June 14, 2013

John Hicks, Transportation Development Analyst
Saint Louis County Department of Highways and Traffic
Division of Highway Planning
121 South Meramec
Clayton, Missouri 63105

RE: Draft Environmental Impact Statement Comments—South County Connector Project

Dear Mr. Hicks:

The Board of Directors of the Great Rivers Greenway District (District) has reviewed the Draft Environmental Impact Statement (DEIS) for the South County Connector and is providing its comments within this letter. The District may have additional comments prior to the DEIS July 19, 2013 deadline.

The District’s Planning Committee met on June 3, 2013 with representatives from St. Louis County Highways and Traffic to discuss in-depth the project’s impacts to Great Rivers Greenway current and future projects. The Planning Committee’s concerns and recommendations were made to the full Great Rivers Greenway Board at the June 14, 2013 Board Meeting.

The District has been tasked by the citizens of the region to build connectivity through greