a project and to learn about different points that might not have occurred to everyone. Public hearings should provide an opportunity for interplay.

As to the draft SEIS, we offer these initial points:

• **No amount of mitigation land will adequately make up for the damage done to Creve Coeur Lake Memorial Park.** The original mitigation plan included in the FEIS and covered by the Pipeline Safety Act was merely a bribe to local elected officials. The preferred alternative in the draft SEIS presumably sweetens the pot, but it is still just a bribe.

• **The Little Creve Coeur Lake area will be just as impacted by the highways as will the Creve Coeur Lake area.** All this proposal does, in effect, is increase the size of the affected area -- in other words more public open space will be adversely impacted.

• **The revelation in the draft SEIS about the plans and alignment for the Earth City Expressway point out the inadequacy of the original FEIS on Page Avenue where plans for the Earth City Expressway were all but denied.** The entire Final Environmental Impact Statement is little more than a 4-volume lie to the public.

• **In addition to the Earth City Expressway, the City of Maryland Heights has made its intention to construct a 500-year levee on the Creve Coeur Bottoms abundantly clear.** Neither the original FEIS nor the draft SEIS adequately address the issues of cumulative impacts or secondary consequences.

• **The draft SEIS does not properly address noise impacts to the park and mitigation area from an expanded Creve Coeur Airport as proposed by the City of Maryland Heights.** This airport will be located just inside the angle formed by the Page Avenue Extension and the Earth City Expressway.

• **Additional information on the supposed traffic needs justifying this project has called into question the underlying assumptions in the original FEIS.** The National Park Service refused to consider

such additional information in its preparation of the draft SEIS. Both documents thus fail to satisfy the terms of the National Environmental Policy Act.

7 { • Other alternative proposals, such as the Confluence Area, that are removed from Creve Coeur Lake Park -- and thus distant from the impacts of the two highway proposals -- do much more to provide true mitigation. A whole new park is better than the Park Service's "band-aid approach."

N/A { • The serious ozone violations already experienced by St. Louis this summer will probably result in the metropolitan area being placed in a higher level of noncompliance. This Page project could not meet the new air conformity test if St. Louis goes into the "serious" category; in fact, it probably would not meet the conformity standards now.

For all of these reasons we urge the National Park Service to withdraw its preferred alternative and inform Secretary of the Interior Bruce Babbitt that suitable mitigation is not available in the immediate vicinity of Creve Coeur Lake Memorial Park because of the far-reaching impacts of the two proposed highway projects and the other developments associated with them.

Sincerely yours,



R. Roger Pryor  
Executive Director  
Missouri Coalition for the Environment

# Missouri Coalition for the Environment

6267 Delmar Boulevard, Saint Louis, Missouri 63130

(314) 727-0600

August 23, 1994

The Honorable Bruce Babbitt  
Secretary of the Interior  
1849 C Street, NW  
Washington, D. C. 20240

RECEIVED  
RECREATION GRANTS

RE: Page Avenue Draft Supplemental EIS

'94 AUG 26 P1:46

Dear Secretary Babbitt:

On behalf of the Missouri Coalition for the Environment, I am writing to urge you to withdraw the above captioned document. The draft SEIS was prepared by the National Park Service to review additional mitigation proposals to replace park land in Creve Coeur Lake Memorial Park (CCLMP) to be taken by the Page Avenue Extension project. This review was prompted by your letter in the spring of 1993 expressing concerns about the original land replacement scheme outlined in the Final EIS prepared by the Missouri Highway and Transportation Department (MHTD) and the Federal Highway Administration (FHA).

2

The original FEIS was flawed in many ways. Your letter and the resulting Supplemental EIS address only one of these flaws -- inadequate replacement for Land and Water Conservation Fund lands. One by-product of the Park Service effort has been time -- time for more careful scrutiny of this ill-conceived project -- and disclosure -- disclosure of various road projects and development schemes directly related to the Page Avenue extension. This time and disclosure have only reinforced our original contentions about the FEIS and its shortcomings. For all of the following reasons, the Federal government should withdraw support of this project:

N/A

1) MHTD has failed to make even a basic case for the traffic projections it used to justify this project. The Missouri Coalition for the Environment hired its own traffic consultant (Paul Box, Chicago) to review the FEIS, the accompanying technical reports and limited backup data made available from MHTD. His analysis failed to reach the same conclusions of MHTD and FHA. As you know, the NEPA process is a full-disclosure process whereby any reviewer (let alone an expert like Mr. Box) of an EIS should be able to ascertain exactly how an agency has reached its conclusions on a particular project.

4,5

2) The City of Maryland Heights, the Howard Bend Levee Association and other political interests in western St. Louis County have revealed their true goals: extension of the Earth City Expressway (ECE), construction of a 500-year levee and development of the Missouri River floodplain. These goals were revealed in correspondence to you by the above named parties in June and July wherein they object to the preferred NPS mitigation alternative as not being consistent with their development plans. But, plans for the ECE and a 500-year levee were never given due consideration in the FEIS (or the SEIS) under cumulative development or secondary consequences.

N/A

3) The St. Louis metropolitan area is a "moderate" nonattainment area for ozone, but this summer's ozone violations will probably push us into the "serious" category after 1996. Page Avenue was approved under interim "air conformity" guidelines; under the current guidelines it is doubtful that the project could be approved today -- and certainly not if St. Louis gets bumped into the serious category. So far this summer, St. Louis has experienced 22 exceedences at area ozone monitors. Violations at two of these monitors -- ironically in west St. Louis County -- show 4 and 5 violations, whereas three at any one monitor in a 3-year period is enough to change the area's status with EPA.

N/A { 4) Earlier this month, voters in St. Louis City and County -- by large margins -- approved a one-fourth cent increase in the sales tax to fund expansions of the areas new light rail system, Metrolink. MHTD has consistently refused to consider light rail or any public transportation in its planning for traffic -- in clear disdain for the Clean Air Act and Intermodal Surface Transportation Efficiency Act. Given the unexpected enthusiasm for Metrolink -- ridership is double its projections, now is the time to reevaluate the federal government's financial commitment to the area's transportation infrastructural needs. Page Avenue is an anachronism -- a 30-year old project whose time has passed.

3,4 { 5) The preferred mitigation alternative in the SEIS is itself heavily impacted by proposed highways, airport expansions and other commercial developments. The Park Service shows a new Creve Coeur Lake Memorial Park configuration that is essentially a horseshoe in shape. The eastern bend -- mostly the existing park area will be bisected by Page Avenue on an elevated bridge and paralleled by an expansion of the Earth City Expressway. The western bend -- new mitigation lands -- will be bisected by ECE and paralleled by Page. In no part of this expanded park will the visitor be out of eyesight or earshot of these elevated expressways. All the NPS has achieved with this proposal is to increase the size of the impact area. Given that, the SEIS includes almost no discussion on the impacts to the park -- old or new. Maryland Heights desires to greatly expand Creve Coeur Airport -- roughly the area inside the horseshoe. Again, the SEIS does not address these impacts.

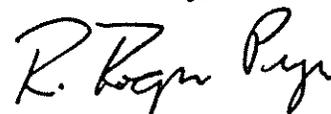
2 { 6) The park impact area identified in the original FEIS was too small to begin with so all mitigations proposals have been undertaken predicated on a lie. This large, elevated highway will be visible from most vantage points within CCLMP and will be heard everywhere. MHTD maintains that the impact area only includes that area where the noise will exceed a certain decibel level. That might be adequate if one were trying to measure impact on hearing or hearing loss, but the question here is one of tranquility, a value highly desired by park visitors. Interestingly enough, MHTD and NPS apparently disagree over just what the decibel level should be.

N/A { 7) Recently, the St. Louis County Municipal League asked that East-West Gateway Coordinating Council (the area's transportation and air quality metropolitan planning organization) to study just where all the traffic from Page Avenue is going to go once it crosses the park and is dumped in St. Louis County. The League was surprised to learn that MHTD had no idea since they had not bothered to study that issue. This incredible shortcoming was also highlighted by our own consultant, Mr. Box. Of course, the FEIS does not address this either.

N/A { 8) Since the time of your letter to Sen. Danforth in 1993, many more elected officials have awoken to this disaster in the making. Many state legislators are now on record opposing the Page Avenue extension. You have heard from some of them. Sen. Danforth has blasted you in public as being an obstructionist to this road project, a charge which is clearly unfounded. When I was a kid and I was crying, my father would say that if I didn't quit he'd really give me something to cry about. Go ahead and give Jack something to really cry about!

Thank you for considering these comments as you and the Park Service further consider the Page Avenue project.

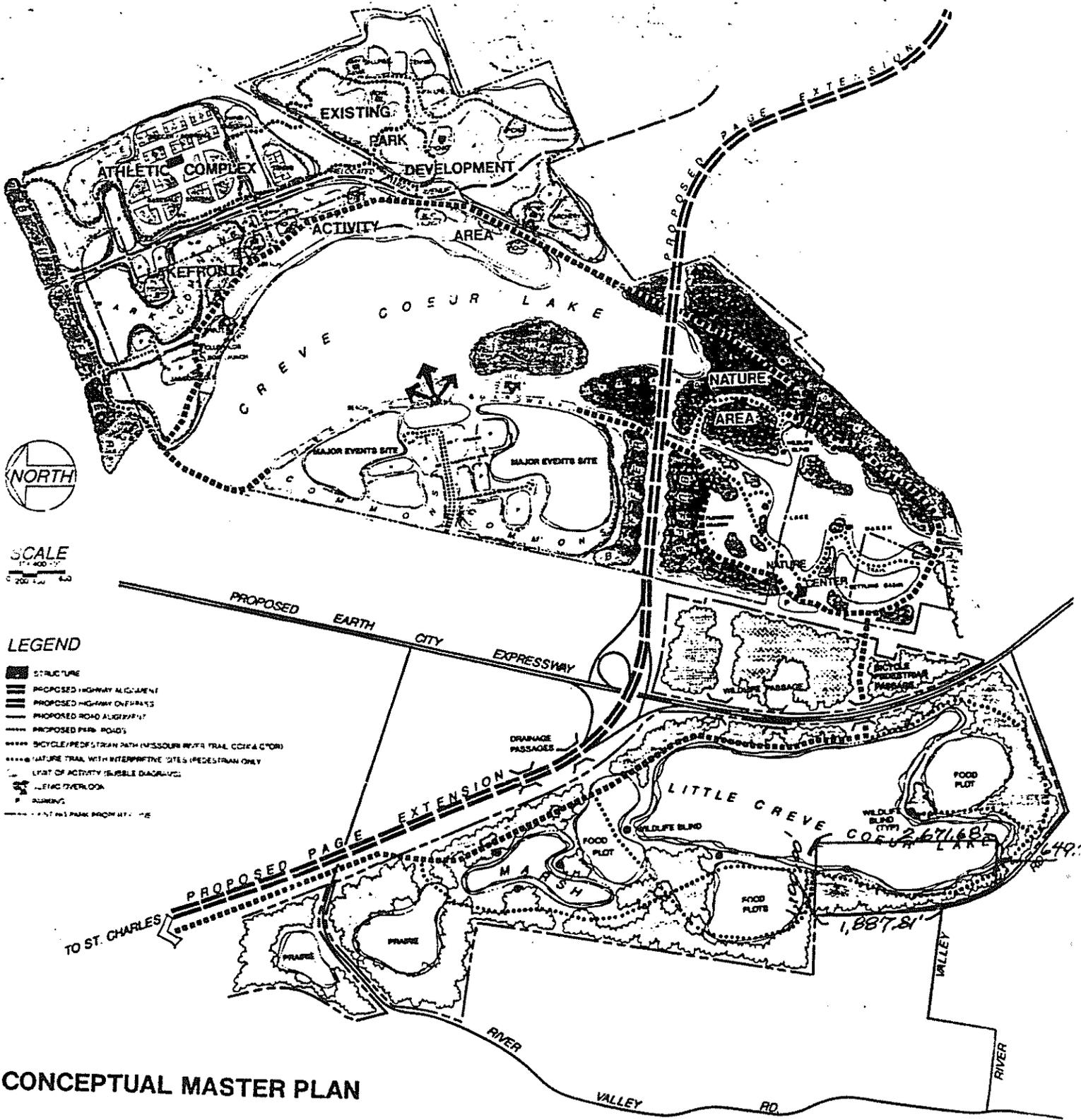
Yours sincerely,



R. Roger Pryor  
Executive Director

cc: N. Clay McDermeit, NPS  
William Rice, USEPA  
Col. Richard H. Goring, COE  
David Shorr, MDNR





SCALE  
1" = 400'

**LEGEND**

- STRUCTURE
- ▬ PROPOSED HIGHWAY ALIGNMENT
- ▬ PROPOSED HIGHWAY OFF-RAMP
- ▬ PROPOSED ROAD ALIGNMENT
- ▬ PROPOSED PARK ROAD
- ▬ BICYCLE/PEDESTRIAN PATH (MISSOURI RIVER TRAIL CORridor)
- ▬ NATURE TRAIL WITH INTERPRETIVE SITES (PEDESTRIAN ONLY)
- ▬ LIST OF ACTIVITY (BUBBLE DIAGRAM)
- ▬ ELECTRIC OVERLOOK
- PARKING
- ▬ EXISTING PARK PROMENADE

**CONCEPTUAL MASTER PLAN**



# Creve Coeur Athletic Assn. Inc.

P.O. BOX 410119 • CREVE COEUR, MISSOURI 63141

serving the recreational needs of west st. louis county children since 1957

August 3, 1994

REMARKS TO PUBLIC HEARING BEFORE THE  
NATIONAL PARKS SERVICE  
RELATING TO THE SUPPLEMENTAL ENVIRONMENTAL  
IMPACT STATEMENT  
FOR THE PAGE AVENUE EXTENSION

The Creve Coeur Athletic Association is a Not-for-Profit organization run totally by community volunteers for the sole purpose of providing our children with a place to play baseball and softball. We presently play on 6 ball diamonds located at a facility on River Valley Drive. This property is owned by the Creve Coeur American Legion Post and is located within the Little Creve Coeur Lake Mitigation Plan. Our membership includes almost 1,500 families from the Creve Coeur, Maryland Heights and Chesterfield areas. There are kids from kindergarten through 12th grade playing baseball and softball at our facility. With teams from other athletic associations coming in to play our teams it can easily be said that over 6,000 boys and girls from the West County area play baseball and softball at this facility.

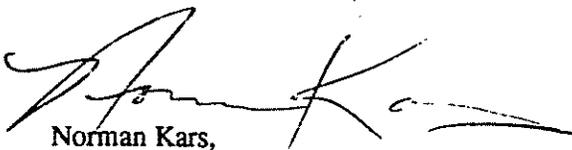
The Creve Coeur Athletic Association would like to go on record as being opposed to the Preferred Alternate Little Creve Coeur Lake Mitigation Plan. If there must be a Mitigation Plan for the Page Ave Extension, we would rather see the Park Service adopt the Alternate Mitigation Plan proposed by the Howard Bend Levee District.

If the Little Creve Coeur Lake Mitigation Plan is adopted our baseball facility will be destroyed, the Howard Bend Levee District Plan does not include this property.

Relocation is not a viable option. Finding enough land at a price we could afford, even with relocation assistance from the National Park Service, would be next to impossible. If land were found, obtaining the necessary zoning and usage permits for a lighted athletic facility would be even more difficult.

Therefore, if the Little Creve Coeur Lake Mitigation Plan is adopted it will probably be the end of the Creve Coeur Athletic Association.

Thank you for the opportunity to present our views.

  
Norman Kars,  
President, Creve Coeur Athletic Association

HOWARD BEND LEVEE DISTRICT  
c/o Gary Hente  
3411 Creve Coeur Mill Road  
St. Louis, Missouri 63146  
(314) 542-9400

June 30, 1994

The Honorable Bruce E. Babbitt  
Secretary of the Interior  
Main Interior Building  
1849 C Street, N.W.  
Washington, D.C. 20240

Re: Page Avenue Extension Mitigation Plan

Dear Secretary Babbitt:

Recently we had the opportunity to meet with T. Destry Jarvis, Special Assistant to the Director of the National Park Service, regarding the Page Avenue Extension Mitigation Plan. It was a great pleasure to meet with him and to express personally our concerns regarding certain aspects of the mitigation plans submitted in connection with the Page Avenue Extension project in St. Louis County, Missouri. We believe that his personal inspection of the Park and surrounding areas will very much improve your Agency's understanding of the various mitigation proposals.

14 { Our District has previously recommended that the Park be expanded by taking certain land to the northeast of the existing Park and Lake. (See enclosed remarks to National Park Service, July, 1993.) We discussed with Mr. Jarvis at our meeting the possibility of supplementing this expansion with certain additional properties. We also discussed our view that the Page Avenue Extension was part of a comprehensive plan including the construction of the Earth City Expressway/State Highway 141 Extension and the construction of a connecting highway to State Highway 109. The importance of these highways for St. Louis County has been emphasized by the Mayors of eleven (11) area cities in their letter to you dated June 7, 1994, a copy of which is enclosed for your reference. Our suggested plan constitutes a comprehensive mitigation plan for this entire transportation improvement plan. Our detailed proposal is described below.

1. Area Northeast of Park.

13 { The Page Avenue Extension will principally affect the southern portion of Creve Coeur Lake Park which is a wooded, wetland area. This area is primarily used for quiet activity, such as hiking and nature study and is heavily wooded along the river bluff. The 353-

acre area north and east of the Park contains comparable wooded wetland along the river bluffs.

2. Area South of Park.

10 { We suggest that in addition to the 353 acres to the north and east of the Park that the Creve Coeur Lake Memorial Park also be extended by including 97 acres to the south of the existing Park in an area which the St. Louis County Department of Parks and Recreation has always coveted. This would link the Park to certain acreage leased from the Metropolitan St. Louis Sewer District. This would expand the total Park acreage along the Missouri River bluffs by a total of 450 acres.

7 { We believe this expansion is preferable to the proposed mitigation in the area referred to as Little Creve Coeur Lake for several reasons. This area is heavily wooded with a variety of terrain and includes natural wetland areas very comparable to the areas which will be impacted by the Page Avenue Extension. These areas would be protected from development which would overlook the Park and intrude upon its quiet areas. We believe that this will also provide a much preferable natural resource in comparison to the treeless, cleared and cultivated fields contemplated to the south and west of the Page Avenue extension and Creve Coeur Mill Road. The major expansion of the Park to the north and east will also minimize the impact of the highways upon the Park rather than situating the expanded Park primarily along the proposed highway rights-of-way. We find it most difficult to understand why the property selected to mitigate the noise and other impacts of the Page Avenue Extension is proposed to be primarily situated along the Page Avenue Extension and on both sides of the Earth City Expressway/State Highway 141 proposed right-of-way.

3. Jane Downing Island.

11 { We would also like to suggest that the proposed mitigation include an area known as Jane Downing Island and adjacent Missouri River frontage. This proposed area is heavily wooded and naturally subject to periodic inundation by the Missouri River. We believe inclusion of this area in the mitigation plan would provide very valuable permanent conservation areas comparable to other sites along the Missouri River which have been set aside for wildlife and quiet recreational uses. This would be an ideal natural resource area which would be a very suitable mitigation for the wooded wetland acres of Creve Coeur Lake Memorial Park impacted by the Page Avenue Extension, Earth City Expressway Extension and Highway 109 connector.

4. Catfish Island/Green's Bottom.

7 { In addition to the approximately 725 acres described above, we suggest that the mitigation plan should also include approximately 400 acres in the Catfish Island/Green's Bottom area in St. Charles County near the KATY Trail. This would be accessible by the

bicycle trail across the Missouri River. Again, this acreage would include wooded wetland areas, prior converted farmland with no buildings, creeks and land adjacent to the KATY Trail, and would be preferable as a natural resource to the totally cleared and farmed properties in the Little Creve Coeur Lake area which have been cultivated since the Civil War. Our proposal also would leave unaffected the Creve Coeur Athletic Association complex which presently serves over 2,000 young people in the community. This organization is very opposed to the taking of their property by a governmental agency. We have included in the List attached to this letter approximately 750 acres in various parcels which we believe would be appropriate for such mitigation. The exact amount of acreage and its precise location will need to be determined by further discussions with the representatives of St. Charles County.

17,  
23 { We believe that this proposal is a substantial expansion of the proposal presented by the Howard Bend Levee District to the National Park Service at the local hearing held in July of 1993. The current proposal would increase the mitigation acreage within St. Louis County by approximately 375 acres over our prior proposal, providing a total mitigation within St. Louis County of approximately 725 acres. With the additional mitigation on the St. Charles flood plain area the total mitigation would be approximately 1125 acres of primarily wooded, wetland areas.

As we discussed with Mr. Jarvis, there has also been extensive planning in St. Louis County for the construction of additional roads through the same flood plain area affected by the Page Avenue Extension. One of these proposals is referred to as the Earth City Expressway or State Highway 141 Extension. This project is referred to in both the draft and final environmental impact statements with respect to the Page Avenue Extension. In those documents it was noted that an environmental impact statement had been initiated with respect to the Earth City Expressway Extension because its construction is intimately related to the Page Avenue Extension project. As we mentioned earlier, we find it difficult to understand why the proposed mitigation sites should be located along and adjacent to the proposed right-of-way for the Earth City Expressway Extension. Also affecting the immediate vicinity of the Little Creve Coeur Lake proposed mitigation site would be the Highway 109 connector which is proposed to be constructed along the bluff from the Earth City Expressway to the Chesterfield Valley commercial area. For these reasons, we believe that the plan with respect to the Earth City Expressway Extension and the Highway 109 connector should be coordinated with the planning for the Page Avenue Extension.

##### 5. Jackass Bend.

10 { As part of the comprehensive mitigation plan for all of these highway projects, we suggest that additional mitigation would be provided by property located in the area known as the Jackass Bend along the Missouri River in western Missouri. This site consists of approximately 475 acres. It is sought by State resource

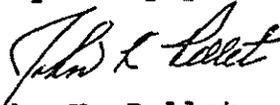
agencies and includes all of the elements that the U.S. Fish and Wildlife and other agencies deem desirable for conservation or mitigation purposes.

14,23 { We understand that all these sites would be available for purchase as mitigation sites in connection with these other highway projects and in connection with the Page Avenue Extension. It should be noted that neither the Earth City Expressway Extension nor the Highway 109 connector affects Creve Coeur Park directly and that the only mitigation which might be involved would relate to any wetlands impacted by their construction. We also note that most of the owners of our proposed mitigation properties would be willing Sellers. We will be happy to supply additional information regarding these sites if we are permitted to participate in the planning for the mitigation relating to the Page Avenue project, Earth City Expressway Extension and Highway 109 connector.

For the reasons mentioned above, we believe this proposal is the most preferable and hope that the Secretary will recommend approval of this plan.

Again, thank you for your allowing Mr. Jarvis to visit the Creve Coeur Lake Memorial Park area. It was a pleasure to meet with him and discuss our concerns. Please do not hesitate to contact us for further information and details. We are also enclosing several maps which show the mitigation plan proposed.

Very truly yours,



John K. Pellet  
President, Howard Bend Levee District

JKP:jah

Enclosures

cc: The Hon. John C. Danforth  
The Hon. Christopher S. Bond  
The Hon. Mel Carnahan  
The Hon. George R. Westfall  
The Hon. James M. Talent  
The Hon. Richard A. Gephardt  
The Hon. Harold L. Volkmer  
The Hon. Franc E. Flotron  
The Hon. Fred Dyer  
The Hon. Steve Ehlmann  
Mr. T. Destry Jarvis  
Mayor and Members of the City Council of City of Maryland Heights  
Mr. J. T. Yarnell  
Mr. Gary Elmestad  
Members of Coalition of West St. Louis County Mayors

July 1, 1993

REMARKS TO PUBLIC HEARING BEFORE NATIONAL PARK SERVICE RELATING TO  
CREVE COEUR PARK EXPANSION AND PAGE AVENUE EXTENSION.

Submitted by Howard Bend Levee District  
c/o Mr. Gary Hente  
3411 Creve Coeur Mill Road  
St. Louis, Missouri 63146

The Howard Bend Levee District is an area of roughly 6000 acres stretching along approximately seven miles of the Missouri River. This District was formed by the persons owning the property within the flood plain in order to provide for protection from flooding. The District is a political subdivision of the State of Missouri and the property owners elect a Board of Supervisors who are responsible for maintaining flood protection, both from the Missouri River and several creeks which run across the flood plain. The Page Avenue extension is proposed to be constructed across the District with considerable consequences for the drainage of the flood plain within the boundaries of the District.

The Board of Supervisors of the Howard Bend Levee District are intimately acquainted with the area affected by the Page Avenue extension since most of them have spent their lives farming the rich lands around and about what is now Creve Coeur Park. The Board of Supervisors of the Howard Bend Levee District has reviewed and considered certain aspects of the proposed project to extend Page Avenue in St. Louis County from its present location across the Missouri River flood plain to St. Charles County. We believe that the Page Avenue extension is necessary for St. Louis and St. Charles Counties. We support the State of Missouri Department of Traffic and Highways and St. Louis County in their plans to route the proposed Page Avenue extension as indicated by the Red Route, but we have certain reservations about the boundary lines of the presently approved mitigation plan and the proposed use of portions of the mitigation property for borrow pits.

We are delighted that the Missouri Highway Department, working with the Missouri Department of Natural Resources and the National Park Service, are attempting to identify comparable lands and match the land purchased to expand the Park with the land proposed to be used for the Red Route. We have previously suggested that much of the land proposed to be taken for Park expansion is inappropriate and will be inappropriately utilized as borrow pits for the highway project.

We strongly believe that certain aspects of the proposed mitigation plan could be modified in a manner which would better serve the purpose of mitigation for loss of wetlands affected by

12 { the proposed Page Avenue Extension. Under the Red Route proposal, a proposed mitigation plan is required as the result of the acquisition of right-of-way for the Page Avenue highway extension through Creve Coeur Park. That Park lies wholly within and is protected from Missouri River floods by the Howard Bend Levee District. The proposed mitigation plan includes approximately 150 acres of land west of Creve Coeur Mill Road. This acreage is currently under cultivation. This land is some of the best land in Missouri, in the United States and on this green earth. This land is also isolated from the Park by Creve Coeur Mill Road. We believe that there are substantially preferable lands adjacent to the Park which should be designated as a portion of the mitigation land in lieu of the wholly cultivated land west of Creve Coeur Mill Road. In particular, there is a triangular area of acreage along the bluff to the north and east of the Park which would be better suited to be an addition to the Park. The bluff land is rough and less developed and would be a much more ecologically diverse site. This area is substantially wooded with hardwood forests which are among the most colorful in the world in the Fall months and populated by many species native to the area. A portion of this area is also low-lying and subject to greater flooding than the proposed mitigation land. There are approximately 165 acres in this area bounded by Creve Coeur Mill Road to the north, the bluff to the south, Deerwood Commerce Center to the east and the Park and other proposed mitigation land to the south and west. Also, this property is entirely south and east of Creve Coeur Mill Road so that it may be used as an integral part of Creve Coeur Park, not isolated and cut off from the principal park.

13 { We believe that this proposal is preferable because it will provide more comparable replacement ground for mitigation and provide the greatest protection of Park lands of the most interesting type in place of the acreage proposed by the mitigation plan which is all currently under cultivation.

Furthermore, it has come to our attention that the State Department of Highways and Transportation has suggested that portions of the mitigation property be used as borrow pits in order to provide fill material for the Page Avenue road embankment. The District believes that there are serious practical drawbacks to the use of the proposed mitigation properties as fill for Page Avenue, including the resulting problems from hydrostatic water pressure in the area. That hydrostatic water pressure may create serious flooding and drainage problems which would have to be remedied as part of the project. We believe that alternative sites and methods for obtaining fill for the road embankment are available and preferable.

12 { The members of the Board of Supervisors are strongly opposed to adding additional acreage to the total acreage to be set aside in mitigation. The Board of Supervisors are deeply distressed by the significant loss of cultivated land already proposed as part

12 { of the Page Avenue/Creve Coeur Park Mitigation Plan. The size of the Park is already proposed to be increased by at least fifty percent (50%); nearly thirty (30) acres are being acquired for every one (1) acre to be taken by the highway; further expansion of the land acquisition is unnecessary, unjustified, and should not be required.

We feel we must also make a comment regarding the absence of any elected representatives of our District or the City of Maryland Heights as members of the Design Committee appointed pursuant to the Page Avenue Extension Agreement between the Missouri Highway and Transportation Commission and the U.S. Department of Transportation. We feel that this is a significant omission which substantially reduces local input regarding this project. In this regard, the Supervisors wish to point out that local support for the revision to the Plan as described above is overwhelming. The Supervisors have discussed this with many local residents and officials. These local residents and officials from the City of Maryland Heights are unanimous in support of the changes suggested. They all believe that this proposed change would provide more comparable lands better suited for expansion of the Park.

In summary, we would like to conclude our comments by emphasizing our support for the proposed project in general. However, we strongly recommend and urge that the final mitigation park expansion plan include the alternative properties we have proposed above in place of the properties West of Creve Coeur Mill Road.

That concludes our comments and we thank you for this opportunity to present our views.

PAGEAVNE.REH  
DLH.LTR (7-1-93)

# Coalition of West St. Louis County Mayors

Ballwin Bridgeton Chesterfield Clarkson Valley Creve Coeur Ellisville  
Manchester Maryland Heights Town and Country Twin Oaks Winchester

June 7, 1994

The Honorable Bruce Babbitt  
Secretary of Interior  
Washington, D.C. 20520

Dear Secretary Babbitt,

We represent over 150,000 residents of eleven cities in St. Louis County. We are writing to express our concern that the proposed Page Avenue Extension Mitigation Plan endorsed by St. Louis County and the State of Missouri will preclude the construction of the much needed 141/Earth City Expressway. We are very concerned about this plan's lack of consideration of our area's future transportation needs.

3 { The plan would mitigate impacted park lands in Crève Coeur Park by establishing new park lands which will be impacted by the adjoining highways (Page Avenue and 141/Earth City). While the extension of the Earth City Expressway (Route 141) was identified in the proposed mitigation plan, the associated impacts on the new park of this additional highway were not considered.

Our communities feel very strongly that the construction of 141/Earth City is critical to the continued economic well being of our area. Without this important link in the local transportation network, our cities will not experience the benefits of the Page Avenue Extension. In fact, it appears to us that we will be harmed because the additional traffic from Page Avenue will be dumped onto I 270, adding to the existing traffic congestion.

14 { Equally vital is a new roadway connection between the Chesterfield Valley and the 141/Earth City Expressway. This new road was totally ignored in the planning of the mitigation area and is therefore precluded from ever being constructed if this plan is approved.

These accumulated impacts suggest that the proposed plan has serious shortcomings. Our group's focus is on extension of the 141/Earth City Expressway. The difficulty that has been experienced by the Page Avenue Extension clearly shows the need for insuring that proposed roadway corridors are protected and included in any park mitigation plan.

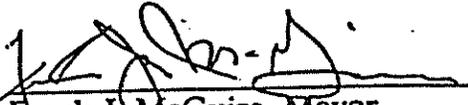
The Honorable Bruce Babbitt  
Secretary of the Interior  
June 7, 1994  
Page 2

While we do not want to block the construction of the Page Avenue Extension, we are committed to using all of our available resources to bring about the creation of a mitigation plan that does not stifle the development of a complete transportation network.

Sincerely yours,



Richard Andrews, Mayor  
City of Ballwin



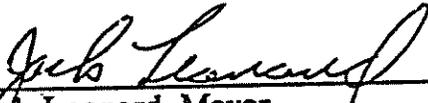
Frank J. McGuire, Mayor  
City of Manchester



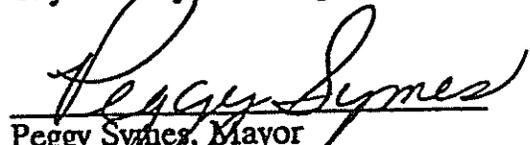
Conrad Bowers, Mayor  
City of Bridgeton



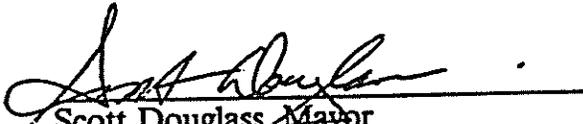
Michael T. O'Brien, Mayor  
City of Maryland Heights



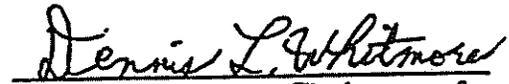
Jack Leonard, Mayor  
City of Chesterfield



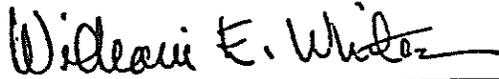
Peggy Sykes, Mayor  
City of Town and Country



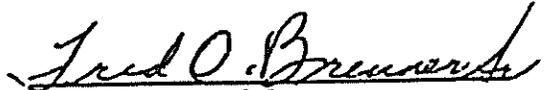
Scott Douglass, Mayor  
City of Clarkson Valley



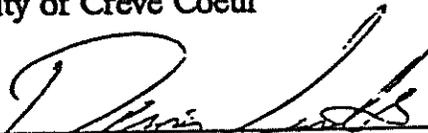
Dennis Whitmore, Chairman of  
Trustees, Village of Twin Oaks



William E. Winter, Mayor  
City of Creve Coeur



Fred Brenner, Mayor  
City of Winchester



Dennis Smith, Mayor  
City of Ellisville

LIST OF MITIGATION PROPERTIES

<u>Name</u>	<u>Acres</u>
A. <u>MARINE AVENUE / EAST OF PARK:</u>	
Arthur L. Sitton	23.56 acres 13P22-0546;
	29.00 acres 13P24-0034
Sandra Rohr Wathen	2.00 acres 13P230464
SPS Partnership	73.02 acres 13P520086
MFS Properties	15 acres 13P540013;
	16.52 acres 13P540022
Wilbur Beckemeier	24.53 acres 12P210014
Fred Weber, Inc.	96.27 acres 13P63-0064
Cass Corporation	46.48 acres 13P63-0053
Wm. & Viola Schaffner	24.69 acres 12P31-0013
Riverport Farm Partners	1.84 acres 12P34-0043
P. & J. Gallagher	.80 acres 12P34-0018
C. & M. Davidson	.70 acres 12P34-0025
Mattie Handley	.70 acres <u>12P34-0034</u>
	353.11 acres

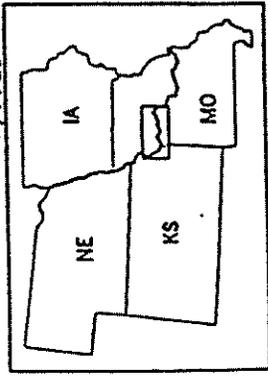
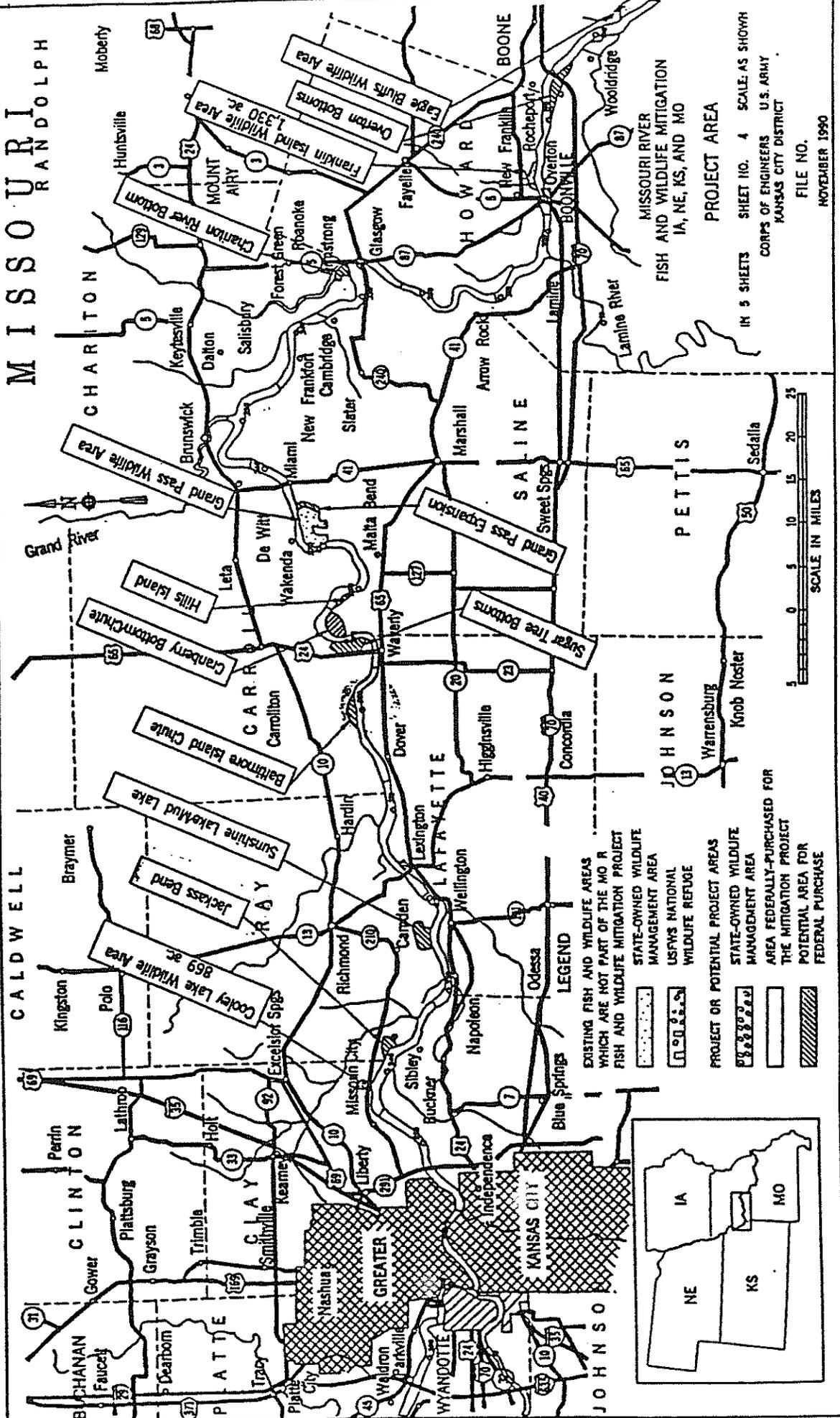
<u>Name</u>	<u>Acres</u>
<b>B. <u>SOUTH OF PAGE AVENUE:</u></b>	
Fred Weber, Inc.	97.27 acres 15P41-0462
<b>C. <u>MISSOURI RIVER FRONTAGE:</u></b>	
Earl and Betty Stolte	100 ± acres 13R32-0015 13R31-0023
Alwal Moore Trustee	175 ± acres 13Q430023
	—————
	275 ± acres
<b>D. <u>CATFISH ISLAND / GREEN'S BOTTOM:</u></b>	
Approximately Four Hundred (400) acres to be identified in wooded bottomland near KATY Trail - Specific Parcels to be Determined.	
Hollrah, Linda	51.0 acres 3-119-0308-00-13
Hercules, Norbert J. Betty Stephen Audrey	35.5 acres 3-119-0308-00-12
Montgomery, Kenneth John	1.05 acres 3-119-0308-0011.1
Trails of Riverwood Comm. Assoc.	12.41 acres 3-038-S023-001
Gronefeld, Maxime F. Life Est.	16.0 acres 3-038-S023-00-5
Gronefeld, Margaret	16.0 acres 3-038-S023-00-6
Horstmeier, Willma	20.0 acres 3-038-S023-00-7

<u>Name</u>	<u>Acres</u>
St. Charles Investment	242.50 acres 3-039-S026-00-1
Montgomery, Kenneth John	276.00 acres 3-039-S026-00-2
Ostmann, John H., Jr.	30.50 acres
Ostmann, Dorothy	3-039-S026-00-1.1
Ostmann, David P. & Eunice L.	
Wilke, Oliver L.	45.55 acres <u>3-039-S026-00-10</u>
	746.51 acres

E. JACKASS BEND:

Additional mitigation for highways would be available in this area along the Missouri River.

# MISSOURI RANDOLPH



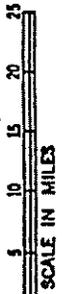
- LEGEND**
- EXISTING FISH AND WILDLIFE AREAS WHICH ARE NOT PART OF THE MO R FISH AND WILDLIFE MITIGATION PROJECT
  - STATE-OWNED WILDLIFE MANAGEMENT AREA
  - USFWS NATIONAL WILDLIFE REFUGE
  - PROJECT OR POTENTIAL PROJECT AREAS
  - STATE-OWNED WILDLIFE MANAGEMENT AREA
  - AREA FEDERALLY-PURCHASED FOR THE MITIGATION PROJECT
  - POTENTIAL AREA FOR FEDERAL PURCHASE

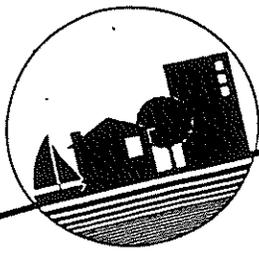
MISSOURI RIVER FISH AND WILDLIFE MITIGATION IA, NE, KS, AND MO PROJECT AREA

IN 5 SHEETS SHEET NO. 4 SCALE: AS SHOWN

CORPS OF ENGINEERS U.S. ARMY KANSAS CITY DISTRICT

FILE NO. NOVEMBER 1990





City of Maryland Heights  
212 Millwell Drive • Maryland Heights, MO 63043

July 27, 1994

The Honorable Bruce Babbitt  
Secretary of the Interior  
Washington, D.C. 20520

Dear Mr. Secretary:

Enclosed is a copy of Resolution 94-375, a Resolution of the City Council of the City of Maryland Heights, opposing the "Preferred Mitigation Plan" for the Page Avenue Extension, and endorsing the mitigation plan for the Page Avenue Extension submitted to you on June 30, 1994 by the Howard Bend Levee District (copy attached).

Thank you for your prompt and serious consideration.

Sincerely yours,

*Michael T. O'Brien*

Michael T. O'Brien  
Mayor

MOB/ct

- cc: Mr. William W. Schenk, Acting Regional Director  
National Park Service
- Mr. N. Clay McDermeit, Chief, Western Heartlands Div.  
National Park Service
- Mr. Les Sterman, Executive Director  
East-West Gateway Coordinating Council
- Mr. Buzz Westfall, County Executive  
St. Louis County
- Maryland Heights City Council
- Metro-West Mayors Transportation Coalition

APPROVED 1

M





Missouri Plant Society

MR. N. Clay McDermeit  
Recreation Assistance Programs  
Midwest Regional Office  
National Park Service  
1709 Jackson Street  
Omaha, Nebraska 68102

August 3, 1994

RECEIVED  
RECREATION GRANTS  
94 AUG -5 AIO:28  
NATIONAL PARK SERVICE  
MIDWEST REGION

Dear Mr. McDermeit:

I am writing to state my strongest opposition to the proposed Page Avenue extension through the Creve Coeur Lake Memorial Park in western St. Louis County, St. Louis, Missouri. The initial planning for this road extension should have never been considered in the first place, and the proposed project should never be completed. The various decisions by highway officials, elected representatives and builders over the years have never been hampered by knowledge of the natural features of the park, for what other reason would a plan of this monumental ignorance, stupidity and ultimately, greed, have gotten this far?

Our Missouri Native Plant Society, St. Louis Chapter has been doing a floristic study of the lake edges since July 1993 and have now started to measure  
9 {the size and age of old-growth trees in the southern edges of the park. There is no comparison with land to be included in possible mitigation and this steep prairie forest which would be directly affected by road building. The land adjacent to the park is disturbed

MR. N. Clay McDermitt  
National Park Service  
Omaha, Nebraska

August 3, 1994

Page 2

by roads, agriculture and other human occupation, so that trading the destruction of old growth forest remnants with altered, disturbed flood plains is a real crime against nature and the citizens.

I ask in the strongest words that the National Park Service soundly condemn and reject this plan. Enclosed is our Missouri Native Plant Society statement on the issue.

Thank you for your attention on this matter,

Sincerely,

Patricia Grace

30 N. IOLA Drive

ST. LOUIS, Missouri 63119

(314) 961-2511

Missouri Native Plant Society  
Membership Chairman



## MISSOURI NATIVE PLANT SOCIETY

James L. Bogler  
President, St. Louis Chapter  
Missouri Native Plant Society  
7916 Col. Dent Drive  
St. Louis, MO 63123

2 June 1993

Mr. Bruce Babbitt  
Secretary of the Interior  
1849 C Street, NW  
Washington, D.C. 20240

Dear Sirs,

I am writing to you as President of the St. Louis Chapter of the Missouri Native Plant Society on behalf of our chapter to request in the strongest possible manner that you reject permission for the project known as the Page Avenue Extension through Creve Coeur County Park in the environs of St. Louis, Missouri. We base our request upon the grotesque failure of the analysis and plans in the form of the Final Environment Impact Statement submitted by the applicant, the Missouri Highway and Transportation Department (MHTD). This document, examined by us, fails to correctly judge the quality and extent of the native and natural upland and wetland botanical communities to be degraded by this project, and in any way, in kind or quality, to compensate for this degradation.

Our objections are:

1. The lack of any intelligible botanical plan for the proposed wetland mitigation. The document lacks botanically meaningful goals, any progress monitoring of the scheme, and any commitment of resources for the long term successful implementation of such a biologically complex and difficult task as wetland restoration.
2. Failure to anticipate the impact of planned future development upon the sites chosen for the proposed mitigation effort.
3. Failure to consider the hydrological characteristics of the proposed wetland mitigation sites.
4. Failure to plan for undesirable and exotic plant colonization of the proposed mitigation sites.
5. Failure to anticipate current or future water pollution problems for the chosen wetland mitigation sites.
6. Failure to adequately assess the quality and extent of botanical features to be degraded by this project and failure to compensate either in kind or in quality for those botanical features being degraded.
7. The lack of professional staff and of a believable record of concern or achievement in matters botanical, combined with a history of flagrant and willful violation of related federal laws regarding the use of native plantings on the part of the applicant, the MHTD, make this organization unfit to be trusted with sensitive biological undertakings.

An expanded discussion of each of these objections, along with subsidiary objections under each one, is attached to this letter.

We wish it to be known to all persons that we are a society of amateur and professional botanists dedicated to the conservation and study of the flora of Missouri, to the education of the public about the significance of the native flora of Missouri and to the publication of related information. When we first heard of plans for a highway through Creve Coeur County Park our chapter voted without dissent to oppose such a plan, as all knew in their hearts that such a project could only be detrimental to a much loved county park. Nothing we have seen or heard since that time, including that mocking parody of honest biological assessment, the applicant's Final Environmental Impact Statement, has caused us to reconsider our position.

We urge, in the strongest possible terms, that both the U.S. Army Corps of Engineers and the U.S. Department of the Interior deny permission to proceed with this project.

Sincerely,

*James L Bogler*

James L. Bogler  
On behalf of the  
St. Louis Chapter  
Missouri Native Plant Society

cc: U.S. Army Corps of Engineers  
MONPS Archives (MBG)  
Others as needed

## Preface to Objections

Wetland restoration is a relatively new conservation activity with a still relatively unproven record, especially in the state of Missouri. It is a laudable effort fully encouraged by the Missouri Native Plant Society. Wetland mitigation is a more dubious activity in which a native wetland feature is allowed to be degraded or destroyed in return for a promise to engage in wetland restoration at some other site. We do not believe that irreplaceable, functioning and already publicly owned native habitats such as those now protected in Creve Coeur County Park should be sacrificed for the sake of a highway project for which, if truly desired by the public, other routes are clearly available.

Though always undesirable, there are cases in which mitigation efforts might be beneficial. For example, any more reasonably routed transportation project across the Missouri River would surely hit some already degraded or destroyed wetland. In this case a well conceived wetland restoration of some kind would be laudable. We do not deny the right of Missourians to re-configure their transport systems.

In order for a mitigation effort to be acceptable, it must plausibly have a chance for long term success at restoring a degraded native wetland system to some considerable degree of its former native and natural glory. It must do this in some honestly desirable combination of kind, quality and quantity in comparison to the feature being sacrificed.

Florida is the only state known to us that has conducted a review of the success or failure of permitted wetland mitigation projects within its bounds. Wetland mitigation is an important issue in Florida. Approximately 50% of Florida was naturally wetland. Half of this original wetland has since been seriously degraded or destroyed. Development of all types constantly infringes on Florida's remaining wetlands. That state has attempted to reverse the loss of its wetlands by a number of means, including the creation of permitted wetland mitigation requirements for development.

Recently, the Inspector General of the Department of Environmental Regulation of the State of Florida has conducted an investigation of 100 wetland mitigation projects in 13 Florida Counties (Perry, 1993). The results of this investigation are shocking. The outright majority of investigated Florida wetland mitigation efforts are failures due to lack of implementation. The minority of implemented wetland mitigation projects were found to be marred by multiple flaws that diminished greatly their value as functioning native wetlands.

For us in Missouri, there is one silver lining in Florida's depressing investigation of its wetland mitigation experience. For the first time we see in a clearer light the type of factors which must be planned in advance if a proposed permitted wetland mitigation project is to stand any reasonable chance of success.

It is regrettable that no such survey of wetland mitigation projects within the state of Missouri is known to us. Wetlands form a smaller part of the total picture in Missouri, even though the majority of Missouri wetlands have been lost. However, we know of no reason to believe that the success of permitted wetland mitigation has been any better in our state and see no reason why the hard lessons learned in Florida concerning basic and reasonable factors now known to be critical in the determination of success or failure in this sort of enterprise should not be addressed by an applicant seeking to degrade a well known, functioning, protected and natural wetland community. Particularly when in a beloved county park.

We have therefore compared this application for a wetlands mitigation permit against five factors noted in the Florida investigation as important issues in determining the success or failure of permitted wetland mitigation projects. These five areas of concern are:

1. Lack of any coherent plan that could reasonably be analyzed for criteria of success or failure combined with inadequate long term monitoring and a lack of commitment of resources to correct problems that inevitably arise.
2. Failure to anticipate the impact of future development upon the mitigation sites.
3. Failure to consider the hydrology of the mitigation sites.
4. Failure to plan for the control of undesirable, exotic and unnatural plant colonization of the mitigation sites.
5. Failure to anticipate current or future sources of water pollution for the mitigation sites.

Failure to adequately plan for the successful resolution of any of these five problem areas is now known to be a failing that has already drastically impaired the ability of a large number of permitted wetland mitigation projects to function as restored natural wetlands. Failure to successfully plan and implement solutions in any of these areas would in and of itself be a sound reason to reject any wetland mitigation proposal.

We would like to raise two additional strong objections to the applicant's proposal:

6. Failure to describe and assess both the upland and wetland botanical features to be degraded by this project and failure to compensate in kind, quality and quantity for the botanical features being destroyed.
7. That the applicant lacks the biologically professional and experienced staff necessary for the undertaking of the project described in this proposal, that he has a woeful past and continuing record of refusing to take any responsibility for botanical and all other types of natural features on lands under his jurisdiction and that he blatantly and willfully refuses to comply with just federal laws in regards to the use of native plantings along federally funded highway projects, all issues pertinent to this project.

Any of the above seven stated objections to this proposed project should in and of itself be solid ground for the rejection of a permit for this project. Each of these objections will be detailed one by one on the pages that follow.

We of the Missouri Native Plant Society, St. Louis Chapter, find that the multiple grievous failures in the planning of this project make the planned degradation of natural upland and wetland communities in a beloved county park doubly repugnant. We urge that both the U.S. Army Corps of Engineers and the U.S. Department of the Interior reject permits for this flawed project.

**Objection #1:** That the proposed wetland mitigation projects lack any coherent plan that could reasonably be analyzed for criteria of success or failure is combined with a total lack of long term monitoring and a total lack of commitment of resources to correct problems that will inevitably arise.

It should be noted that in the recent investigation conducted by the Inspector General of the Department of Environmental Regulation of the State of Florida of 100 wetland mitigation projects in 13 Florida counties, a shocking 60 out of 100 (60%) projects were total failures for the simple reason that no mitigation work had been undertaken at these sites. Developers simply applied for permits, completed their own projects and then reneged on their mitigation duties. The lack of adequate numbers of professional experts and field personnel by the state, the legal difficulties of enforcing poorly planned projects and the trifling penalties imposed upon violators are among the reasons for this dismal performance of wetland mitigation in Florida.

The proposed mitigation projects of this project are so lacking in any biologically meaningful way that it is impossible that they can be intelligently analyzed in any biologically meaningful way as feasible or unfeasible or, if undertaken at all, analyzed as successful or unsuccessful. We note:

1. The FEIS (p. 4-85) notes that no studies have been done at the proposed mitigation sites in the following areas:

- a. Soil types (Top soil and subsoil)
- b. Vegetation (Current and potential)
- c. Hydrology (Subsurface and surface)
- d. Topography (as it affects drainage)

It is difficult for us to imagine what a botanist is to say about the potential for native wetland restoration in the face of such a vacuum of information. We note with the greatest alarm that the FEIS only recommends that such studies be made but does not actually promise that they will be done. We urge that permits be denied on this ground alone.

2. Twenty three types of natural wetland communities are currently recognized to occur in the state of Missouri (Nelson, 1985). The applicant cannot bring himself to a commitment to restoring natural wetland anywhere in the FEIS. We urge that permits be denied on this ground alone.

3. Wetland mitigation site 'B' is described in the FEIS (p. 4-79) as: "A 50-foot wide by 2.25 mile linear strip parallel to the south side of the Page Avenue right-of-way." This linear wetland is said to have great potential education value for the public. No such "50-foot wide by 2.25 mile linear strip" natural wetland community ever existed at this site, anywhere in the flood plane of the Missouri River or, indeed, anywhere on this planet. This is, in fact, only the applicant's disingenuous description of his barrow pit that will be created as a by product of his need to raise his highway above the flood level of the Missouri River. It is unacceptable to offer a barrow pit in mitigation for the destruction of natural wetlands in a much loved county park. We urge that permits be rejected on this ground alone.

4. Lack of any biologically intelligible plan is compounded by a total lack of monitoring of any kind on this project. We urge that permits be rejected on this ground alone.

5. Insufficient planning and total lack of monitoring is compounded by a total lack of commitment to longer term maintenance on this project. We urge that permits be rejected on this ground alone.

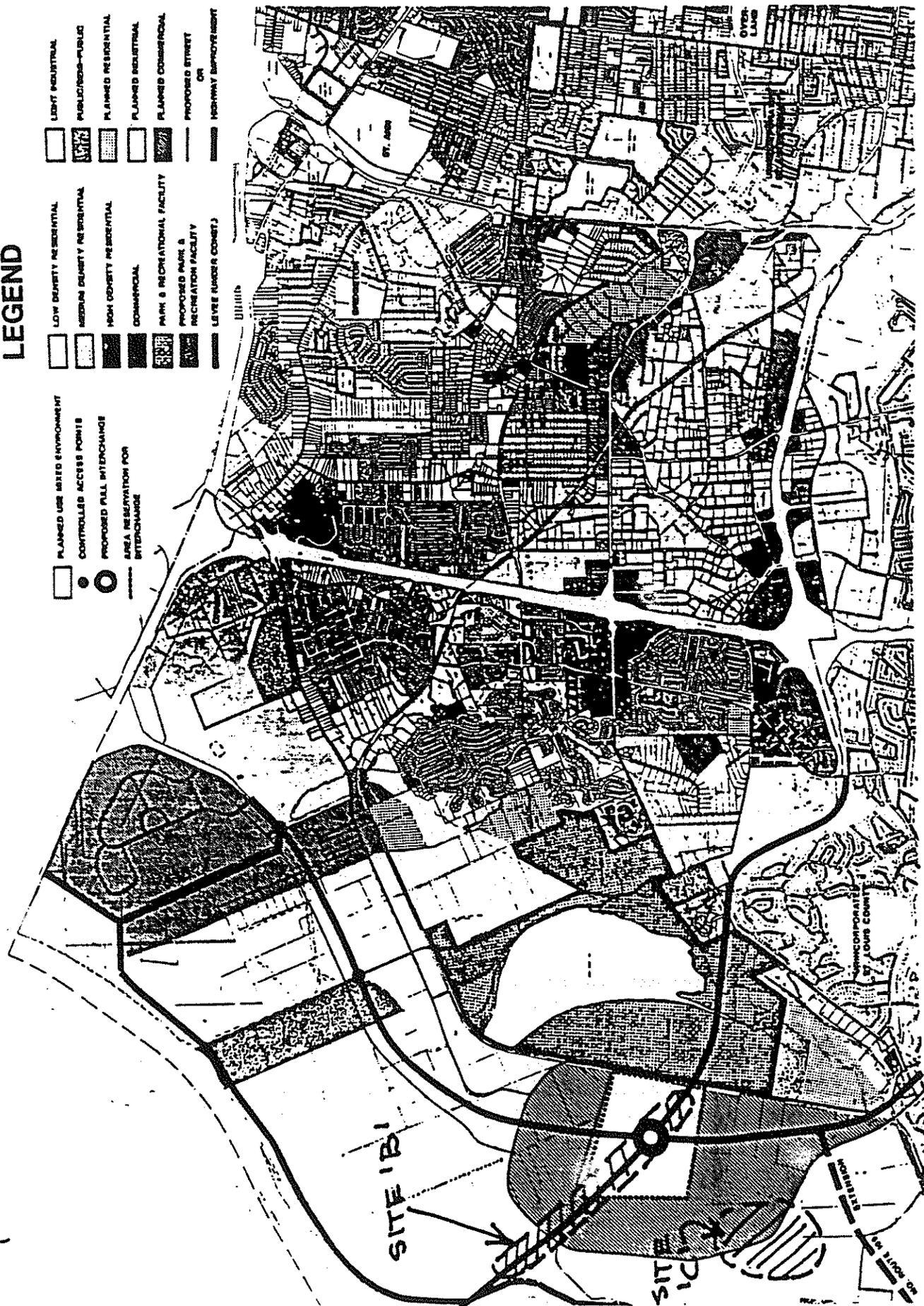
We of the Missouri Native Plant Society, St. Louis Chapter, find that the multiple grievous failures in the planning and proposed execution of the chosen wetland mitigation projects make the planned degradation of both upland and wetland communities in a beloved county park doubly incompetent. We urge that the U.S. Army Corps of Engineers and the U.S. Department of the Interior reject permits for this flawed project on these grounds alone.

**Objection # 2:** That the proposed mitigation plan fails to anticipate the future impact of development upon the chosen mitigation sites.

It should be noted that in the recent investigation conducted by the Inspector General of the Department of Environmental Regulation of the State of Florida of 100 wetland mitigation projects in 13 Florida counties a shocking 23 out of 40 (57%) of completed mitigation projects were judged to be located where present or anticipated surrounding land use will render them ecologically worthless.

# LEGEND

- PLANNED USE MIXED ENVIRONMENT
- CONTROLLED ACCESS POINTS
- PROPOSED FULL INTERCHANGE
- AREA RESERVATION FOR INTERCHANGE
- LOW DENSITY RESIDENTIAL
- MEDIUM DENSITY RESIDENTIAL
- HIGH DENSITY RESIDENTIAL
- COMMERCIAL
- PARK & RECREATIONAL FACILITY
- PROPOSED PARK & RECREATION FACILITY
- LEVEE NUMBER CONCEPT
- PLANNED INDUSTRIAL
- PUBLIC/SEMI-PUBLIC
- PLANNED RESIDENTIAL
- PLANNED INDUSTRIAL
- PLANNED COMMERCIAL
- PROPOSED STREET OR HIGHWAY IMPROVEMENT



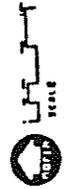
## CITY OF MARYLAND HEIGHTS



PLATE 5

## COMPREHENSIVE PLAN

FUTURE LAND USE CONCEPT  
(SUBJECT TO LEVEE CONSTRUCTION)  
W/ SITES 1B1 & 1C LOCATED



1. Both proposed wetland mitigation sites are located within the limits of the City of Maryland Heights, Missouri. This city holds all lawful power to plan and zone for all of the developments surrounding the two proposed sites. Maryland Heights is unusual amongst cities in the St. Louis area in that it has more land use devoted to commercial and industrial usage than to residential usage. Maryland Heights is what is referred to locally as a "sales tax" city in that it receives the sales tax revenues generated within its bounds rather than sharing them in the county wide pool based upon population. So great are its commercial and industrial assets and the revenue derived from them that it can offer excellent amenities without the need for property taxes.
2. The city of Maryland Heights, Missouri, is well known to favor policies promoting commercial and industrial development which enhance its revenues in preference to, but not to the exclusion of, residential development. These strategies were openly discussed in the formation of its current comprehensive plan.
3. The FEIS alludes to the Comprehensive Plan of the City of Maryland Heights (1987) but does not explain its impacts on the two chosen wetland mitigation sites 'B' and 'C.' We hereby provide a copy of that plan's "Future Land Use Concept," a document officially adopted by the City of Maryland Heights, the lawful body with planning and zoning authority over both mitigation sites and all lands surrounding them. Upon this we superimpose the location of the mitigation sites. A grotesque maladjustment in planning is revealed.
4. Mitigation site 'B,' in reality an obnoxious barrow pit, is also the site of a full highway interchange planned by the applicant himself when he extends the Earth City Expressway south to meet the Page Avenue Extension. Will he then have to mitigate his old barrow pit? We urge that permits be denied on this ground alone.
5. Knowing that a highway interchange is always a prime commercial location, the City of Maryland Heights, in its quest for ever more sales taxes, has planned around this future interchange what it calls a "Planned Use Mixed Environment!" The City is known to have what are called "Planned Use Development" (PUD) provisions in its zoning laws which allow it to negotiate directly with large developers their conditions for construction outside the normal zoning provisions. The city is clearly planning for a major commercial development at this interchange. This development gobbles up about half of mitigation site 'B,' the applicant's hapless barrow pit. We urge that permits be denied on this ground alone.
6. Around this "Planned Use Mixed Environment," the City of Maryland Heights next plans an enormous "Planned Commercial Zone." This commercial zone is so large that it engulfs about a quarter more of mitigation site 'B' and even a good portion, perhaps a third of mitigation site 'C.' We urge that permits for this project be denied on this ground alone.
7. As noted in 1 and 2 of this objection, there can be little doubt that the City of Maryland Height has already planned for the commercial development in and around both sites chosen for wetland mitigation. Further, the applicant himself plans a highway interchange on his own mitigation site 'B.' We urge that permits be denied for this project on this ground alone.

We of the Missouri Native Plant Society, St. Louis Chapter find that multiple grave failures in the anticipation of the effects of anticipated future developments make the planned degradation of natural upland and wetland communities in a beloved county park doubly repugnant. We urge both the U.S. Army Corps of Engineers and the U.S. Department of the Interior to reject permits for this flawed project on this ground alone.

- d. It is the condition of the woody component of the flora on these steep slopes that is most remarkable. This forest, dominated by red, white and chestnut oaks is clearly either very mature second growth or possibly even old growth over most of the area. Apparently, the unusual topographic situation of extremely steep slopes dropping abruptly into a large marshy area has created a situation where timbering and grazing, important factors in the degradation of most Missouri forest, have had little or no impact. An excellent upland community has been preserved at this site.
- e. None of the conditions that would, to the experienced eye, be taken as evidence of the younger classes of second growth forest are observed on these steep slopes above this wetland:
1. Absence of trees that could be thought large for the site.
  2. Lack of large standing or fallen snags.
  3. A visually discernible predominance of some certain size class of tree.
  4. The remains of human activities such as structures or roads.
  5. Logging stumps.
  6. Numbers of multiply sprouted trees.
- f. Only a true quantitative analysis based firmly on core borings of the important tree species and the spatial distribution of the older size classes on this site could actually provide the needed evidence to decide whether this was very mature second growth or old growth forest.
1. The occurrence of 300+ year old trees at densities between 2 and 5 per hectare would be indicative of an old growth condition.
  2. A limitation of the older classes to the 100 to 200 year old groups would be indicative of a second growth forest or of an area once more open in presettlement times that has since become forested. In either case, this would have to be considered a most notable forest for this area.
- g. The wetlands that occur at the base of these steep slopes are of an unusual character. They do not look like the wetlands that still occur in areas where the Missouri and Mississippi Rivers still overflow their normal banks into adjacent lands creating a system of chutes in which wet forest or shrub swamp occur and natural levies upon which wet/mesic forest is found. At this site the topography is extremely level. Minute differences in elevation create areas in which an open forest of cottonwood, silver maple, sycamore and willows are found and other areas dominated by graminoid species. These observations were made in early June, when the whole area was saturated. It is not known how much of this area would dry out, at least on the surface, later in the season.
- h. It is known that the wetlands of Creve Coeur Lake have been manipulated by the diversion of Creve Coeur Creek to this lake and by the raising of a low dam at the outlet, apparently to increase the open water area at this site for boats. The real impact of these manipulations is not known, but it would appear that the wetlands above the open water area are still naturally and natively functioning.
- i. The natural wetland community of Creve Coeur Lake is unusual among those now protected in the state of Missouri upon the flood plain of the Missouri River in that natural ground water seepage from adjacent upland areas plays some part in their functioning. That some such seepage does indeed occur at Creve Coeur County Park is obvious in that one of the park's notable landmarks is the "Weeping Spring," located at the south edge of the parking area and now sadly degraded from a botanical point of view, where the steep slopes meet the water. According to legend, this "Weeping Spring" was the site of the suicide by a lovelorn Indian woman. This incident at the "Weeping Spring" is supposed to account for the old French name for this whole wetland feature, Lake Creve Coeur, Lake of the Sorrowful Heart. This "Weeping Spring" is a small area where ground water visibly trickles out over a series of limestone ledges.

- j. At the public hearings held at Maryland Heights on May 25, 1993, statements were made that the larger part of the water at Creve Coeur Lake comes from "springs" and that fish from this lake do not suffer from the same chlordane contamination problems found in fish from the Missouri River in St. Louis County. The magnitude of ground water seepage does not seem to be known accurately, but that some amount does occur seems to be true.
- k. When ground water seepage is the source of water for a wetland area and the site is also on deep soil in a limestone area, the term currently being applied for that feature is "Deep Muck Fen" (Nelson, 1985). Such deep muck fens are best known from small upland valley areas in the Ozarks where the contrast between the dark and saturated soil of the fen and that of the surrounding areas is readily evident. However, such deep muck fen areas also occur in the much larger valley of the Missouri River on a larger scale along bluffs and steep slopes where exceptionally heavy seepage occurs at their base. These deep muck fens in the valley of the Missouri River are not much studied botanically or hydrologically.
- l. Two such deep muck fen sites in the Missouri River valley have been observed by members of our chapter. The first is Mackenzie Fens in Jackson County, Missouri, in the Kansas City Area. Mackenzie Fens is a registered Missouri Natural Area in private ownership managed in co-operation with the Nature conservancy. It is located at the base of a very high and steep slope in an area of considerable ground water seepage. It was rediscovered in the course of the Missouri Natural Heritage Inventory (Currier and Smith, 1988) and was formerly a station of the Missouri threatened species *Lysimachia thyrsoiflora* and *Epilobium leptophyllum*, last collected on that site at the turn of the century. Formerly, the wetlands at Mackenzie Fens were much larger than the present 1 1/2 acres. Engineering projects, most likely those associated with the berm structure upon which the nearby railroad sits and its associated drainage improvements have devastated the natural plant community of the larger area at this site. That any fen remains here at all is due to the fact that the railroad at this point was located a fair distance from the steep slopes.
- m. A second deep muck fen situation formerly occurred at the mouth of the ravines that constitute Englemann Woods Natural Area, a 145 acre old growth forest site in adjacent Franklin County, Missouri, at the point where these ravines broached the Missouri River bluffs. The older botanical literature (Missouri Botanical Garden Bulletin, 1943) describes a "marsh" which added to the botanical interest of this area. Unfortunately no real botanical survey of this area was ever made. This "marsh" is now known to have been fed by seepage from the St. Peters sandstone, a well known aquifer, which surfaces just at this point. This little marsh is noted as a feature preventing the usual 19th century logging of this preserve, a situation reminiscent of that found at Creve Coeur Lake and its associated upland woods. The modern visitor will, however, find no little marsh at this site today. In former times, the ever present railroads that line the Missouri River on both banks and held close to the bluffs at this point, crossed the little marsh on old fashioned wooden trestles which seem to have had little effect on such fen sites. Sometime after the early 1950's, these wooden trestles were replaced by a modern earth berm structure. The drainage improvements necessitated by such a structure completely destroyed the original native flora of this little fen.
- n. The present status of all deep muck fen situations in the State of Missouri is: "Extremely rare; most areas drained for road construction or grazing." [emphasis added] (Nelson, 1985, p. 148).
- o. There is little doubt that a seepage situation exists at Creve Coeur County Park and could indeed be integral to its wetlands. It is with great alarm that we see that the FEIS does not even note the possibility and does not consider the devastating effects ill-conceived drainage works associated with the proposed massive engineering project

could have on the part of the Creve Coeur Lake wetland that is presently most natural and unusual.

- p. The FEIS also proposes even more engineering works near this site to control siltation of the current open water area of the lake. While such works might be compatible with the existing natural wetlands at this unusual site, they would need to be carefully reviewed for their potential impact upon the still functioning natural hydrology of the site. The FEIS certainly fails in this regard.
- q. In conclusion, we would like the U.S. Army Corps of Engineers and the U.S. Department of the Interior to recognize that both the upland and wetland native natural communities to be degraded at Creve Coeur County Park are indeed of outstanding interest. These facts are absent from the FEIS, whose proffered mitigation efforts cannot hope to match in kind or in quality the natural, existing condition. We urge that both the U.S. Army Corps of Engineers and the U.S. Department of the Interior reject permits for this much flawed project on this ground alone.

**Objection # 7:** That the lack of professional staff and a believable record of concern or achievement in matters botanical combined with a history of flagrant and willful violation of other federal laws regarding the use of native plantings on the part of the applicant, the Missouri Highway and Transportation Department, make it unfit to be trusted with sensitive biological undertakings.

We hesitate to bring these matters into public debate because in the past it has always been our policy to try to maintain a positive and hopeful stance toward the applicant for these permits. We have hoped that by gradual replacement of older by younger, more forward looking persons to eventually see a more environmentally concerned and active highway department in Missouri. This is important because MHTD controls a vast acreage of land within this state that is highly visible and which contains many fine features that should be cherished and protected.

1. It can be said that MHTD's recent behavior is not totally without merit. Its most laudable achievement of late years is the establishment of a new mowing policy that is more favorable to a large number of native plant species while reducing maintenance costs. This is a significant achievement.
2. In other matters the applicant's behavior as an institution is more regrettable. We are aware that the MHTD has added a horticulturist to deal with roadway problems. We applaud this move, but we do not believe that it rectifies the MHTD's long neglect to have a staff capable of dealing effectively on issues involving botanical and other natural features on lands under its jurisdiction because we have seen no actual examples of effective work in this regard in eastern Missouri. We strongly feel that the multiple failures of the proposed mitigation plan for this project, noted in objections #1 through #6, stem from a long lack of competent staffing. We feel that this will seriously mar MHTD's efforts if it attempts to carry out this flawed plan. We urge that permits be rejected on this ground alone.
3. We note that the applicant can have little to say for itself in presenting a believable record of concern for botanical and other natural features occurring on lands under its jurisdiction. In recent years, Missouri highways have been increasingly vandalized by commercial "diggers" for the herbal trade. Our highways do in fact contain valuable resources in regards to this enterprise which could theoretically, if properly managed, be of legitimate economic value to persons living in the state. In recent years, however, we have witnessed an increase of the unregulated digging of plants in a manner that is destructive to the flora along Missouri highways that still harbor decent populations of native plants. Today we see "diggers" systematically moving down roadsides uprooting economically valuable plants by the

truckload much to the detriment of maintaining healthy populations of such plants along Missouri's public roads.

4. When faced with appeals from the public and from institutions to establish the regulation of these abuses, the MHTD refused to render any cooperation. Instead the MHTD concocted out of its own legal resources bizarre new legal opinions never seen before in the State of Missouri or sanctioned by any court of law to the effect that it lacks the legal and statutory basis for the protection of botanical and other natural resources occurring on lands under its jurisdiction. For several years now no botanical or other natural resource occurring on lands regulated by MHTD has had even the pretense of stewardship for the public good.
5. It is inconceivable to us that the U.S. Army Corps of Engineers or the U.S. Department of the Interior would issue permits for the undertaking of such biologically delicate operations as wetland restoration and the granting of a gigantic right-of-way through a much loved county park to an agency that will not publicly admit to the people of this state that it has the legal and statutory ability to protect botanical and other natural features on its lands. We urge that permits for this project be rejected firmly on this basis alone.
6. We of the Missouri Native Plant Society, along with other organizations, have just this year successfully supported a bill which passed the Missouri legislature that forbids the commercial digging of underground plant parts along Missouri highways without permission. This law will be enforceable by all law officers not only as an aid to the MHTD but to make sure that there is enforcement. Hopefully at least some of the most destructive of the "digging" will be curbed. We wish to note that all of this was brought about by MHTD's dogged insistence that it has no legal or statutory ability to protect botanical or other natural features on lands under its jurisdiction. Although this new law may curb the worst cases of "digging," it will do nothing if other legitimate concerns arise regarding botanical and other natural features on MHTD lands. We urge you to reject permits for this project on this ground alone.
7. We must point out that the applicant is indeed a persistent and still unrepentant violator of those laws commonly known as "LADY BIRD JOHNSON LAWS" after the former first lady who fought so hard for their passage, that require that funds be set aside for native plantings along federally funded highway projects. We consider these to be beneficial laws.
  - a. The only successful enforcement of these laws known to us in the state of Missouri occurred in certain parts of the Mark Twain National Forest along U.S. 60. Yet it is known to us that this project was not MHTD's initiative. MHTD had planned its usual exotic seed mixture. But the U.S. Forest Service did not wish to see the exotic invasion this seeding always produces along lands it administers. The U.S. Forest Service is a federal agency of considerable size and power and quite cognizant of Federal laws in these matters and was able to force MHTD to change its plans along land in U.S. Forest Service ownership. The Forest Service had to assume all planning of this project, however, which was MHTD's responsibility from the beginning.
  - b. To our knowledge, all others since have failed to force MHTD to abide by federal law in these matters. MHTD follows a now familiar pattern of planning projects and letting contracts in total disregard of federal law requiring the setting aside of funds for native plantings. When individuals or institutions notice this lack of native planing, they are told that planning has been completed or that contracts have already been made and that there is nothing that MHTD can do to rectify the situation.
  - c. This situation is sadly illustrated in the case of the recently completed I-44 improvements in the area of St. Louis County known as "FOREST-44." In this area, two county parks, a state park, the new "FOREST-44" tract of the Missouri Department of Conservation, Washington University's Tyson Research Center and Beaumont Scout Reservation form a large area of natural and contiguous tracts. When

the director of Washington University's Tyson Research Center. Dr. Richard Coles, noted with alarm that MHTD intended to hydroseed its normal exotic Eurasian species mix adjacent to plots used by the University for native prairie plantings, he raised the alarm. The MHTD advanced its usual denials of responsibility. The director persisted, however, and was given the option of planning a new planting provided that the University bore all costs that might be demanded by the contractor as the condition for a change of specifications. Our organization, the Missouri Native Plant Society, advised MHTD that it had responsibility under federal law to set aside funds for native plantings and that if ever a case deserved it, that this was it. We still stand on this judgment. But the MHTD stood firm also knowing that time was on their side as the work progressed, and finally succeeded in having its way. Dr. Coles was forced to do all the planning and our organization, the Missouri Native Plant Society, along with several other organizations and individuals, put up money so that the patient work of students and scholars might not be destroyed.

- d. Throughout the rest of Missouri we see federal law on this matter violated daily. We urge that permits for this project be denied on this ground alone.
8. We note that the MHTD undoubtedly intends to evade those federal laws in regards to native plantings on this very project for which it now applies to federal agencies for special permits to proceed.
- a. The applicant has long held an inane policy of refusing in particular to use native plantings in what it decides are urban areas. We admit that this is almost meaningless in view of MHTD's refusal to implement such native plantings anywhere. As late as last February 20, 1993, at the Naturescaping Symposium held at the Powder Valley Nature Center in Kirkwood, Missouri, this policy was reiterated to the president of our Chapter when in conversation with the horticulturist hired by MHTD to assist in highway landscaping. When questioned as to when we could expect to see native planting the reply was that the MHTD has a policy against such plantings in the urban areas. When asked why there were no native plantings on the recent new Missouri Highway 21 project, a new highway right-of-way with miles of exotic planting stretching to Hillsboro, Missouri, through areas by no means urban, only the same policy could be reiterated. When asked where in Missouri native planting could be observed, only the plantings in Mark Twain National Forest could be cited, a planting well known to us to be not the initiative of the MHTD.
  - b. We note with great alarm, then, that the FEIS (p.4-78) only recommends, but does not require, native plantings near wetland sites. It offers not even weak and non specific recommendations for the planting of the huge right-of-way through the most significant botanical features of Creve Coeur County Park. This right-of-way will undoubtedly, from MHTD's sorry record in these matters, be grotesquely regraded without thought for the native flora and then reseeded with exotic species in a continuing willful disregard for all federal laws regarding the setting aside of federal funds for native planting, laws whose basic wisdom and justice could never be better perceived than in just this project. We urge that permits for this project be rejected on this ground alone.

In conclusion, we of the Missouri Native Plant Society, St. Louis Chapter, find that the lack of professional staff and believable record of concern or achievement in matters botanical combined with a history of flagrant and willful violation of other federal laws regarding the use of native plantings on the part of the applicant, the Missouri Highway and Transportation Department, make the proposed degradation of a beloved county park doubly repugnant. We urge that both the U.S. Army Corps of Engineers and the U.S. Department of the Interior reject permits for this flawed project on this ground alone.

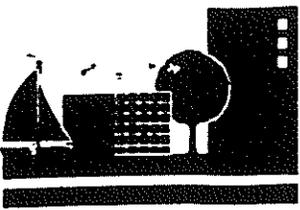
## Conclusion

We will not here summarize the many objections to this obnoxious project by the Missouri Native Plant Society, for it would be tedious. We would only note that our representatives attended the Public Hearing held on May 24, 1993, in Maryland Heights, Missouri, held by the U.S. Army Corps of Engineers. At that hearing were heard so many complaints concerning this project from so many citizens and groups with so many other points of view, that our representatives were simply overwhelmed by the display of affection by the people of St. Louis for this unique and irreplaceable county park. Long ago, a wise decision was made by federal officials to assist materially in the creation of this park, a decision that has born fruit for our generation and should continue to do so for generations to come. We urge you to reject permission for this ill-conceived highway project to proceed through Creve Coeur County Park.

## References

- Anonymous. "A Notable Gift to the Missouri Botanical Garden." Missouri Botanical Garden Bulletin, vol. xx, No. 9, pp. 179-181, Nov. 1942.
- Comprehensive Plan of the City of Maryland Heights. Missouri (1987). Available upon request at the Maryland Heights City Hall.
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- Nelson, Paul; The Terrestrial Natural Communities of Missouri. (Missouri Natural Areas Committee, 1985).
- Perry, John; "The Mitigation Scam" in Wild Earth, vol. 3, No. 1, Spring 1993, pp. 58 and 59.





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**RESOLUTION**

WHEREAS, The Maryland Heights - West Port Chamber of Commerce has previously endorsed the expeditious completion of the Page Avenue Extension following the "Red Route", and

WHEREAS, The Chamber supports the need for a complete transportation system to serve the City of Maryland Heights, and

WHEREAS, the "Preferred Mitigation Plan" set forth in the Supplemental Environmental Impact Statement (SEIS) will hinder the construction of the Earth City Expressway, and

WHEREAS, the Alternate Mitigation Plan submitted by the Howard Bend Levee District does not provide such barriers to the completion of the Earth City Expressway.

NOW THEREFORE, be it resolved by the Board of Directors of the Maryland Heights - West Port Chamber of Commerce, that the Chamber endorses the "Alternate Mitigation Plan" \* submitted by the Howard Bend Levee District as the best means of mitigating the impact of Page Avenue Extension on Creve Coeur Lake Park.

Adopted this 2nd day of August, 1994 in a unanimous vote of the Board of Directors of the Maryland Heights - West Port Chamber of Commerce.

*Walter G. Goerss*

President

\* this refers to the recent submission of Howard Bend which includes substantial land in St. Charles County





# East-West Gateway Coordinating Council

911 WASHINGTON AVENUE, ST. LOUIS, MISSOURI 63101-1295  
314 421-4220 618 274-2750 FAX 314 231-6120

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Administration	
Operations	
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EEO Officer	
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Action taken & date	

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August 4, 1994

Mr. William W. Shenk  
Acting Regional Director  
National Park Service  
Midwest Regional Office  
1709 Jackson Street  
Omaha, Nebraska 68102

Dear Mr. Shenk:

The East-West Gateway Coordinating Council, the metropolitan St. Louis area's Council of Governments and Metropolitan Planning Organization (MPO), is pleased to comment on the Page Avenue Extension, draft Supplemental Environmental Impact Statement (SEIS).

The Council has long advocated the need for the Page Avenue Extension, including the crossing of the Missouri River, in order to meet the growth of travel between St. Charles and St. Louis Counties. This transportation improvement was noted in the Long-Range Transportation Plan we developed for the region in 1984 and was selected as the most appropriate alignment in our St. Charles County Transportation Study we published in 1987. The project is shown in our draft year 2015 Long-Range Transportation Plan.

Growth and development in St. Charles County is inevitable. That growth is caused by economic, social and geographic factors. The Page Avenue Extension will not sustain that growth nor will it's absence curtail it. What is at stake with the development of this project is the quality of life for the many people who live or work in these two counties.

One noteworthy concern we have relates to the environmental impact on airports, specifically Creve Coeur Airport, and deserves further consideration. The Federal Aviation Administration (FAA) has designated Creve Coeur Airport as a reliever for the Lambert-St. Louis International Airport, and is in the process of investing an estimated 5 million dollars to develop and bring Creve Coeur Airport up to FAA safety standards. The FAA Advisory Circulars stipulate that wildlife attractions (wetlands) should not be located within 5,000 feet of any edge of a piston-use runway. This is a safety issue which relates to minimizing the potential for aircraft bird strikes. We realize that wetlands and open waterways currently exist within

Page Two  
Mr. William W. Shenk

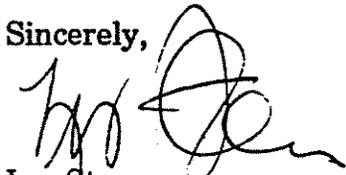
15

this 5,000 feet restriction. However, in the interest of public safety, the mitigation plan should not promote further development of wetlands within the 5,000 feet restriction. Other compatible land use alternatives within the vicinity of the airport should be considered.

As the region's designated MPO we feel it our responsibility to support worthy transportation improvement projects of regional significance. The Page Avenue Extension is one of those projects and deserves to be considered favorably. We feel the Missouri Highway and Transportation Department and local governments have acted in a prudent fashion in addressing environmental factors including the acquisition of homes and businesses and addressing environmental issues such as those associated with the Missouri River flood plain. We believe these issues can be dealt with reasonably and to the satisfaction of all interested parties.

The Council endorses this project and trust you will find the necessary solutions to environmental issues to allow the project to proceed in an expeditious manner.

Sincerely,



Les Sterman  
Executive Director

COMMENTS  
Draft Supplemental Environmental Impact Statement



8/3/94

Creve Coeur Lake Memorial Park  
Replacement Land

Daniel L. Human (314) 727-5822  
Name Ziercher & Hocher P.C.  
231 S. Bemiston 8<sup>th</sup> Floor St. Louis MO 63105  
Address City State Zip

Comments about the Alternative Replacements (please print):

I am attaching the preliminary prepared remarks of the Howard Bend Levee District. Additional comments may be submitted prior to August 23, 1994 which expand the preliminary comments

Howard Bend Levee District  
By: *[Signature]*

Thank you for participating in this open forum public hearing. The National Park Service will consider all signed statements. Please drop this in the nearest collection box, or mail to Mr. William W. Schenk, Acting Regional Director, Midwest Region, National Park Service, 1709 Jackson Street, Omaha, Nebraska 68102.

Comments must be received by Tuesday, August 23, 1994.



Howard Bend Levee District  
c/o Daniel L. Human  
231 S. Bemiston, 8th Floor

August 3, 1994 St. Louis, MO 63105  
(314) 727-5822

REMARKS TO PUBLIC HEARING  
BEFORE THE  
NATIONAL PARKS SERVICE  
RELATING TO THE SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT  
FOR  
THE PAGE AVENUE EXTENSION

Introduction:

The Howard Bend Levee District (the "District") comprises roughly 6,000 acres stretching along seven miles of the Missouri River in St. Louis County, Missouri. The District was formed in 1987 by persons owning property within the flood plain. The purpose of the District is to provide protection from flooding. The District is a political subdivision of the State of Missouri governed by an elected Board of Supervisors. The Supervisors are responsible for protecting the District from flooding from the Missouri River and the tributaries that cross the flood plain.

The Missouri and Federal Highway Departments propose to extend Page Avenue through the District, across the Missouri River and into St. Charles County. The manner in which this ten-lane highway is extended has major consequences upon the drainage of the District's flood plain. Various organizations including the District have advanced proposals to extend Page Avenue and minimize the impact upon the surrounding property, and Creve Coeur Park. The District's proposal was presented as part of its Remarks to the National Parks Service on June 25, 1993 and was expanded in its letter dated June 30, 1994 to Secretary Babbitt which suggested that additional areas South of Creve Coeur Lake Municipal Park ("CCLMP") and adjacent to the Missouri River (in both St. Louis and St. Charles Counties) be included in the mitigation plan.

The National Park Service has presented a drastically different proposal, one which the Park Service calls the "Preferred" plan. The Board of Supervisors, speaking for the District, considered the Park Service Plan and resolved that the mitigation plan, designated as "preferred" by the National Park Service in the draft Supplemental Environmental Impact Statement is seriously flawed. The flaws in the National Park Service plan are so serious and (if implemented) would work great harm to the District that the Board of Supervisors has resolved to take all possible action to prevent its adoption.

Specifically, the Supplemental Environmental Impact Statement ("SEIS") and "Preferred Alternative" prepared by the National Parks Service should be rejected for the following reasons:

1. The "Preferred" Plan is Flatly Inconsistent With Park Use. The "Preferred" plan suggests that land adjacent to the ten-lane Page Avenue Extension be used as parkland. To do so would result in the following undesirable consequences:

4 { (A) Serious Noise Pollution. The Park Service "Preferred" plan would create pronounced visual and noise pollution within the parkland mitigation area. Noise pollution and its harmful impact upon Creve Coeur Park is one of the primary reasons for requiring a mitigation plan. The FHWA used a 57 DBA standard in evaluating noise levels for purpose of evaluating the extent of noise pollution to Creve Coeur Park, yet, curiously, the Park Service in writing the SEIS uses a markedly higher 65 DBA standard for evaluating the noise pollution. The Park Service offers no explanation for their use of a different standard but their decision to do so has the result of dramatically understating the noise pollution and the amount of property affected by the noise. If the proper standard used by the FHWA were used in the Park Service's evaluation, the matrix used by the Park Service to score their plan as the "Preferred" alternative would likely favor one of the other alternatives.

16 { (B) The Park Service "Preferred" Plan Creates a 10-Lane Highway as a Barrier Through the Center of Creve Coeur Park. The Park Service rejects the District's proposal of including secluded, wooded property which is away from the highway in Creve Coeur Park. Instead, the Park Service as their "preferred" alternative suggests acquiring land on each side of a 10-lane highway and including a reserved corridor for another major highway. The result is a barrier between the two portions of the park hundreds of feet wide with tens of thousands of vehicles driving daily through the middle of the park at highway speeds.

17 { (C) The Park Service's "Preferred" Plan Costs Significantly More Money to Acquire Lower Quality Property Than Proposed by the District. The "Preferred" alternative proposes to acquire more than 109 acres of property unsuited for park use due to noise and visual pollution. The SEIS concludes that this land will not be considered toward the CCLMP mitigation. In fact, the comparably noise impacted land is even greater since the SEIS uses the incorrect DBA standard of 65 instead of the standard of 57 used to determine the harm to Creve Coeur Park.

2. Blocking the Earth City Expressway. The "preferred" plan will impede and potentially prevent the construction of the Earth City/Route 141 Expressway. Mayors of eleven Cities in West St.

4, 19 { Louis County in their recent letter to Secretary Babbitt dated June 7, 1994 are united in their plea for this essential roadway. This highway has been included in the St. Louis County Highway System Plan for decades. Its construction will further impact the "preferred" mitigation plan with noise and visual impacts as well as further isolating the mitigation property from CCLMP. Its construction must be fully planned and approved before the mitigation parkland is situated on both sides of what will be at least a 4-lane highway. To acquire this land and manage it as part of Creve Coeur Park is practically to decide that the Earth City/Route 141 linkage will NEVER be constructed.

18 { 3. A Dry "Wetland". The "preferred" mitigation plan promises to create a "wetland" in an agricultural area that is dry as a bone 4 years out of 5. The Park Service acknowledges that the water table is 19 feet below the surface. The farmers who know this area from years of daily work in its fields could easily have advised the SEIS drafters that this area is dry in most years. Only in unusually wet years do these landowners pump any water out of this area in order to work their fields. The experience in adjacent flood plain areas confirms this. In the nearby Earth City area, water must be pumped into the retention ponds in most years to keep them from going dry.

8 { 4. Destruction of Creve Coeur Athletic Association. The "preferred" mitigation plan will destroy a treasured community resource, the Creve Coeur Athletic Association Complex. This Summer the Creve Coeur Athletic Association Complex has served more than 2,000 young people. The Park Service refers to these facilities in the SEIS as heavily damaged by the Flood of 1993; yet, the Park Service fails to report that the recreational complex has been reconstructed and performs a valuable and essential community service. Finding an alternative recreational complex will be extremely difficult if these facilities are destroyed.

19 { 5. The "Preferred Plan Blocks Economic Development". The "preferred" mitigation plan seems designed to frustrate and prevent productive use or development of as much land as possible with the desire of limiting the future economic potential of St. Louis County. Areas such as Earth City and Riverport have provided much needed economic development and job creation for St. Louis County as well as strengthening the tax base.

The SEIS states that one consequence of the "Preferred" mitigation plan will be that "an environmentally beneficial secondary impact of limiting or precluding future development would be realized (regardless of whether or not a 500-year levee is constructed)." This statement is an honest admission of the true motive for the Park Service's selection of the so-called "preferred" plan. Namely the fact that the "Preferred" plan will kill economic development which is a Park Service goal advanced by the "Preferred" plan.

15 { 6. The "Preferred" Plan Violates FAA Guidelines. The "preferred" mitigation plan will violate Federal Aviation Administration guidelines by increasing the likelihood of wildlife striking aircraft using Creve Coeur Airport. FAA guidelines specify that wildlife attractions should not be located within 5,000 to 10,000 feet of an airport runway. The Park Service proposes just this. If the proposed wetlands are successful in achieving their designed purpose they will attract large numbers of migratory waterfowl to the immediate area of Creve Coeur Airport. This airport has just been designated as a reliever airport for Lambert International Airport. There is no basis cited in the Supplemental Environmental Impact Statement for stating that such a risk will not be significantly increased by siting this wetland mitigation area at the Southern terminal of the Creve Coeur Airport runway.

20 { 7. Mitigation for Remote and Unrelated Impacts. The "preferred" mitigation plan will require 200 acres of St. Louis County land which must be condemned from unwilling sellers to mitigate for impacts in other parts of the region. Exactly this concept is rejected elsewhere in the SEIS when the statement declines even to consider in depth any Page Avenue mitigation proposal which is not located in close proximity to the parkland impacted by the Page Avenue Extension. See Keeven v. Missouri Highway and Transportation Department, Missouri Supreme Court, May 31, 1994.

Conclusion:

For these reasons noted, the Board of Supervisors of the District believes that the Park Service's suggestion of the so-called "Little Creve Coeur Lake" area as the "preferred" mitigation plan is a very serious mistake which will work long-term damage to the District. It will provide a poor substitute for the land taken, because it will be heavily impacted by Page Avenue itself. It will not serve as a wetland as intended. It will destroy existing recreational facilities. It will destroy productive farmland. It will violate Federal Aviation Administration guidelines. And, it will involve wasteful spending of taxpayers' money to acquire noise polluted land which is worthless for a park. As if that were not enough, this "preferred" plan will further impede the development of a badly needed highway and is expressly designed to frustrate future economic development in St. Louis County. For all these reasons, we urge the National Park Service to reject the impact statement as drafted.

The Howard Bend Levee District Alternative Should Be Selected.

The proposal submitted to Secretary Babbitt with our letter dated June 30, 1994 substantially addresses the concerns discussed above. The mitigation sites are selected so as to be removed from

Page Avenue itself. No unnecessary acquisition of noise-impacted acreage would be required. While economic development of the land found in the flood plain which would be included in CCLMP would be prevented, other potential uses will be left to consideration of the appropriate private and public agencies. The Creve Coeur Athletic Association would continue to have the use of its facilities for the area's young athletes. The impact on potential construction of the Earth City/Route 141 Expressway is minimized.

21 { The areas selected as mitigation sites are more desirable natural resources and can be more readily developed as wetlands from available water resources. Proximity of wildlife attractions to the Creve Coeur Airport is reduced.

In conclusion, we respectfully state that the proposed "preferred" mitigation plan is very seriously flawed in a number of respects and that the District's proposed mitigation plan should be reconsidered and approved as the "preferred" alternative.

Thank you for this opportunity to present our views. This concludes our comments.

REMARKS.3  
HOWARD.DLE (8-3-94)

# Metro-West Mayors Transportation Coalition

Ballwin Bridgeton Chesterfield Clarkson Valley Creve Coeur Ellisville  
Manchester Maryland Heights Town and Country Twin Oaks Winchester

VIA FEDERAL EXPRESS

August 22, 1994

Mr. N. Clay McDermeit, Chief  
National Park Service  
Midwest Regional Office  
1709 Jackson St.  
Omaha, NE 68102

RECEIVED  
RECREATION GRANTS  
94 AUG 23 10:22  
NATIONAL PARK SERVICE  
MIDWEST REGIONAL OFFICE  
OMAHA, NE

Re: Comments on Draft SEIS on Page Avenue Extension

We are requesting that the following enclosed documents be made a part of the official record of the Public Hearing held by the National Park Service on August 3, 1994, in St. Louis, regarding the above referenced subject:

- 1) Letter dated July 27, 1994 to the Hon. Bruce Babbitt, Secretary of the Interior, from the Metro-West Mayors Transportation Coalition;
- 2) Correspondence dated June 7, 1994 to the Hon. Bruce Babbitt, Secretary of the Interior, from members of the Metro-West Mayors Transportation Coalition; and
- 3) Resolution No. 94-375 of the City of Maryland Heights.

Sincerely,

*Michael T. O'Brien*

Michael T. O'Brien, on behalf of  
METRO-WEST MAYORS TRANSPORTATION COALITION

Copies for file to:

Mayor Richard Andrews, City of Ballwin  
Mayor Conrad Bowers, City of Bridgeton  
Mayor Jack Leonard, City of Chesterfield  
Mayor Scott Douglass, City of Clarkson Valley  
Mayor William Winter, City of Creve Coeur  
Mayor Dennis Novak, City of Ellisville  
Mayor Frank McGuire, City of Manchester  
Mayor Michael T. O'Brien, City of Maryland Heights  
Mayor Peggy Symes, City of Town and Country  
Chairman Dennis Whitmore, Village of Twin Oaks  
Mayor Fred Brenner, City of Winchester



# Metro-West Mayors Transportation Coalition

Ballwin Bridgeton Chesterfield Clarkson Valley Creve Coeur Ellisville  
Manchester Maryland Heights Town and Country Twin Oaks Winchester

July 27, 1994

The Honorable Bruce Babbitt  
Secretary of the Interior  
Washington, D.C. 20520

Dear Mr. Secretary:

In our June 7 letter to you (attached) we expressed serious concern about the "Preferred Mitigation Plan" for the Page Avenue Extension and the Plan's lack of consideration of our area's current and future transportation needs. Specifically, we raised the need to preserve the corridors to construct the much needed 141/Earth City Expressway and the Chesterfield Valley connector. We do not believe it is prudent to construct a four-lane roadway through a park land, which the "preferred" mitigation plan suggests.

14 { We are writing in support of the attached Resolution 94-375, passed by the City of Maryland Heights endorsing an alternate mitigation plan proposed by the Howard Bend Levee District. This is a better plan to address the transportation needs for west St. Louis County. It moves the mitigating park land away from the critical north-south corridor (141/Earth City Expressway), provides no interference with the east-west corridor (Chesterfield connector), preserves more environmentally valuable resources, and will be less expensive and less difficult to acquire.

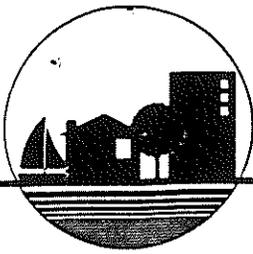
We believe that this alternative plan meets the Department of Interior's requirement of significant mitigation lands while avoiding future conflicts between environmental preservationists and transportation planners.

Thank you for your continued attention to our concerns.

Sincerely,

METRO-WEST MAYORS TRANSPORTATION COALITION





City of Maryland Heights

212 Millwell Drive • Maryland Heights, MO 63043 • (314) 291-6550

August 15, 1994

Mr. N. Clay McDermeit, Chief  
National Park Service  
Midwest Regional Office  
1709 Jackson St.  
Omaha, NE 68102

RECEIVED  
RECREATION GRANTS  
.94 AUG 17 A9 30  
NATIONAL PARK SERVICE  
MIDWEST REGION

Re: Comments on Draft SEIS on Page Avenue Extension

We request that the following enclosed documents be made a part of the official record of the Public Hearing held by the National Park Service on August 3, 1994, in St. Louis, regarding the above referenced subject:

- 1) Comments by Michael T. O'Brien, Mayor, Maryland Heights, titled "Remarks before the Highway Commission";
- 2) Correspondence dated July 27, 1994, to the Hon. Bruce Babbitt, Secretary of the Interior, from Michael T. O'Brien, and its attached Resolution 94-375 titled "A Resolution Opposing the 'Preferred Mitigation Plan' for the Page Avenue Extension and endorsing the Plan proposed by the Howard Bend Levee District";
- 3) Map titled "Alternate Mitigation Plan Page Avenue Extension"; and
- 4) Correspondence dated June 30, 1994 to the Hon. Bruce Babbitt, Secretary of the Interior, from the Howard Bend Levee District, together with its attachments, pp. 1-9.

Sincerely,

*Michael T. O'Brien*

Michael T. O'Brien  
Mayor

cc: City Council Members

maintain its levee? Will the sewage treatment plant, the water treatment plant, and all of the local roads be regularly subjected to flooding in the future because no accommodation has been made to protect them?

The SEIS is wrong in its analysis of the impact of additional wetland areas south of Creve Coeur Airport. The Airport has received over \$100,000 in federal funds to prepare a new master plan. This plan envisions lengthening the north-south runway to 5,000 feet, which could accommodate small turbine aircraft. The FAA advises that wildlife attractions should not be placed within 10,000 feet of turbine-use runways. The proposed wetland management area is within this limit. In addition, the statement that the Arrowhead Airport was completely destroyed in the flood is false.

The City of Maryland Heights endorses the mitigation plan recently submitted by the Howard Bend Levee District. This plan contains more land of higher environmental value, would be less expensive to acquire, would provide a much higher proportion of new non-impacted parkland, and is owned by willing sellers. And none of the lands contained in the Levee District's plan would be impacted by the future development of the infrastructure this area will need in the next few years.

The City of Maryland Heights urges you to reject the "preferred plan" and to endorse the alternative plan submitted by the Levee District. Thank you.

From: Mr. Mark R. Kaufmann  
2437-A Rustic Ridge Dr.  
Overland, Missouri 63114  
Telephone: (314) 427-0058

To: Mr. N. Clay McDermeit  
Chief, Western Heartlands Division  
Recreation Assistance Programs  
Midwest Regional Office  
National Park Service  
U.S. Dept. of the Interior  
1709 Jackson St.  
Omaha, Nebraska 68102

RECEIVED  
RECREATION GRANTS

'94 JUN 24 P1 55

Date: August 21, 1994

NATIONAL PARK SERVICE

Re.: comments in response to Page Avenue Extension DSEIS of June, 1994

Mr. McDermeit:

The following are my comments submitted in response to the Draft Supplement to the Final Environmental Impact Statement (DSEIS), Page Avenue Extension, St. Louis and St. Charles Counties, Missouri, dated June, 1994.

2 { In short, I arrive at the following conclusions. None of the Alternatives proposed in the DSEIS satisfy the requirements of the Land and Water Conservation Fund Act (LWCFA). Even more importantly, it is not possible to propose an Alternative that so complies, for no such Alternative exists. The proposed "red" alignment of the Page Avenue Extension represents wholly unacceptable degradations and ruination of Creve Coeur Lake Memorial Park (CCLMP) that cannot satisfactorily be mitigated.

I am a 4th-generation St. Louisan. The home in which I was raised is less than 3 miles from CCLMP. I walked and bicycled to the Park many times, and I continue to visit the Park frequently, usually preferring the undeveloped southern section of the Park. I have substantial knowledge of the Creve Coeur Lake, Park, and the surrounding area.

2 { Section 6(f)(3) of the LWCFA states that "[t]he Secretary [of the Interior] shall approve such conversion [of L&WCF public park land to other than public outdoor recreation uses] only...upon such conditions as he deems necessary to assure the substitution of other recreation properties of at least equal fair market value and of reasonably equivalent usefulness and location." None of the proposed Alternatives are "of reasonably equivalent usefulness and location."

24 { Furthermore, none of the proposed Alternatives comprise "a project mitigation plan that includes, at a minimum...such other mitigation measures as the Secretary [of Transportation] may determine are appropriate to ensure that the environmental benefits of the project mitigation plan exceed the environmental damage associated with the project," as required by Section 601 of the Pipeline Safety Act of 1992 (Pub.L. 102-508, Title VI, Section 601(a)(2)(H)).

#### Concerns regarding the decision process

According to p. 4 of vol. 4 of the Nov., 1992, FEIS, at some time in the past, authority to approve Section 6(f) land conversions was delegated by a former Secretary of the Interior to the Regional Directors of the National Park Service, which for the Midwest Regional Office is Mr. William W. Schenk, Acting Regional Director. Yet, the DSEIS implies on p. 4 that the present Secretary, the Hon. Bruce Babbitt, is directly involved in this decision: in a letter of May 18, 1993, he stated that he intends not to use his authority under Section 6(f) to block the construction of the project, but believes that "it is necessary to identify a significant *amount* [my emphasis] of additional lands to be included in the mitigation package."

25 { Firstly, it immediately is unclear which person(s) will actually make the decision to approve or deny the proposed conversion: Mr. Babbitt, Mr. Schenk, or other(s). This should have been made clear to the public.

Secondly, the full text of the aforementioned letter should have been included in this DSEIS, in order that the public be informed of the specific nature of the decisions that have been made with respect to their park land. On

26 { the surface, it appears that an executive decision has been made which overrides without authorization both the spirit and the letter of a legislative act, namely, Section 6(f). Specifically, it appears that the requirement of "reasonably equivalent usefulness and location" of mitigation lands is no longer a criterion in the decision to approve or deny the proposed conversion, but instead that mere quantity will suffice. Unquestionably, quality, rather than quantity, is central to the requirement, which nowhere mentions the acreage or extent of mitigation lands. Yet, this DSEIS claims (unnumbered page preceding page 1), that the requirement remains a criterion, in which case Secretary Babbitt is indeed required by law to deny the conversion—and consequently block the Page Avenue Extension as it is currently proposed—if the requirement is not met.

**Page would predominantly impact the only substantial undeveloped portion of CCLMP; public park status disregarded**

27 { The red route would bisect the largest undeveloped area of CCLMP, an area of bottomland and uplands forest south-east of the Lake, which is roadless, isolated, secluded, and very quiet; which features woodlands and wetlands and wildlife (including deer, turkey, bobcat, migratory waterfowl and shorebirds); and which is already part of a public park. For these reasons alone, the area deserves preservation as an increasingly rare and welcome oasis within an otherwise extensively-developed modern metropolitan area.

It must be noted that under United States statutes (Section 4(f) of the Department of Transportation Act of 1966) and case precedent under this statute (the prohibited extension of I-40 through Overton Park in Memphis, Tennessee, by the Supreme Court of the United States), it would normally be the case that its status as a public park would preclude construction of a federally-funded road or highway through it, and neither the FEIS nor this DSEIS lawfully could have been written. This prohibition was stricken by Section 601 of the Pipeline Safety Act of 1992, which does not repeal Section 4(f), but rather authorizes the United States to violate their own statute, and to do so solely to allow the "red" alignment of the Page Avenue Extension. This brings up in any American's mind the question, if the Congress of the United States can violate whatever law they please, whenever they please, without repealing the law outright, then why cannot the people of the United States do the same, for surely the rulers of the American Republic must submit to the same laws as the people?

**Unique and irreplaceable natural area of pre-settlement old-growth uplands forest**

9 { But this undeveloped area of CCLMP is much more than just a pleasant wooded area which is already part of a public park. As has been only recently discovered, this area includes a natural area of old-growth uplands forest that dates to pre-settlement times, which is an extremely rare find in Missouri, and potentially is of high natural historical significance.

Recently a quantitative dendrological census of the area was undertaken by the Missouri Native Plant Society (MoNPS) under the leadership of James L. Bogler, President of the St. Louis Chapter of MoNPS. I have been one of several volunteers assisting in this research. The survey area is divided into 11 parcels, as indicated on Maps 1 and 2. The red alignment would pass through parcel 3. Although the study is ongoing, the preliminary results are fairly astounding to us.

The area surveyed so far consists of areas 1-4 as shown on the map. For each tree with diameter at breast height (DBH) exceeding 4 inches, we recorded its DBH, species, and location. So far, over 1000 trees have been measured in this way.

Also, core samples have been bored from a number of trees, in order to correlate DBH with age, both among the different species, and among different locations (e.g. upper slope, middle slope, lower slope, bottom of hollow, lake shore).

In the approximately 8 acres surveyed so far, we have discovered 3 trees over 300 years of age, and 8 over 200. The oldest tree is a mid-slope chinquapin oak (*Quercus muhlenbergii*) dating to A.D. 1628 (age 366 years, DBH 27 inches); the second oldest is also a chinquapin oak (age 311 years, DBH 32 inches). (For reference, the Pilgrims arrived at Plymouth Rock in 1620; Marquette and Joliet explored the Mississippi River in 1673; St. Louis was founded in 1764.)

A preliminary plot of the number of trees per unit area versus age (not enclosed and unavailable to me at this time) results in a distribution which appears to indicate that the forest is old-growth, i.e., there is no cut-off at a certain age which would indicate felling and removal of the oldest trees. The mere fact that highly marketable timber stands such as these chinquapin oak trees date to pre-settlement times also suggests that little or no logging has been carried out here. Also found here are large white oaks (*Q. alba*), northern red oaks (*Q. rubra*), and ashes. The larger northern red oaks have DBH over 3 feet, although they are probably not as old as the chinquapin oaks due to their

faster rate of growth. The understory is largely maple. MoNPS has also been conducting an ongoing general floristic survey of this area and its surroundings.

The deep soils of the area surely have contributed to the exceptional tree growth. The area is mantled with windblown loess to depths exceeding 30 feet. There are only scattered small exposures of bedrock; there is no exposed cliff face.

We speculate that the area has survived as it has because of its inaccessibility. The area consists of a very steep bluff, occasionally deeply dissected by small hollows. No roadway has been built along the base of the bluff. (An old gravel road does exist along the base of the bluff, but to the south of this area; it is marked on the USGS 7.5-minute Creve Coeur Quadrangle topographic map.) Furthermore, because of the presence of the Creve Coeur Lake, the railroad was built not along the base of the bluff as is usual, but rather around the far (west) side of the Lake. The Lake and its surroundings were for many decades used as a resort and recreational area, whose visitors included my parents, grandparents, and great-grandparents, further contributing to the preservation of this woodland.

The total size of this pre-settlement forest could be up to 25 acres, which is relatively large for Missouri standards. The dendrological census and floristic survey continue, and further results will be forthcoming. A more detailed report of the findings will be submitted by MoNPS.

One of my pastimes for the past few years has been visiting and seeking out areas of old-growth (or original-growth) forest. I have visited many Natural Areas and several designated and undesignated old-growth areas in the Mark Twain National Forest. This area of Creve Coeur Lake Memorial Park is one of the most impressive forests I have had the pleasure to visit. I remained ignorant of the quantitative characteristics and value of the forest until I became involved in the aforementioned dendrological census. I am happy to see that my long-held qualitative impressions of the area have been confirmed by the quantitative results.

I would like to emphasize that trees of such ages are quite uncommon in the region. "Missouri Trees," a 1989 publication of the Missouri Department of Conservation, states on pp. 19-20, "White oak is one of our longest lived trees. Some, still growing, started life about the time the Mayflower reached the shores of Plymouth." (Both chinquapin oaks and white oaks are members of the white oak group, *Leucobalanus*.)

I consulted the *Directory of Missouri Natural Areas* (Richard H. Thom and Greg Iffrig, Jefferson City: Missouri Natural Areas Committee, 1985), with regard to tree ages and other forest characteristics in those designated Natural Areas which, like CCLMP, lie in the Missouri River Section of the Ozark Border Natural Division and which contain uplands forest.

The pre-settlement old-growth uplands forest in CCLMP proposed for conversion appears to be of at least equal characteristics to these existing Natural Areas, and may well be of unique significance, particularly due to its stands of chinquapin oak. Eastern redcedars, which I understand to be a sign of disturbed uplands forest, do not occur here to my knowledge. Otherwise, the types of trees listed there are also present here, plus more, including black walnut, box elder, black cherry, Kentucky coffee tree, red elm, and American elm.

Also, upon reading the descriptions of old growth areas in *Old Growth in the East: A Survey* (Mary Byrd Davis, Richmond, Vermont: Cenozoic Society, Inc., 1993), I conclude that the CCLMP area compares favorably.

I emphasize in the strongest possible terms that this area appears to be of botanical and ecological, and possibly dendrochronological, value to the scientific study of the natural history of Missouri and the region. It is my strongest belief that this area must be passed on to those who will come after us in a preserved state, without major modification, with attention given to appropriate buffering about its periphery, certainly without road construction, and most certainly without the irreversible destruction of and changes to bedrock, soils, and flora, brought about by the construction of a 10-lane freeway directly through this area. (One might naively have believed that, today, the purchase with public monies and creation of a public park would suffice to engender and encourage such protection, as exemplified by the 1983 designation of the Pelican Island Natural Area within St. Louis County's Sioux Passage Park, but the 1992 action of the outlaw Congress of the United States proves otherwise.) The fact that adjoining this pre-settlement old-growth upland forest are quality emergent wetlands of the Creve Coeur Lake, which was originally the largest natural lake in Missouri, makes this a unique and irreplaceable site. *Both* fall directly in the right-of-way of the red alignment.

I am aware of no uplands forest of equivalent status anywhere in the St. Louis area that is not already public property. If so, then *any* proposed replacement land necessarily would fail to satisfy both the Section 6(f) requirements of "reasonably equivalent usefulness" and "reasonably equivalent...location," and any conversion of CCLMP land would and must be denied.

**“Reasonably equivalent usefulness”: the very purposes for visiting CCLMP would be permanently eradicated by highway construction in the vicinity**

Usually, I visit CCLMP for one of the following purposes. (1) To visit the uplands forest, with its giant trees, deep, secluded hollows, and its peace and quiet. A significant minority of the users of the Park walk back into the undeveloped area of the Park, also experiencing its quiet and isolation, even though many may not be aware of the unique features of the area. Rarely do I walk back there without encountering another visitor. (2) At times of good visibility, to arrive just before sunset, and enjoy the sunset and dusk twilight, which appears not only in the sky but also as a reflection in the Lake. Typically most visitors have departed by this time of day, and the Park, even along the automobile drives, is a quiet place. It is so quiet that a flock of geese can be heard landing on the water near the opposite (western) shore of the Lake, as I have experienced many times. (3) During every winter season, to visit several times, particularly after a recent snowfall, or after a very cold spell, which results in the Lake being frozen over and the “dripping springs” waterfall freezing into a massive ice formation. (4) During fall, to view the autumn coloration, which in good years is a particularly spectacular scene due to the long, tall, steep, nature of the bluff, and the heights and density and species of its trees. (5) After excessive rainfall, to see and hear the runoff pouring over the waterfall.

4 { Key words in the above experiences are “secluded” and “quiet.” Any replacement area must at least match these characteristics to be of “reasonably equivalent usefulness.” I continue to find completely unacceptable the base-line noise measurement in the Park of 43 dBA, as well as the noise threshold of 57 dBA used in the DSEIS to define the area of the Park and Alternatives impacted by noise. If geese can be heard landing on the water over 1000 feet away, then this area is much quieter than 43 dBA. An acceptance of noise levels of 57 dBA in the replacement lands would represent an increase of several orders of magnitude in base-line noise which would be experienced by visitors. This is simply not “reasonably equivalent,” particularly when the very purpose of visiting CCLMP is its quiet. With the relatively high traffic of urban areas, any high-speed multi-lane limited-access highway is audible well over 2 miles away. Therefore it is not possible to build either the Page Avenue Extension or the Earth City/141 connector while offering replacement lands in the vicinity. This includes both the Missouri Bottoms on the St. Louis County side, and the Greens Bottoms on the St. Charles County side, since the Page Avenue Extension would pass close enough to both areas to be audible.

In addition, to be of “reasonably equivalent usefulness,” any replacement area must include the following physical features, at a minimum, for these are the very instances of usefulness I usually seek at CCLMP: over 20 acres of roadless secluded quiet old-growth uplands forest; extensive open water, emergent wetlands, and bottomland forest; a length of at least 2 miles of 150-foot-high wooded bluff (with tall, densely-spaced trees, not just any trees) almost completely unbroken by any artificial feature; a large, natural body of water with flat bottomland for a distance to its west, allowing both the viewing of nearly the full western hemisphere of the sky, and a nearly complete reflection of said hemisphere in the water, from its east shore; a stream, with year-round water flow, cascading down a natural waterfall, which then flows into said body of water.

28 { **“Reasonably equivalent location”: a site in St. Charles County or beyond violates this requirement**

Any site on the western side of the Missouri River in St. Charles County is too distant from CCLMP, and thus is not of “reasonably equivalent...location.” I visit CCLMP by three modes of transportation. I occasionally walk to CCLMP from the homes of friends and relatives who live nearby. Obviously, walking to a site in St. Charles County would be quite unequivalent indeed. I occasionally bicycle to CCLMP, and, even with the bicycle path proposed in the mitigation plan, bicycling to St. Charles County represents a doubling or tripling of the length, probably rendering the trip cancelled. A drive by automobile from my home to CCLMP would be approximately doubled in length if I were forced to continue on to St. Charles County. A factor of 2 is a significant change.

**No Alternative proposed in the DSEIS satisfies the requirement of “reasonably equivalent usefulness”**

The following conclusion is clear: *none of the five Alternatives proposed in the DSEIS are of “reasonably equivalent usefulness” to the area that would be both directly and indirectly impacted by the red alignment.* I come to this conclusion after having visited each of the five Alternatives specifically to evaluate them with regard to the DSEIS. Following is a detailed criticism of each of the proposed areas.

**Alternative A (no-action alternative).** Firstly, Alternative A has been “locked in” as acreage that will be purchased as mitigation land regardless of the outcome of this DSEIS. That is, Alternative A has been elevated above any scrutiny as to its suitability as Section 6(f) mitigation land. I object to this state of affairs. In this case, the only logically possible “no-action” alternative is to acquire no mitigation land at all, and to begin the EIS process anew

The wooded portion of this Alternative is relevant to this question, but it is unacceptable as mitigation land for the following reasons. Although presently wooded, this area has been heavily disturbed by past activities, some of which have left permanent damage and structures. I visited the site on 14 Aug. 1994 and photographed a number of scenes; some of these photographs are included here. Photographs are identified by written numbers on the back, e.g., 3-14 means roll 3, frame 14. All of these scenes are from either the uplands or from the narrow strip of wooded bottomlands along the bluff, and all are east of the Louiselle Creek valley. I didn't bother to photograph the expansive corn fields to the north.

This site includes at least one old gravel road on the bottomland, which parallels the base of the bluff (photos 6-22, 6-24). Along this road, numerous piles of dumped debris are found (photos 1-4, 4-9 to 4-11, 4-13 to 4-17, 4-18, 5-1, 6-23). One immediately wonders what sorts of hazardous substances may be found in these piles, and in the soil beneath them.

The uplands forest is a very narrow strip, much narrower than the area of uplands through which the Page red alignment would pass. It does not feature any deep hollows offering seclusion and isolation. But most importantly, the uplands forest here (composite photos 2-1 to 2-8, 2-11 to 2-19, 3-16 to 3-25 and 4-1 to 4-8) is not even qualitatively similar to the area in CCLMP. Artificial features found in the uplands suggest heavy disturbance (photos 3-6, 3-11).

Furthermore, much of the wooded bottomland area was formerly a large-scale quarrying operation. The bluff was blasted and the rock removed over hundreds of feet of its length; numerous drillholes are visible (photos 6-8, 6-9, 6-10 to 6-13). The bluff face resembles a 30-foot-deep road cut for a major highway. What appears to be an abandoned stone-grinding works (photos 5-19, 5-20, 5-22, 5-23) exists in the bottomland woods. Numerous large concrete structures, including a 50-foot-high concrete tower, were part of the works (photos 5-17, 5-18, 5-25, 6-1, 6-2, 6-3, 6-4, 6-5 to 6-6, 6-7). There are numerous tailings piles dumped on the bottomland, the largest being approximately 20 feet high and over 100 feet in length. (photos 5-4 to 5-6, 5-7 to 5-8, 5-9, 5-10 to 5-11).

Also present is at least one partially-underground concrete bunker, resembling the bunkers in the Weldon Springs area which were used to store ammunition or explosives (photo 4-19). Again, one wonders what sorts of chemical residues might remain at the site.

In the northwestern part of the bottomland woods, automobile tires far outnumber trees. It is not clear if they have been dumped here or not, but I suspect that, since many are still holding air, they may have been transported from the salvage yard upstream by the flood waters of Summer 1993, caught by the trees and other vegetation, and deposited here in great numbers (literally hundreds of tires).

The DSEIS on page 18 describes this area as "forest land...[which remains] as a remnant of the once-dominant presettlement forest." I fail to understand how this conclusion was drawn, given the massive and widespread activities and associated clearing which have occurred on this site. Can it be concluded that the site has not been visited by any of the persons who are proposing to substitute this totally used and abused scrap patch of woods for the pre-settlement old-growth forest and emergent wetlands in CCLMP?

*Alternative E (MoHTD alternative).* The northern portion of Alternative E is a subset of Alternative D, but without a strip of cleared land between Creve Coeur Mill Road and the old Chicago, Rock Island, and Western Railroad track. Please refer to the comments on Alternative D above.

The southern portion of Alternative E would have been a viable candidate for replacement land, except that in the last 2 years a residential subdivision has been built in this area. I visited this site on 31 July 1994, and estimate that only about 10% of the original parcel remains as undeveloped uplands woodland. For reasons unknown to me, the cleared, bulldozed, developed lawn area extends well into the bottomland. Unlike the would-be-impacted area of uplands old-growth forest, this site has been disturbed by the presence of an old gravel road along the base of the bluff, which was recently cleared by the St. Louis Metropolitan Sewer District, and presumably will be maintained in this condition in order to service sewer lines from the aforementioned new subdivision. Also present in the bluff in this area are a number of small abandoned quarries. The uplands forest here does not appear to even approach the quality of the uplands forest which would be impacted. For all these reasons, this parcel fails to meet the criterion of "reasonably equivalent usefulness."

*Recent proposed alternative (Mayor O'Brien).* A recent article in the St. Louis Post-Dispatch ("Mayor Offers a New Plan for Page Ave. Project," 15 Aug 1994, p. 1N) describes another Alternative, proposed by Mayor Mike O'Brien of Maryland Heights. The proposal consists of Catfish Island and part of the Greens Bottoms, on the western side of the Missouri River. Like Alternatives B and C, because this area includes no uplands forest at all, not to mention rare old-growth pre-settlement uplands forest with deep, secluded hollows, it is not of "reasonably equivalent usefulness" and hence is unacceptable as replacement land.

with different alternatives.

Secondly, the parcels comprising Alternative A should be indicated on the same topographic map as Alternatives B-E, rather than the map appearing between pp. 4 and 5 of the DSEIS, to facilitate evaluation of exactly what is contained in Alternative A.

Neither of the two parcels (A,B) comprising Alternative A contains uplands forest. Since this is the most important natural feature of the area that would be impacted by the red alignment, Alternative A is unacceptable as mitigation land in that respect. The wooded (eastern) portion of Parcel B of Alternative A is predominantly early successional forest, which has over several decades overgrown what was originally open water, as the Creve Coeur Lake shrank in size due to siltation. Accelerated erosion (caused by the settlement and clearing of the drainage basin of the Creve Coeur Creek, which empties into the Lake), as well as the leveeing and channelization of the Creek itself, contributed, and continue to contribute, to the high siltation rate. This is indeed similar to the bottomland forest which would be impacted by the red alignment, but it has no relation to the uplands old-growth forest. The remainder of Parcel B of Alternative A, as well as the entirety of Parcel A, has been cleared for agriculture. Because the impacted area is virtually completely wooded, or is natural open water, such cleared land has no relevance whatsoever to the question of being of reasonably equivalent usefulness and value as the impacted area.

*Alternative B (LCCL alternative and the preferred alternative).* This alternative consists almost entirely of cleared agricultural fields. Although this parcel contains much of what was formerly the Upper Creve Coeur Lake (also known as the Little Creve Coeur Lake)—the present Lake being the remnants of the Lower Creve Coeur Lake—the land is cleared, and has been maintained in a cleared state for agricultural purposes and actively drained using pumps. (The leveeing and channelization mentioned above evidently diverted the Creek from the Upper Lake so that it emptied directly into the Lower Lake.) As mentioned on p. 17 of the DSEIS, only 5.3% of Alternative B is wooded.

Furthermore, most (or all) of the 5.3% wooded area surrounds the former channel of the Creek (which was bypassed when an artificial channel diverted the Creek into the Lower Lake), in the extreme southeast corner of Alternative B. These patchy, totally disturbed woods would be completely obliterated by the Earth City/141 connector! The DSEIS fails to recognize this. Hence, as nearly as I can tell after visiting the area but without access to current aerial photographs (after the Great Flood of 1993), the portion of Alternative B remaining wooded would be literally zero per cent.

Since virtually 100% of the directly-impacted Park land is wooded, Alternative B is not of "reasonably equivalent usefulness" to the impacted area. Conceivably, the tract could be restored to its original condition of the Upper Lake completely surrounded by large expanses of old-growth bottomland forest via active management over a period of many decades, but about as many acres on the north side of the Page red alignment as on the south side would be required for this, due to the natural topography of the area. That is, both Page and the EC/141 connector would bisect such an area, which would be unacceptable even if it remained a natural lake and original-growth bottomland forest, much less an artificially restored version.

The "Conceptual Master Plan" appearing between pages 34 and 35 of the DSEIS proposes to create several artificial wetlands, which do not use and conform to the natural topography of the land, but instead seem to go to lengths to utterly ignore it. To the human visitor, an artificial borrow pit is a mud-hole, not a wetland. Although wildlife may find them satisfactory to a degree, and certainly artificial wetlands have other beneficial purposes, they cannot substitute—to the human visitor who visits a public park specifically to experience its natural features, and for the enjoyment of whom and preservation of which CCLMP obviously was created and purchased in the first place—for the real thing. I have canoed on the Lake, and these cannot approach the quality of quiet recreation on the Lake that can be and are enjoyed at this time by Park users.

More obviously, Alternative B would be bounded by the Page Avenue extension and would be bisected by the Earth City/141 connector. In other words, Alternative B on the face of it is a proposal to mitigate wooded park land impacted by a freeway with cleared land impacted by two freeways. Such a proposal is unacceptable.

*Alternative C (USFWS alternative).* This alternative is similar to Alternative B, in that it would be bisected by two freeways. Also, it includes even less wooded acreage than B. Again, such a proposal is unacceptable.

*Alternative D (HBLD alternative).* This alternative consists mostly of cleared land, with some bottomland and upland woodlands along the southeast edge of the parcel. The cleared area is used for agriculture, and for a salvage yard containing hundreds of derelict vehicles. The cleared area, again—regardless of whether it is used for row crops, storage space, or nothing at all—has no relevance whatsoever to the question of being of "reasonably equivalent usefulness" to the impacted area.

7,26,28

26

But O'Brien declares that, since St. Louis County residents are being asked to stand by and see their Creve Coeur Park destroyed forever, that St. Charles County should give up land parcels as mitigation. So while St. Louis County residents would witness the ruination and physical destruction of their wonderful CCLMP, St. Charles County residents would be given a new highway to their homes and a new park in their back yards, too far from St. Louis County residents to be of "reasonably equivalent...location," as discussed previously. This is not only wholly unacceptable, but insulting to the degree that it is difficult for me to fathom that this O'Brien was elected by St. Louis County residents.

**Visual impacts**

The DSEIS significantly understates the acreage visually impacted by the freeway and bridge and hence requiring mitigation. On p. 8, the visually impacted area is described as at most 183.4 acres. We believe that this is a grave oversight. Clearly, a multi-lane highway elevated up to 150 feet will be visible from most locations on the Creve Coeur Lake and along its shore, as well as on the flat bottomland surrounding the Lake. An artist's rendering of a view of the proposed red alignment highway found on p. 14 of Volume 4 of the FEIS makes this evident; yet Figure 8 of Volume 4 and associated text indicates that only 4.5 acres of open water are considered visually impacted. The area of the Lake alone is over 300 acres. Thus, the area of visually impacted Park land must be increased accordingly.

29

**Auditory impacts**

It is evidently the case that the noise models employed in this study assume that the "worst-case" source of noise is a 4-lane road (p. 34, DSEIS). Yet, the Page Avenue Extension would be a 10-lane road. This could result in an increase in noise intensity of a factor of 2.5. Furthermore, it is not clear whether the source is modeled as a level road. In the case of Page, eastbound vehicles would have to ascend about 150 feet from the level of the flood plain to the top of the bluff. In order to maintain their speed, drivers would have to increase the r.p.m. of their engines, with the associated large increase in engine noise. This is particularly true of loaded trucks, whose exhaust pipes would extend well above the concrete barrier along the side of the highway. Similarly, westbound vehicles could attain relatively higher rates of speed in descent, with associated greater noise generation, particularly from their tire treads.

In addition to the preceding, I question the widths of the noise corridors as given in the DSEIS, based on the coordination described on p. 16, Volume 4, FEIS, which states that 57 dBA is the noise impact threshold agreed to. Yet, all corridors described in the DSEIS are based on 65 dBA, a discrepancy of 8 dBA. This represents a significant widening of the noise corridors, which must be adjusted accordingly, both for the impacted Park land and for any proposed replacement lands. But even further, as stated previously, accepting land suffering from the ceaseless 24-hour, 365-day noise of a major freeway—whether it be louder than 57 dBA or not—as replacement for an area as quiet as CCLMP cannot be viewed as a reasonable substitution, for the quiet and seclusion is one of the major examples of usefulness obtained by visitors to the present Park.

4, 6

**Miscellaneous comments.**

The DSEIS states on p. 44, "it is recognized that when or if [the Earth City Expressway/Mo. 141 connecting highway project is begun], its impact on the adjacent land will be fully evaluated and could result in additional park land conversion. However, with the highway project presently not identified on area short- or long-range transportation plans, the project is not considered a reality in the foreseeable future." This directly contradicts recent statements published in the St. Louis Post-Dispatch ("Mayor Offers a New Plan for Page Ave. Project," 15 Aug 1994, p. 1N): "[Maryland Heights Mayor] O'Brien said he and other mayors had hoped that [MoHTD] would first extend Highway 141 from Jefferson County to Olive Boulevard before they extended Page Avenue. But that's not likely to happen, he said.... O'Brien said [St. Louis County Executive] Westfall supports both the Page and 141 projects, but he [Westfall] offered little hope that order of the expansion projects would reverse." One cannot help but wonder whether or not Msrrs. Westfall and O'Brien have been deliberately withholding information of their plans and wishes from the National Park Service.

*General comments.* Governments certainly should not actively encourage further urban sprawl, nor subsidize automobile travel at the expense of cleaner and more efficient mass transit alternatives. Nevertheless, given present circumstances, I would find acceptable the following alternative to a Page Avenue extension, which appears to be both feasible and prudent. This would involve expanding the capacity of existing river crossings. I believe that the

possibility of adding another bridge at U.S. 40 and/or Interstate 70 should be seriously considered by the Missouri Highway and Transportation Department (MoHTD). As far as I know, all public park land can be avoided. Noise and visual impacts are minimal to non-existent because a high-speed freeway already exists along the route. For the outlaw Congress of the United States to lock in the red alignment of the Page Avenue Extension as they did is an unforgiveable crime.

I am unaware of any study that examines the effect that a Page Avenue Extension would have on traffic patterns in St. Louis County. From the beginning, it has appeared that this project would merely transfer present traffic congestion from Mo. Hwy. 94 in St. Charles County to Interstate 270, and to other primary roads in northwest St. Louis County where such congestion does not now exist or is minimal. A recent article in the St. Louis Post-Dispatch ("Page Ave. Extension Examined," 28 July 1994, p. 3B) notes that at the request of the St. Louis County Municipal League, the East-West Gateway Coordinating Council has agreed to study this question. It is inconceivable to me that a project of this magnitude and cost to the taxpayers would be proposed without knowing the degree to which it will worsen traffic congestion! Also, nowhere in the DSEIS has the total monetary cost of the project to the taxpayers been stated.

5,14 - Lastly, it is evident that several local governments, particularly the City of Maryland Heights and the County of St. Louis, seek to encourage large-scale commercial development of that portion of the Missouri Bottoms between the St. Louis County Water Company plant and the Riverport developments south of Interstate 70. Maryland Heights officials long ago expressed their desire that the Page Avenue Extension not be elevated on a berm through this area, but instead be built at the level of the flood plain, facilitating exits from and entrances to the highway. The "City of Maryland Heights Comprehensive Plan, Plate 5: Future Land Use Concept" (undated) indicates that, subject to future fortification of the levee from its current 100-year flood protection level to a 500-year level, large areas of the flood plain are to be set aside for "planned commercial" space. According to this map, the intent is that such space would surround the interchange between the Page Avenue Extension and a proposed north-south highway which would join Earth City Expressway to the north with Mo. Hwy. 141 to the south. This space would also be near a second proposed highway interchange between the Earth City/141 connector and a proposed north-eastward extension of Mo. Hwy. 109. The map entitled "Conceptual Master Plan" found between pages 34 and 35 of the DSEIS illustrates a plan for parkland associated with Alternative B (the preferred LCCL Alternative), and although it does indicate that this so-called park land would be bisected and bordered by at least two high-speed limited-access highways and at least one clover-leaf intersection, it does not at all indicate the intention of the City of Maryland Heights that this park land would eventually be surrounded by commercial buildings and associated development such as parking lots. Much or all of this development and associated vehicle traffic would be visible and audible from the proposed replacement park lands, since no topographic or other features exist on the bottomland to inhibit it. Therefore, the currently proposed land-use plans of local municipalities must be integrated into the Final SEIS, in order to give a complete picture of the environment within which the Alternatives would be located.

We taxpayers continue to pay the price of development of the flood plains of the two largest rivers on the continent, as we absorb direct and indirect costs resulting from the Great Flood of 1993. For any government to plan and actively encourage expensive commercial and industrial construction on such land is the height of folly. An extension of Page Avenue can only encourage the realization of such short-sighted planning.

I thank you for the opportunity to comment, and for your time and consideration.

Sincerely,



Mark R. Kaufmann, Ph.D.

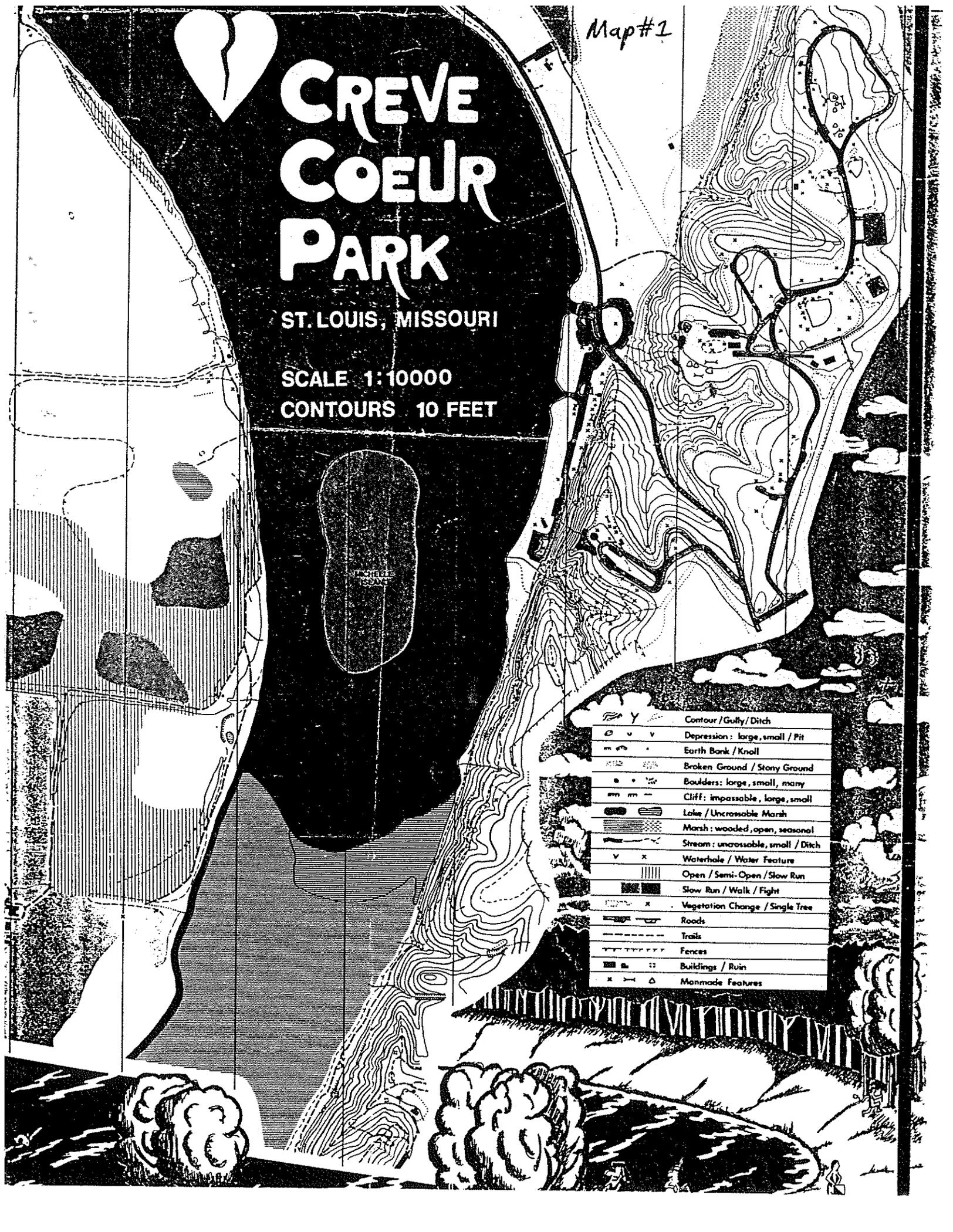
Enclosures

Map #1

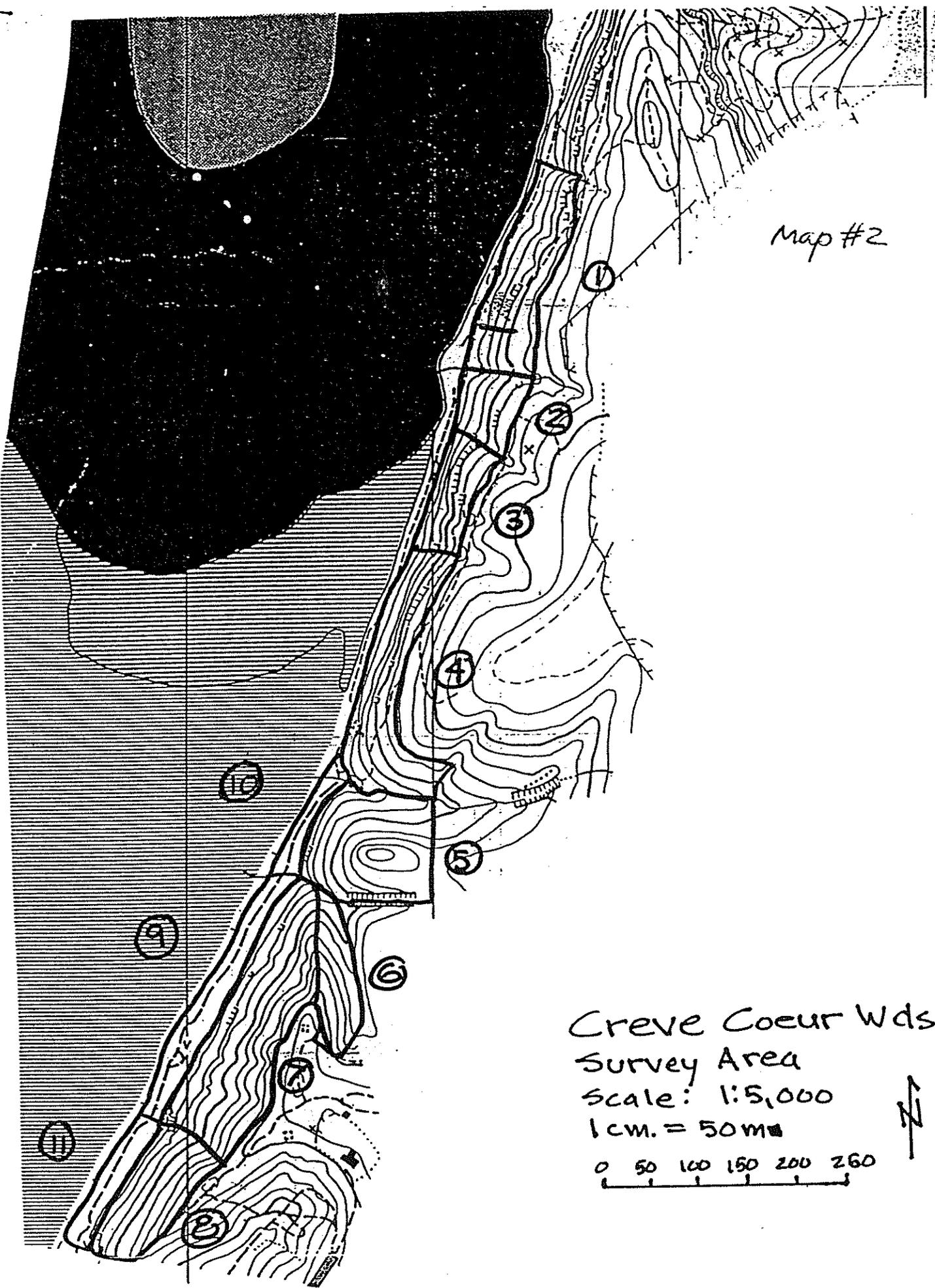
# CREVE COEUR PARK

ST. LOUIS, MISSOURI

SCALE 1:10000  
CONTOURS 10 FEET



	Contour / Gully / Ditch
	Depression: large, small / Pit
	Earth Bank / Knoll
	Broken Ground / Stony Ground
	Boulders: large, small, many
	Cliff: impassable, large, small
	Lake / Uncrossable Marsh
	Marsh: wooded, open, seasonal
	Stream: uncrossable, small / Ditch
	Waterhole / Water Feature
	Open / Semi-Open / Slow Run
	Slow Run / Walk / Fight
	Vegetation Change / Single Tree
	Roads
	Trails
	Fences
	Buildings / Ruin
	Manmade Features



Map #2

Creve Coeur Wds.  
Survey Area  
Scale: 1:5,000  
1cm. = 50m  
0 50 100 150 200 260



703 Crompton Ct.  
Crestwood, MO 63126  
Aug. 22, 1994

Mr. N. Clay McDermeit  
Recreation Assistance Programs  
Midwest Regional Office  
National Park Service  
1709 Jackson St.  
Omaha, Nebraska 68102

Dear Mr. McDermeit:

I writing to express my strong outrage over the draft supplement to the final environmental impact statement on the Page Avenue extension project in St. Louis County, Missouri, that was recently issued by the National Park Service Midwest office. It is clearly full of more bureaucratic crap to appease some local politicians and our incompetent state highway "& transportation" department, MHTD, as even implied by its title of a "supplement" to a "final" EIS. Clearly both the federal N.P.S. and the Transportation Dept. are trying to cover for the arrogance, indifference and ignorance of our MHTD; which resists helping with the real and critical local needs for better mass transit or consideration of the effects of its policies in both aggravating our urban sprawl and deteriorating older central core communities. This is a 25 year old pork barrel that had never advanced beyond the proposal stage for decades because it clearly had so little merit.

2 { First, no surrounding land can possibly adequately mitigate for the core damage to Creve Coeur Lake Memorial Park since it is not as spectacular and diverse in either recreational, scenic, or wildlife habitat values. The proposal severely impacts the main park lake and adjacent Little Creve Coeur Lakes with two major highway extensions, Page Av. and Earth City Exp., while also managing to split the added replacement land from the original park land with not only the excessively multilane highway corridors but a scenic and peaceful major highway interchange. Plans also call for construction of a 500 year levee by the expressway, causing further loss of floodplain and development of the currently mostly farmland adjacent to this county park on its west. One would think that after last years flooding in this region that government officials would now understand the benefits of maintaining floodplains.

This ancient road plan is incompatible with the current federal ISTEA transportation policy. Objective traffic analysis show that there is no clear need for these highway extensions. The great utilization rate of our new but very limited Metrolink light rail system shows the clear demand for mass transit alternatives. Yet while Illinois is planning to extend Metrolink further into the eastside metro area there is no serious, MHTD funded plan to extend it westward where so obviously needed into St. Charles county. Finally, the St. Louis metro area already has severe ozone smog air quality problems and is not meeting clean air standards. Thus this highway extension proposal will only further aggravate traffic congestion and air quality problems in the Creve Coeur Park area. It could not and would not be approved using consistent current federal standards. This dinosaur is a \$400 million waste of taxes that should have been permanently killed years ago. Please have the courage and common sense to kill it now.

Sincerely,  
*Richard LaMonica*  
Richard LaMonica



EARL AND BETTY STOLTE  
29 MARINE LANE  
MARYLAND HEIGHTS, MISSOURI, 63043

(314) 878-7460

August 25, 1994

REC'D  
MIDWEST REGION  
AUG 22 10:17  
MISSOURI DEPARTMENT OF REVENUE

Mr. N. Clay McDermeit  
Chief, Western Heartland Division  
Recreational Assistance Programs  
Midwest Region  
National Park Service  
1709 Jackson Street  
Omaha, Nebraska 68102-2571

Dear Mr. McDermeit:

We are writing you this letter to express our strongly felt opposition to the Little Creve Coeur Lake Mitigation Plan which was described in the Draft Supplemental Environmental Impact Statement for the Page Avenue Extension. We are a farm family who has lived for generations on and with the land which your proposal plans to condemn. Earl's father and his family moved to this land in 1935 and have lived there since. Our son, Rick, and his family, now live on the farm to be taken under your plan.

12, 20 { Your preferred proposal will involve the condemnation of 108.2 acres of the farm we own and cultivate. It will also involve taking 70.5 acres of land which we cultivate which is owned by Alwal Moore. Your proposal will destroy our farm and our livelihood and that of our son. This is some of the best farmland in Missouri and on this green earth.

Early on we supported the Page Avenue Extension Project because we realized that St. Charles County needed this highway. However, in our worse nightmares, we never believed that this highway would cost us our farm!

14, 15, 20 { We have read many descriptions of the problems which this plan creates involving the noise of Page Avenue, the folly of proposing a "wetland" in an area which will be dry most years, the problems relating to the Creve Coeur Airport, and the blocking of the Earth City/Woods Mill Expressway. We agree completely with these objections. But it is most upsetting that the Missouri Highway and Transportation Department plans to use our farm to substitute as mitigation for undefined environmental impacts elsewhere in the region. There can be no justification nor necessity for taking our farm as mitigation for a highway built miles and miles away.

In conclusion, we completely support the Comments of the Howard Bend Levee District and urge that its alternative Mitigation Plan be adopted or that the Page Avenue Extension not be built.

Thank you for this opportunity to present our comments.

Sincerely yours,

  
\_\_\_\_\_  
Earl Stolte

  
\_\_\_\_\_  
Betty Stolte

cc: The Honorable John C. Danforth;

The Honorable Christopher S. Bond;

The Mayor and Members of the City Council of the City of Maryland Heights, c/o Mr. Mark Levin, The City of Maryland Heights; and

Mr. John K. Pellet

MCDERMOTT.LET

HOWARD (8-25-94)

August 15, 1994

Mr. N. Clay McDermeit  
Recreation Assistance Programs  
Midwest Regional Office  
National Park Service  
1709 Jackson Street  
Omaha NE 68102

NATIONAL PARK SERVICE  
MIDWEST REGION  
RECEIVED  
RECREATION GRANTS  
'94 JUN 18 P2:53

Re: Draft Supplement to the FEIS  
Page Avenue Extension Project

Dear Sir:

Please accept these comments on the referenced Draft Supplement. We believe the Preferred Alternative "B" is unacceptable because it does not assess the impact of the following consequences:

2 { Inclusion of the additional lands does not accomplish mitigation of the lands lost from Creve Coeur Memorial Park. The resultant three parcels will eventually be separated by Page Avenue Extension and the Earth City Expressway Extension. Dividing a contiguous block of land with highways and "replacing" presently-contiguous land with remote parcels is hardly mitigation, irrespective of the number of acres proposed.

2 { The mitigation lands bring no new, needed, unique values to the park; they are not the quality of land one would select for a new park. Bottom land, fields and a highway right-of-way hardly constitute mitigation.

Land development around the park will increase local air pollution in the Missouri River floodplain, induced by Page Avenue and Earth City Expressway extensions. Flood plains are subject to inversions; St. Louis already fails to comply with Clean Air Act implementation requirements. Increased air pollution will adversely affect wildlife habitat, vegetation and human health.

5 { Commercial development and highway traffic will increase pressure for extension of the Earth City Levee, resulting in increased river flood stages, flood damage and destruction of natural wildlife habitat within the flood plain.

The only solution to the issue at hand is re-routing the Page Avenue Extension corridor away from Creve Coeur Park. Other corridors are available but are not pursued because the "preferred" route produces the maximum amount of land development. The only way that the mitigation proposal might accomplish the purposes of equivalent land replacement would be by permanently eliminating the corridor reserved for the Earth City Expressway and prohibiting any future extension of the Earth City Levee.

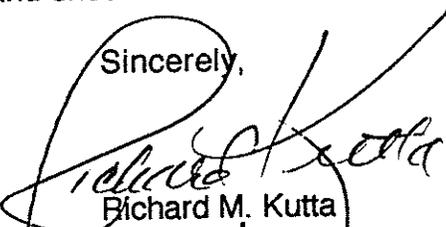
My family regularly enjoys Creve Coeur Park, as it is. The ox-bow lake offers perhaps the only "beach" in the St. Louis area. The park is excellent for canoeing, bank fishing, hiking and picnicking. Even on a busy weekend, there are quiet places suitable for individual and family enjoyment.

The Page Avenue Extension is a federally-financed land-development project for St. Louis and St. Charles, counties disguised as a transportation enhancement. It will worsen presently non-complying air pollution levels, encourage increased automobile transportation, destroy Creve Coeur Memorial Park for family recreation, increase conversion of land from rural to commercial use and encourage present trends of abandoning our older urban areas in favor of continued urban sprawl. Land use conversion and development induced by the proposed project will produce increased traffic, congestion, pollution and make the proposed project obsolete by the time it is completed.

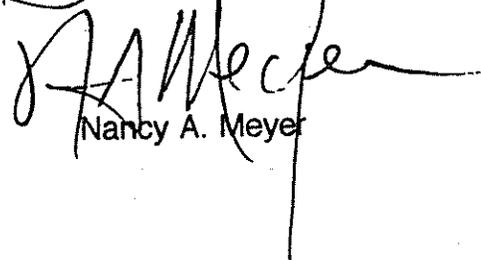
The Page Avenue Extension is an antiquated project and an unnecessary expenditure of Federal Funds in violation of federal laws and present federal transportation, wildlife and environmental policies. Spending the same amount of money on an alternative transportation project: extension of existing Metro-Link light rail system to serve St. Charles and west St. Louis County would produce all the benefits with none of the costs. Creve Coeur Park would remain intact, air pollution and traffic congestion would be reduced, wildlife habitat and recreation spaces would be preserved, rural lands would remain rural and human health would not be worsened. Interim programs like scheduled commuting, car pooling and lane management systems will reduce present automobile congestion levels.

The Draft Supplement FEIS is unacceptably flawed and should be withdrawn.

Sincerely,



Richard M. Kutta



Nancy A. Meyer

3 Colonial Hills Pkwy.  
Creve Coeur MO 63141

August 15, 1994

RECEIVED  
RECREATION GRANTS  
94 AUG 18 P2:54  
NATIONAL PARK SERVICE  
MIDWEST REGION

Mr. Clay N. McDermeit  
Chief, Western Heartlands Division  
Recreation Assistance Programs  
Midwest Regional Office  
National Park Service  
1709 Jackson Street  
Omaha, NE 68102

Dear Mr. McDermeit:

I am a grain farmer operating within the Howard Bend Levee District in Maryland Heights, MO. Our family farm has been operating since 1869. I would like to express my views on the proposed mitigation plan for the Page Avenue Extension.

I am very disturbed to find that the draft Supplement to the Final Environmental Impact Study (EIS) recommends the Little Creve Coeur Lake (LCCL) Plan as mitigation for the Page Avenue Extension.

20 { Should the LCCL Plan be accepted, I will lose one-third of the acres in my farming operation. Since the acres I will lose are leased, I will receive no compensation whatsoever. I have a large capital investment in equipment and buildings in order to farm these leased acres. Since agricultural land is very limited in St. Louis county, finding other land to farm is simply not an option. Loss of these acres will also drastically decrease the incomes of the two families this operation supports.

2,28 { The 745 acres included in the LCCL Plan are primarily in agricultural production and have been for many years. This area does not closely resemble the areas in Creve Coeur Park which are affected by the Page Avenue Extension. There are other areas in this river bottom which more closely resemble the affected areas which should be used for mitigation.

5, 30 { The LCCL Plan also includes part of the Howard Bend Levee system protecting the river bottom from flooding. If future flooding damages the Levee in the proposed mitigation area, repairs to, or realignment of, the Levee will be jeopardized.

6,29 { One of the goals of mitigation is to remove the noise and visual impacts on Creve Coeur Park. However the land in the LCCL Plan lies adjacent to the proposed highway. It would make more sense to mitigate land away from the proposed highway.

7,20 { Finally, since St. Charles County receives the benefit of the Page Avenue Extension, St. Charles County should be required to mitigate some of the land required for this project.

In closing, I am totally opposed to the Little Creve Coeur Lake mitigation plan. I support the alternative mitigation plan submitted to Secretary of the Interior Bruce Babbitt on June 30, 1994 by the Howard Bend Levee District. This plan allows both St. Louis and St. Charles counties to share the mitigation land and includes land which closely resembles that affected in Creve Coeur Park.

I ask that you consider the points I have raised and urge you to include the Howard Bend Levee District plan in the Final EIS.

Your time and consideration of this matter are greatly appreciated.

Sincerely,

*Warren A. Stemme*

Warren A. Stemme

*Arantz*

**COMMENTS**  
**Draft Supplemental Environmental Impact Statement**



RECEIVED  
NATIONAL PARK SERVICE  
MIDWEST REGION  
AUG 12 1994  
CREATION OF COMMENTS

**Creve Coeur Lake Memorial Park  
Replacement Land**

Kevin E. Rhoades  
Name  
23 Richmond Ct. St. Charles MO 63303  
Address City State Zip

Comments about the Alternative Replacements (please print):

31 { I favor the MHTD alternative (identified as #4 in the project overview). The wooded uplands and scrub wetlands will be more appropriate for a park setting and would leave a more compact park setting. The other proposals are too near the airport (which is bad for the airport and the park) and use up too much farmland. The MHTD alternative would be further away from the Page right-of-way and the airport.

This alternative would bring the total to over 300 acres of land being set-aside to replace the 183 "impacted" acres. As a St. Charles county resident who has to drive to downtown St. Louis everyday I feel that this extension of Page Avenue is badly needed!!

Thank you for participating in this open forum public hearing. The National Park Service will consider all signed statements. Please drop this in the nearest collection box, or mail to Mr. William W. Schenk, Acting Regional Director, Midwest Region, National Park Service, 1709 Jackson Street, Omaha, Nebraska 68102.

**Comments must be received by Tuesday, August 23, 1994.**



22 August 1994  
13185 Royal Pines Drive  
St. Louis, MO 63146

Mr. N. Clay McDermeit  
Chief, Western Heartlands Division  
Recreation Assistance Programs  
Midwest Regional Office  
National Park Service  
1709 Jackson Street  
Omaha, Nebraska 68102

RECEIVED  
RECREATION GRANTS

'94 AUG 23 10:12

Enclosure : Comments Prepared for Public Hearing  
Replacement Land for Creve Coeur Lake Memorial Park  
3 August 1994  
Prepared By E. M. Schultz

Dear Mr. McDermeit

The enclosed comments are provided in response to the invitation included in your cover letter of 29 June 1994 accompanying my copy of the Draft Supplemental Environmental Impact Statement, Page Avenue Extension. I appreciate your offer to me to provide these comments.

In response to this offer I have prepared the Enclosure entitled Comments Prepared for Public Hearing, Replacement Land for Creve Coeur Lake Memorial Park, dated 3 August 1994. In compliance with the National Park Service letter of instruction provided at the 3 August 1994 Public Hearing, this document was also provided " (4) by depositing your prepared statements at the designated area".

This letter attempts to summarize key points made in that document and to provide some additional information developed since the Public Hearing.

A Project Overview, Draft Supplemental Environmental Impact Statement, Creve Coeur Lake Memorial Park Replacement Land document was provided to participants of the 3 August Public Hearing. In this document ten section 6 (f) (3) replacement criteria are listed as being applicable. However, the 6 (f) (3) replacement criteria presented to the Public Hearing participants have been inappropriately excerpted (foreshortened) and are incomplete in several critical areas. The actual 6 (f) (3) list is important because these criteria should have driven the scope of the Draft Supplemental Environmental Impact Statement (DSEIS).

The DSEIS should have addressed those areas of 6 (f) (3) law which were inadequately treated in the Final Environmental Impact Statement, Page Avenue Extension, Section 6(f) Evaluation, Volume 4 of 4, dated November 1992. Instead, the DSEIS was purposely "de-scoped" to preclude addressing critical problematical areas.

The first 6(f) (3) prerequisite

- (1) *"All practical alternatives to the conversion have been evaluated and rejected on a sound basis "*

has not been met.

This requirement is virtually identical to the very consideration which triggered the passage of the Public Law 102-508, the Pipeline Safety Act of 1992. Proponents of the Red Alignment, in view of Supreme Court rulings and without waiving current law, were unable to demonstrate that no prudent and reasonable alternatives to the Red Alignment existed. In fact several government agencies including the National Park Service's own Department of the Interior stated the reasonable and prudent do exist ("easterly extension of the Black route" - also similar to the Yellow route).

Therefore prerequisite number 1 is not satisfied.

The second 6 (f) (3) prerequisite

- (2) *"The fair market value of the property to be converted has been established and the property proposed for substitution is of at least equal fair market value as established by a state approved appraisal (prepared in accordance with uniform Federal appraisal standards) "*

has not been met.

The acreage proposed for conversion under 6(f) (3) of the Land and Water Conservation Fund (L&WCF) act is 183.4 acres with a notional value of \$1.555 M. An additional 464.8 acres of Section 6 (f) (3) land (valued at \$1.6 M) is offered as part of this DSEIS. The total Little Creve Coeur Lake (LCCL) proposal includes 773.8 acres. However, the DSEIS takes credit for only 464.8 acres of the total due to excess noise (109 acres) and other ( 200 acres wetland bank) exclusions.

4 { In reality, due to erroneous DSEIS noise assumptions/calculations, in excess of 300 acres should have been excluded (vice 109 acres) on the basis excess noise (see page 15 of attachment). Additionally, the Page Ave noise impacted area of Creve Coeur Lake Memorial Park is well in excess of the 183.4 acres being considered for conversion.

- Page Ave will produce approximately a half-mile wide swath (see pages 11 thru 14 of enclosure) of noise-impacted area (>57 dBA) as it traverses nearly a mile of parkland. Thus the noise impacted area is nominally 350-400 acres ( significantly greater than the 183.4 under consideration.

Therefore, the total DSEIS analysis of comparable lands and their replacement value is erroneous. The entire replacement lands concept needs to be re-evaluated using a corrected noise impact assessment.

29 { Visual impacts were also assessed in section 4.7 of the DSEIS. But in reality, visual impacts were ignored ( i.e., ..."the visual contour will be considered to correspond to the noise contour" - DSEIS page 36). To illustrate the inappropriateness of this assumption, a copy of the FEIS Figure 8, Volume 4, 6(f) Evaluation is enclosed. It shows a narrow visual impact area. However, the reader is referred to an enclosed FEIS artist's illustration and the associated commentary which shows in excess of a mile's unencumbered view of the CCLMP bridge from the northern edge of the lake.

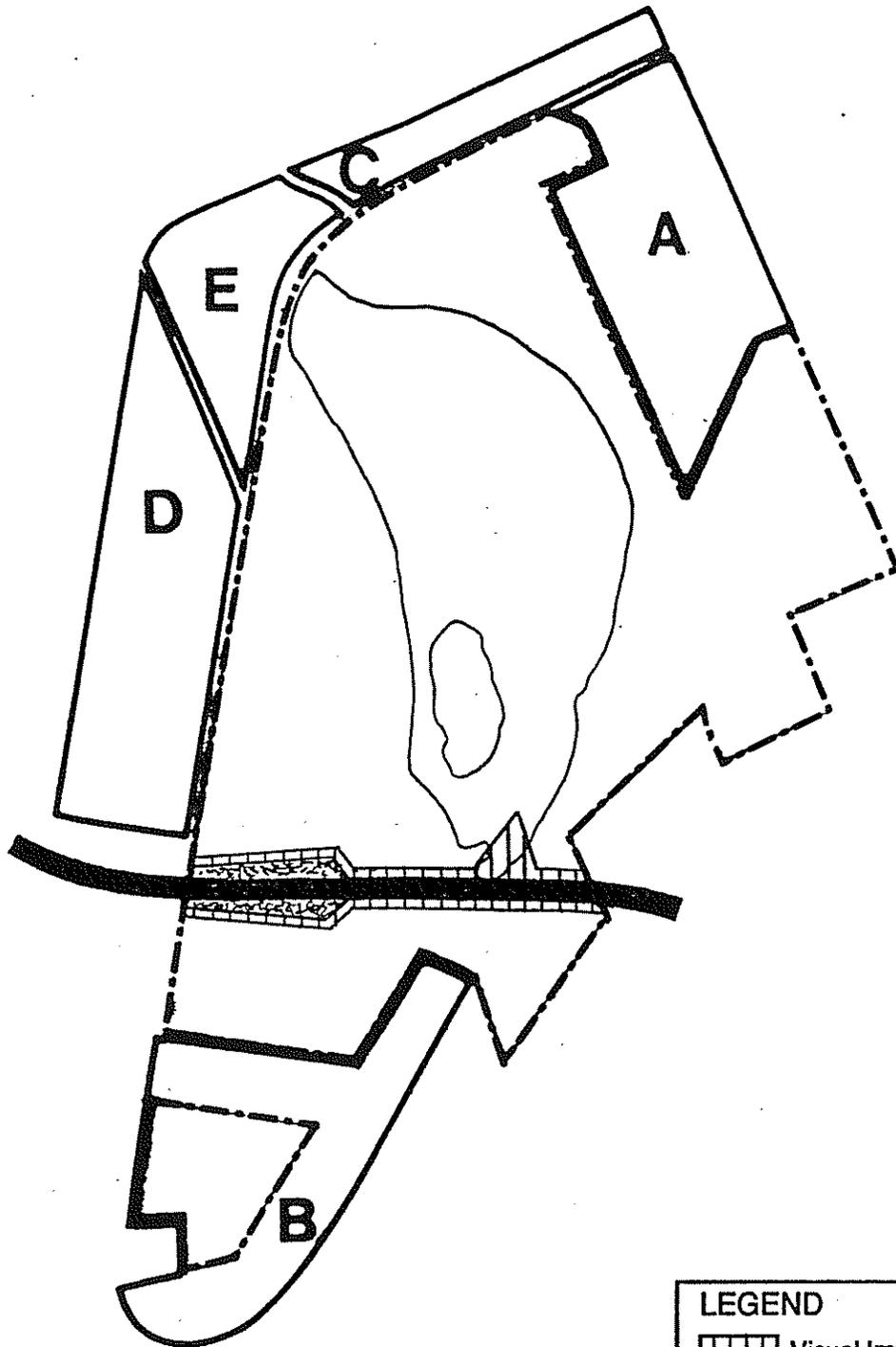
From these data is clear that

- An objective assessment of the noise and visual impacts on both CCLMP and candidate replacement lands has not been conducted in the DSEIS,
- The DSEIS 6(f) (3) criteria (number 2) fair market value assessment is erroneous, and
- The prerequisites identified in criteria (2) cannot be met with the land replacement package offered in the DSEIS

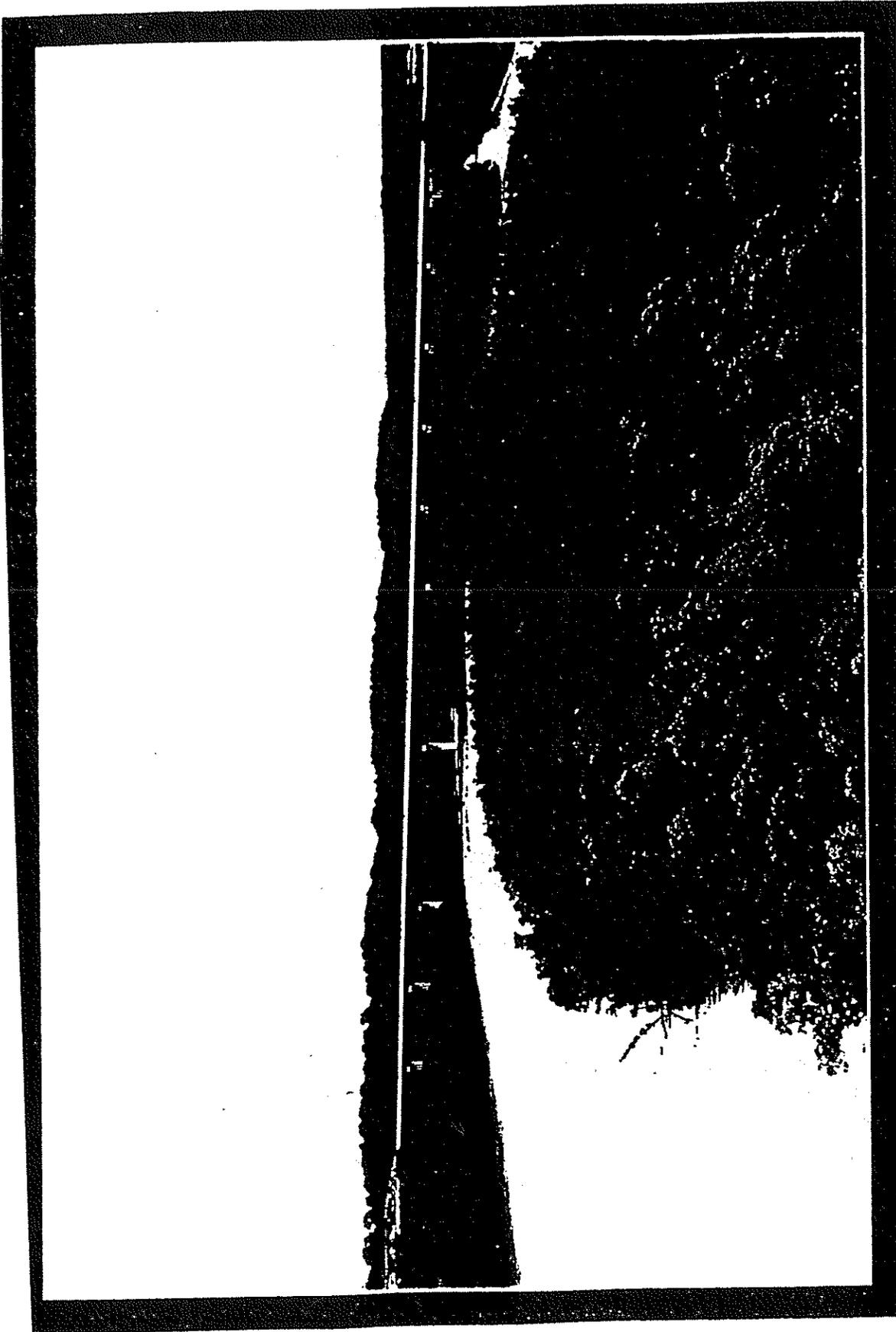
The third 6 (f) (3) prerequisite

28 { (3) *"The property proposed for replacement is of reasonable equivalent usefulness and location as that being converted."*

is not met.



LEGEND	
	Visual Impact Area
	Roadway Berm



Proposed Bridge over Creve Coeur Memorial Park  
St. Louis County

9 { The CCLMP lands being considered for conversion due to the Page Ave Extension are unique and irreplaceable. The Sierra Club, Eastern Missouri District, has determined via a recent dendrological census of old growth in the CCLMP area that

*".....at least 22 acres of old growth forest (pre-settlement) exist at this (CCLMP bridge crossing) site. It is surely one of the more important sites in the lower Missouri River valley. Also, the fact that adjoining this upland old growth is quality emergent wetlands, makes this a unique and irreplaceable valuable site."*

In addition to these unique features, CCLMP provides considerable wildlife concentrations in an urban park setting. Sightings of groups of as many as a dozen deer in the park area are commonplace. The DSEIS stated that *"the nearest active bald eagle nest occurs near Labadie, MO, along the Missouri River approximately 28 miles upstream of the project site."* However, local pilots operating light aircraft from airports in the bottomlands project area are known to keep active and current logs of bald eagle sightings in the general vicinity of the proposed Page Avenue bridge Missouri River crossing.

It is clear that the DSEIS has grossly underestimated both the environmental impact of the Page Avenue Extension in the area of CCLMP as well as the uniqueness/value of CCLMP lands to the St. Louis area.

The fifth 6 (f) (3) prerequisite

- (5) *"In the case of assisted sites which are partially rather than wholly converted, the impact of the converted portion on the remainder shall be considered. If such a conversion is approved, the unconverted area must remain recreationally viable or be replaced as well."*

is not met.

After the proposed project is completed, the unconverted area will never be as recreationally viable as it was prior to construction. Irreplaceable lands, trees, and wildlife will be permanently destroyed or displaced. Grossly underestimated road noise and visual impacts will significantly contaminate the park and surrounding (recreational and residential) areas. The replacement

lands offered are of a greatly different nature than those being taken. Additionally, funds to convert and maintain these lands for appropriate use are not available.

On final comment is offered regarding the proposed project. No total Page Avenue Extension project costs have been made available for public scrutiny since the 1987 "Reconnaissance Report". Those estimates were developed for a four-lane expressway. During the Public Hearing on the Draft Final Environmental Impact Statement, it was revealed that the road-bridge system was envisioned to be 10-lanes in capacity, but only funded at 6-lanes. The FEIS Section 6(f) (3) did provide a summary cost estimate for that portion of the roadway from Bennington to a "common point" where various road options joined. However, neither the Missouri River crossing nor the portion of the road in St. Charles county was addressed.

No project of this magnitude (perhaps \$0.75B) should be initiated without early public scrutiny. Responsible public disclosure of total project costs with element breakdowns needs to be provided now.

It is clear that road development plans are being phased such as to spread the real project costs into elements that will make overall assessment virtually impossible (i.e., no interchange with the proposed Earth City Expressway, 6-lane initial Page Ave Extension construction, no new interchange with I-270, no improvement of Page east of Bennington, no connection of the Page Ave Extension with Route 40/I-64 in St. Charles County, etc). Also, noise abatement in residential areas has not been included. The cost of even minimal noise reduction in the project area is assessed to exceed the Missouri Highway and Transportation Department (MHTD) cost criteria as too expensive. Residents of the project area whose homes are not taken will be left to bear the burden of MHTD's purposely underestimated road environmental impact.



Eugene M. Schultz  
Resident

Royal Pines Condominiums  
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Landscape Architects & Land Planners

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(314) 968-3805

August 19, 1994

Mr. N. Clay McDermeit  
Recreation Assistance Programs  
Midwest Regional Office  
National Park Service  
1709 Jackson St  
Omaha, Nebraska 68102

RE: Public Hearing on Page Avenue Draft SEIS:

Dear Mr. McDermeit:

First, I would like to make it clear that as a member of the Board of the Open Space Council of greater St. Louis, I consider the whole attempt at getting approval of this route of Page Avenue Extension has been flawed every step of the way. The idea of routing a 10 lane Highway through one of the best parks in the County, with one of the largest natural lakes in the State, is ludicrous. People go to a Park to get away from the stress of urban life, and the constant highway noise which will be heard all over the Park and will be a nagging reminder of that stress. I know from living three blocks from I-44 that it is constantly there. The interesting phenomena is that I don't hear it as much from the part closest to me because it is in a trench, as from about a mile away, where it levels out with the surrounding land. That mile is filled with large trees and houses. When the wind is from that direction, I hear it like it was next door.

3, 4 { Therefore, to add a piece of land as mitigation, which will parallel the Page Avenue Extension and the Proposed 141 Extension, both of which will be elevated, doesn't make sense.

It is interesting, however, that the recent Resolution from the City of Maryland Heights, opposing the "Preferred Mitigation Plan, exposes their own plans for developing the flood plain as commercial/industrial, and their desire for completion of the 141/Earth City Expressway. This would be against the new Federal policy of discouraging new flood plain development. At least, they do bring up one point we have been making; that no traffic studies have been made on the impact this project will have on local St. Louis County roads.

Furthermore, St. Louis County has been placed on pollution alert and are very close to being placed in a higher level of noncompliance. The Page Avenue project could not meet the new air conformity test if St. Louis, goes into the "serious" category.

I feel that a whole new park, such as the Confluence area, would provide better mitigation than the two separate but damaged parks.

For all of these reasons, we urge the National Park Service to withdraw its preferred alternative and inform Secretary of the Interior, Bruce Babbitt that suitable mitigation is not available in the immediate vicinity of Creve Coeur Lake Memorial Park because of the far-reaching impacts of the two proposed highway projects and the other developments associated with them.

Sincerely Yours,

  
Robert E. Goetz

cc. Secretary Babbitt

556 Oakhaven Lane  
Cleve Coeur, MO 63141  
August 20, 1994

RECEIVED  
RECREATION GRANTS  
94 AUG 25 AM 12  
NATIONAL PARK SERVICE  
MIDWEST REGION

Mr. N. Clay McDermeit  
Chief, Western Heartlands Division  
Recreation Assistance Programs  
Midwest Regional Office  
National Park Service  
1709 Jackson Street  
Omaha, Nebraska 68102

Dear Mr. McDermeit:

The following comments summarize some of the questions I had upon reading the Draft Supplement to the Final Environmental Impact Statement on the Page Avenue Extension (PAE).

1. Why did this Draft SEIS not include a map showing all significant existing structures (for example, houses) in the immediate neighborhood of both the existing park and the various proposed mitigation lands? Without such a map, I had difficulty evaluating whether a better mitigation proposal could have been designed. And without one, the Draft SEIS does not convince the public that the best mitigation proposal has been designed or chosen.

5 { 2. Page 37 indicates that the Draft SEIS makes no assumption as to whether a 500-year levee will be built to protect the various proposed mitigation lands. However, page 35 indicates "the assumption that the [extension of Earth City Expressway] transportation facility would be constructed close to existing grade. Page 36 states that landscaping and a noise wall could reduce both visual and noise impacts, and that "the visual contour will be considered to correspond with the noise contour." If a separate levee is built to protect this part of the flood plain, the Earth City Expressway Extension (ECEE) can be built at grade. If such a levee is not built, the ECEE would have to be built above existing grade. However, the Draft SEIS doesn't make a separate assessment of the noise contour based on the possible requirement for a higher elevation of the ECEE. Therefore, its assessment of both visual and noise impacts is inadequate.

4 { 3. The Draft SEIS assumes the ECEE will be a 4-lane highway with a concrete median barrier. If the PAE is being designed with 10 lanes between St. Charles County and the ECEE, then 6 lanes between the ECEE and I-270, this would indicate that 4 lanes coming from the Missouri River bridge will be diverted onto the ECEE. If this is true, and if the ECEE is connected with Highway 141 as intended, the ECEE will also need its own through lane. Thus, the ECEE is likely to become at least a 6-lane, not a 4-lane, highway. What guarantee do the citizens have that a "transportation facility" assessed in an EIS will be built with the characteristics that the EIS evaluated? What are the regulatory consequences if the facility does not conform with the EIS's expectations?

4. If PAE is going to be 10 lanes between St. Charles County and the ECEE, then 6 lanes between there and I-270, this would indicate that the ECEE will be a necessary adjunct to PAE, and therefore should have been evaluated in the FEIS. The FEIS did not do so, and was therefore inadequate.

5. Page 42 states: "As with all long-range developments, any future project impacting park land would be subject to all environmental laws and regulations in effect at the time of implementation depending upon project funding sources." What is your definition of "implementation"? It appears that the sentence quoted above is meaningless if Congress can pass special legislation at any time exempting a particular project from particular environmental laws and regulations. What assurance does the public have that a future project impacting park land will conform with current environmental law?

6. Page 43 states: "NPS will consider conversion requests if the following prerequisites have been met: (1) All practical alternatives to the conversion have been evaluated and rejected on a sound basis ...". This would indicate that NPS has an obligation to determine both that the FEIS adequately evaluated alternatives to PAE and that alternatives suggested in response to the FEIS were also evaluated. However, page 46 indicates that NPS summarily dismisses this obligation by simply accepting the FEIS as it is, and also by not preparing a written evaluation of several alternatives sent to NPS during the winter of 1993-94. The FEIS was inadequate in numerous respects. One of these was pointed out above. Others were mentioned in a letter dated December 23, 1993 from David Hutchings to Secretary of the Interior Bruce Babbitt and to Don Castleberry of the National Park Service. The fact that an Alternatives Analysis is currently under way for an extension of MetroLink light rail into St. Charles County, and that voters in St. Louis City and County just voted by a wide margin to increase a local tax for the extension of this very popular light rail system, is additional evidence that the FEIS for PAE was inadequate due to its quick dismissal of public transit as at least a partial solution (which could be combined with other partial solutions into a comprehensive solution) to traffic congestion on interstate highways over the Missouri River. The fact that the FEIS (Vol.1, p.2-27) acknowledges that PAE will also not "solve" traffic congestion problems in the corridor is further evidence that the FEIS was inadequate in reviewing potential alternative solutions, such as policies which encourage urban development patterns that are conducive to "alternative modes" of transportation.

32 { 7. Were the interagency meetings on PAE held between August and November 1993 subject to the Open Meetings Law? How and when was the public notified that each of these meetings had been scheduled? Did members of the public or press attend?

Thank you for this opportunity to comment on the Draft SEIS. I look forward to receiving your response to my questions and comments.

Sincerely,  
*Virginia Harris*  
Virginia Harris

Steve Sorkin #36 Queensbrook Place St. Louis, Missouri 63132 314/991-3990

August 23, 1994

Mr. N. Clay McDermeit  
Recreation Assistance Programs  
Midwest Regional Office  
National Park Service  
1709 Jackson Street  
Omaha, Nebraska 68102

Dear Mr. McDermeit:

I am strongly opposed to the draft supplement to the Final Environmental Impact Statement proposed by your office for the Page Avenue extension project in St. Louis County, Missouri. Please include this letter in the record of written comments on the document.

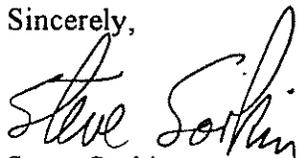
It is a sad day when citizens must beg the National Park Service not to allow a ten-lane highway to go right through the largest natural lake in the state and a beautiful park that was expanded with Federal funds. It is beyond dispute that St. Louis County is in this position because of poor planning, duplicitous development policies, and total disregard for Federal laws and policies, all as documented in the enclosed 1991 story in the St. Louis Post-Dispatch. Approval of this project will, quite simply, reward the County for this behavior.

5, 6 { As for the specifics of the FEIS, it ignores or minimizes several critical items in order to reach its faulty conclusion, including a traffic analysis that disputes the need for the highway, plans by the municipality of Maryland Heights to build a levee and expand the airport, the impact of the plan on "Little Creve Coeur Lake," the effect of the highway on air quality in light of new federal standards, the highway's inconsistency with current federal policy as stated in ISTEA, and perhaps most importantly, the additional impact of the County's planned Earth City Expressway extension.

28 { The latter item means that Creve Coeur Park, supposedly improved with "reasonably equivalently useful land," will be bisected and bordered by two large, noisy expressways--most notably, of course, a ten-lane highway sweeping over the lake, leaving noise, fumes, and vehicular runoff in its wake.

2 { No amount of "mitigation" land will make up for the damage to the lake and park done by this project. I urge the National Park Service to reject the FEIS for the Page Avenue project.

Sincerely,

  
Steve Sorkin

NATIONAL PARK SERVICE  
RESTORATION GRANTS  
AUG 25 AM 11:3

# Building Up To A Problem

## Planners could have plotted way to skirt Creve Coeur Park

By E.F. Porter and Virgil Tipton of the Fishbein-Hughes staff

**N**INETEEN FORTY-FOUR was a seminal year for St. Louis County. As the nation cheered the advance of Allied forces across Europe and the Pacific and contemplated the postwar era with optimistic anticipation of peace, the county made some hopeful preparations of its own.

It used a gift of 400 wooded bluff acres in the west county to establish the first St. Louis County park. A commission, recognizing the first time that the public has a legitimate interest in orderly coordination of growth and development.

The two events came hand in hand. The donors of the parkland were a group of philanthropists, led by A.P. Greenfelder, who had formed an organization called the County

Planning Association to promote land-use planning. They paid \$13,500 for the land.

When the county accepted the gift and founded the planning commission, the Greenfelder group dissolved. That was the deal.

Over the ensuing years, the original 400-acre gift was added to so that it included 1,000 acres in the times and sizes which it took the times and mood heavily used park of the spirit.

The county's planning office, meanwhile, undertook the supervision of growth. One of its main responsibilities was reviewing developers' plans so as to avoid conflicts among — for example — residential development, highways and parks. More about that later.

A former bond in the Missouri that was isolated when the river shifted its course many centuries ago, Creve Coeur Lake is Missouri's largest natural lake. (The state's larger lakes were created by dams.)

310-314 circumferential made that plan redundant, and in 1945 it was believed.

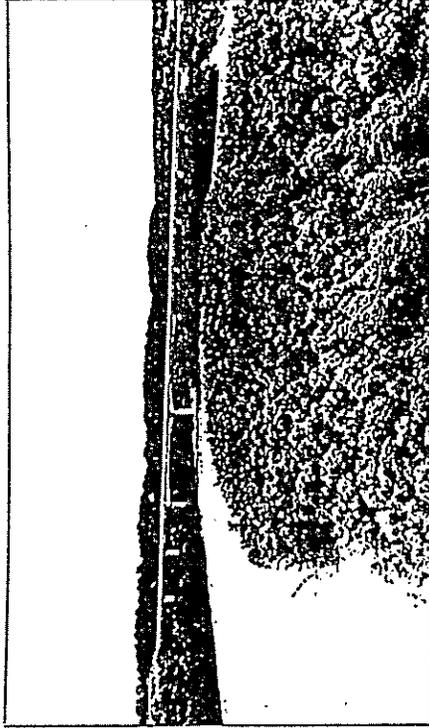
It was at that moment the alternative plan took shape that is causing such controversy today. Instead of being Page and 270, it was planned to run over the Missouri River to St. Charles county. The clerical at Page and 270, in 1947, was designed and built so that the extension could be connected to the river.

Since the development boom west of 270 had hardly begun, the choice of routes was virtually wide open. Only one subdivision (Old Farm Estates) had been authorized in the area where the route might go when the Page Avenue extension was planned in 1948. The planners could have plotted a route that skirted the park and made severe allowances for park expansion, without setting up any residential development at all.

Instead, the planners laid out a route that crosses the lake at the divide between the open water and the wooded area where the route, that has formed where the route, that lake had silted up. It is now called the red route.

The proposed road would be 10 lanes wide. It would leap off the bluff 125 feet above the lake and march across it on pillars. Park lovers, environmentalists and conservation agencies at the state and federal level agree that the effect of the times, the fear of traffic, highway department's The state highway department's changed for more than a century of century and has, in fact, through the on-going cooperation of county planners, become more firmly entrenched and increasingly more difficult and more expensive to change. In approving subdivision plans for the area, the county planning department has consistently required developers to create corridors to accommodate the route.

### URBAN PLANNING



An artist's rendering of the proposed Page Avenue bridge over Creve Coeur Park. Missouri Highway and Transportation Dept.

Like most lakes, Creve Coeur began drying from the moment of birth, becoming shallower and smaller as silt built up on the bottom and vegetation encroached on the edges. A banana-shaped expanse more than two miles long, a half-a-mile wide (about 600 acres) at the turn of the century, the lake had shrunk to half that size by the time the county

In 1900, the Midland Street

Westfall said he would go along with the route through the park because he thought it would be a better route than the red route. The red route is 120 miles long, and it would entail displacing 130 families instead of 17.

On Tuesday, St. Louis County Executive George R. "Buzz" Westfall announced to the state's plan to drill through the park, forging the first of three links in the chain of approval for the highway department.

Next, the highway department needs approval from the state Department of Natural Resources. Finally, and most importantly, the department needs the approval of the federal Department of Transportation.

While Westfall's impetuous was not a legal requirement, highway officials said that, without it, the route would have been stalled.

There was a string attached. Under the federal highway act, the state cannot be used for a highway for existing except outdoor recreation unless replaced with comparable acreage of equal market value and utility. The trade off is subject to federal approval.

County records show that county officials were aware of the restriction and complications it could cause in the future, but chose to take the federal money anyway.

In fact, the county did not on the assumption that it had to be a deal. It was not until the late 1970s, then-County Executive Gene McHenry proposed building a sports and amusement center on the flood plain next to Creve Coeur Park — with the Page Avenue highway as a centerpiece.

The state highway department has offered the county an indemnity of \$30 acres of flood-plain farmland in exchange for the highway right-of-way, but whether this will just muster with the feds is questionable.

The planners could have made generous allowances for park expansion, without plowing up any residential development at all.

the 1904 World's Fair) and kindred amusements. Boat races, train launches and sailing clubs had the rowboat liveries complete the Renoir-esque picture. At the peak of its popularity, the park had 100,000 visitors a day. Or so the owners proclaimed.

The Creve Coeur resort fell victim to the automobile. The amusement park closed in 1934 and the lookout tower was scrapped in 1941 for the war effort.

The trolley enjoyed a resurgence in popularity during the war when gasoline was rationed, but it was short-lived. On July 25, 1950, laden mostly with streetcar buffs, the Creve Coeur 65 made its last run.

The following three decades saw the building of the highway system, which dewatered the automobile-friendly area. The trolley was abandoned. The face of the property changed. One of the early collisions between highways and green open space occurred in early 1960 when plans showed Interstate 241 blitting off a piece of Grand View County Park in

See PARK, Page 11

Another element in the controversy is a provision in the federal highway law barring running a road through a park unless there is no "practical or feasible" alternative.

"It is feasible and prudent to place more families and spend an additional \$9 million to avoid the park," says Wayne Hart, the state's chief highway engineer. "We believe it is not."

A federal judge may believe differently. The U.S. Supreme Court decided the law activity is a 1971 decision with the case of *Northwest Florida* in Memphis.

In similar cases, the courts have held that the high cost of an alternative route is no excuse for forcing a highway through a park — especially if local government officials were the cause of making the alternative route in the first place.

The principle seems to fit the Creve Coeur situation like a glove.

Mel Carnahan  
Governor



State of Missouri  
**OFFICE OF ADMINISTRATION**  
Post Office Box 809  
Jefferson City  
65102

Richard A. Hanson  
Commissioner

Stan Perovich  
Director  
Division of General Services

July 25, 1994

William W. Schenk  
Acting Regional Director  
U.S. Department of the Interior  
National Park Service  
1709 Jackson Street  
Omaha, Nebraska 68102-2571

Dear Mr. Schenk:

Subject: 94070015 - Draft Supplement to Final Environmental  
Impact Statement - Page Avenue Extension  
St. Charles & St. Louis Counties, Missouri

The Missouri Federal Assistance Clearinghouse, in cooperation with state and local agencies interested or possibly affected, has completed the review on the above project application.

None of the agencies involved in the review had comments or recommendations to offer at this time. This concludes the Clearinghouse's review.

A copy of this letter is to be attached to the application as evidence of compliance with the State Clearinghouse requirements.

Sincerely,

Lois Pohl, Coordinator  
Missouri Clearinghouse

LP:cm

cc: East-West Gateway Coordinating Council

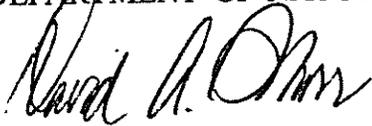
Mr. N. Clay McDermeit  
Page 2

We understand that the Howard Bend Levee District has submitted a new or expanded alternative. The information that we have is insufficient to fully evaluate this alternative. Thus, we reserve final comment and commitment pending further investigation and analysis of this and any additional information or alternatives that may be provided by the public during this public comment period.

Please feel free to contact me if you have questions.

Very truly yours,

DEPARTMENT OF NATURAL RESOURCES

A handwritten signature in black ink, appearing to read "David A. Shorr". The signature is written in a cursive style with a large, prominent initial "D".

David A. Shorr  
Director

Enclosure

SKL

MISSOURI DEPARTMENT OF NATURAL RESOURCES

COMMENTS REGARDING JUNE 1994 DRAFT

SUPPLEMENT TO THE ENVIRONMENTAL IMPACT STATEMENT

PAGE AVENUE EXTENSION

Page 5 - The last sentence on page 5 states that the "selection of any action alternative will result in additional replacement land ...." Alternative E, the Missouri Highway and Transportation Department (MHTD) proposal does not meet this criteria. In this alternative, 38.7 acres of new land would be substituted for 38.7 acres of the original CCLMP mitigation resulting in a zero net effect, as noted in the last sentence of the first paragraph on page 11.

✓ Page 11 - The first sentence of Section 2.6.1 states, "This replacement proposal, presented at the July 1, 1991, scoping meeting...." The date should be changed to reflect the July 1, 1993 meeting date.

✓ Page 14 - The first sentence on this page discusses the conversion of CCLMP stating, "This impact will result in a Section 6(f)(3) conversion under the L&WCF Act, as amended, and consideration of appropriate replacement land." The word "consideration" understates the legal requirement that appropriate replacement land must be provided.

✓ Page 20 - Discussion of utilities under Section 3.10.4, Howard Bend Levee District (HBLD) Proposal, indicates that Union Electric's 345-kilovolt Sioux-Mason overhead electrical transmission line "runs approximately midway between Creve Coeur Mill Road and the St. Louis Southwestern Railroad." An overhead power line of this size constitutes a significant intrusion on proposed replacement land. The parcel is already segregated from the park by the railroad line. Recognition of an additional intrusion of this magnitude would further reduce the recreational utility of the portion of the proposed mitigation between the railroad and Creve Coeur Mill Road. Discussion should be included explaining how this area could accommodate recreational activities. The risk of potential health hazards for park users from exposure to high voltage emissions should also be discussed. Existence of the overhead power line and railroad are not issues in the other alternatives because they border existing boundaries, rather than cross through proposed park land.

✓ Underground sewer and water lines and their respective easements through park land are generally not a problem. However, if lift stations or other above-ground appurtenances associated with underground lines are present, those support facilities could be an intrusion to the aesthetics or recreational usage of the park. Section 3.10 should include discussion regarding the impact of these utility easements and existing facilities under each affected alternative.

Page 21 - Section 3.11.2, the Little Creve Coeur Lake (LCCL) alternative, indicates that zoning and local planning are the same as for the Fish and Wildlife Service (FWS) alternative. Since LCCL is discussed first and is a larger parcel, it would seem more appropriate to place the verbiage that applies to both proposals in this section with a reference notation in the FWS section. If the location of the verbiage is not changed, the second sentence in paragraph 3 of Section 3.11.3, "This area is included with the FWS Alternative" should be omitted, since it is within the FWS discussion.

Pages 23 through 31 - Section 4.1.1 addresses the recreational utility aspect of the proposed alternatives and evaluates them against specific environmental concerns. Section 4.1.3 discusses the surrounding land use and water resources regarding the LCCL alternative with the simple statement that "Water resources exist in the form of drainage ditches that eventually flow into CCLMP...." The last paragraph of that section states, "This site would be adjacent to the proposed Page Avenue Extension on the north and could be bisected by a future transportation corridor on the east." There is no mention of the current quality of the water resource or of the impact of water runoff from the adjacent proposed Page Avenue extension or other roadways. Since the FWS alternative was expanded into the LCCL alternative because of concerns over hydrology issues within the drainage basin for the proposed wetlands, water quality is an important issue and impacts of proposed actions should be addressed, particularly in the LCCL and FWS alternatives. The issue has added importance, since, in some cases, water from the proposed alternative areas drains into CCLMP. Any impact on these areas could potentially affect CCLMP, as well.

Sections 4.1.3 and 4.1.4 address currently available access to the LCCL and FWS sites; however, there is no discussion addressing access in the event the Earth City expressway and proposed interchange with Page Avenue is built as noted in the future land use concept at the bottom of page 21.

The LCCL and FWS alternatives addressed in Sections 4.1.3 and 4.1.4 state that noise levels would be reduced due to the loss in farming operations without addressing the increase in noise that will result from the Page Avenue extension and the potential interchange of the Page Avenue extension/Earth City expressway, or the Earth City expressway itself. The same is true in the discussion of aesthetics; there is discussion of a positive impact by eliminating farming without discussion regarding the impact of new roadways. An acknowledgement that there could be impacts would be sufficient, with reference to subsequent sections that specifically address these issues, particularly sections 4.6 through 4.8.

Statement on page 24 - "The area, as a wetland, may also reduce noise levels by the absorption of ambient sounds being produced in the general area either by farming or airport operations." There is new information available regarding potential expansion of the Creve Coeur Airport. This document should include discussion regarding the potential for noise impact from increased air traffic on all alternatives. There should also be discussion in the document of potential for noise impact from increased air traffic on CCLMP.

Discussion of the LCCL alternative refers to the FWS alternative, requiring that the reader look forward to a subsequent section for information needed to understand the alternative at hand. An example would be statements such as sentence 5, paragraph 2 on page 25, "Wetland characteristics would be similar to the FWS proposal." Those characteristics should be stated up front in the first instance and reiterated or referred to in subsequent sections, as appropriate.

Page 28 - Discussion of recreational utility of the MHTD alternative in Section 4.1.6 states, "The sites would be developed in a manner similar to the HBLD proposal and, therefore, would have high recreation potential." The HBDL alternative discussion provides general reference to wetland preservation in the description of the environment. However, the section on page 26 addressing recreation potential simply states: "This site has a high recreation development potential." It does not describe proposed development or recreational usage.

Pages 28 through 31 - The Recreation Matrix process omits an explanation of how points were assigned and some of the numbers have changed from the preliminary draft. The item "Reclamation of Spoiled Lands" is particularly confusing. The HBLD alternative, which is the only alternative that would reclaim spoiled lands was assigned a high number; all other sites that would not reclaim spoiled land were also assigned numbers on this item, with the LCCL alternative also assigned a high number. The rationale for assigning points should be discussed in this section.

Page 31 - Section 4.2 addresses natural resources impacts. The discussion begins with alternative D, switches to alternative E, and proceeds backwards from alternative C through B. The format could be improved by discussing the alternatives in the same sequence as in previous sections, starting with B and addressing in alphabetical sequence through E.

Page 33 - Discussion of noise impacts on FWS and LCCL alternatives indicates that "the Section 6(f)(3) boundary will be adjusted in the area of the proposed Page Avenue Extension along a line in which projected noise levels are not expected to exceed 65 dBA...it is anticipated that the same measurement standards will be applied to the reserved corridor...." The 65 dBA noise level is inconsistent with the level of 57 dBA determined to be the acceptable level for the portion of CCLMP to be converted. The document should include discussion regarding rationale for adopting the 65 dBA level as acceptable for the replacement land.

The section on noise impacts goes on to state that "Although the project sponsor (St. Louis County) will be encouraged to acquire land up to the highway boundary, that area exceeding 65 dBA and approximately 335 feet from centerline would be excluded from the Section 6(f)(3) boundary." Exclusion of land amounting to 335+ feet from the centerline of a highway or reserved highway corridor from the LCCL alternative, or 670+ feet from the FWS alternative (since it encompasses both sides of Page Avenue) would not assure the integrity of these proposed wetland areas regarding hydrology, noise, and visual issues. If either LCCL or FWS proposals are to remain as viable alternatives, provisions must be stipulated that either the project sponsor or MHTD are required to acquire this buffer area between the highway(s) and the replacement land and retain and manage it as open space in perpetuity.

Page 35 - The third paragraph of Section 4.7 regarding visual impacts states: "However, with the existence of the St. Louis Southwestern Railroad structure and Creve Coeur Mill Road already bisecting the area, the addition of another highway may not significantly add to the present visual intrusions." If two significant intrusions already exist, addition of a third intrusion in the form of a two to four lane highway could be "the straw that broke the camel's back." This additional intrusion involving the visual distraction of moving vehicles on another highway could render the area unsuitable as replacement land for the taking of a reasonably serene natural area from CCLMP.

The statement that "In essence, the associated landscaping and ground contour of a roadway could enhance some areas where currently a lower degree of visual quality exists and help blend the man-made environment to the natural environment" should be eliminated. Construction of a roadway to enhance the visual quality of open wetland natural areas would not be a consideration. While landscaping and ground contour of a roadway, in and of itself, could offer visual relief of flat, open areas (which is not a typical wetland area development goal) usage of the roadway in the form of moving vehicles would still cause visual distraction, along with other associated impacts, such as noise and water pollution.

Page 36 - The last sentence in Section 4.8 summarizing noise and visual impacts states, "Therefore, acquisition to the right-of-way of the proposed corridor and Page Avenue Extension by the project sponsor will be encouraged, but only that area outside the projected 65 dBA noise contour will be accepted as Section 6(f)(3) replacement land." We re-emphasize our earlier statement that provisions must be stipulated in consideration of the LCCL and FWS alternatives that, if these alternatives are to remain as viable, either the project sponsor or MHTD must be required to acquire the buffer area between the highway right-of-way and the 6(f)(3) replacement land to assure the integrity of the proposed wetland area regarding hydrology, noise, and visual issues.

Section 4.9 - This section states that Arrowhead Airport is located in the vicinity of LCCL and that "indications are that Arrowhead Airport was completely destroyed by recent flooding and will likely not reopen." If there is strong evidence or documentation supporting the statement that this airport "will likely not reopen," it should be discussed to validate this statement. If there is not such evidence or documentation available and the airport could just as likely reopen, impacts should be discussed.

This section should also include discussion regarding potential for impact on Creve Coeur Airport, with particular regard to air strikes by migratory water fowl if the proposed expansion occurs.

Page 39 - The second paragraph again states "it is recommended that the local sponsor acquire the total area of the LCCL ....The proposed reserved corridor and an area adjacent to the proposed Page Avenue Extension would be excluded from the Section 6(f)(3) replacement package." We reiterate that, for the LCCL and FWS alternatives to remain viable, the area between proposed highway right-of-way and the 6(f)(3) boundary must be acquired by St. Louis County or MHTD and maintained as open space in perpetuity.

JAMES M. TALENT  
2D DISTRICT, MISSOURI

1022 LONGWORTH HOUSE OFFICE BUILDING  
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**Congress of the United States**  
**House of Representatives**  
**Washington, DC 20515-2502**

August 19, 1994

COMMITTEES:  
ARMED SERVICES

SUBCOMMITTEES:  
RESEARCH AND TECHNOLOGY  
MILITARY PERSONNEL

SMALL BUSINESS

SUBCOMMITTEES:  
SBA LEGISLATION AND  
GENERAL ECONOMY

MINORITY ENTERPRISE, FINANCE AND  
URBAN DEVELOPMENT

FRESHMAN WHIP

REPUBLICAN HEALTH CARE POLICY  
TASK FORCE CO-CHAIRMAN

Mr. N. Clay McDermeit  
Chief, Western Heartlands Division  
Recreational Assistance Programs  
Midwest Regional Offices  
National Park Service  
1709 Jackson Street  
Omaha, Nebraska 68102

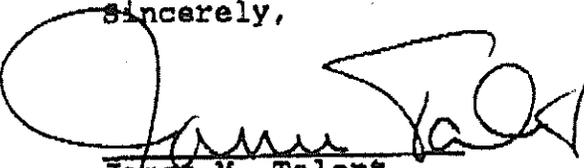
Dear Mr. McDermeit:

I am writing to you regarding the Draft Supplement to the Final Environmental Impact Statement for the Page Avenue Extension, dated June 1994. On numerous occasions, we have conveyed to the Secretary of the Interior the need to proceed with the Page Avenue Extension. The development of the Page Avenue extension has been over twenty years in the making, yet the residents of St. Louis and St. Charles counties are still without this essential link. For many years, they have patiently battled overly-congested traffic resulting from the lack of sufficient roads connecting these counties.

The environmental enhancement proposals available for public review during the recent Public Hearing in Missouri provide the significant additional replacement lands, demanded by the Secretary of the Interior, to compensate for encroachment on Creve Coeur Park. I understand that the NPS is recommending the adoption of the Little Creve Coeur Lake Proposal, as the proposed action and preferred alternative.

I urge that a favorable Record of Decision be issued this fall, based on what the applicable Federal, State, and local officials deem the best and appropriate environmental enhancement plan which provides for compliance with the 6(f) requirement of the Land and Water Conservation Fund Act. This is a crucial step in the completion of the Page Avenue project, which will greatly improve the flow of traffic in our region, and it should be advanced as soon as possible.

Sincerely,



James M. Talent  
Member of Congress

✓ Page 40 - Most of the second paragraph of Section 4.12 should be deleted. It is placed under "irreversible or irretrievable commitments of resources," then discusses Section 6(f)(3) lands as temporary commitments that can be retrieved. It states that "Section 6(f)(3) land used as addition(s) to CCLMP is considered an irreversible commitment during the time period that land is used for recreation purposes. However, if a greater public need arises for use of the land, the land could be wholly or partially converted to another use...." (Emphasis added.)

✓ These statements make light of the conversion process and totally ignore the intent of the LWCF Act that land acquired or developed with LWCF assistance is dedicated to outdoor recreation use in perpetuity. While conversions of use are generally permitted with the provision of adequate replacement land, the intent is that the replacement land will remain in outdoor recreation use in perpetuity. These statements provide the perception that dedication of Section 6(f)(3) lands to recreation are simply temporary uses that can be taken lightly and changed at will, rather than genuine commitments.

/ It would be appropriate to state "Section 6(f)(3) land used as addition(s) to CCLMP is considered an irreversible commitment. The balance of the paragraph should be deleted.

/ Page 42 - The last five words in the second paragraph should be deleted. The sentence should read "...any future project impacting park land would be subject to all environmental laws and regulations in effect at the time of implementation." Compliance with environmental laws would be required and would not be dependent "upon project funding sources."



MISSOURI SENATE  
JEFFERSON CITY

NATIONAL PARK SERVICE  
MIDWEST REGIONAL OFFICE

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RECREATION GRANTS

August 19, 1994

Mr. N. Clay McDermeit  
Chief, Western Heartlands Division  
Recreation Assistance Programs  
Midwest Regional Office  
National Park Service  
1709 Jackson Street  
Omaha, Nebraska 68102

Dear Mr. McDermeit:

Members of the St. Charles County State Legislative Delegation are writing to advise you of our staunch support on behalf of the Little Creve Coeur Lake (LCCL) Proposal, (Proposed Action and Preferred Alternative) Alternative B, described in the Draft Supplement to the Final Environmental Impact Statement for the Page Avenue Extension, dated June 1994.

The entire St. Charles County State Legislative Delegation, a bi-partisan delegation, attended the Public Hearing on August 3, 1994, in support of the proposed Page Avenue Bridge and Extension; the red alignment adopted for the facility, the Little Creve Coeur Lake (LCCL) environmental enhancement proposal; and in addition, we conveyed the need to proceed with the Page Avenue Extension without delay.

However, we would like to elaborate on our decision to support the LCCL proposal. Put simply, the plan is extraordinary. Some would argue, too extraordinary. However, many members of this delegation urged the adoption of a plan such as the LCCL proposal in exchange for encroachment on Creve Coeur Park. We do not take this encroachment lightly, and understand the need to comply with the 6(f) requirement of the Land and Water Conservation Fund Act. What we do object to are the demands, by some, for further study of matters that have time and again been considered. This is not constructive, but rather a deliberate effort to kill a project supported by the vast majority of elected officials and residents in the St. Louis metropolitan area. The Page Avenue Extension

also enjoys the support of major civic organizations in this region.

The LCCL Proposal will provide for not only a bigger Creve Coeur Park, but a better park. We have been monitoring the development of this proposal and know that the LCCL Alternative was conceived through intense coordination of many Federal, State, and local agencies. In other words, all applicable agencies provided input which resulted in the "proposed action and preferred alternative". Some will say this is not good enough. However, we want to assure you that no Missouri transportation project has ever received more scrutiny, study, and consideration, than the Page Avenue Extension, and the environmental enhancement plan proposed for the facility to compensate for the park crossing is a phenomenal public improvement of its own.

As you know, the total area to be acquired consists of 773.8 acres, and will be adjusted for Section 6(f)(3) replacement land to 464.8 acres. The alternative is proposed and supported by the State of Missouri as the best selection for additional Section 6(f)(3) replacement land.

St. Charles County, Missouri, is being choked by traffic gridlock, not only due to the growth in the area, but due to the location of the community, which is bisected by Interstate 70, a major transcontinental highway. The vast majority of the constituents whom we represent in St. Charles County are demanding traffic relief, and feel that the plan proposed for Creve Coeur Park is a win win solution for everyone involved. We are grateful that the Secretary of the Department of the Interior will not block the project, and will allow the Page Avenue Extension to proceed in exchange for these significant additional replacement lands. The LCCL Proposal, we are convinced, meets the Secretary's requirements.

The members of the St. Charles County State Legislative Delegation urge that a favorable Record of Decision be issued in the fall of 1994, or earlier, based on the LCCL Proposal.

Sincerely,



Fred Dyer  
Missouri State Senate  
St. Charles County



Steven E. Ehlmann  
Missouri State Senator  
St. Charles County

*Bill Luetkenhaus*

Bill Luetkenhaus  
Missouri State Rep.  
St. Charles County

*Harriet Brown*

Harriet Brown  
Missouri State Rep.  
St. Charles County

*Cindy Ostmann*

Cindy Ostmann  
Missouri State Rep.  
St. Charles County

*Ted House*

Ted House  
Missouri State Rep.  
St. Charles County

*Rich Chrismer*

Rich Chrismer  
Missouri State Rep.  
St. Charles County

*Joseph R. Ortwerth*

Joseph R. Ortwerth  
Missouri State Rep.  
St. Charles County

*Chuck Gross*

Chuck Gross  
Missouri State Rep.  
St. Charles County



United States  
Department of  
Agriculture

Soil  
Conservation  
Service

Parkade Center, Suite 250  
601 Business Loop 70 West  
Columbia, Missouri 65203

NATIONAL PARK SERVICE  
 MIDWEST REGION  
 JULY 12, 1994  
 10:18 AM  
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 PLANNING & LANDS

Clay McDermeit  
United States Department of the Interior  
National Park Service  
Midwest Region  
1709 Jackson Street  
Omaha, NE 68102-2571

Dear Mr. McDermeit:

Our office has reviewed the Supplemental Environmental Impact Statement (SEIS) for the Page Avenue Extension in St. Louis and St. Charles Counties, Missouri.

Considering land use and values, our choice is the Missouri Highway and Transportation Department's proposal. Our primary concern is preserving prime farmland in conjunction with wildlife habitat.

If you should have any questions or need additional information, please do not hesitate to call Kenneth Vogt, Assistant State Soil Scientist (Correlation) at 314/876-0907.

Sincerely,

RUSSELL C. MILLS  
State Conservationist



The Soil Conservation Service  
is an agency of the  
Department of Agriculture

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**GREEN, HENNINGS & HENRY**

314 NORTH BROADWAY-SUITE 1830  
 ST. LOUIS, MO. 63102-2097

TELEPHONE (314) 231-4181  
 FACSIMILE (314) 231-4184

OVERALL & JUDSON - 1877  
 JUDSON & GREEN - 1900  
 JUDSON, GREEN, HENRY & REMMERS - 1929  
 GREEN, HENNINGS, HENRY & ARNOLD - 1965

JOHN R. GREEN II  
 LEWIS C. GREEN

BRUCE A. MORRISON  
 KATHLEEN G. HENRY

August 19, 1994

National Park Service  
 Midwest Regional Office  
 1709 Jackson Street  
 Omaha, Nebraska 68102-2571

Attention: Mr. N. Clay McDermeit

Re: Draft Supplement to the Final Environmental Impact Statement  
 Page Avenue Extension

MIDWEST REGIONAL OFFICE	
Regional Director	
Secretary	
Deputy Reg. Director	
Administration	
Operations	
✓ 8/23/94 [Signature] Pres	
Reg. Asst.	
Public Affairs	
EEO Office	
Public Health Services	
✓ PO [Signature]	
GRANTS	
Action taken & date	

Dear Sir:

I hereby submit the following comments respecting the Draft Supplement to the FEIS.

Please refer to my letter of Mr. Schenck dated January 15, 1994, the three letters cited therein, with enclosures, and my comments submitted at the scoping meeting of July 1, 1993, and documents referenced in those papers. I will not repeat all those comments. The Draft Supplement fails to comply with NEPA and the applicable regulations for all the reasons cited therein, which have been entirely ignored. DOI has the obligation to prepare a proper EIS, not merely to choose which one of the proposed mitigation plans is least offensive. Further, DOI has the obligation to prepare a proper EIS on the basis of 1994 knowledge, not 1992 knowledge.

The Draft Supplement is insufficient for the following additional reasons.

1. Clearly this is a highly controversial project. Even the selection of one of a number of alternative mitigation proposals has turned out to be highly controversial. It therefore calls for a public hearing, pursuant to the regulations. The public non-hearing of August 3, 1994, does not fulfill the requirements of the regulations, for the reasons stated by the Open Space Council.

2. The Draft Supplement goes a little further than the FEIS in recognizing the Earth City Expressway (ECE), but only a little further. We now have far more proof of the plans of all governmental bodies to build the ECE. This proof requires assessments of the following:

National Park Service  
August 22, 1994  
Page Two

4 { A. The impact of this proposal, including the proposal for a reserved corridor for the ECE, in fixing the ultimate route of the ECE, thereby deciding in advance, without consideration or evaluation or assessment of any alternatives, which wetlands will be taken by the ECE, and what will be the impact of this location in other respects. Will the ECE be protected from flooding by another levee, or will it be built on a berm? If the latter, will there be culverts under the berm, or will the ECE act as a levee, setting aside a large part of the floodplain and wetlands of the Missouri Bottoms for future development? Nor does the Draft Supplement consider the impact of this proposal in advancing the cause of the proponents of building the ECE.

4 { B. The evidence of the plans for building the ECE being as firm as it is, and those plans having been given a big boost by this proposal, the Draft Supplement must consider the secondary and cumulative impacts of the ECE. They should have been considered in the FEIS, but this proposal makes their consideration even more urgent.

16 { C. The impact of the ECE on the quality of the park, including the mitigation lands, must be evaluated. Can it seriously be contended that a "park" bisected by two super highways will really be a park suitable for passive recreation? What is the basis for assuming an ECE of four lanes? We know that the four surplus lanes of the Page Avenue bridge will fill those four lanes entirely, without any other traffic. What is the basis for assuming that nobody will use the ECE in addition to those people going to and from the Page Avenue bridge? We know that St. Louis County has planned the ECE for years as a major outer belt, to relieve Highway 270. What is the basis for assuming that St. Louis County will not build the ECE at least eight lanes or ten lanes wide? The discussion of noise and visual impacts assumes that the ECE will be constructed at grade level. That assumption is not documented. That assumption is absurd, unless one also assumes that the ECE will be protected by a 500-year flood levee. The latter assumption is not set forth as a basis for the noise and visual impact discussion. If it were, it would clearly require further assessment of the cumulative impact of the levee. We all know that St. Louis County plans to locate the ECE on a berm, a fact which would substantially alter the noise and visual impacts of the ECE.

4 { 3. Consideration of the impact of the ECE on the quality of the park, including the mitigation lands, if it were undertaken, would require consideration of matters not addressed in the Draft Supplement. The Draft Supplement considers the impact of the ECE only in terms of 65 dBA. The Draft Supplement does not explain why. Apparently the Draft Supplement is acknowledging an effect upon usefulness of the park land only in terms of a conversion of land under § 6(f) (although the Draft Supplement does not explain why the number 65 is used rather than the number 57, a question raised by the Open Space Council).

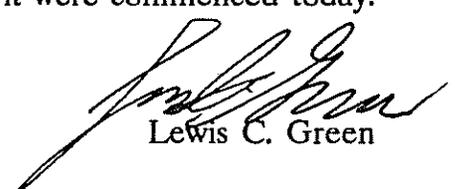
National Park Service  
August 22, 1994  
Page Three

28 { However, § 6(f) requires that replacement lands be of "reasonably equivalent usefulness." In this instance, that means usefulness for passive recreation purposes. One cannot maintain that land impacted by 64 dBA, from the ECE alone, aside from other impacts, is land of reasonably equivalent usefulness to the quiet land at the southern end of the park which will be taken by the Page Avenue Extension. If we reduce the number to 57, or 50, or 45, or some other number, the point will still remain. Little chunks of land nestled in the corners of the intersections of two super highways, adjacent to a greatly expanded airport, has virtually no usefulness for passive recreation purposes. The Draft Supplement fails even to acknowledge this concern, much less to deal with it. It fails altogether to explain the criteria for determining reasonably equivalent usefulness, or to justify the criteria.

15 { 4. As noted by others, plans are afoot to expand greatly the Creve Coeur Airport, adjacent to the old park and the mitigation lands. The Draft Supplement, at § 4.9, purports to consider the impact of the mitigation proposal *on* the airport. Someone at DOI seems to have a strange sense of humor. Surely an environmental evaluation must assess the impact *of* the airport on the park lands and mitigation lands, particularly in terms of reasonable equivalent usefulness for passive recreation.

5. This year we have acquired new and substantial information concerning ozone concentrations in the St. Louis Air Quality Control Region. In recent years we have seen the evolution of new conformity regulations under the Clean Air Act amendments of 1990, and the enactment of ISTEA, and promulgation of regulations under that Act. Clearly this proposal, if it were presented today, could not be approved. DOI has a duty under the statute and the regulations to make its determination on the basis of today's knowledge, and today's statutes and today's regulations. DOI should require a new conformity determination of the current regulations, and full compliance with ISTEA. It may be suggested that this project was begun sufficiently long ago that it is exempt from compliance with the statutes and regulations. Even if that were correct, DOI's determination is not exempt from NEPA. Clearly the Draft Supplement must address the question whether compliance with those statutes and regulations is required. If it should be determined that compliance is not required, the Draft Supplement must assess and evaluate those adverse impacts which Congress sought to avoid in adopting those statutes, and must point out wherein this project will or may produce adverse environmental impacts of such magnitude that the project would be illegal if it were commenced today.

August 19, 1994

  
Lewis C. Green





# Sierra Club

Eastern Missouri Group  
Ozark Chapter  
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Comments in response to the Draft Supplement to the  
Final Environmental Impact Statement, Page Avenue Extension,  
St. Louis and St. Charles Counties, Missouri (June, 1994)

Submitted by the Eastern Missouri Group, Ozark Chapter, Sierra Club,  
August 19, 1994

We, the Eastern Missouri Group of the Sierra Club (SCEMG), continue to oppose the proposed Page Avenue Extension. Here, we address specifically the suitability of the Alternative parcels proposed in the DSEIS as replacement land of "reasonably equivalent usefulness," as required by the Land and Water Conservation Fund Act (LWCFA), to substitute for the public park land impacted by the proposed "red" alignment of the Page Avenue Extension. In short, the red route represents wholly unacceptable degradations and ruination of Creve Coeur Lake Memorial Park (CCLMP) which cannot be satisfactorily mitigated by replacement lands required by Section 6(f) of the LWCFA and by Section 601 of the Pipeline Safety Act of 1992.

The red route would bisect the largest undeveloped area of CCLMP, an area of bottomland and uplands forest south-east of the Lake, which is roadless, secluded, and very quiet. This area features woodlands, wetlands, and wildlife (including deer, turkey, bobcat, migratory waterfowl and shorebirds), and it is already part of a public park. For these reasons alone, the area deserves preservation as an increasingly rare and welcome oasis within an otherwise extensively-developed modern metropolitan area.

It must be noted that under United States statutes (Section 4(f) of the Department of Transportation Act of 1966) and case precedent under this statute (the prohibited extension of I-40 through Overton Park in Memphis, Tennessee, by the Supreme Court of the United States), it would normally be the case that its status as a public park would preclude construction of a federally-funded road or highway through it, and neither the FEIS nor this Supplement lawfully could have been written. This prohibition was stricken by Section 601 of the Pipeline Safety Act of 1992, which does not repeal Section 4(f), but rather authorizes the United States to violate their own statute, and to do so solely to allow the Page Avenue Extension project.

*Unique and irreplaceable natural area of old-growth forest.* But this area is more than a pleasant wooded area which is already part of a public park. As we have recently discovered, this area includes a natural area of old-growth forest that dates to pre-settlement times, which is an extremely rare find in Missouri.

Recently a quantitative dendrological census of the area was undertaken by the Missouri Native Plant Society (MoNPS) under the leadership of James L. Bogler, President of the St. Louis Chapter of MoNPS. Members of the SCEMG have been assisting in this research. The survey area is divided into 11 parcels, as indicated on Maps 1 and 2. The red alignment would pass through parcel 4. Although the study is ongoing, the preliminary results are fairly astounding to us.

The area surveyed so far consists of areas 1-4 as shown on the map. For each tree with diameter at breast height (DBH) exceeding 4 inches, we recorded its DBH, species, and location. So far, over 1000 trees have been measured in this way.

Also, core samples have been bored from a number of trees, in order to correlate DBH with age, both among the different species, and among different locations (e.g. upper slope, middle slope, lower slope, bottom of hollow, lake shore).

In the approximately 8 acres surveyed so far, we have discovered 3 trees over 300 years of age, and 8 over 200. The oldest tree is a mid-slope chinquapin oak (*Quercus muhlenbergii*) dating to A.D. 1628 (age 366 years, DBH 27 inches); the second oldest is also a chinquapin oak (age 311 years, DBH 32 inches). (For reference, the Pilgrims arrived at Plymouth Rock in 1620, and Marquette and Joliet explored the Mississippi River in 1673.)



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## Eastern Missouri Group

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A preliminary plot of the number of trees per unit area versus age (not enclosed and unavailable to us at this time) results in a distribution which appears to indicate that the forest is old-growth, i.e., there is no cut-off at a certain age which would indicate felling and removal of the oldest trees. The mere fact that highly marketable timber stands such as these chinquapin oak trees date to pre-settlement times also suggests that little or no logging has been carried out here. Also found here are large white oaks (*Q. alba*), northern red oaks (*Q. rubra*), and ashes. The larger northern red oaks have DBH as large as 3 feet, although they are probably not as old as the chinquapin oaks due to their faster rate of growth. The understory is largely maple. MoNPS has also been conducting an ongoing general floristic survey of this area and its surroundings.

We speculate that the area has survived as it has because of its inaccessibility. The area consists of a very steep bluff, occasionally deeply dissected by small hollows. No roadway has been built along the base of the bluff. An old gravel road does exist along the base of the bluff, but to the south of this area. Furthermore, because of the presence of the Creve Coeur Lake, the railroad was built not along the base of the bluff as is usual, but rather around the far (west) side of the Lake. The Lake and its surroundings were for many decades used as a resort and recreational area, further contributing to the preservation of this woodland.

The total size of this pre-settlement forest could be up to 25 acres, which is relatively large for Missouri standards. The dendrological census and floristic survey continue, and further results will be forthcoming. We emphasize in the strongest possible terms that this area appears to be of botanical and ecological value to the scientific study of the natural history of Missouri. It is our strongest belief that this area must be passed on to those who will come after us in a preserved state, without major modification, with attention given to appropriate buffering about its periphery, certainly without road construction, and most certainly without the irreversible destruction of and changes to bedrock, soils, and flora, brought about by the construction of a 10-lane freeway directly through this area. One might naively have believed that the creation of a public park would suffice to engender and encourage such protection, as exemplified by the 1983 designation of the Pelican Island Natural Area within St. Louis County's Sioux Passage Park, but the 1992 action of the Congress of the United States proves otherwise. The fact that adjoining this pre-settlement upland old-growth forest is quality emergent wetlands makes this a unique and irreplaceable site worthy of further study.

The following conclusion is clear: *none of the five Alternatives proposed in the DSEIS are of "reasonably equivalent usefulness" as the area to be mitigated.* Following are our comments and questions regarding each of the proposed Alternatives.

*Alternative A (no-action alternative).* Firstly, Alternative A has been "locked in" as acreage that will be purchased as mitigation land regardless of the outcome of this DSEIS. That is, Alternative A has been elevated above any scrutiny as to its suitability as Section 6(f) mitigation land. We object to this state of affairs. In this case, the only logically possible "no-action" alternative is to acquire no mitigation land at all, and to begin the EIS process anew with different alternatives.

Secondly, the parcels comprising Alternative A should be indicated on the same topographic map as Alternatives B-E, rather than the map appearing between pp. 4 and 5 of the DSEIS, to facilitate evaluation of exactly what is contained in Alternative A.

Neither of the two parcels (A,B) comprising Alternative A contains upland forest. Since this is the most important natural feature of the area that would be impacted by the red alignment, Alternative A is unacceptable as mitigation land in that respect. The wooded (eastern) portion of Parcel B of Alternative A is predominantly early successional forest, which has over several decades overgrown what was originally open water, as the Creve Coeur Lake shrank in size due to siltation. Accelerated erosion (caused by the settlement and clearing of the drainage basin of the Creve Coeur Creek, which empties into the Lake), as well as the leveeing and channelization of the Creek itself, contributed, and continue to contribute, to the high siltation rate. This is indeed similar to the bottomland forest which would be impacted by the red alignment. The remainder of Parcel B of Alternative A, as well as



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the entirety of Parcel A, has been cleared for agriculture. Because the impacted area is virtually completely wooded, cleared land is not a reasonable trade.

*Alternative B (LCCL alternative and the preferred alternative).* This alternative consists almost entirely of cleared agricultural fields. Although this parcel contains much of what was formerly the Upper Creve Coeur Lake (also known as the Little Creve Coeur Lake)—the present Lake being the remnants of the Lower Creve Coeur Lake—the land is cleared, and has been maintained in a cleared state for agricultural purposes and actively drained using pumps. As mentioned on p. 17 of the DSEIS, only 5.3% of Alternative B is wooded. Conceivably, the tract could be restored to a bottomland forest via active management over a period of many decades, but no such plan is mentioned in the DSEIS. Since virtually 100% of the directly-impacted Park land is wooded, Alternative B is not of “reasonably equivalent usefulness” as the impacted area.

The “Conceptual Master Plan” appearing between pages 34 and 35 of the DSEIS proposes to create artificial wetlands. These cannot approach the quality of quiet recreation on the Lake that can be and are enjoyed at this time by Park users.

More obviously, Alternative B would be bounded by the Page Avenue extension and would be bisected by the Earth City/141 connector. In other words, Alternative B is a proposal to mitigate wooded park land impacted by a freeway with cleared land impacted by two freeways. Such a proposal is unacceptable.

*Alternative C (USFWS alternative).* This alternative is similar to Alternative B, in that it would be bisected by two freeways. Again, such a proposal is unacceptable.

*Alternative D (HBLD alternative).* This alternative consists mostly of cleared land, with some bottomland and upland woodlands along the southeast edge of the parcel. The cleared area is used for agriculture, and for a salvage yard containing hundreds of derelict vehicles. The cleared area, again—regardless of whether it is used for row crops, storage space, or nothing at all—has no relevance whatsoever to the question of being of “reasonably equivalent usefulness” as the impacted area.

The wooded portion of this Alternative is relevant to this question, but it is unacceptable as mitigation land for the following reasons. Although presently wooded, this area has been heavily disturbed by past activities, some of which have left permanent damage and structures. In August a SCEMG member scouted the area. This site includes at least one old gravel road. Along this road, numerous piles of dumped debris are found. One immediately questions what sorts of hazardous substances may be found in these piles, and in the soil beneath them.

Furthermore, much of the wooded bottomland area was formerly a large-scale quarrying operation. The bluff was blasted and the rock removed over hundreds of feet of its length. The bluff face resembles a 30-foot-deep road cut for a major highway. What appears to be an abandoned stone-grinding works exists in the bottomland woods. Numerous large concrete structures, including a 50-foot-high concrete tower, were part of the works. There are numerous tailings piles dumped on the bottomland, the largest being approximately 20 feet high and over 100 feet in length.

Also present is at least one partially-underground concrete bunker, resembling the bunkers in the Weldon Springs area which were used to store ammunition. Again, one questions what sorts of hazardous chemicals might remain at the site.

In the northwestern part of the bottomland woods, automobile tires far outnumber trees. It is not clear if they have been dumped here or not, but we suspect that, since many are still holding air, they may have been transported from the salvage yard upstream by the flood waters of Summer 1993, caught by the trees and other vegetation, and deposited here in great numbers (literally hundreds of tires).

The DSEIS on page 18 describes this area as “forest land...[which remains] as a remnant of the once-dominant presettlement forest.” We fail to understand how this conclusion was drawn, given the massive and widespread activities and associated clearing which have occurred on this site.



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4

*Alternative E (MoHTD alternative).* The northern portion of Alternative E is a subset of Alternative D, but without a strip of cleared land between Creve Coeur Mill Road and the old Chicago, Rock Island, and Western Railroad track. Please refer to the comments on Alternative D above.

The southern portion of Alternative E would have been a viable candidate for replacement land, except that in the last 2 years a residential subdivision has been built in this area. A SCEMG member visited this site in July, and estimated that only about 10% of the original parcel remains as undeveloped uplands forest. Unlike the would-be-impacted area of uplands old-growth forest, this site has been disturbed by the presence of an old gravel road along the base of the bluff, which was recently cleared by the St. Louis Metropolitan Sewer District, and presumably will be maintained in this condition in order to service sewer lines from the aforementioned new subdivision. Also present in the bluff in this area are a number of small abandoned quarries. The uplands forest here does not appear to approach the quality of the uplands forest which would be impacted. For all these reasons, this parcel fails to meet the criterion of "reasonably equivalent usefulness."

*Impacts due to noise.* It is evidently the case that the noise models employed in this study assume that the "worst-case" source of noise is a 4-lane road (p. 34, DSEIS). Yet, the Page Avenue Extension would be a 10-lane road. This could result in an increase in noise intensity of a factor of 2.5. Furthermore, it is not clear whether the source is modeled as a level road. In the case of Page, eastbound vehicles would have to ascend about 150 feet from the level of the flood plain to the top of the bluff. In order to maintain their speed, drivers would have to increase the r.p.m. of their engines, with the associated large increase in engine noise. This is particularly true of loaded trucks, whose exhaust pipes would extend well above the concrete barrier along the side of the highway. Similarly, westbound vehicles could attain relatively higher rates of speed in descent, with associated greater noise generation.

In addition to the preceding, we question the widths of the noise corridors as given in the DSEIS, based on the coordination described on p. 16, Volume 4, FEIS, which states that 57 dBA is the noise impact threshold agreed to. Yet, all corridors described in the DSEIS are based on 65 dBA, a discrepancy of 8 dBA. This represents a significant widening of the noise corridors, which must be adjusted accordingly, both for the impacted Park land and for any proposed replacement lands.

*Visual Impacts.* The DSEIS significantly understates the acreage visually impacted by the freeway and bridge and hence requiring mitigation. On p. 8, the visually impacted area is described as at most 183.4 acres. We believe that this is a grave oversight. Clearly, a multi-lane highway elevated up to 150 feet will be visible from most locations on the Creve Coeur Lake and along its shore, as well as on the flat bottomland surrounding the Lake. An artist's rendering of a view of the proposed red alignment highway found on p. 14 of Volume 4 of the FEIS makes this evident; yet Figure 8 of Volume 4 and associated text indicates that only 4.5 acres of open water are considered visually impacted. The area of the Lake alone is over 300 acres. Thus, the area of visually impacted Park land must be increased accordingly.

*Recent proposed alternative.* A recent article in the St. Louis Post-Dispatch ("Mayor Offers a New Plan for Page Ave. Project," 15 Aug 1994, p. 1N) describes another Alternative, proposed by Mayor Mike O'Brien of Maryland Heights. The proposal consists of Catfish Island and part of the Greens Bottoms, on the western side of the Missouri River. Like Alternatives B and C, because this area includes no uplands forest at all, not to mention rare old-growth pre-settlement uplands forest, it is not of "reasonably equivalent usefulness" and hence is unacceptable as replacement land.

*General comments.* In general, the SCEMG continues to oppose the entire proposed Page Avenue Extension, for a number of reasons. The project would encourage continued urban sprawl in a metropolitan area whose



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population has not increased substantially in 15 years, but whose total land area has expanded by about 1/3 in that time. Hence, more and more infrastructure must be maintained by roughly the same number of taxpayers. Furthermore, the resulting increased length of automobile commutes leads to increased air, water, and noise pollution; greater usage of non-renewable resources; and reduction in actual and potential recreational space and other open spaces. In the long run, all these things will be deleterious to the area, and if governments are to carry out such long-range planning at all, they certainly should not actively encourage further urban sprawl, nor subsidize automobile travel at the expense of cleaner and more efficient mass transit alternatives.

We are unaware of any study that examines the effect that a Page Avenue Extension would have on traffic patterns in St. Louis County. From the beginning, it has appeared that this project would merely transfer present traffic congestion from Mo. Hwy. 94 in St. Charles County to Interstate 270, and to other primary roads in northwest St. Louis County where such congestion does not now exist or is minimal. A recent article in the St. Louis Post-Dispatch ("Page Ave. Extension Examined," 28 July 1994, p. 3B) notes that at the request of the St. Louis County Municipal League, the East-West Gateway Coordinating Council has agreed to study this question. It is inconceivable to us that a project of this magnitude and cost to the taxpayers would be proposed without knowing the degree to which it will worsen traffic congestion! We note that nowhere in the DSEIS has the total monetary cost of the project to the taxpayers been stated.

Lastly, it is evident that several local governments, particularly the City of Maryland Heights and the County of St. Louis, seek to encourage large-scale commercial development of that portion of the Missouri Bottoms between the St. Louis County Water Company plant and the Riverport developments south of Interstate 70. Maryland Heights officials long ago expressed their desire that the Page Avenue Extension not be elevated on a berm through this area, but instead be built at the level of the flood plain, facilitating exits from and entrances to the highway. The "City of Maryland Heights Comprehensive Plan, Plate 5: Future Land Use Concept" (undated) indicates that, subject to future fortification of the levee from its current 100-year flood protection level to a 500-year level, large areas of the flood plain are to be set aside for "planned commercial" space. According to this map, the intent is that such space would surround the interchange between the Page Avenue Extension and a proposed north-south highway which would join Earth City Expressway to the north with Mo. Hwy. 141 to the south. This space would also be near a second proposed highway interchange between the Earth City/141 connector and a proposed north-eastward extension of Mo. Hwy. 109. The map entitled "Conceptual Master Plan" found between pages 34 and 35 of the DSEIS illustrates a plan for parkland associated with Alternative B (the preferred LCCL Alternative), and although it does indicate that this so-called park land would be bisected and bordered by at least two high-speed limited-access highways and at least one clover-leaf intersection, it does not at all indicate the intention of the City of Maryland Heights that this park land would eventually be surrounded by commercial buildings and associated development such as parking lots. Much or all of this development and associated vehicle traffic would be visible and audible from the proposed replacement park lands, since no topographic or other features exist on the bottomland to inhibit it. Therefore, the currently proposed land-use plans of local municipalities must be integrated into the Final SEIS, in order to give a complete picture of the environment within which the Alternatives would be located.

We, the taxpayers, continue to pay the price of development of the flood plains of the two largest rivers on the continent, as we absorb direct and indirect costs resulting from the Great Flood of 1993. For any government to plan and actively encourage expensive commercial and industrial construction on such land is the height of folly. An extension of Page Avenue can only encourage the realization of such short-sighted planning.

We thank you for the opportunity to comment, and for your time and consideration.



# Sierra Club

Eastern Missouri Group

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Sincerely,

*Diane J. Albright*

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*Jeff Tipper*

CONSERVATION CHAIR, EASTERN MISSOURI GROUP

Enclosures

Map #1

# CREVE COEUR PARK

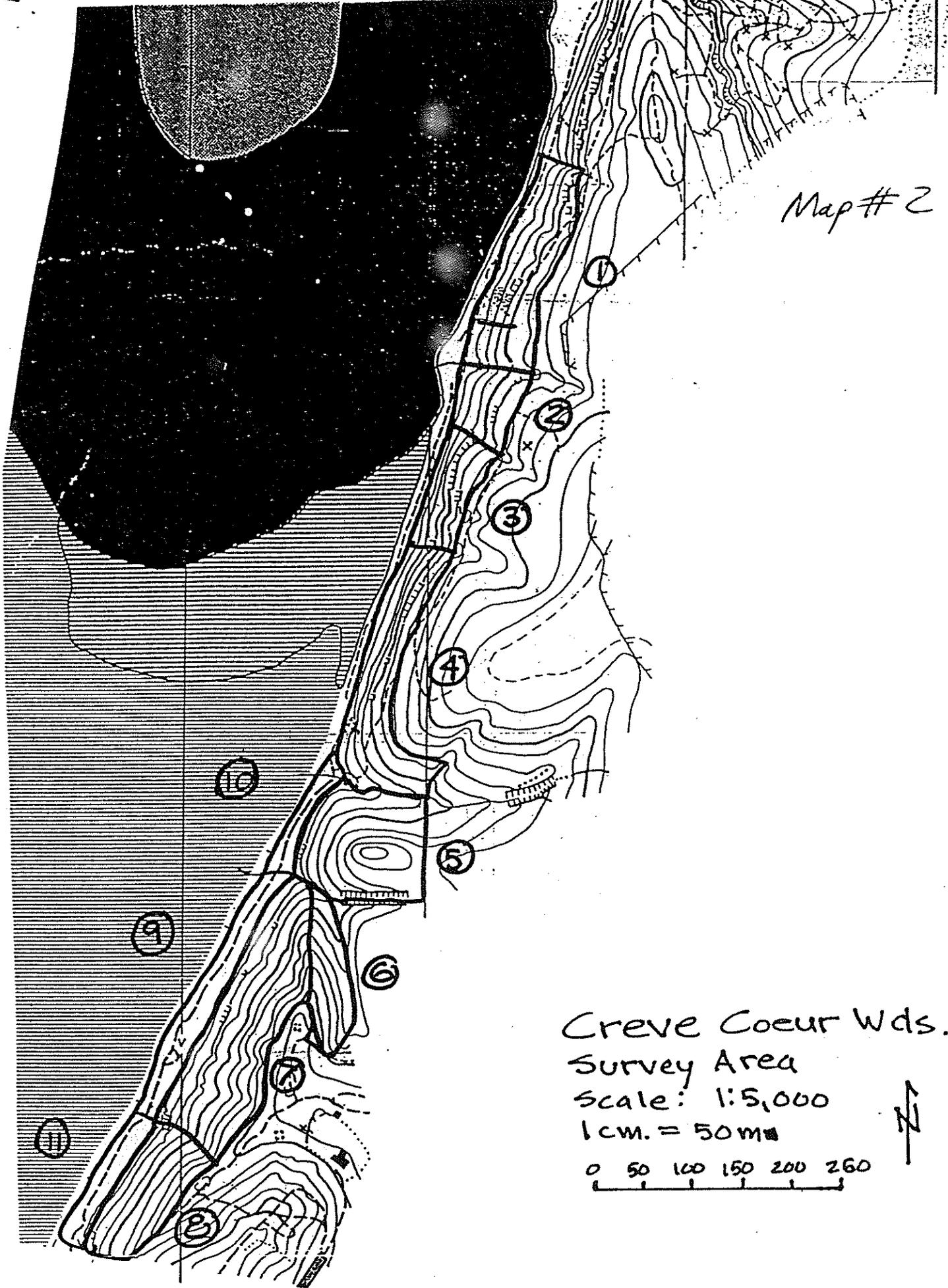
ST. LOUIS, MISSOURI

SCALE 1:10000  
CONTOURS 10 FEET



	Contour / Gully / Ditch
	Depression: large, small / Pit
	Earth Bank / Knoll
	Broken Ground / Stony Ground
	Boulders: large, small, many
	Cliff: impassable, large, small
	Lake / Uncrossable Marsh
	Marsh: wooded, open, seasonal
	Stream: uncrossable, small / Ditch
	Waterhole / Water Feature
	Open / Semi-Open / Slow Run
	Slow Run / Walk / Fight
	Vegetation Change / Single Tree
	Roads
	Trails
	Fences
	Buildings / Ruin
	Manmade Features

Map # 2



Creve Coeur Wds.

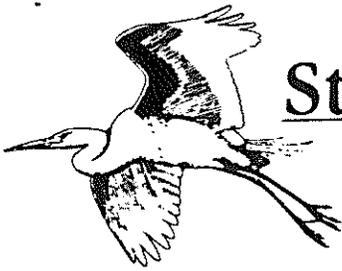
Survey Area

Scale: 1:5,000

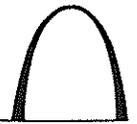
1cm. = 50m

0 50 100 150 200 250





# St. Louis Audubon Society



(314) 822-0410

James N. Holsen  
419 E. Argonne Drive  
Kirkwood, Missouri 63122

17 August 1994

Mr. N. Clay McDermeit  
Chief, Western Heartlands Division  
Recreation Assistance Programs  
Midwest Regional Office  
National Park Service  
1709 Jackson Street  
Omaha, Nebraska 68102

RECEIVED  
NATIONAL PARK SERVICE  
AUG 23 1994

- Ref.: 1. Draft Supplement to the Final Environmental Impact Statement - Page Avenue Extension. St. Charles and St. Louis Counties, Missouri. Prepared by the U.S. Department of the Interior, National Park Service, June 1994.
2. Final Environmental Impact Statement - Page Avenue Extension, prepared by Booker Associates, Inc., for the Federal Highway Administration, U.S. Department of Transportation, and the Missouri Highway and Transportation Department, Nov. 1992.

Dear Mr. McDermeit:

The St. Louis Audubon Society, with 2800 members in the metropolitan area, is pleased to respond to your request for comments on the Supplementary Environmental Impact Statement (SEIS) prepared by the National Park Service.

It is proposed to construct the "Red Alignment" of the Page Avenue Extension over a portion of Creve Coeur Lake Memorial Park (CCLMP) in St. Louis County. Since some lands in the park were purchased and/or developed with federal money, Section 6(f)(3) of the Land and Water Conservation Fund Act requires that the sponsor, the Missouri Highway and Transportation Department (MHTD), provide additional replacement park lands of equal or greater equivalent usefulness and fair market value. The replacement lands must be approved by the Secretary of the Interior.

Mr. Bruce Babbitt, the Secretary of the Interior, has determined that the original package of replacement lands offered by MHTD does not offer reasonably equivalent usefulness, particularly in the light of the scale and scope of this highway project. Several supplementary replacement land packages were suggested during the Summer of 1993. This Draft SEIS was prepared by the National Park Service (NPS) to evaluate the usefulness of the several supplementary replacement land packages.

The St. Louis Audubon Society has long opposed the Page Avenue Extension, and particularly the Red Alignment over CCLMP, for many reasons. The highway represents bad urban planning and has many undesirable environmental consequences. Much has happened in the 20 to 25 years that this highway has been under consideration. Considerations of atmospheric and water pollution, efficient use of energy, flood damage control, and the steady loss of wetlands and wildlife habitat all require that we reevaluate the necessity for this highway as presently proposed.

St. Louis Audubon Society has several considerations of a general nature with respect to the SEIS and several specific comments regarding the proposed alternative replacement packages. We will discuss these in that order.

## Comments of a General Nature

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1. **The SEIS does not adequately evaluate the consequences of the proposed highway corridor through Alternative B and along the eastern edge of Alternative C** - In laying out the replacement lands for Alternative B, which includes much of the area known as Little Creve Coeur Lake (LCCL), MHTD reserved a corridor along the western edge of the slightly higher land to the west of Creve Coeur Mill Road. An interchange with the proposed Page Avenue Extension is shown on the Conceptual Master Plan opposite page 34 in the SEIS. This corridor is obviously designed to accommodate an extension of Missouri Highway 141 north from Olive Blvd. If that highway is constructed, it is almost certain that an Earth City Expressway Extension will also be constructed from the Riverport area south to the Page Avenue interchange. For the purpose of evaluating noise impact on nearby replacement lands, NPS has assumed a four lane highway divided with a concrete barrier (SEIS, p. 34), but they persist in ignoring the likely possibility that the Earth City Expressway Extension will be constructed, stating that "A reserved corridor for future transportation purposes in that area has not been identified and, therefore, noise impacts from future actions would be purely speculative."

In fact, the Future Land Use Plan for the City of Maryland Heights shows both MO Highway 141 and the Earth City Expressway extension, as well as a new MO Highway 109 along the edge of the floodplain from the Chesterfield area to the south. A new Howard Bend Levee District proposal, to be discussed later, expresses the view of the proponents that "the Page Avenue Extension was part of a comprehensive plan including the construction of the Earth City Expressway/State Highway 141 Extension and the construction of a connecting highway to State Highway 109."

It is clear to everyone in St. Louis County that the reservation of a corridor through the replacement parkland of Alternate B, and along the eastern edge of Alternative C, will facilitate the construction of major expressways through the floodplain. The implications of that construction should have been considered in all of their variations. That evaluation would show that acceptance of the reserved corridor will in all likelihood lead to intensive commercial and industrial development in the floodplain west of CCLMP. Instead, only a limited assessment of the noise impact along the proposed highways was discussed.

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2. **The effects of induced floodplain development on the replacement parklands as well as their effects on the common good of the metropolitan area must be evaluated.** Section 4.10 of the SEIS, p. 37, considers Secondary and Cumulative Impacts, including future development on the floodplain and, after noting that "the pressure to ultimately develop these areas is increasing," goes on to reach the conclusion that "if a passive use wetland management area were to be established in those areas, an environmentally beneficial secondary impact of limiting or precluding future development would be realized (regardless of whether or not a 500-year levee is constructed)". This is not an evaluation of the effects of induced development on the replacement parklands. A realistic evaluation would picture the proposed "wetland management area" in the midst of an intensive commercial and development complex, with a ten-lane expressway running along the northern edge and a second major expressway running through the middle. To what extent can such a wetland area in the midst of a development complex fulfill the various functions of a true wetland?

"Wetlands are important to the public interest because of such functions as food chain production, nesting, spawning, rearing, and resting sites for aquatic and land species, discharge or recharge areas for ground waters, and purifying the water in our waterways." That is how the Corps of Engineers described the importance of wetlands in a letter to James F. Roberts of MHTD, dated 1 Feb 1989 (FEIS, Vol. 3, p. 14). The NPS should have considered how many of these functions can be fulfilled in a wetland area surrounded by industrial development and subject to excessive noise, chemical run-off from highways and roadways, all draining into the LCCL area, air pollution from two intersecting highways, and all of the other impacts of civilization.

The possibility of induced development was considered at several places in the FEIS (Ref. 2, above), but in each case the discussion was followed with a remark intended to demonstrate how unlikely it is that floodplain

development will follow construction of the Page Avenue Extension. Thus induced development is never seriously considered in the FEIS.

The likelihood of future induced development on the floodplain is, probably correctly, linked to the provision of 500-year flood protection. Thus in the FEIS, Volume 1, pages 1-1 and 1-2, under Section 1-1 -- Background/Project Status, we read: "It should be clearly understood by all reviewing this document that the Page Avenue Extension will not increase flood protection to the 500-year level for any area on the floodplain and, therefore, will not encourage floodplain development by providing an increase in flood protection. Moreover, the Kansas City District, Corps of Engineers, noted in an August 9, 1990, letter to MHTD that in St. Louis County the majority of the remaining Missouri River floodplain cannot be protected by levees which afford any substantial degree of flood protection, due to the resulting increases in upstream water surface profiles beyond regulatory limits." On page 3-36, Section 3.8.3 -- Projected Land Use, we read: "Only modest amounts of new development are projected, or will be possible within the St. Louis County portion of the project area given the relative lack of flood protection ... ."

At another point in the FEIS (p. 4-91, Section 4.14.2 -- Floodplain Development Potential) it is stated that "... a minimum of 3,000 net-developable acres of mostly agricultural land can be identified as the likely focus of induced project area development that might occur if sufficient flood protection were provided ... ." The impact of development "30 years after enhanced flood protection systems begin to be put into place" is discussed on p. 4-92. There it is found that development would most likely radiate from the Page Avenue Extension interchange and from the southern end of Riverport. Then we read: "However, this area is being considered for a comprehensive floodplain wetland/natural area which would include mitigation wetlands for those impacted by the Page Avenue Extension," which again serves to diminish the significance of the entire discussion of floodplain development.

In Section 4.23.1 -- Secondary Land Use Impacts, p. 4-156, it is mentioned that "construction of a Page Avenue Extension, particularly in conjunction with the Earth City Expressway Extension, would increase demands for enhanced flood protection for a large percentage of the St. Louis County floodplain." But again, that possibility is negated by a following statement that refers again to the letter from the Corps of Engineers to the effect that 500-year levees will not be permitted because they will increase upstream water surface profiles beyond regulatory limits.

No mention had been made in the FEIS of a possible extension of Highway 141. The possibility of extending the Earth City Expressway south from Riverport had been discussed in the FEIS (Sections 4.23.2 through 4.23.8, pp. 4-158 -- 4-163), but it was stressed that "there is no reason to believe that the Earth City Expressway Extension will be implemented during the immediate future." MHTD said that such an extension, if it were to occur, would be a county road and that MHTD "has no interest in building, operating or funding the Earth City Expressway Extension." MHTD did, however, state that it would make provision "for a potential Page Avenue Extension/Earth City Expressway Extension interchange.

**The new factor to be considered here is the fact that a reserved corridor for Missouri Highway 141 greatly increases the probability that Highway 141 will be constructed. If that should occur, it is almost certain that the Earth City Expressway Extension will also be constructed. The possibilities for commercial and industrial development offered by these new major traffic thoroughfares will make it inevitable that the fight for 500-year levee protection will be fought until it is won. Intensive development will follow.**

**NPS should recognize the greatly increased probability for induced development and realistically evaluate the effects of that development on the replacement parklands.**

The effects of major neighboring highways and of an adjacent commercial/industrial area are major ones that require an honest evaluation. It is pointed out that a number of ponds and/or lake areas are provided in the Earth City development north of Highway I-70, but wildlife such as ducks, shorebirds and herons are never found there although all are found in CCLMP and in the Little Creve Coeur Lake area further south

The Corps of Engineers is charged with considering the cumulative impacts of the proposed activity on the public interest. They should note that on page 4-93 in the FEIS, in a continuing discussion of floodplain impacts, it is said that, if such development were to occur, "many of these jobs ... would probably represent the relocation of economic activities from other commercial and industrial centers. Downtown St. Louis, Clayton, and older industrial areas ... would all be affected ... ." Many social problems arise in part from the loss of jobs in our older cities. We should do nothing to further the loss of jobs in established neighborhoods.

### 3. Intense Political Pressures Exist for Floodplain Development in St. Louis County.

The SEIS should recognize the intense political pressure that is pushing for 500-year levee protection and commercial/industrial development around the proposed interchange in the floodplain. These are mentioned in Section 3.13.1 – St. Louis County Planning, pp. 3-52 through 3-55, where it is noted that the County "Land Policy Map designates most of the Missouri River floodplains within the St. Louis County portion of the project as "Undeveloped Floodplain with Development Potential." The County Executive has consistently worked for further development, despite the analysis by MHTD, cited above, that new development on the floodplain will take business away from established commercial and industrial centers in the County and City of St. Louis.

In the same Section it is noted that most of the floodplain on the St. Louis County side of the Missouri River lies within the City of Maryland Heights and that the city "recognizes that the issue of floodplain development is vital to the community's future." A Comprehensive Plan for the City of Maryland Heights, prepared in 1987, assumes 500-year levee protection, completion of the Earth City Expressway and Highway 141 extensions, and construction of a Missouri Highway 109 Extension north along the floodplain from Chesterfield. A map for the 1987 Plan is shown in Figure 1. The proposed Page Avenue Extension interchange is shown at the "target" symbol in the central left-hand quarter of the figure. The key is difficult to read, but it shows the interchange is surrounded by a planned "mixed use environment" which, in turn, is surrounded by a planned "commercial development." Approximate locations for the wetland mitigation sites B and C, as denoted in the FEIS, are sketched on the figure. Maryland Heights has been described as aggressive in attracting industrial and commercial development, to reduce or eliminate property taxes on residents. The floodplain is about the only undeveloped land left within this already large County municipality which is "grown oriented."

Maryland Heights is still pursuing the goal of floodplain development. On July 27, 1994, the City Council passed a resolution opposing the "Preferred Mitigation Plan" for the Page Avenue Extension, and endorsing a new plan recently proposed by the Howard Bend Levee District in a letter to Mr. Bruce Babbitt, Secretary of the Interior, dated June 30, 1994. That new plan places the mitigation parklands and wetlands outside the central floodplain, which is presumed to be protected by 500-year levees. With this plan the entire central floodplain will be open to development. With the NPS Alternative B, the Preferred Mitigation Plan referred to above, a significant portion is removed from development. This new plan is discussed in greater detail later in this letter.

**Recent actions by the City Council of Maryland Heights and by the Howard Bend Levee District demonstrate that intense pressure for floodplain development still exists. The reserved corridor for the Missouri Highway 141 Extension encourages speculation that all of the floodplain can be opened for development.**

Anticipated political pressures make it likely that 500-year levee protection and commercial development will follow any provision for major highway extensions in the floodplain. These pressures should be considered in evaluating the effect of the proposed reserved corridor on the replacement parklands discussed in the SEIS.

### 4. Analysis of Traffic Patterns at the Eastern End of the Page Avenue Extension Questioned.

Few questions have been asked about the traffic flow analysis presented by MHTD in the FEIS. However, an examination of Figure 2.4 (FEIS, Volume 2), which presents the expected traffic volumes in vehicles per day in

the year 2015, raises some questions. Approximately 73,500 vehicles per day are expected on the Page Avenue Extension as it crosses the Missouri River.

The western terminus of the present Page Avenue is at Bennington Place, west of I-270 in western St. Louis County. Figure 2.4 shows that much of the traffic to and from the Page Avenue Extension will travel over relatively minor roads between Bennington Place and I-270. These roads include Fee Fee Road, Ross Avenue, and McKelvey Road. Figure 2.5 shows that Olive Blvd., to the south of Page Avenue and expected to carry much of the traffic from Ross Avenue and Fee Fee Road, is expected to be in the "Level F" category, in which traffic demand exceeds capacity.

There is no effective entrance or exit for traffic on to or off of the Page Avenue Extension. Page Avenue running east from Lindbergh Blvd. into St. Louis is a heavily traveled city street with frequent stop signs. The two major north-south streets, Lindbergh Blvd. and I-270, are already heavily traveled during rush hours and can hardly be expected to absorb the traffic from a ten-lane divided expressway. The relatively minor streets from Bennington Place to Olive Blvd. and McKelvey Road will be overtaxed, as will be the case with Olive Blvd. itself. **It must be concluded that the proposed Missouri Highway 141 and Earth City Expressway extensions are essential to the success of the Page Avenue Extension. Only the north-south Highway 141/Earth City Expressway connections will be able to funnel traffic on to and off of the proposed ten-lane Page Avenue Extension.**

This preliminary traffic analysis suggests that there will be further pressure from MHTD and others for the approval of the Missouri Highway 141/Earth City Expressway extensions. That pressure will add to the likelihood of commercial and industrial development on the floodplain.

## 5. Evaluation of Proposed Wetland Mitigation Sites Flawed

17 It is not clearly stated in the SEIS, but it seems to be inferred, that the lands of Alternative B and, probably, of Alternative C, if either site is selected, would serve as mitigation wetland sites under Section 404 of the Clean Water Act. Section 4.12 of the FEIS, Habitat and Wetland Impacts/Wetland Mitigation Plan, presents a discussion of wetlands impacted by the proposed Page Avenue Extension and offers an evaluation of several areas that were considered as potential wetland mitigation sites that could be used to off-set the loss of wetlands to highway construction. Table 4.12-3, page 4-83 (Vol. 1), presents a summary of the evaluation of six proposed sites. The six sites are evaluated on a basis of 1 to 6, with an evaluation of 1 being the best of the alternatives. Site A, a mitigation site in the wooded, wetland area south of the proposed bridge over Creve Coeur Lake, while evaluated, was not considered as a possible alternative because it was offered as parkland as part of the CCLMP Mitigation Plan.

First of all, it is asked why Alternatives B and C of the NPS parkland mitigation plan should be considered as wetland mitigation sites when the alternative wetland mitigation site, Site A in the wetland mitigation plan of the FEIS, was not allowed as a wetland mitigation site. (Site A was the new land south of the present CCLMP that was to added to the parkland.)

If Alternative B, or C, of the NPS parkland mitigation plan is to be considered as a wetland mitigation site, then it is important to recognize that the wetland mitigation analysis presented in the FEIS was flawed. The wetland mitigation plan is presented in Section 4.12, pp. 4-71 -- 4-86, of the FEIS. That section describes an evaluation of six potential wetland mitigation sites. The sites are described in Table 4.12-2, p. 4-80, and the results of the evaluation are presented in Table 4.12-3, p. 4-83. All sites received a high rating ("1") for "potential for replacement in kind." Site B, a borrow pit or slough running along the highway across the floodplain toward the Missouri River crossing, received a high rating of "2" for "Use without disruption of existing resources," "Self maintaining," "Habitat diversity/Adjacent land use," and for "Management protection and control." Site C, said to represent Upper Creve Coeur Lake (Little Creve Coeur Lake in the NPS SEIS), but in reality slightly higher land "adjacent to Upper Creve Coeur Lake," received ratings of 5, 1, 2, and 1, respectively, for the latter four criteria

noted above. The last three sites (Green's Bottom, Catfish Island, and Bonhomme Island) received lower ratings on the average.

On the second page (unnumbered) following the title page to the FEIS is a list of ten backup technical reports. Number nine in the list is the Wetlands Mitigation Report. This report, undated but prepared by Booker Associates, as was the FEIS, was not available for distribution, but was examined in the offices of MHTD in Chesterfield, Missouri. This Wetland Mitigation Report described the same mitigation site analysis, using the same sites and the same evaluation criteria. The results of the wetland mitigation site analysis reported in the backup technical report are, however, quite different from the results presented in Table 4.12-3 of the FEIS. No explanation is offered for the different results.

Results of the two wetland mitigation site analyses are compared in Figure 2. Ratings shown in the FEIS in Table 4.12-3 are shown as ordinary numbers. The corresponding ratings presented in the earlier backup Wetland Mitigation Report are shown within circles. In the earlier Wetland Mitigation Report Sites B and C were rated 6 and 5, respectively, in "Potential for replacement in kind," while the three remaining sites were rated 4, 2, and 2, respectively. Overall, Site B (the borrow pit or slough) had the worst rating in the earlier report, but the highest rating in the evaluation published in the FEIS.

**It appears to a casual observer that there is no basis in fact for the evaluation presented in Table 4.12-3 of the FEIS. One must conclude that the earlier evaluation was deliberately "modified" to reflect the outcome desired by MHTD. This analysis of an important component of the Section 404 mitigation plan makes a farce out of the environmental analysis process.**

MHTD must be required to explain the differences between the two evaluations before Alternative B in the NPS parkland mitigation plan can be accepted as a wetland mitigation site. A new EIS should take into account the probability that the two wetland mitigation sites selected by MHTD, while unsatisfactory in the first place, will in all probability be lost to future development in the floodplain. A new analysis is required. The two selected sites, Sites B and C, are sketched on Figure 1.

#### Comments Specific to the NPS Alternative Sites

##### 1. Site B, Little Creve Coeur Lake

33 { The full effects of the proposed interchange on the replacement parkland are not fully evaluated in the SEIS. The scale of the proposed interchange will certainly be larger than is represented in the Conceptual Master Plan, an unnumbered figure opposite page 34 in the SEIS. Reference to the USGS topographical map for the Creve Coeur Quadrangle (photorevised in 1974) shows that the then existing interchange Page Avenue/I-270 intersection was considerably larger than the interchange shown on the Conceptual Master Plan. (The two maps are to the same scale.) At that time I-270 was a four lane divided highway, whereas the Page Avenue Extension will be a ten lane divided highway. The present-day interchanges at the I-270/I-70 and I-270/I-64 intersections are much larger. The proposed interchange will have a far greater impact on the replacement parklands than is suggested in the SEIS.

34 { The evaluation of Alternative B, the Little Creve Coeur Lake area, does not take into account such factors as contaminated run-off from the Page Avenue Extension and the proposed Missouri Highway 141 extension through the reserved corridor. Little Creve Coeur Lake is in the drainage area for both areas and will be heavily impacted by drainage from these two major highways. The almost certain probability, given the Highway 141 extension, that the Earth City Expressway Extension will be constructed north of the proposed interchange and in the Little Creve Coeur Lake drainage area has not been considered. Contaminated run-off from the area of potential commercial development north of the proposed Page Avenue Extension will also run into the Little Creve Coeur Lake drainage area, and from there into the Creve Coeur Lake drainage system. **These run-off effects have not been evaluated.** Noise and visual impacts will also be greater than suggested in the NPS evaluation.

Alternative B, described as Little Creve Coeur Lake, does not include all of the Little Creve Coeur Lake area. Today the shallow inundated area known as Little Creve Coeur Lake extends from several hundred feet from the southern bluff area to within a few hundred feet of the northern arm of River Valley Drive. The part of Little Creve Coeur Lake that lies north of the proposed Page Avenue Extension is included in the FWS Alternative C, although there is no indication that this northern part of Little Creve Coeur Lake will be included as a lake area in Alternative C. Alternative B (Little Creve Coeur Lake) does not include all of the wetland area known as Little Creve Coeur Lake and depends on drainage from the lowland area north of the proposed Page Avenue Extension for a significant portion of the waters that will supply that wetland area. The effects of contaminated runoff from the Page Avenue Extension, Highway 141 Extension, and (most probably) from the Earth City Extension, all of which will drain into the Little Creve Coeur Lake area, have not been evaluated.

## 2. Alternative C – The FWS Proposed Alternative

The description of the FWS Alternative C replacement lands does not recognize that this area includes the northern part of Little Creve Coeur Lake. As discussed under Alternative B, the northern part of the lands presently inundated and known as Little Creve Coeur Lake extend on the north to within a few hundred feet of River Valley Drive. Judging from the discussion in the draft SEIS, however, there appears to be no intention of recreating Little Creve Coeur Lake in the northern parcel of Alternative C, and perhaps that is just as well since that parcel is cut-off from the southern portion of Alternative C by the Page Avenue Extension and will, in all probability be bounded on the east by the proposed Earth City Expressway Extension.

Alternative C includes drainage from the lowlands north of Page Avenue, but it does not include control over the larger LCCL drainage area west of Little Creve Coeur Lake. That area will most likely be developed as a commercial and industrial park, if we follow the Future Land Use Concept proposed by the City of Maryland Heights. As with Alternative C, this Alternative will be impacted from contaminated runoff from the areas of commercial development, from the Page Avenue Extension and, probably, from the Earth City Expressway Extension, since it will be lower in elevation than both proposed highways. Noise and visual impacts will also be problems.

Alternative C will not be favored by proponents of commercial and industrial development in the floodplain since, in this case, the lands reserved for Alternative C will cut the prime areas for development into two separate portions, and the portion to the west will not, under the present plan, have easy access to the Page Avenue Extension or to the lands to the east of Alternative C.

If the lands proposed for Alternative C were to include the drainage area between the present Alternative C and the higher lands along River Valley Drive (west of Alternative C), then a much larger portion of the drainage area could be included in the protected area. As the present proposal stands, the area of Little Creve Coeur Lake stands to be at the mercy of contamination from development in a large portion of the floodplain region west of the present protected region and of development in the higher elevations (about 5 to 10 feet) to the east, between LCCL and Creve Coeur Mill Road. For these reasons, while Alternative C is superficially attractive as a parklands mitigation area, it is deficient in not providing the watershed protection that is necessary, given the almost certain commercial development of the floodplain areas to the east and west of the protected area.

## 3. Alternative D – Howard Bend Levee District Alternative

This 165 acre site north of CCLMP, and adjacent to a newly developing commercial district near the northeast corner, does not represent adequate compensation for parklands lost to highway construction. Since the land is private property and posted, it is not readily accessible. The SEIS (p. 18) describes the area as containing a 50 acre "patch of floodplain woodland species." There cannot be much water in the area because Louiselle Creek, is a narrow ditch as it crosses Creve Coeur Mill Road. The automobile salvage yard, described (SEIS, p. 10) as

"located in the northwestern corner of the area, between the western boundary and the St. Louis Southwestern Railroad." is, in fact, within the larger portion of the tract to the east and south of the railroad. What is without doubt the main shed for the salvage yard is shown on the figure for the Howard Bend Levee Dist. Alternative as a black rectangle near the western boundary of the tract. Whereas the USGS Creve Coeur Quadrangle topographic map shows a rather large wetland area around the southern part of CCLMP, the wetland areas in Alternative D are not deemed sufficiently significant to be shown on the map.

#### 4. Alternative E — MHTD Proposal

Contrary to the SEIS, the automobile salvage yard is located within the northern portion of this area, as noted in the discussion above for Alternative D. Since the wooded upland in the southern portion of this area is already developed to some extent, this is not a desirable alternative for the undeveloped wetlands impacted by the proposed highway.

#### Comments on the New Howard Bend Levee District Proposal

By letter dated June 30, 1994, the Howard Bend Levee District presented Mr. Bruce Babbitt with a new parkland mitigation proposal. This proposal calls for adding 97 acres of new parkland in an area to the south of the existing CCLMP. It is also proposed that Jane Downing Island (on the St. Louis side of the Missouri River, near the proposed crossing of the Page Avenue Extension) and approximately 400 acres in the Catfish Island/Green's Bottom area (west of CCLMP, but on the St. Charles County side of the Missouri River) be purchased and added to the "proposed mitigation" areas. In addition, it is suggested that the area known as Jackass Bend, along the Missouri River in western Missouri, be included as part of a mitigation plan for all of the highways (Page Avenue Extension, Highway 141 Extension, Earth City Expressway Extension, Highway 109 Extension) that are planned to be constructed in the floodplain.

This proposal leaves all of the floodplain west of CCLMP open for commercial development, and that is, in fact, the reason that it has been proposed. The proposed additional lands are located outside the area which is intended to be protected by 500-year levees.

It is not clear from this proposal whether or not the proposed areas on Jane Downing Island and in the Catfish Island/Green's Bottom areas are proposed as replacement parklands, or as wetland mitigation areas. If they are proposed as replacement parklands, their equivalent usefulness is questioned. If they are proposed as wetland mitigation sites, their selection would represent a net loss of wetlands, since those areas are shown as wetlands on SCS maps.

This proposal implies approval for four new highways in the floodplain, three of which have not gone through the NEPA evaluation process. Wetland impacts for the Highway 141 Extension, Earth City Expressway Extension, and Highway 109 Extension have not been evaluated.

#### Conclusions

34 { 1. The SEIS does not adequately evaluate all of the consequences of the proposed Highway 141 Extension on the replacement parklands. Among other effects, contaminated runoff from proposed highways and likely urban development will drain into the Little Creve Coeur Lake drainage area. The proposed Highway 141/Page Avenue Extension interchange will be much larger than is represented on the Conceptual Master Plan, with undesirable effects on the replacement parkland under evaluation.

4,5 { 2. The effects of induced commercial and industrial development in the floodplain have not been adequately evaluated. The presence of the reserved corridor for a Highway 141 Extension north from Olive Blvd. increases the pressure for commercial development. Neighboring commercial areas will have a detrimental

effect on CCLMP, which now provides a natural and relaxing environment away from the cares of urban life. The SEIS should recognize that a park surrounded by commercial and industrial areas will be irretrievably changed.

4. As presently conceived, the access roads near Bennington Place are insufficient to handle the anticipated traffic on the proposed ten lane Page Avenue Expressway. This fact will result in additional pressure for highway construction, and eventual commercial development, in the floodplain.

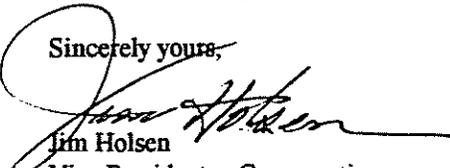
5. It is questioned whether any of the alternatives evaluated in the SEIS can be used simultaneously as replacement parklands and wetland mitigation sites. In its Wetland Mitigation Plan, MHTD did not consider its Alternative A as a valid wetland mitigation site since that land was to be purchased and added to CCLMP. Furthermore, the development described in the Conceptual Master Plan and the presence of adjoining highways will destroy the usefulness of the replacement parklands as true wetlands.

6. Alternatives B and C are flawed because both fail to protect the entire drainage basin for Little Creve Coeur Lake. Anticipated urban development will have detrimental environment effects.

7. Acceptance of the new Howard Bend Levee District proposal will imply approval for new highway construction, eventual 500-year levees, and extensive commercial and industrial development on the floodplain. This proposal cannot be considered without a new environmental impact statement.

8. We find that the new circumstances that flow from the reserved corridor for Highway 141 are so important to the future of the metropolitan area that a new evaluation is required.

Sincerely yours,

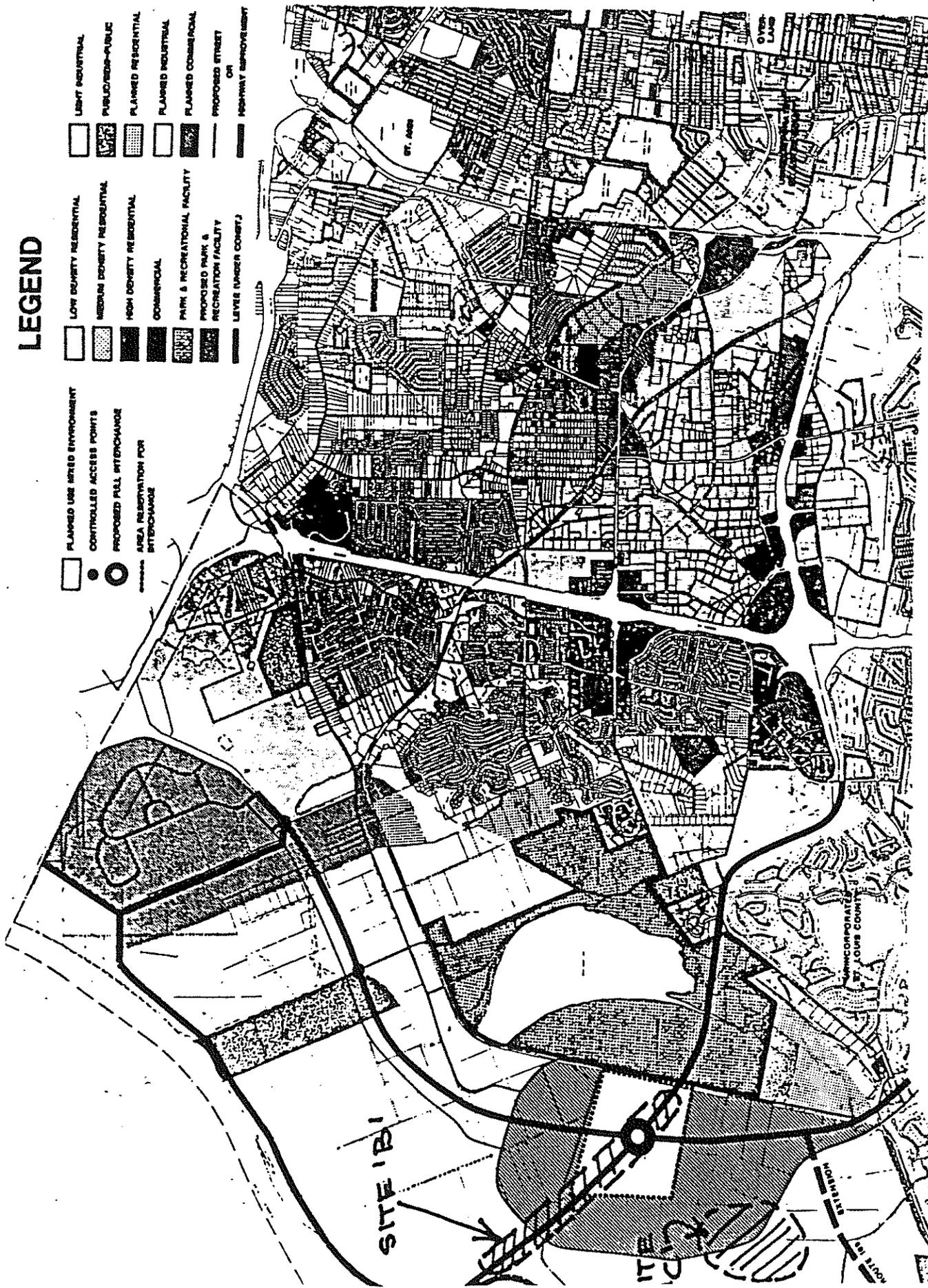


Jim Holten  
Vice President – Conservation

cc: U.S. Fish and Wildlife Service (Columbia, Mo., Twin Cities, Washington, DC)  
National Park Service (Washington, DC)  
Department of the Interior (Washington, DC)  
U.S. Environmental Protection Agency (Kansas City, Washington, DC)  
Federal Highway Administration (Jefferson City, Mo.)  
Missouri Department of Natural Resources (Jefferson City, Mo.)  
Missouri Department of Conservation (Jefferson City)

# LEGEND

- PLANNED USE MERE ENVIRONMENT
- CONTROLLED ACCESS POINTS
- PROPOSED FULL INTERCHANGE
- AREA RESERVATION FOR INTERCHANGE
- LOW DENSITY RESIDENTIAL
- MEDIUM DENSITY RESIDENTIAL
- HIGH DENSITY RESIDENTIAL
- COMMERCIAL
- PARK & RECREATIONAL FACILITY
- PROPOSED PARK & RECREATION FACILITY
- LEVELS UNDER CONSID.
- PLANNED INDUSTRIAL
- PUBLIC/REGIO-PUBLIC
- PLANNED RESIDENTIAL
- PLANNED INDUSTRIAL
- PLANNED COMMERCIAL
- PROPOSED STREET OR
- INDUSTRIAL IMPROVEMENT



## CITY OF MARYLAND HEIGHTS

PLATE 5

## COMPREHENSIVE PLAN

FUTURE LAND USE CONCEPT  
(SUBJECT TO LEVEE CONSTRUCTION)  
W/ SITES 1B1 & 1C1 LOCATED



FIGURE 1

SCREENING OF ALTERNATIVES: EVALUATION OF PROPOSED WETLAND MITIGATION SITES

The Evaluation Presented in Table 4.12-3, FEIS, p. 4-83, Compared With a Similar Evaluation Presented in the Technical Report "Wetland Mitigation Plan"

Site	Potential for Replacement in Kind	Use Without Disruption of Existing Resources	Self-Maintaining, Low O&M	Habitat Diversity	Sufficient Acreage	Management Protection & Control
A Park Mitigation Area	3 (1)	1 (1)	1 (1)	1 (2)	Yes (Yes)	1 (1)
B Adjacent to Right-of-Way	1 (6)	2 (2)	2 (6)	2 (6)	No (No)	1 (6)
C Upper Creve Coeur	1 (5)	5 (6)	1 (2)	2 (3)	Yes (Yes)	1 (2)
D Green's Bottom	1 (4)	5 (5)	2 (3)	1 (1)	Yes (Yes)	6 (3)
E Catfish Island	1 (2)	5 (3)	2 (4)	2 (5)	Yes (Yes)	6 (5)
F Bonhomme Island	1 (3)	5 (4)	2 (5)	2 (4)	Yes (Yes)	6 (4)

Key:

1. Sites are ranked from "1" to "6" relative to each other, a rank of "1" is best.
2. In each case, the number on the left is the evaluation reported in Table 4.12-3, FEIS, p. 4-83.
3. Numbers on the right and enclosed in circles are the corresponding evaluation presented in the referenced Technical Report entitled "Wetland Mitigation Plan."
4. Site A was on land to be added to Creve Coeur Lake Memorial Park and was not considered to be a possible mitigation site.





DEPARTMENT OF THE ARMY  
 KANSAS CITY DISTRICT, CORPS OF ENGINEERS  
 700 FEDERAL BUILDING  
 KANSAS CITY, MISSOURI 64106-2896

August 22, 1994

REPLY TO  
 ATTENTION OF:

Regulatory Branch  
 Operations Division  
 (93-00264)

RECEIVED  
 REGIMENTAL QUARTERS  
 '94 AUG 30 10:04  
 NATIONAL PARK SERVICE  
 MIDWEST REGION

Mr. William W. Schenk  
 Acting Regional Director  
 National Park Service, Midwest Region  
 1709 Jackson Street  
 Omaha, Nebraska 68102-2571

Dear Mr. Schenk:

Attached please find our comments on the draft Supplemental Environmental Impact Statement for the Page Avenue Extension, St. Louis/St. Charles Counties, Missouri.

If you have any questions concerning these comments, please feel free to write me or to call Mr. David R. Hoover, Project Manager, at 816-426-5047.

Sincerely,

Richard H. Goring  
 Colonel, Corps of Engineers  
 District Engineer

Enclosure

Copies Furnished (w/enclosure):

- Environmental Protection Agency
- Region VII
- U.S. Fish and Wildlife Service
- Missouri Department of Conservation
- Missouri Department of Natural Resources
- Missouri Highway and Transportation Department
- Federal Highway Administration

Kansas City District, Corps of Engineers' comments on the National Park Service draft supplemental environmental impact statement (DSEIS) for the Page Avenue Extension.

✓ Page 9, Section 2.2. - Although clarified in the second sentence, the word "expansion" in the first sentence is misleading because it tends to imply that all of the U.S. Fish and Wildlife Service (FWS) Alternative C acreage is included. It would be more correct to substitute "includes a portion" for "is an expansion."

✓ Page 9, Section 2.2. - The total acreage to be acquired for Alternative B is listed as 773.8 acres with the size being adjusted for Section 6(f)(3) replacement land to 464.8 acres. The reason for this adjustment should probably be noted here. Also, the acreage considered for Section 6(f)(3) replacement is only given for this alternative. The entire acreage listed for Alternatives C, D and E included within the Section 6(f)(3) boundary should be clarified.

34 } Page 10, Section 2.3. - This section notes that U.S. Fish and Wildlife Service (FWS) selected this 300 acre area to help insure provisions of an adequate water supply to Little Creve Coeur Lake (LCCL). This section also notes that FWS indicates that this aspect is crucial to the successful development and management of wetland habitat within this replacement area and should be secured prior to project implementation. It appears that it is the NPS goal to replace the equivalent usefulness of the wetlands that may potentially be impacted in the park, and that FWS has identified an area that is critical to the successful development and management of wetland habitat. However, it may be difficult if not impossible to develop a successful wetland habitat on the preferred Alternative B unless that alternative includes all of Alternative C, including the area between the proposed roadway and the existing River Valley Road.

As was expressed by the Corps and other state and Federal resource agencies present during the scoping meetings, the area between the proposed roadway and River Valley Road may be critical to the successful development and management of the Little Creve Coeur Lake as a wetland habitat.

✓ Page 11, Section 2.6.1. - The third paragraph, first line, should read "north and west of CCLMP."

35 ? } Pages 31 and 32, Section 4.3. - The final EIS for this project, dated November 1992, lists numerous historic and prehistoric sites located along all highway alternatives. Many of the areas surveyed and several historic sites are within these supplemental EIS alternative areas. One site, within the preferred alternative, is eligible for the National Register. In addition, one site adjacent to the northern portion of the Howard Bend

Levee District Alternative and the Missouri Highway and Transportation Department Alternative has been recommended for further testing and possibly could also be eligible for the National Register.

✓ Page 34, Section 4.6. - The SEIS should note what roadway heights were used in determining noise impact areas for the Page Avenue Extension and the Earth City Expressway.

Page 34, Section 4.6. - To assist NPS in determining potential noise impacts to the portion of the FWS Alternative located north of the Page Avenue Extension, we have included several maps that show the proposed route of the Earth City Expressway in this area.

29

Page 35, Section 4.7. - Although this section fully addresses the visual aspect of the reserved corridor on the LCCL and FWS Alternatives, there should be some discussion of the visual impacts to these alternatives from the proposed Page Avenue Extension.

36

Page 36, Section 4.9. - Although this section notes that none of the alternatives will have an adverse impact on existing airport facilities, currently there are plans to improve Creve Coeur Airport. These potential improvements should be taken into consideration and addressed in the SEIS.

✓ Appendix A, page 3 - The definition for Prior Converted could include the statement: "These areas are generally considered as nonwetlands by the COE."

**General Comments:**

✓ It should be noted in the "Background and Summary" section that NPS is not requiring any improvement or development of the additional lands.

✓ Maps showing each alternative should include their letter designation, for example - Alternative B: Little Creve Coeur Lake Alternative.

? We concur with the Environmental Protection Agency's request for extension or rescission of the DSEIS based on the new alternative presented at the public hearing.

20

? In regard to the Missouri appellate court decision concerning highway M-115 mitigation, we have concerns regarding the Missouri Highway and Transportation Department's lack of authority to condemn property for mitigation purposes. This should be addressed in the SEIS.

Open Space Council  
 For the St. Louis Region  
 P.O. Box 16122  
 St. Louis, Missouri 63105

REC'D  
 RECREATION  
 '94 AUG 22 P 1 50

August 19, 1994

MIDWEST REGIONAL OFFICE	
Regional Director	
Secretary	
Deputy Reg. Director	
Administration	
Operations	
Plan. & Resource Pres.	
<input checked="" type="checkbox"/> Rec. Asst.	
Public Affairs	
EEO Office	
Public Health Services	
Action taken & date	

National Park Service  
 Midwest Regional Office  
 1709 Jackson Street  
 Omaha, NE 68102-2571

Re: Draft Supplemental Environmental Impact Statement  
 Creve Coeur Lake Memorial Park - Page Avenue Extension  
 St. Louis County, Missouri

Dear Sirs:

We hereby submit our comments on the captioned DSEIS. We commend Secretary Babbitt for requiring a SEIS and the National Park Service for its diligence in preparing the DSEIS. We agree that the Preferred Alternative is the best of the four alternatives analyzed. Nevertheless, we offer the following comments and criticisms.

We are critical of the process involved in the so called "hearing" held in St. Louis County on August 3, 1994. This was not a public hearing in the usual sense of the word, but a session in which individuals and groups could make their comments in virtual privacy to one government agency at a time. The fact that an opportunity was afforded to record a statement was of little advantage to the public as a whole. At a more usual public hearing everyone can hear the comments that are made and there is an opportunity for response and interaction. Nothing demonstrates this more clearly than the fact that the Howard Bend Levy District, joined by the city of Maryland Heights, made a proposal of which we became aware only by chance well after the hearing. This proposal appears to add 150 additional acres of land to the proposal of the HBLD that was analyzed in the DSEIS. Moreover, only by a newspaper article appearing on August 15, 1994, did we become aware of an entirely new mitigation proposal being offered by a group of St. Louis County mayors. These matters should have been disclosed and discussed in an open public forum such as a more usual public hearing would have provided.

As to the substance of the DSEIS, we have the following comments.

2

1. The DSEIS is based on what appears to be the official adoption of a totally insupportable conclusion in the FEIS of the Missouri Highway and Transportation Department (MHTD). That conclusion is that the area of Creve Coeur Lake Memorial Park (CCLMP) being converted by the Page Avenue Extension is only 183.4 (rounded to 184) acres. In previous correspondence to you on this subject, we had pointed out that this acreage is determined by calculations used in the FEIS with respect to both the noise impact and the visual impact of this project. (See letter from J. Peter Schmitz dated July 6, 1993, addressed to Mr. Castleberry.) In our previous letter we questioned both the appropriateness and the application of the 57 dBA standard for noise impact and pointed out the total unreality of the small area supposedly subject to visual impact. Those comments are still applicable and should be reviewed. We believe that the real impact of the project on CCLMP is much greater than 184 acres.

4,5

2. The DSEIS treats the Highway 141/Earth City Expressway (141/ECE) quite ambiguously. On page 25, at the end of section 4.1.3, the DSEIS seems to say that 141/ECE is hardly worth considering because of lack of funding and low priority status. However, on pages 20 and 21, in section 3.11, the DSEIS notes that the Preferred Alternative is located within the City of Maryland Heights and that Maryland Heights includes in its zoning ordinance a Future Land Use Concept which assumes both the Earth City Expressway and an area reserved for a highway interchange with the Page Avenue Extension. The DSEIS also notes in section 3.11 on page 21 that the Future Land Use concept of the Maryland Heights Zoning Ordinance assumes construction of a 500 year levee to protect the flood plain area of Maryland Heights.

4

3. The DSEIS, without any explanation that we can discover, employs a 65 dBA test for delineating land in the Preferred Alternative which will supposedly be impacted by the 141/ECE. If the 57 dBA test used for establishing the impact of the Page Avenue Extension on CCLMP were used with respect to 141/ECE, the arithmetic used in calculating the acreage excluded from the 6(f) replacement land would be very different, and more land would be excluded. We are without the technical ability to assess the amount of that difference, but we believe it would be substantial. Certainly both the reason behind the use of the 65 dBA standard for the 141/ECE extension and the difference in excluded acreage between using that standard and the 57 dBA standard should be discussed in the final SEIS.

4. The DSEIS nowhere deals with the question of whether

4

141/ECE would be constructed at grade level (because protected by a 500 year levee constructed closer to the river) or whether it would be elevated to provide flood protection for itself. The use of the 65 dBA standard in connection with an elevated highway might give far different results than if it were built at grade.

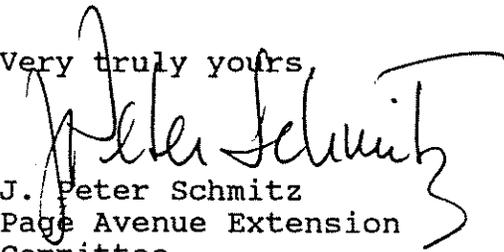
5. Despite the aforementioned ambiguity, the DSEIS does, for 6(f) purposes, reserve a corridor for 141/ECE, albeit a corridor of insufficient width because based on a 65 dBA standard for noise impact. The question is whether this reservation encourages or discourages the eventual construction of 141/ECE. We are prone to think that there is sufficient encouragement so that a proper SEIS should also discuss the cumulative impacts which would result from the building of this highway. One of the purposes of 141/ECE would be to open up the Missouri River flood plain to development.

4

6. A group of 12 St. Louis County mayors, calling themselves the Coalition of West St. Louis County Mayors, has written to Secretary Babbitt taking an opposite position that the preferred alternative will preclude the construction of the "much needed" 141/ECE. This group also complains that the DSEIS does not take into consideration and "equally vital" new roadway connection between the Chesterfield Valley (highway 109) and the 141/ECE. We were previously unaware of any plan for this connection, but it simply adds weight to our argument that the plans of those interested in development of the Missouri River flood plain for commercial and municipal purposes must be taken into consideration in coming up with a SEIS which accurately evaluates a mitigation plan for the proposed Page Avenue Extension.

7. Finally we note what we consider a major defect. The MHTD FEIS assumes the non-existence of the Earth City Expressway while the DSEIS grudgingly and inadequately provides for it. We question whether this incongruity is in compliance with the requirements of the National Environmental Policy Act (NEPA) for an appropriate EIS.

Very truly yours,

  
J. Peter Schmitz  
Page Avenue Extension  
Committee



**CRAWFORD, MURPHY & TILLY, INC.**  
 CONSULTING ENGINEERS  
 2750 WEST WASHINGTON STREET  
 SPRINGFIELD, ILLINOIS 62702-3497  
 (217) 787-8050 FAX (217) 787-4183

August 18, 1994

Mr. N. Clay McDermeit  
 Chief, Western Heartlands Division  
 Recreation Assistance Programs  
 Midwest Regional Office  
 National Park Service  
 1709 Jackson Street  
 Omaha, Nebraska 68102

RECEIVED  
 RECREATION PROGRAMS  
 94 AUG 22 10:28  
 NATIONAL PARK SERVICE  
 WASHINGTON, D.C.

Dear Mr. McDermeit:

Re: Statement Concerning Supplemental Environmental  
 Impact Statement (SEIS) Being Prepared By The  
 National Park Service Regarding Proposed Page  
 Avenue Extension Project

As the engineer/planning consultants for the Creve Coeur Municipal Airport (CCMA), we offer the following comments on the above-referenced project. These comments have been prepared pursuant to review of the SEIS document and attendance at the public hearing on August 10, 1994.

The Creve Coeur Municipal Airport is a public use-general aviation airport facility, which represents a significant local and federal investment. The Creve Coeur Municipal Airport has been designated as a reliever airport to St. Louis International-Lambert Field by the Federal Aviation Administration (FAA). The airport is listed within the FAA National Plan of Integrated Airport Systems (NPIAS) and has received federal funding for airport development. It is imperative that the Page Avenue project and all future public projects not jeopardize, and if possible enhance, this existing transportation facility.

15,36 The Creve Coeur Municipal Airport is generally in favor and support of the proposed Page Avenue extension project. The Page Avenue project will provide much needed access between St. Charles and Maryland Heights. Like the airport, this type of regional transportation facility will service as an economic development generator for the entire area.

However the Creve Coeur Municipal Airport has several concerns for the interaction of this project, and possible adverse effects, with the airport. It appears that little coordination has occurred to date with the airport, MHTD-Aviation Section, the East-West Gateway Coordinating Council Aviation Section, and the FAA in regard to meeting the objective of compatibility between the project and the airport.

Mr. N. Clay McDermeit  
Chief, Western Heartlands Division  
August 18, 1994  
Page Two

Consequently, we offer the following comments and questions for consideration before the determination of a final proposed alternative and record of decision by the National Park Service on the park mitigation area.

1. What evidence is included in the SEIS for the statement on page 36 that the Airport has been coordinated with regarding the proposed Page Avenue plan?
2. Has the safety of the airport's operations been evaluated, due to the proposed changes in the adjacent land area, by the Federal Aviation Administration? Is a copy of all summaries and findings included in the SEIS? If not, it would seem appropriate that a draft copy of the SEIS be forwarded to the FAA Central Region, Air Traffic Division for review and comment prior to final processing and decision making.
3. What coordination was accomplished with MHTD, Aviation Section in preparation of the Draft SEIS? Why has no formal documentation of that coordination been included in the SEIS document?
4. FAA Guidelines state: *"When development on or off airport property requires wetland replacement or mitigation, the airport owner/operator should oppose any measures to establish wetlands in areas defined in paragraph 14 below. The airport owner should support a mitigation plan that is compatible with safe airport operations"*.

Paragraph 14. *"Siting Criteria:*

*a. Wildlife attractions, as described above, will be considered as incompatible if located within areas established for the airport through the application of the following criteria:*

*(1) Sites located within 10,000 feet of any edge of a turbine-use runway.*

*(2) Sites located within 5,000 feet of any edge of a piston-use runway.*

*(3) Any site located within five miles of a runway edge, that attracts or has the potential to attract or sustains hazardous bird movements from feeding, watering or roosting areas into, or across the runways or approach and departure paths of aircraft"*.

Were these existing guidelines for protection of airport operations considered?

Mr. N. Clay McDermeit  
Chief, Western Heartlands Division  
August 18, 1994  
Page Three

5. Do satisfactory alternatives exist for the mitigation of park land area that do not include the development of wetlands within a 5,000 foot arc of the existing or planned airport facilities (see attached facilities Plan)?
6. Have discussions been held between FAA and DOI-NPS in order to seek a balance between federal programs to ensure maximum benefit for facilities and investment?

The development of the LCCMP alternative or the proposed action would significantly impact the Creve Coeur Municipal Airport in an adverse manner. The establishment of wetland area that would likely affect water fowl and other bird population would increase the potential for bird strikes causing an increased exposure of accidents to aircraft pilots, passengers and area residents. The airport has a successful safety record under the present recommended alternative, this safety level would be compromised for all citizens of Maryland Heights and St. Charles.

Two alternatives have been proposed within the SEIS that would satisfactorily meet the airport's safety guidelines. These are the Howard Bend Levee District and the Missouri Highway Transportation District alternates. We would encourage the NPS to give favorable consideration to one of these alternative proposals. In any case, it is essential that a safety study is accomplished with FAA air traffic to ensure no compromise of safety occurs at the existing reliever airport facility.

Sincerely,

**CRAWFORD, MURPHY & TILLY, INC.**



Greg Heaton, P.E., A.I.C.P.  
Manager, Planning Department

sd

c: John Mullen, Creve Coeur Airport  
Lloyd Parr, MHTD  
Michael O'Brien, Mayor, City of Maryland Heights  
John Pellet, Chairman, Levee Board



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
726 MINNESOTA AVENUE  
KANSAS CITY, KANSAS 66101

September 8, 1994

Mr. Clay N. McDermeit  
Chief, Western Heartlands Division  
Recreation Assistance Programs  
Midwest Regional Office  
National Park Service  
1709 Jackson Street  
Omaha, Nebraska 68102

Dear Mr. McDermeit:

RE: Comments to Draft Supplemental Environmental Impact Statement (SEIS) for Route D (Page Avenue Extension) Project EIS

This letter responds in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of The Clean Air Act, as amended. We have rated the document EO-2, Environmental Objections - Insufficient Information. A rating of EO-2 is given to a document when corrective actions may require substantial changes to the preferred alternative or consideration of a new alternative. The basis for environmental objections include situations where there is potential for significant environmental degradation that could be corrected by project modification or other feasible alternatives. The document is rated as insufficient when the reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysis in the draft SEIS, which could reduce the environmental impacts of the proposal.

During the public meeting held in St. Louis on August 3, 1994, a new and reasonable alternative was presented to the Park Service that could provide greater environmental benefit than would the preferred alternative. The new alternative was offered by the Howard Bend Levee District, with support from eleven near-by municipalities. The alternative was described in a letter to the Park Service, dated June 30, 1994, and was further described, in a modified version, to the Service on the date of the Public meeting.

Based on the June 30 Howard Bend Levee District correspondence, the map and verbal description presented during the public meeting by the Levee District, discussions

with your office and coordination with other state and Federal resource agencies, we believe that the alternative meets the requirements set forth in EPA's Policy and Procedures for the Review of Federal Actions Impacting the Environment.

In your letter to EPA, dated August 23, 1994, and in subsequent conversations with your Omaha and Washington offices, you indicated that you do not intend to withdraw the existing Draft SEIS and publish a new document nor do you intend to amend the draft document which would provide for full public interest review of the proposed new alternative. However, consistent with the spirit and intent of NEPA and in order to provide effective application of the NEPA decision process, we again request (see our letter, dated August 12, 1994) that the existing SEIS be withdrawn and a revised SEIS be published that considers the new alternative. The revised document should consider all feasible alternatives and compare environmental benefits available to the public and the resource in a balanced manner. The rewritten SEIS should also respond to the following comments provided under authority of the Act:

#### Cumulative, Secondary and Indirect Impacts

4, 14 { Section 1502.16, 1508.7 and 1508.8 of the National Environmental Policy Act calls for inclusion of a cumulative and indirect impact discussion to be a part of the EIS process. Similarly, our letter to the Acting Regional Director, dated July 8, 1993, asked that the SEIS address cumulative and secondary impacts to the mitigation site. We also requested that selection of mitigation sites include siting of future state, county and municipal roads. The preferred alternative shows a corridor for the Earth City Expressway (Hwy. 141), however, the indirect impacts caused by an expressway to the mitigation area was not considered. All alternatives presented in the document must include consideration of roads and feeder routes and any associated impacts caused by future proposed road locations.

15, 36 { While the preferred alternative is located in an area that could be easily adapted to wetland conversion, it appears to be located in close proximity to the Creve Coeur Airport. The proposed expansion design of the airport, dated April, 1994, should be included in the decision process related to selection of a preferred alternative. The city of Maryland Heights has contracted with Crawford, Murphy and Taly Consulting Engineers which have provided preliminary airport plans to Maryland Heights, and which are available for inclusion in the SEIS.

The June 30 correspondence (mentioned above) from Howard Bend Levee District mentions the Chesterfield Valley

5

commercial area. We are also aware that the Howard Bend Levee District met with the Corps of Engineers recently concerning a proposal for a 500-year flood event levee. If there are plans existing to develop floodplain areas adjacent to any proposed mitigation sites, the cumulative and indirect impacts to the proposed sites must be discussed.

**Wetland Impacts**

14, 34

The value of the preferred alternative wetland mitigation area should be discussed in light of impacts from proposed roads feeder routes, airport expansion, and floodplain development. We also believe that concerns about the successful development of the wetland mitigation area expressed by the federal and state agencies have not been fully addressed. Without inclusion of the area between the proposed roadway and the existing River Valley road, the value and success of wetland establishment and maintenance may be questionable.

A recent Missouri court decision concerned the inability of the Missouri Highway and Transportation Department to condemn property for mitigation purposes. We believe the relevance of this decision to the ability of the highway department to obtain the necessary mitigation area should be discussed.

**Preferred Alternative**

2

The site selected as the preferred alternative provides some, but not all, of the replacement values lost as a result of the Page Avenue Extension through Creve Coeur Memorial Park. Wetland loss appears to be mitigated, however, the quietude found in the southern portion of the park will be lost due to the bisection of this forested area. The preferred alternative doesn't seem to provide either the forested habitat (some of which appears to be old growth timber) nor does it offer a "quiet place", due primarily to the location of the Earth City Expressway corridor running through the southern portion of the site and the adjacency of the Page Avenue Extension running along the northeast portion of the site. Reconsideration of any park replacement areas must meet the functional replacement test, to include an evaluation of values, utility and functional needs. We believe that the new alternative discussed above may provide a greater environmental benefit to the area resource and to the park users.

15, 36

Locating a wetland mitigation area close to an airport may expose aircraft to increased danger from bird strikes and coordination with the Federal Aviation Administration (FAA) should take place. FAA compliance requirements must be

levels in the St. Louis metropolitan area. Any projected emission increases from the proposed Earth City Expressway should be addressed under the Transportation Conformity Rule. A transportation conformity determination is the responsibility of the East-West Gateway Coordinating Council and the respective transportation agencies.

#### General Comments

During the scoping process, we requested that correspondence sent to you as part of the development of the SEIS be included in the draft document. The Draft SEIS did not contain the record of coordination or correspondence. We believe that the evolution of project development is important to the public so that "how did we get to this point" can be better answered and understood.

4 { The preferred alternative does not address access to the park. The site seems to meet the adjacency needs of the St. Louis County Parks Department, but it is separated by the proposed Earth City Expressway and the Southern Pacific Railroad. Public access concerns should be included in the revised document.

The addition of North arrows on the drawings and maps would be helpful and would reduce any confusion to the reader.

It is our belief that the Park Service is required, under NEPA, to evaluate the new alternative and compare it against the alternatives presented in the existing document. We believe that the new proposal may offer a more biologically diverse landscape and may provide greater environmental benefit than does the preferred alternative. Opportunities may exist to tailor the new alternative to include a larger portion of Jane Downing Island in exchange for some of the floodplain acreage offered on the St. Charles County side of the river. NEPA clearly states that the public should be given the opportunity to review new and reasonable alternatives and to be given the opportunity to comment on relevant and new information added to the process.

We request to meet with you and other interested parties, both state and Federal, to discuss the issues brought forth at the public meeting and during the Draft SEIS comment period. We also request that you provide us with an analysis of the new proposed alternative as it (and the other proposed alternatives) relate to the concerns raised in this comment letter.

If you have any questions regarding wetlands and Section 404 of the Clean Water Act, please direct them to Ms. Kathy Mulder at (913) 551-7542. You may direct questions concerning

considered in the document and compliance factors must be met. FAA regulations may preclude selection of the preferred alternative as the location for wetland mitigation.

#### Noise Impacts

4 { When the noise impact area for the selected "red route" was delineated by the Missouri Highway and Transportation Department (MHTD), a noise footprint or boundary was established based on a decibel level established for park areas. We request that the revised SEIS utilize the same noise guidelines used by MHTD to determine the impacts caused by the Earth City Expressway, the Page Avenue Extension and any other roadways proposed for the area. Noise impacts from the Creve Coeur Airport (using the proposed expansion) must also be plotted for potential acquisition sites.

#### Floodplain Impacts

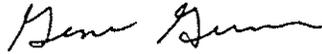
5 { It is clear that the 1993 Flood is having a major impact on the way decisions are being made in the floodplain. As an agency, EPA believes that the report assembled following the Flood of 1993 by the Interagency Floodplain Management Review Committee be implemented in its entirety. As a result of the flood and report recommendations to the White House; Executive Order 11988 has taken on renewed significance. The recommendation for consideration of the Howard Bend Levee District proposal should in no way be mis-understood by the Park Service or other interests as an endorsement of continued development in the floodplain. Additional roadways, industrial parks, levee construction and other development/expansion projects would be addressed under NEPA as separate issues. The Park Service should not confuse these separate development issues as to mean that the subject SEIS can ignore assessment of this foreseeable development and the associated cumulative impacts.

#### Air Impacts

The document should contain a statement that recognizes the action being taken in an ozone nonattainment area. The direct action proposed by the SEIS falls below the de minimis levels for ozone nonattainment areas as stated in Section 93.153 of the General Conformity Rule (effective, January 1994) of the Clean Air Act as amended. However the impacts to the nonattainment area caused by induced development and the cumulative effects of traffic patterns caused indirectly by increased emissions from surface transportation should be evaluated as it affects the proposed mitigation sites. Moreover, discussion should also include attention to the effects that mitigation siting would have on floodplain development and any impacts to the potential increase of ozone

NEPA comments to Dewayne Knott at (913) 551-7299. We look forward to meeting with you, and thank you for the opportunity to comment.

Sincerely,



Gene Gunn  
Chief, Environmental Review  
and Coordination Section

cc: Jake Hoogland, Environmental Quality Division,  
National Park Service, Washington D. C.  
Rick Hansen, U. S. Fish and Wildlife Service,  
Columbia, MO  
Mel Jewett, U. S. Army Corps of Engineers,  
Kansas City District  
Ken Bechtel, Federal Highway Administration,  
Kansas City, MO  
Dick Sanderson, EPA, OFA (2251)  
David Shorr, Missouri Department of Natural Resources,  
Jefferson City, MO  
Tom Lang, Missouri Department of Natural Resources,  
Jefferson City, MO  
Jerry Presley, Missouri Department of Conservation,  
Jefferson City, MO  
Norm Stucky, Missouri Department of Conservation,  
Jefferson City, MO  
Mark Cross, Missouri Highway & Transportation Department,  
Jefferson City, MO  
Ben Knox, St. Louis County Parks Department

**COMMENTS**  
**Draft Supplemental Environmental Impact Statement**



**Creve Coeur Lake Memorial Park  
Replacement Land**

DIANE Albright  
Name  
14615 Rialto Dr #203, Chesterfield MO 63017  
Address City State Zip

Comments about the Alternative Replacements (please print):

I have serious concerns with many aspects of the original draft and now the supplemental draft.

1) The fact that we can not address any of the fallacies with the original which the supplement is built on is permitting further errors.

4 { 2) The DSEIS has permitted 65 dBA for noise - this is more noise than is presently being experienced and can't be ignored as a concern (it exceeds the 57 dBA Nat'l Park Service).

3) As a user of the park for hiking, boating + just to get some scenery; there is no way I can see the Page Ave Extension as an intrusion. We have very few green spaces which are nice, now this one is being threatened.

4) This Extension permits us to ignore the real problem of access.

Thank you for participating in this open forum public hearing. The National Park Service will consider all signed statements. Please drop this in the nearest collection box, or mail to Mr. William W. Schenk, Acting Regional Director, Midwest Region, National Park Service, 1709 Jackson Street, Omaha, Nebraska 68102.

collection  
mass transp  
system  
place.

**Comments must be received by Tuesday, August 23, 1994.**



# Missouri Highway and Transportation Department

Capitol Ave. at Jefferson St., P.O. Box 270, Jefferson City, MO 65102 (314) 751-2551 Fax (314) 751-6555

January 6, 1995

Mr. William W. Schenk  
Acting Regional Director  
National Park Service  
1709 Jackson Street  
Omaha, NE 68102-2571

Attention: Mr. Clay McDermeit

RECEIVED  
PROPERTY SERVICES  
JAN 11 1995

Dear Mr. Schenk:

The Missouri Highway and Transportation (MHTD) has been given authority through the Federal Aviation Administration (FAA) for the administration of the State Block Grant Pilot Program. The program facilitates the planning, design review, project oversight and post construction approval of airport projects including compliance with the National Environmental Policy Act (NEPA) and other federal and state laws. It is by and through this authority that MHTD makes the following comments regarding the issue of compatible use between the recommended Little Creve Coeur Lake (LCCL) and the Creve Coeur Airport.

Creve Coeur Airport (CCA) is a privately owned facility designated as a reliever for Lambert International Airport in 1991. The facility is located in the floodplain of the Missouri River and is in the vicinity of Creve Coeur Lake Memorial Park (CCLMP) and the LCCL recommended alternate.

MHTD intends to fulfill its obligation to provide replacement land for parkland impacted at CCLMP, in accordance with Section 601 of the Pipeline Safety Act and Section 6(f)(3) of the Land and Water Conservation Fund Act. To that end, the National Park Service (NPS), at the direction of the Secretary of the Department of the Interior, has prepared and circulated for public comment a Draft Supplemental Environmental Impact Statement (SEIS) that considers the merits of a reasonable range of parkland replacement alternatives. That document recommended the LCCL alternate as the preferred alternative to provide significant additional lands to CCLMP. The LCCL has high potential to fulfill the intended goal of a passive recreation park with a wetlands emphasis, as per the intent of Interior Secretary Bruce Babbitt and is endorsed by the cooperating agencies including the Environmental Protection Agency (EPA), Department of Natural Resources (DNR), Missouri Department of Conservation (MDC), U.S. Army Corps of Engineers (COE), St. Louis County, and the U.S. Fish and Wildlife Service (FWS).

In the Draft SEIS it is noted that the LCCL alternate lies just south of the CCA. One of the reasons that makes the LCCL alternate so attractive as future parkland is because the shallow LCCL is the central feature of that identified acreage. The location of the LCCL generated comments during the public review period for the Draft SEIS. Some commentators have suggested that the LCCL area, if allowed to remain and function as a wetland, will be an attraction for waterfowl. As such, those commentators inferred it would become a threat to pilots due to the possibility of bird strikes. Some commentators have cited the

proposed Draft FAA Advisory Circular (AC) 150/5200, Wildlife Attractions, Paragraph 1-3,a, Wetlands and Paragraph 1-4, Siting Criteria for Wetlands that state the following:

When development on or off airport property requires wetland replacement or mitigation, the airport owner/operator should oppose any measures to establish wetlands in areas defined in Paragraph 1-4 of AC 150/5200 that states the following criteria: (a) Sites located within 10,000 feet of any edge of a turbine-use runway: (b) Sites located within 5,000 feet of a piston-use runway: And, (c) any site within five miles of a runway edge, that attracts or has the potential to attract or sustain hazardous bird movements from feeding, watering or roosting areas into, or across the runways or approach and departure paths of aircraft.

Some commentors on the Draft SEIS have suggested the proposed guidelines apply to the LCCL area as mitigation and for that reason should no longer be considered as the preferred alternative for parkland replacement by the NPS. It should be emphasized that the Draft AC 150/5200 is a proposed revision to an existing FAA siting criteria that is also referred to as AC 150/5200. The existing circular refers only to the siting of landfills as wildlife attractions and does not include consideration of wetlands. The proposed guidance would broaden the scope of the circular to include wetlands. Since substantial changes are proposed to FAA siting criteria regarding wetlands which may be implemented in the future, MHTD has chosen to address the proposed FAA guidance and its relation to the LCCL alternative.

The MHTD is concerned about the safety of the flying public and realizes that the potential for bird strikes may pose a problem for aviators. The likelihood of a bird strike, however, is generally considered insignificant for several reasons. The northern edge of LCCL is approximately 3,000 feet from the runway protection zone (RPZ) of Runway 34. RPZ's and object free areas (OFA) are protected airspace. Within these zones it is desirable to clear all objects that may interfere with navigation. There are some uses provided for these areas as long the use does not attract wildlife or provide for permanent human occupation. As noted, the separation of the RPZ and OFA from LCCL is adequate for safe aircraft operations for the protected areas within the avigation easement required.

From a seasonal perspective, the majority of operations will take place during warmer months. With prevailing winds generally from the south, the most actively used runway of the four available would be Runway 16 during high use periods. Since concentrations of migratory waterfowl have been documented to be greatest in spring and fall in this area, there will not be a conflict between migrant birds and summer aircraft activity on this runway. In addition, non-precision instrument operations should not be significantly affected since they represent less than one percent of the total annual airport operations.

The mitigation area will not accommodate permanent human occupation. Also, it is important to note that the area will be developed with a wetland theme. This does not endorse waterfowl-specific use. In fact, multiple species will use the area yearly. While waterfowl may be attracted to the area there is no basis to assume that waterfowl or any other species will be attracted to the area any more than is currently noted. It should be pointed out that the LCCL, as well as the CCA and the majority of CCLMP including Creve Coeur Lake, is within the floodplain of the Missouri River, which is a major flyway for migratory waterfowl. Incrementally, the LCCL will not significantly add to the waterfowl population already found

Mr. William W. Schenk

Page 3

January 6, 1995

in the area. Extensive areas of planted fields already serving as feeding spots for waterfowl and other wildlife occur throughout the river bottoms. These areas in themselves are highly attractive to waterfowl and are found in great abundance.

It is well known to resource agencies, such MDC and the FWS, that the LCCL has been a landscape feature in that area for years, as it is an old meander of the Missouri River and is similar in origin to Creve Coeur Lake. The LCCL has been pumped dry in many years to allow for cultivation as well as becoming dry in years of sparse rainfall amounts; however, the pumping has typically been after the fall migration of waterfowl. For this reason the LCCL area does not fit the intent of FAA Guidelines at this time regardless of whether or not the LCCL is developed as a wetland. The LCCL has been an identifiable natural feature for some time and is not a new feature as some suggest. However, the LCCL's ability to retain water should be more assured by including it as an integral part of a public park.

Improvements to the LCCL are and will be contemplated to further the concept of a park for wetland interpretive purposes as well as other passive outdoor recreation. Those improvements can be made with a goal of lessening the possible impacts that such a park could potentially have on the operation of the CCA. For example, food plots, if implemented in the design, could be located at the very southern end of the LCCL area and farther away from the CCA. Also, a Notice to Airman (NOTAM) could alert pilots to the possibility of bird strikes in the area. We recommend taking this action regardless of the selection of the LCCL alternative, considering the existing pattern of waterfowl use of water bodies and crop lands within a five mile radius of CCA.

Because it has been demonstrated that the existence of the LCCL poses no significant additional threat to aircraft from potential bird strikes, we believe that this section of the proposed draft FAA Advisory Circular 150/5200 for Wetlands and Siting Criteria does not apply. In addition, MHTD feels that to the extent capable, the airport operator should support this mitigation plan that is compatible with safe airport operation and that the airport operator should support the mitigation plan that the cooperating agencies have recommended.

Sincerely yours,



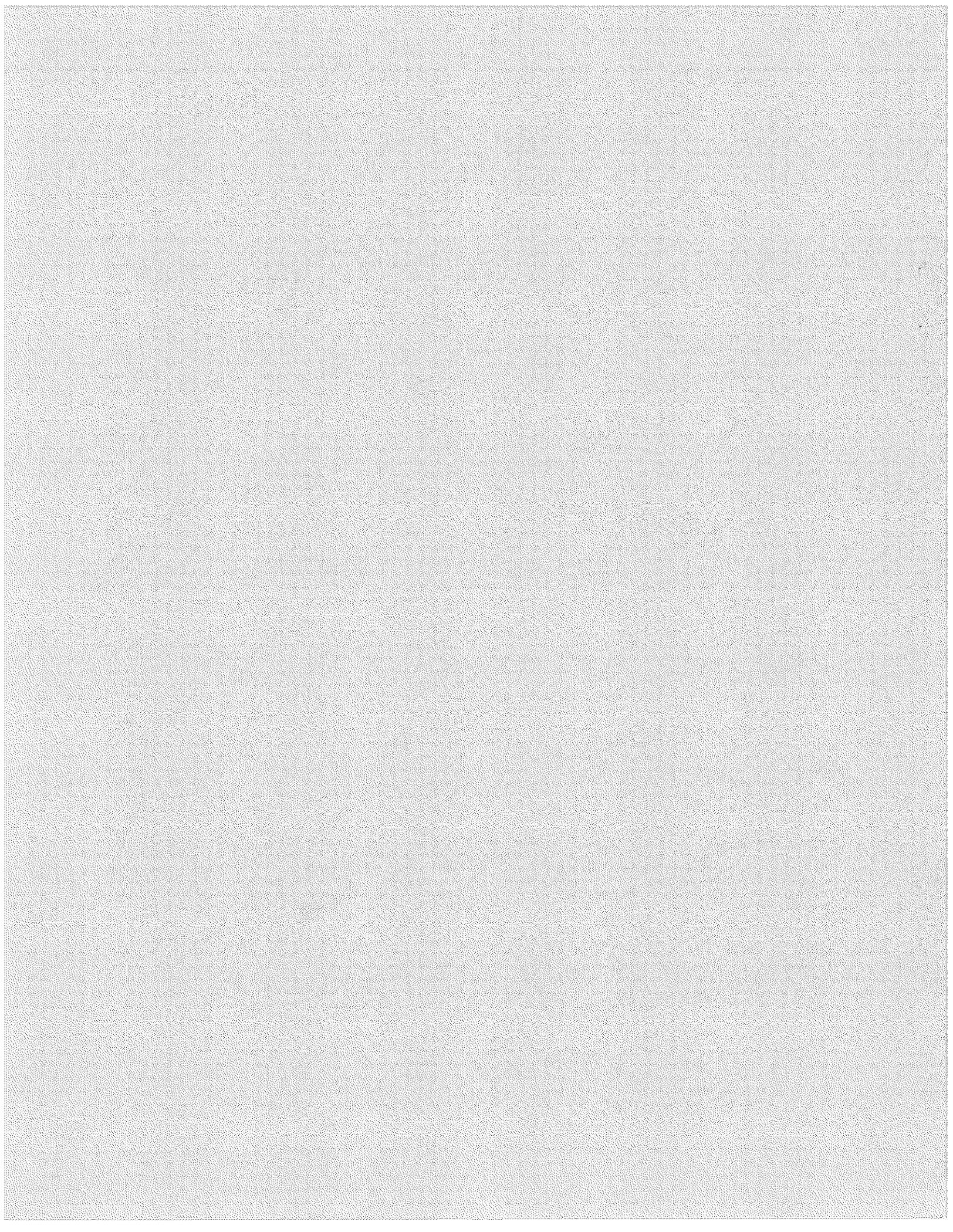
Joe Mickes  
Chief Engineer

jm/bg/tv-de

Copy: Mr. Gerald Reihsen - FHWA



## **APPENDIX C**





# Missouri Highway and Transportation Department

CAPITOL AVE. AT JEFFERSON ST., P.O. BOX 270, JEFFERSON CITY, MO 65102 (314) 751-2551 FAX (314) 751-6555

December 7, 1994

Mr. William W. Schenk  
Acting Regional Director  
U.S. Department of the Interior  
National Park Service  
Midwest Region  
1709 Jackson Street  
Omaha, NE 68102-2571

Attention: Mr. Clay McDermeit

Dear Mr. Schenk:

Subject: Design, Route D, St. Charles and St. Louis Counties, Missouri, Page Avenue  
Extension, Job No. J6U0803B, Supplemental Environmental Impact Statement,  
Additional Baseline Information on Replacement Alternatives

We have collected baseline environmental and cultural information for areas included in the Howard Bend Levee District's (HBLD) proposal to add additional land to Creve Coeur Lake Memorial Park (CCLMP). The areas examined are contained in the proposal presented by HBLD at the August 3, 1994 public hearing. We have concentrated our efforts on collecting data for areas that have not been looked at previously. Those areas are the northwest corner of the Greens Bottom area in St. Charles County and Jane Downing Island and vicinity in St. Louis County. The remaining areas identified in the HBLD proposal, with the exception of Jackass Bend, in Ray County, Missouri, have been addressed in the Draft Supplemental Environmental Impact Statement (SEIS) that was prepared by National Park Service staff and circulated for comments on July 8, 1994.

As you know, no decision has been made by the Secretary of the Interior on how to proceed with the Final SEIS. In anticipation of a decision being imminent in this regard, a copy of the baseline data is attached for use in preparing additional narrative for the Final SEIS.

If you have any questions or need clarification on any of the information, please call me or Bill Graham of my staff at telephone number (314) 526-2909.

Sincerely,

Mark S. Kross  
Environmental Manager, Design

bg/tv

Attachment

Copies: Mr. Freeman McCullah - 6  
Mr. Greg Schroeder - cc



December 7, 1994

Page Avenue Extension  
Supplemental Environmental Impact Statement  
Howard Bend Levee District Recent Proposal

Introduction

In response to the circulation of the Draft Supplemental Environmental Impact Statement (Draft SEIS) and a public hearing held on August 3, 1994, the Howard Bend Levee District (HBLD) presented a proposal to add significant additional land to Creve Coeur Lake Memorial Park (CCLMP).

The Draft SEIS was prepared and circulated for public comment with four alternatives being carried through the document and afforded detailed study. Those alternatives are: the MHTD, original HBLD, Fish and Wildlife Service and Little Creve Coeur Lake (LCCL) Alternatives. The LCCL Alternative was conceived by a multi-agency panel consisting of the U.S. Fish and Wildlife Service, Missouri Department of Conservation, Missouri Department of Natural Resources, St. Louis County Parks and Recreation, U.S. Army Corps of Engineers and MHTD. The LCCL was presented in the Draft SEIS by the National Park Service (NPS) as the preferred alternative for providing significant additional parkland.

The most recent proposal submitted by the HBLD is composed of the following parcels of land:

Catfish Island/Green's Bottom: - 746 acres of mostly open cropland located along the Missouri River in St. Charles County.

Jane Downing Island and vicinity: - Parcel composed of 175 acres on Jane Downing Island along with about 100 acres located immediately south of and across a side chute of the Missouri River in St. Louis County. Nearly all of both areas are characterized by floodplain forest.

Original HBLD area: - Approximately 167 acres located northeast of the existing park. A 46-acre auto salvage yard is included within this area. The remaining 121 acres are a combination of cropland, upland woods and scrub-shrub land. This area was submitted by HBLD as an alternative at the July 1, 1993 SEIS scoping meeting held in St. Louis.

Adjacent parcel (A): - This approximately 182-acre parcel is located northeast of and adjacent to the existing park. 159 acres of this area is included in the original park mitigation plan as Parcel A, discussed in the Final Environmental Impact Statement (FEIS) for the Page Avenue Extension approved on November 24, 1992. The remaining

acres were rejected by the NPS as being not acceptable park replacement land. The area is mostly open cropland with a wooded fringe at the base of the bluff.

Adjacent parcel (B): - This 97-acre area is located adjacent to and south of the existing park. This land is part of a 178-acre area known as Parcel B which was identified as part of the original park mitigation plan in the FEIS. Both Parcels A and B have already been accepted by the NPS as meeting the equal monetary value criteria for Section 6(f) replacement land.

#### Summary

1453 acres	Total acreage in Howard Bend's most recent proposal
878 acres	Considered previously in the Draft SEIS
575 acres	New lands not considered in the SEIS process

Jackass Bend: An additional area consisting of 475 acres referred to as Jackass Bend was also included in the HBLD II proposal. The area is located in southwest Ray County along the Missouri River, approximately 200 miles west of the existing CCLMP. The area is not considered reasonable because of its distant location.

#### Negatives Associated With HBLD II

The following narrative discusses the negative aspects of the HBLD II proposal.

The key component to acquisition or development with Land and Water Conservation Fund (LWCF) assistance is Control and Tenure of the property. While tenure is accommodated with deeds, tenure must be established and maintained through boundary delineation. All LWCF projects require the placement of a boundary that is accurately and clearly stated in the project agreement and diagramed on the Section 6(f)(3) boundary map. LWCF assisted projects shall be maintained in public outdoor recreation in perpetuity. The application of this perpetuity requirement is based on the Section 6(f)(3) boundary map that is provided at the time of the acquisition.

For land included in a project proposal, the sponsor must have title or adequate control and tenure of the area in order to provide reasonable assurances that a conversion under Section 6(f)(3) of the LWCF Act will not occur without NPS approval. Failure to adequately delineate and then protect this delineation is a major criteria in the approval of the project under LWCF regulations.

Of the 1453 acres proposed by the HBLD 275 acres are unprotected by levee and subject to the above concerns.

Inasmuch as control and tenure are important, access to the area also presents a problem. During periods of even moderately high water levels a portion of the area unprotected by the levee would be inaccessible. As far as access is concerned HBLD officials have indicated some concern of actual use of the property by park visitors. HBLD's position is that the land is available but not for heavy use. More than half of this proposal has limitations for much use by the public. The primary limitation is the inaccessibility of the property, with the island parts being entirely inaccessible during high water flows. Poor access means use by only the most ardent of adventurers. Also, limited access creates an even greater potential security risk with this proposed property that is somewhat isolated.

The 275 acres identified as the Jane Downing Island area are also in the regulatory floodway. This differs from those that are placed in the base floodplain, because of volumes and flows that may cause substantially more damage than static backwater situations.

Based on poor access and potential for conversion the 175 acres comprising Jane Downing Island should be removed from consideration.

St. Charles properties should be eliminated for several reasons. MHTD has reviewed approximately 300 acres of this 746-acre area. HBLD's proposal to include this 746 acres does not carry the same landowner "willingness to sell" as other parcels in St. Louis County. There would be certain fallout from those landowners included in the proposal that is currently being voiced by St. Louis County landowners. The St. Charles lands do not currently exhibit any wetland development. In fact the area suffered greatly from the flood of 1993 and has not completely recovered. On the other hand, LCCL has recovered completely and resembles the lake as it has developed for the past forty years. The areas proposed by HBLD that would include areas in St. Charles County do not have any visible wetland environment comparable to LCCL.

The Duckett Creek Sewer District facility is located adjacent to the area identified by HBLD. The facility is located on the St. Charles County side and has a substantial interest in the proposed property. An important part of their operation is the land application of sludge on the adjoining property. Sludge is the end product of the sewage treatment process. The land use of this property is cropland used entirely for the production of feed grains. Land application of sludge is a typical means of disposal used by sewage treatment facilities. With only a very

## Howard Bend Levee District Recent Proposal - Negative Issues

- Inability to maintain control and tenure of lands proposed outside of levee protection.
- Inability to access areas during periods of even moderately high water.
- Adjacent landowner opposition to visitors in some areas if added as mitigation, even though there is a willingness to sell.
- Limited ability to provide security to remote areas.
- Designation of land for use and development on regulatory floodway as opposed to regulated floodplain.
- No confirmed willing sellers in St. Charles County area.
- Lands in St. Charles County damaged by flood of 1993.
- Wetland potential does not exist in St. Charles County as it does in LCCL area.
- Impacts and increased cost associated with Duckett Creek Sewer Treatment District facility and inability to operate *status quo* or to expand in the future.
- Uncertainty with cleanup and reclamation of the auto salvage operation.
- Extensive cleanup from flood of 1993 needed for lands east of the auto salvage.
- Inclusion of lands in HBLD proposal that were previously rejected by NPS.
- Inability to access additional lands from adjoining subdivisions south of the proposed property.
- St. Louis County desires mitigation within their jurisdiction.
- Selection of HBLD proposal does not meet the cooperating agencies' desire to create a manageable recreation unit.
- Wetlands mitigated outside the protection of levees may not persist due to flooding.
- Sites proposed by HBLD would not represent the same character of wetlands after extensive development that LCCL would after even minimal development.

## LCCL Potential

- Residual pool exists in place without need for substantial development.
- The area impacted by the selection of LCCL is not currently farmed and is subject to flooding without pumping.
- Wildlife is currently using the area.
- Passive participation of the LCCL alternate is possible from selected viewing areas.
-

## St. Charles

The area north of the tree line directly east of the Duckett Creek Sewer Treatment Plant (DCSTP) consists of approximately 151 acres. The area has five individual owners that share-crop their property to a larger farm operation. A levee has recently been replaced around this area. The DCSTP has plans to expand their operation into this area due to the increasingly high demand for sewer facilities. In 1993, nearly 2000 new customers were added to the system and 1994 estimates are expected to be nearly 3000. Plans call for additional lagoons. Currently the sewer plant disposes of their processed solids by spreading them on the fields around the plant. These fields are used during periods when crops are not in the field. At least four of these property owners have land directly adjacent to the River and the Katy Trail State Park (KTSP).

The area south of the treeline contains approximately 76 acres and is owned by two individuals. Among these two is Oliver L. Wilke a partner in other acres in the Catfish Island area. He is a strong player in land ownership in the area. None of this property adjoins the river or the KTSP.

Southeast of DCSTP are two parcels that total 248 acres. Approximately 242 acres are owned by the St. Charles Investment Corporation and the other 276 acres are owned by Kenneth Montgomery. Mr. Montgomery is a major land owner in the area and may own over 1000 acres in Catfish Island. Much of this land, however, was heavily damaged during the flood and may be under several inches to several feet of sand in some places. Currently, some of this land is not available to farm because of the sand cover. The immediate future of the land is subject to the sand cover and may not be available to farm for several years. Some of this damaged land may be available for acquisition.

The recreation potential of properties in the St. Charles County area are greatest near the KTSP and near the river. Since the KTSP is adjacent to the river, just north of the northernmost parcel included in this proposal, access to the river is not a significant benefit. The usefulness of the property within the levee structure north of DCSTP could accommodate active recreation in the form of soccer fields or ballfields or could be used in a passive manner if the area was allowed to revert to a natural condition. The same is true of most of the properties in this area, since reversion to a natural state is the most likely use for the property. The recreation usefulness, quality and value of any of the areas that have been damaged by sand deposits is questionable.

The downside to use of any of this property is the reduction in available land for the disposal of processed solids from

the DCSTP and future expansion planned for the facility. The expansion of the population in the St. Charles County area and the increased demand for sewer facilities would place an extreme burden on the treatment facility and this in turn would affect the population as a whole.

Selection of any of these areas in the St. Charles County area is not considered acceptable. This is based primarily on St. Louis County's desire to mitigate within their jurisdiction and the fact that no wetland environment exists in the area similar to what is available with LCCL.

#### Jane Downing Island

The key component to acquisition or development with Land and Water Conservation Fund (LWCF) assistance is Control and Tenure of the property. This is especially pertinent to Jane Downing Island. While tenure is accommodated with deeds, control must be established and maintained through boundary delineation. All LWCF projects require the placement of a boundary that is accurately and clearly stated in the project agreement and diagramed on the Section 6(f)(3) boundary map. LWCF assisted projects shall be maintained in public outdoor recreation in perpetuity. The application of this perpetuity requirement is based on the Section 6(f)(3) boundary map that is provided at the time of the acquisition.

For land included in a project proposal, the sponsor must have title or adequate control and tenure of the area in order to provide reasonable assurances that a conversion under Section 6(f)(3) of the LWCF Act will not occur without NPS approval. Failure to adequately delineate and then protect this delineation is a major criteria in the approval of the project under LWCF regulations. Jane Downing Island is not protected by a levee.

Jane Downing Island consists of 175 acres and is owned by Alwal Moore, Trustee. Access to the island is through privately owned property to the south and east (Stolte). A channel of water separates the island from lands to the east and south. Access across this channel is over two rock dikes, one located near the southern tip of the island and the other located near the center of the eastern edge of the island. These dikes provide pedestrian access only and may require some improvements for heavy use. The potential recreation use of this area is strictly passive. With the provision of trails, possible camping areas, adequate access and openings for vistas this area could become a quality passive recreation facility if control and tenure of the property could be accomplished. In addition, the area has large sand bars along the western edge that can be accessed for recreation. The island is totally wooded.

South of the island is an adjoining 100 acres (separated by channel) that is owned by the Stolte's. Again, this area is only useable as a passive recreation facility and is not provided any protection by a levee system. Most of the parcel is wooded with small plowed openings near the southern edge. Access to this area would be from River Valley Road and along the southern edge of the property. Trails could be provided that would link the southern parcel with the island via the rock dikes.

Due to the lack of control and subsequent inability to maintain the Section 6(f)(3) boundary, potential for flooding, and inability to access during periods of even reasonable low water levels (14.0 feet at the St. Charles gauging station) Jane Downing Island is not considered as a viable mitigation parcel.

#### Stolte/Dierberg

These areas are generally level with small tree line divisions that separate the fields. Active recreation could take place here in conjunction with the wooded passive areas due to the openness of the fields. If reestablished as pasture the fields could be developed for soccer or baseball. The provision of parking and adequate roads would be important for this to be realized as a recreation area.

As is the case with other parcels in this area levee protection is not available. Any development may meet with objections from the U.S. Army Corps of Engineers since some of this land is considered farmed wetland. Reversion to anything other than wetlands could be a problem. In addition, the development of this unprotected area into a wetland environment may be short lived given the damage that would occur when flooded. Without protection, development to a wetland should be avoided. Recreation facilities commonly exist in flood plains but not as commonly in floodway areas. In floodplains, slower moving flood waters generally inundate recreation areas causing minimal damage. Floodway characteristics are different, since moving water is more obvious and creates more sedimentation, scouring, and movement of debris than does backwater.

Without adequate protection none of the areas within the Jane Downing Island area are considered practical as mitigation.

#### Howard Bend Levee District

It is important not to view the entire HBLD northeast corner as one parcel. Each of the 14 parcels has features, attributes or distractions that may or may not make the area desirable for recreation use.

To the extreme east is a 96.27-acre parcel owned by Fred Weber Inc. This area is partially wooded of which some is possibly wooded wetland. Along the bluff (abandoned quarry) trees cover the entire hillside to the top of the bluff where residential development has occurred. A crude trail links the top of the bluff with the wooded areas below. Within the area, several old structures exist. A large amount of auto salvage debris has collected in this wooded area, possibly trapped during the flood of 1993. Adjacent to the woods, crops have been planted. During periods of wet weather, portions of this area are not accessible for farming operations. This property is adjacent to an office development located to the east.

North of the Weber parcel are five parcels of varying sizes. These have been rejected by the NPS as possible replacement mitigation due to the lack of recreation utility. These areas also contain commercial operations that have impacted the land, at least visually, with buildings, abandon vehicles, stock piled materials and fencing.

Within ~~the~~ a portion of the additional 165 acres that has been proposed by HBLD and MHTD is the Continental Auto Salvage operation. The existence of the auto salvage operation could be problematic for any mitigation immediately adjacent or in close unshielded proximity. Use of the salvage operation may result in cleanup problems associated with salvage petroleum by-products and the perception that land impacted by the Page Avenue Extension is not comparable to that being used as mitigation, such as the salvage operation. Those lands directly adjacent to the salvage operation, if considered, would be influence by the auto salvage and may be perceive as detrimental to the surrounding mitigation land.

Any mitigation in the immediate area of the auto salvage should be considered carefully. Currently those parcels proposed and approved by NPS are west of the auto salvage and buffered by adjacent agricultural lands and somewhat screened by a row of trees. Also cleanup of the areas around the salvage operation would be necessary because of considerable salvage related debris through out the area.

A recreation matrix and cost matrix are provided to equate the newly proposed areas with areas previously evaluated.

#### Category I

New alternatives are considered and scored using a Likert-type scale. Each of the nine criteria in Category I are listed, and a number from 1 through 5 is assigned. Low recreation potential could indicate incompatible surrounding land uses, inadequate access, high ambient noise levels, traffic concerns, or an overall poor environment for

recreation development. High recreation potential would reflect favorable existing and surrounding land uses, low existing noise levels, and an overall high potential for recreation use after development. The scoring is divided into three categories. Scoring for Category I is indicated by the following criteria.

- 1 = Low Recreation Potential
- 2 = Moderately Low Recreation Potential
- 3 = Moderate Recreation Potential
- 4 = Moderately High Recreation Potential
- 5 = High Recreation Potential

Recreation Matrix

CRITERIA	ST. CHARLES CO.	JANE DOWNING ISLAND, STOLTE DIERBERG
Existing Land Use	3	3
Surrounding Land Use	4	3
Water Resources	2	4
Transportation Network	4	3
Increase of Wildlife Habitat	2	3
Noise	3	4
Preservation of Natural Area	2	4
Increased Aesthetics	4	3
Reclamation of Spoiled Lands	3	2
Increased Traffic	3	3
Potential Recreation Value	3	4
=====		
Totals for Category I	33	36

Summary

Scoring between the approximately 470 acres located in St. Charles County and the 351.27 acres located in St. Louis County indicates a slightly higher value for St. Louis County properties. Surrounding land use for St. Charles County properties is slightly higher because of the adjacent Katy Trail State Park. Water resources for Jane Downing Island are higher due to direct access to Missouri River frontage. Transportation is higher for St. Charles County because it is linked by asphalt roads, and the Katy Trail

State Park. No major increase in wildlife habitat will occur on St. Charles County properties for some time due to the extensive amount of damage cause by recent flooding. Jane Downing was relatively undamaged. The preservation of Jane Downing scores slightly higher, however due to flooding minimal use of the island is planned and no developments will occur. Due to its remoteness, noise is somewhat lower on Jane Downing Island than what is experienced on St. Charles County lands. An increase in aesthetics could occur in St. Charles by the removal of farming operations and the return of the land to a natural environment. Little change in aesthetics would occur at Jane Downing. Overall the recreation potential of the Jane Downing Island area is higher.

- 5 = Low Cost
- 4 = Moderate Low Cost
- 3 = Moderate Cost
- 2 = Moderately High Cost
- 1 = High Cost

CRITERIA	ST. CHARLES CO.	JANE DOWNING ISLAND, STOLTE DIERBERG
Cost to Develop	2	4
Security	4	1
=====		
Totals	6	5

As is the case with other mitigation proposals, the larger St. Charles County parcel would be higher in cost to develop strictly due to size. Security would be lower in cost for St. Charles County because residential development currently exists in close proximity to the area where police protection occurs. The remoteness of the Jane Downing area would require special procedures and possible additional patrols and only where access was available.

Threatened or Endangered Species: The areas of the Howard Bend Levee District II proposal not examined in the Draft SEIS have been assessed for the potential occurrence of threatened or endangered species. The same threatened or endangered species discussed in the Draft SEIS would also apply to the area in St. Charles County and Jane Downing Island and vicinity.

Air quality - The same rationale used in the SEIS would also apply to the additional lands contained in the HBLD II proposal that were not considered in the Draft SEIS.

Relocations - There are no standing structures in any of the additional lands not considered in the Draft SEIS. (The Duckett Creek Sewer complex is excluded from the HBLD II proposal.)

Hazardous waste - The data base query performed to provide information for the Draft SEIS was broad enough to include the expanded Howard Bend Levee District II proposal. No additional sites located in the HBLD II area were identified.

J: \m...ing> ... 1-1-18 ...

**St. Louis Co. Portions of New HBLD Proposal**

Jane Downing Island - Most of this alternative is within the regulatory floodway; all of this alternative is within the 100-year floodplain.

South of Jane Downing Island - Most of this alternative is within the regulatory floodway; all of this alternative is within the 100-year floodplain.

Missouri River Frontage- Most of this alternative is within the regulatory floodway; all of this alternative is within the 100-year floodplain.

**St. Charles Co. Portions of New HBLD Proposal**

Catfish Island (previously evaluated) - All of this alternative is within the regulatory floodway and within the 100-year floodplain.

Green's Bottom - Almost all of this alternative is within the regulatory floodway; all of this alternative is within the 100-year floodplain.

## Cultural Resources

MHTD cultural resources staff have examined the Greens Bottom area in St. Charles County and Jane Downing Island and vicinity for known sites and for the potential of encountering unreported cultural resources. Background research at the Archaeological Survey of Missouri, University of Missouri - Columbia, identified no previously reported archaeological sites, and no historic sites in the subject areas. Practically all of the land area contained in the St. Charles County parcels and the Jane Downing Island and vicinity parcels are located in historic river channels. This causes the probability of intact prehistoric sites in this setting to be extremely low. This geographic condition alleviates the likelihood of prehistoric sites being found.

However, the existence of old river channels does raise the possibility of encountering shipwrecks in these areas. A map of recorded shipwreck sites on display at the Arabia Museum in Kansas City notes the possibility of five known shipwrecks being present. The parcels located in Greens Bottom contain four of the potential wreck sites. The wrecks occurred during the years 1843 to 1876. One wreck dating from 1860 occurred on what is now Jane Downing Island. The locations of these shipwrecks are approximations and the possibility of being able to locate them is low.

## Noise considerations within CCLMP

The Final Environmental Impact Statement (FEIS) prepared for the Page Avenue Extension considered the impact of traffic generated noise within CCLMP. The discussion of noise impacts related to the Red Line are found in Volume 1 of the FEIS and within the technical memorandum entitled, Page Avenue Extension - Noise Impacts Assessment. The Record of Decision (ROD) on the FEIS allowed MHTD to begin project design and engineering.

When the original noise study was prepared, certain assumptions were necessarily made regarding the future design of the Page Avenue Extension. Now, as details of the roadway and bridge designs become more defined, MHTD has reevaluated the noise impact studies that were completed during preparation of the FEIS. This reevaluative action is a commitment made in the FEIS and is conducted as a matter of routine in the development of MHTD projects. FHWA's STAMINA 2.0/OPTIMA noise level prediction program was run again on the Page Extension, using the most recent known design parameters. The results of the study determined that an additional 23.6 acres of parkland within CCLMP would be affected by noise levels over 57 dBA. Therefore the total area within CCLMP affected by noise and visual impairment is revised from 183.4 acres to 207.0 acres. The area affected by noise and visual impacts represents 18 percent of the total area of CCLMP. Based on the total size of CCLMP, this represents an increase of about 2 percent in the size of the noise/visual impact area. Also, the revised noise study indicates that approximately 6.3 acres of Area B of the original mitigation package will be impacted by noise levels over 57 dBA. The National Park Service has already accepted for eligibility 264.78 acres contained within the total acreage of Areas A and B as meeting the criteria of fair market value for Section 6(f) (3) conversion. With 6.3 acres of additional noise impacted land taken away from that total, 258.48 acres remain acceptable as replacement land within Areas A and B of the original mitigation package.

## Planning and Zoning:

The Greens Bottom area is located in an unincorporated area of St. Charles County. The land use planning document, Year 2000 Master Plan - St. Charles County, Missouri (April 1990) was prepared by the county to assess existing land uses and to facilitate a logical land use plan for the future.

Existing land use in the Greens Bottom area is characterized in the land use planning document as a mix of non-urban and agricultural uses, with the latter being the dominant use. The area is zoned as F-P, Floodplain. The generalized future land use plan shows the preferred land use for this area as agricultural.

Jane Downing Island and vicinity are located within the incorporated boundaries of the city of Maryland Heights. The City of Maryland Heights Zoning Code (Supplement No. 3) indicates this area is zoned as NU - Non-Urban. The Comprehensive Plan - 1987 identifies the future land use concept as planned use mixed environment.

## Utilities

### Greens Bottom/St. Charles Co.

Electrical and telephone service lines are located along the northwest boundary of the Greens Bottom area in St. Charles County. Cuivre River Electric, Union Electric and Southwestern Bell Telephone all have service distribution lines that run along the KATY Trail State Park. Also, the St. Charles and St. Peters Joint Venture water line crosses the Missouri River from St. Louis County and proceeds northwesterly across Greens Bottom. The line then passes into the uplands near Jungs Station Road. The Joint Venture is a 36-inch main and is used primarily as a conduit to receive drinking water by contract with the City of St. Louis Water Division, Howard Bend Plant. The water line lies at about 48 inches below the ground surface.

### Jane Downing Island and Vicinity/St. Louis Co.

After crossing the Missouri River, the St. Charles and St. Peters Joint Venture water line turns to the south and runs parallel to the St. Louis County shore of the river to the Howard Bend Plant. No other utilities are located within the Jane Downing Island area. However, local service electric and telephone lines are located across and parallel to River Valley Road which borders the area.

November 3, 1994

**Page Avenue Extension  
Supplemental Environmental Impact Statement  
Land Use and Land Cover Classification  
for  
Significant Additional Land  
Creve Coeur Lake Memorial Park**

The following information was compiled using the Missouri River Flood Plain Atlas completed in July of 1982 and on-site visits. This information quantifies the present land uses and cover types for the additional lands offered to the Howard Bend Levee District alternative in the Draft Supplemental Environmental Impact Statement.

**ALTERNATIVE:**

1. Howard Bend Levee District. The extra lands offered to the original proposal are located in St. Louis County and St. Charles County. The St. Louis County acreage includes the 138 acres of the Jane Downing Island, the 147 acres south of the island and 257 acres immediately south of this area. According to the Atlas, Jane Downing Island is categorized as floodplain woodland; 53 acres of Jane Downing Island has been classified by the SCS as wooded wetlands and 10 acres as open-water wetland (Appendix A). The acreage south of the island are also classified as floodplain woodland, except approximately 10 acres which is opened and used as cropland. The cropland acres are used for the production of feed grains. The SCS has classified 71 acres of this area as wooded wetland. The most southern area described is classed as both floodplain woodland and cropland. The cropland, also used for feed grains, makes up 123 of the 257 acres. The remaining 134 acres are floodplain woodland. The total wetland area in this section are 61 acres of wooded wetland and 28 acres of farmed wetland as designated by the SCS. All of the land defined as floodplain woodland are dense, closed canopies that have no specific use.

The land offered in St. Charles County consists of 470 acres of Green's Bottom located north of the Catfish Island proposal. The majority of this acreage is being used as cropland for the production of feed grains. The SCS has identified approximately 51 acres as wooded wetland, 1 acre as emergent wetland, 7 acres as farmed wetland and 1 acre as open-water wetland (Appendix A). As a secondary land use, the cropped acres are being used for land application of sludge from the Duckett Creek Sewer District treatment plant.

The Duckett Creek Sewer District has a substantial interest in a good deal of the proposed property in this area. An important part of their operation is the land application of sludge on the adjoining property. Sludge is the end product of the sewage treatment process. Land application of sludge is a typical means of disposal used by sewage treatment facilities. With only a very limited amount of storage potential for the sludge, every available acre for spreading is crucial. All the surrounding land is needed at present, and with the expected expansion of the facility, due to the associated population growth in St. Charles county, even more will be needed.

The auto salvage yard presents another problem with this proposal. The offer of this property as replacement lands could be viewed as a poor choice for what is being acquired. Even though it's proximity to CCLMP and the recreation potential of the large building seems advantageous, the past use of the property might have high associated clean up costs and limited recreational potential.

More than half of this proposal has limitations for much use by the public. The limitations being primarily the inaccessibility of the property, with the island parts being entirely inaccessible during high water flows. Poor access means use by only the most ardent of adventurers. Also, limited access creates an even more potential security risk with this proposed property that is some what isolated.

**Suggested Additions to 3.4 SOILS**

Additions are in *italics* with existing text in regular font.

**Add to Paragraph 1:**

1. The Blake silty clay loam map unit is found on the bottom land *north of CCLMP* at the HBLD Alternative. *The Blake-Eudora-Waldron complex and Sarpy fine sandy loam map units are found on the land west of the levee in the HBLD alternative.*
2. Soils at these sites *that are listed on the SCS St. Louis County hydric soils list include the Blake silty clay loam map unit, the Sarpy fine sandy loam map unit, the 10 percent of Blake ... the Booker clay map unit, the 8 percent Booker inclusions ... , and the 5 percent of Booker inclusions plus the 5 percent of Sarpy inclusions and 40 percent of Blake inclusions that are frequently flooded for long duration in the Blake -Eudora-Waldron map unit.*

**Add As Separate Paragraph, After Paragraph 1:**

*The portion of the HBLD Alternative in St. Charles are shown on the SCS's general soil map of St. Charles County as Haynie-Blake-Waldron Association. This floodplain association is nearly level, with well drained and somewhat poorly drained soils formed in silty, loamy, and clayey alluvium. The Blake soils, which make up 26 percent of the association, are somewhat poorly drained soils with a silty clay loam surface texture located on low ridges and in drainageways and swales. The Haynie soils, which make up 26 percent of the association, are well drained soils with a silt loam surface texture located on ridges and natural levees. The Waldron soils, which make up 16 percent of the association, are somewhat poorly drained soils with a silty clay surface texture that occur in low-lying drainageways and depressions. The Blake silty clay loam and Haynie silt loam map units are the most common on the St. Charles County portion of the HBLD Alternative. Other soil map units found on the St. Charles area include Hodge loamy fine sand, Haynie-Blake complex, Carr fine sandy loam, and Waldron silty clay. Soils on the Greens Bottom and Catfish Island area that are listed on the SCS St. Charles County hydric soils list include the Hodge loamy fine sand, Haynie-Blake complex, Haynie silt loam and Blake silty clay loam map units, and minor inclusions of Haynie and Blake soils in the Carr loamy fine sand and Waldron silty clay map units. All of the St. Charles County soils listed as hydric that occur on these sites are considered hydric only when frequently flooded for long duration.*

**Suggested Additions to 3.5 LAND COVER AND USE**

**3.5.4 HBLD Proposal (Alternative D)**

Jane Downing Island - Approximately 124 acres of this area are identified by the SCS as wooded wetland and 10 acres as open-water wetland (Appendix A).

Missouri River Frontage - Approximately 61 acres of this area are identified by the SCS as wooded wetland and 28 acres as farmed wetland (Appendix A).

Green's Bottom - Approximately 51 acres of this area are identified by the SCS as wooded wetland, 1 acre as emergent wetland, 7 acres as farmed wetland and 1 acre as open-water wetland (Appendix A).

Catfish Island (previously evaluated) - Approximately 78 acres of this area are identified by the SCS as wooded wetland, 3 acres as farmed wetland and 1 acre as open-water wetland (Appendix A).

**Table A1 Wetlands and Hydric Soils**

Acres of wetlands and hydric soils mapped by the Soil Conservation Service and U.S. Fish & Wildlife Service (National Wetlands Inventory) for Page Avenue Supplemental EIS mitigation alternative locations. Acreage estimates are rounded to the nearest whole number.

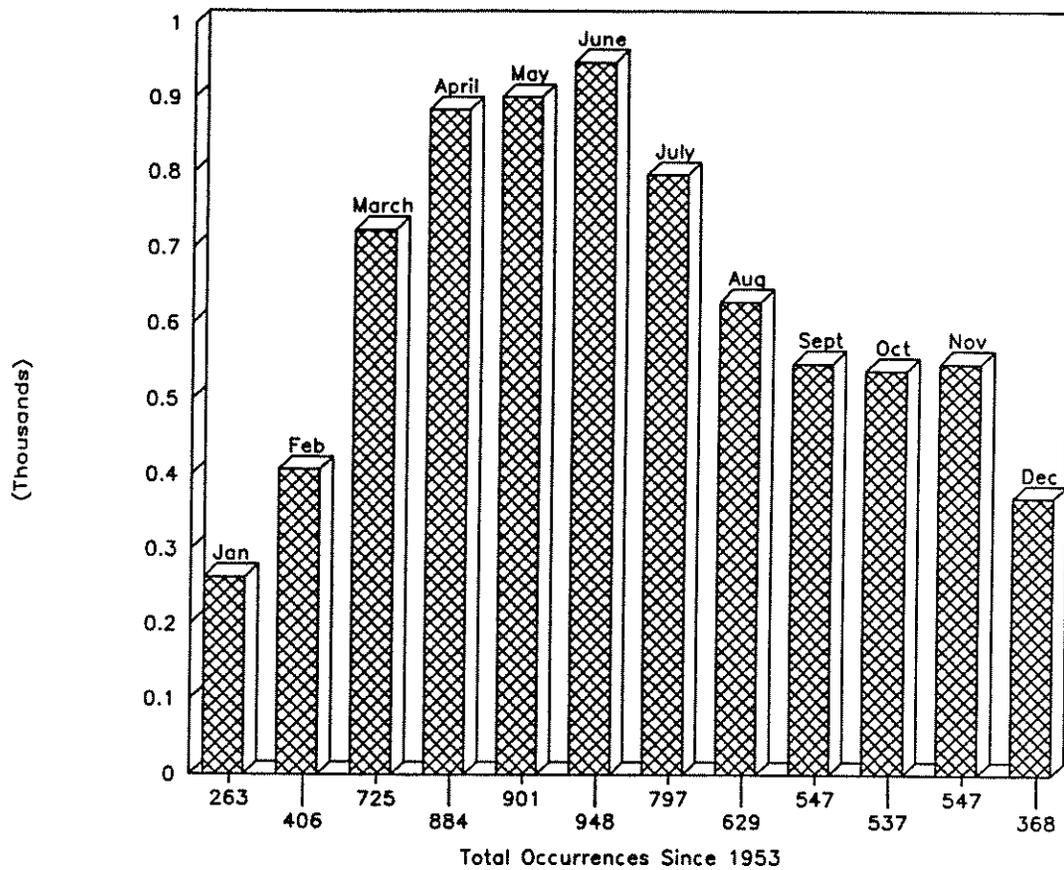
MAP INFORMATION		ALTERNATIVES										
Source Map	"No Action" Alternative A <small>(FWS, Areas A, B, C, D, E)</small>	LLCL Proposal Alternative B	FWS Proposal Alternative C	HBLD1 Proposal Alternative D	HBLD2 Proposal Catfish Island	HBLD2 Proposal Green's Bottom	HBLD2 Proposal Jane Downing Isl.	HBLD2 Proposal S. of J. D. Isl.	S. of HBLD2 Mo. R. Frontage	MHTD Proposal Alternative E	Areas A and B of EIS Proposal	
National Wetland Inventory												
PFO1A	25	14	13	11	30	44	116	102	80	9	20	
PFO1C	78	0	0	0	0	0	2	3	0	0	77	
PEM1A	0	15	17	0	5	7	0	0	0	0	0	
PEM1C	1	129	153	16	6	5	0	1	2	7	1	
PUBF/G	2	0	0	0	0	1	0	3	0	0	2	
PEM/SS1C	0	0	0	33	0	0	0	0	0	33	0	
PSS1A/C/F	1	14	26	0	3	0	0	28	0	0	0	
R4SBCX	0	0	0	1	0	0	0	0	0	0	0	
LIUBH	1	0	0	0	0	0	0	0	0	0	1	
RZUSA, RZUBS/H	0	0	0	0	0	0	10	0	0	0	0	
<b>Total NMI Wetland Acres Mapped</b>	<b>107</b>	<b>171</b>	<b>208</b>	<b>61</b>	<b>45</b>	<b>58</b>	<b>128</b>	<b>137</b>	<b>82</b>	<b>60</b>	<b>101</b>	
St. Louis & St. Charles Co., Mo. Soil Surveys												
Hydric Soils (90% to 100% hydric)	215	277	193	146	203	456	72	23	19	55	163	
Hydric-Upland Complex (50% hydric)	0	39	0	0	0	0	56	124	238	0	0	
Partially Hydric (5% to 15% hydric)	295	434	51	0	76	14	0	0	0	0	56	
Non-hydric Soils	118	24	46	19	0	0	0	0	0	45	118	
Food Security/Act Wetland Inventory **												
Wooded Wetland (WW)	134	18	15	29	78	51	53	71	61	14	125	
Emergent Wetland (WE)	0	2	2	0	0	1	0	0	0	0	0	
Open-water Wetland (WO)	0	0	0	0	1	1	10	0	0	0	0	
Farmed Wetland (FW)	0	9	4	68	3	7	0	0	28	41	0	
Non-Wetland (NW or PC)	494	744	278	68	197	411	66	76	169	45	212	
<b>Total FSA Wetland Acres Mapped</b>	<b>134</b>	<b>29</b>	<b>22</b>	<b>97</b>	<b>82</b>	<b>59</b>	<b>62</b>	<b>71</b>	<b>88</b>	<b>55</b>	<b>125</b>	
<b>Total Acres in Proposed Site</b>	<b>628</b>	<b>774</b>	<b>300</b>	<b>165</b>	<b>279</b>	<b>470</b>	<b>128</b>	<b>147</b>	<b>257</b>	<b>100</b>	<b>337.0</b>	

\* Conceptual Plan - actual land package would incorporate 38.7 acres of the 99.9 acres evaluated.

\*\* FSA acreage may include some acreage already accounted for by the National Wetland Inventory shown above.

River stages at St. Charles Since 1953 (occurrences greater than 14.0 feet)														Per Yr	Per Mo	% or Yr
Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec					
1953	0	0	20	27	27	18	12	0	0	0	0	0	104	8.67	28.49	
1954	0	0	0	0	7	26	3	9	2	11	0	0	58	4.83	15.89	
1955	3	7	25	2	5	11	11	0	1	9	0	0	74	6.17	20.27	
1956	0	0	0	0	3	3	10	3	0	0	0	0	19	1.58	5.21	
1957	0	1	1	19	19	30	21	0	0	4	0	1	96	8.00	26.30	
1958	0	1	30	25	19	15	30	28	22	7	4	0	181	15.08	49.59	
1959	0	11	22	21	28	12	10	8	4	24	0	0	140	11.67	38.36	
1960	11	7	8	30	31	27	18	5	8	0	3	0	148	12.33	40.55	
1961	0	1	23	30	31	27	21	8	21	18	29	1	210	17.50	57.53	
1962	4	28	21	23	13	30	31	3	6	11	0	0	170	14.17	46.58	
1963	0	1	17	3	17	9	2	0	0	0	0	0	49	4.08	13.42	
1964	0	8	0	18	9	21	21	0	8	0	2	0	83	6.92	22.74	
1965	7	1	24	30	14	30	31	11	28	31	2	4	213	17.75	58.36	
1966	4	11	8	14	23	12	3	6	0	0	0	0	81	6.75	22.19	
1967	0	0	0	25	18	30	31	13	6	18	14	19	172	14.33	47.12	
1968	0	11	8	22	13	14	10	27	2	10	16	13	148	12.17	40.00	
1969	16	28	28	30	31	30	31	31	30	31	26	0	310	25.83	84.83	
1970	1	0	3	28	31	30	5	14	15	31	28	2	188	15.67	51.51	
1971	5	8	31	12	27	30	31	18	0	1	28	15	204	17.00	55.89	
1972	5	0	7	15	31	28	11	26	25	27	30	16	221	18.42	60.55	
1973	25	28	31	30	31	30	31	31	26	31	30	31	355	29.58	97.28	
1974	21	28	31	30	31	30	11	6	16	0	22	6	232	19.33	63.56	
1975	6	25	31	30	29	30	31	31	30	31	30	19	323	26.92	86.49	
1976	0	0	21	20	31	22	11	0	0	0	0	0	106	8.75	28.77	
1977	7	5	3	3	4	14	16	9	30	26	30	1	148	12.33	40.55	
1978	0	0	18	30	31	30	31	31	30	31	30	9	269	22.42	73.70	
1979	0	7	31	30	31	30	31	28	12	0	21	4	225	18.75	61.64	
1980	0	4	18	30	9	23	0	2	0	0	0	4	90	7.50	24.66	
1981	0	0	0	0	18	30	31	28	9	8	10	4	138	11.50	37.81	
1982	0	23	31	28	22	30	31	31	30	31	30	31	318	26.50	87.12	
1983	27	25	31	30	31	30	31	28	11	21	29	22	316	26.33	86.58	
1984	5	28	31	30	31	30	31	31	30	31	30	27	335	27.92	91.78	
1985	26	8	31	30	31	30	20	27	19	31	30	31	314	26.17	86.03	
1986	16	27	28	30	31	30	31	31	30	31	30	31	346	28.83	94.79	
1987	31	23	31	30	31	30	31	21	26	0	6	21	281	23.42	76.99	
1988	3	14	22	30	10	0	0	0	0	0	0	0	79	6.58	21.64	
1989	0	0	7	6	2	2	1	8	21	0	0	1	48	4.00	13.15	
1990	3	4	18	28	31	30	30	23	0	0	0	0	167	13.92	45.75	
1991	6	3	0	15	31	30	4	0	0	0	0	1	90	7.50	24.66	
1992	0	6	6	22	9	4	20	24	19	5	13	31	159	13.25	43.56	
1993	31	28	31	30	31	30	31	31	30	27	24	23	347	28.92	95.07	
Total	263	406	725	884	901	948	797	629	547	537	547	368 Avg	184.20	15.35	50.48	

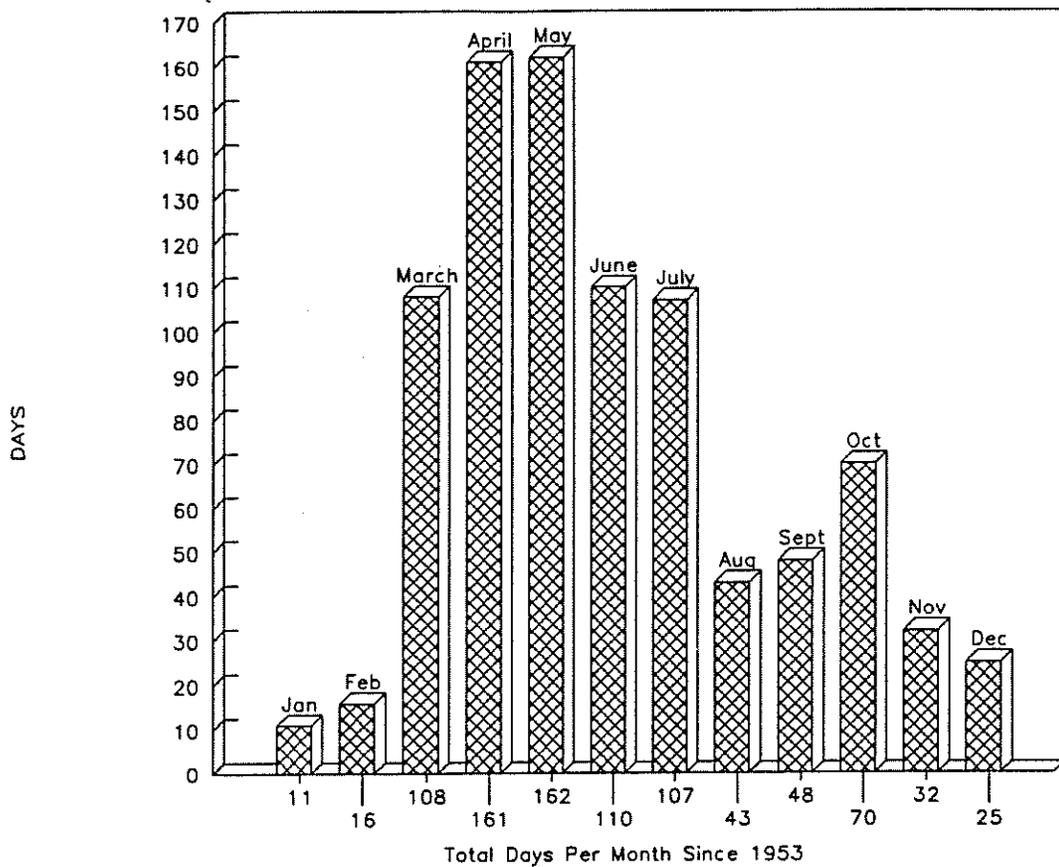
The data presented here show river stages that have occurred since 1953 that have been measured at 14.0 feet or greater. The level was determined after several site visits to Jane Downing Island. During those reviews the greatest level noted was 12.9 feet. At that stage access to the site was marginal and required stepping on rocks that were exposed. It was determined that at 14.0 feet these rocks would be underwater and access to the island would be restricted without a bridge structure or a boat. This graph also indicates that over 50% of the year access to the island would be limited. Based on these 40 years of data it appears that this trend would be consistent.



This graph clearly shows the months that would have the greatest outdoor recreation activity would also have the greatest potential for levels over 14.0 feet. Based on this data access to the island would be limited during those months.

River stages greater than 25 feet (flood stage) at St. Charles													avg			
	Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec	Per Yr	Per Mo	% of yr	
1953	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	
1954	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	
1955	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	
1956	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	
1957	0	0	0	0	2	0	0	0	0	0	0	0	2	0.17	0.55	
1958	0	0	0	0	0	0	15	8	0	0	0	0	23	1.92	6.30	
1959	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	
1960	0	0	3	20	6	0	0	0	0	0	0	0	29	2.42	7.95	
1961	0	0	0	0	13	0	0	0	6	0	0	0	19	1.58	5.21	
1962	0	0	10	2	0	0	0	0	0	0	0	0	12	1.00	3.29	
1963	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	
1964	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	
1965	0	0	2	8	0	0	8	0	0	0	0	0	18	1.50	4.83	
1966	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	
1967	0	0	0	0	0	17	6	0	0	0	0	0	23	1.92	6.30	
1968	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	
1969	0	0	0	6	2	2	17	0	0	6	0	0	33	2.75	9.04	
1970	0	0	0	4	10	2	0	0	0	0	0	0	16	1.33	4.38	
1971	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	
1972	0	0	0	0	0	0	0	0	0	0	3	0	3	0.25	0.82	
1973	5	4	25	30	18	2	0	0	1	20	0	3	108	9.00	29.59	
1974	4	0	4	0	7	9	0	0	0	0	0	0	24	2.00	6.58	
1975	0	0	0	5	1	0	0	0	0	0	0	0	6	0.50	1.64	
1976	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	
1977	0	0	0	0	0	0	0	0	4	0	3	0	7	0.58	1.92	
1978	0	0	13	16	7	0	0	0	0	0	0	0	36	3.00	9.86	
1979	0	0	16	0	0	0	0	0	0	0	0	0	16	1.33	4.38	
1980	0	0	0	1	0	0	0	0	0	0	0	0	1	0.08	0.27	
1981	0	0	0	0	5	6	8	2	0	0	0	0	21	1.75	5.75	
1982	0	6	0	0	5	22	2	2	4	0	0	10	51	4.25	13.97	
1983	0	0	0	20	21	5	0	0	0	0	0	0	46	3.83	12.60	
1984	0	0	12	28	28	20	12	0	0	0	3	0	103	8.58	28.22	
1985	2	6	11	1	0	4	0	0	0	6	9	2	41	3.42	11.23	
1986	0	0	0	0	8	0	8	0	5	31	3	3	58	4.83	15.89	
1987	0	0	5	7	0	0	0	0	0	0	0	0	12	1.00	3.29	
1988	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	
1989	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	
1990	0	0	3	0	12	15	0	0	0	0	0	0	30	2.50	8.22	
1991	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00	0.00	
1992	0	0	0	0	0	0	2	1	0	0	5	7	15	1.25	4.11	
1993	0	0	4	13	17	6	29	30	28	7	6	0	140	11.67	38.36	
Totals	11	16	108	161	162	110	107	43	48	70	32	25	Avg	21.78	1.82	5.97

The data presented here show river stages greater than 25 (flood stage). At this level not only would Jane Downing Island be influenced by high water many surrounding areas would be inundated. Nearly 22 days per year access to the island and surrounding areas would be restricted. It should be noted that prior to this level and after this level access would also be limited.



This graph clearly shows the months that have the greatest occurrence of flood stage activity. In this case primarily spring months are influenced most by flood stage occurrences. Recreation activity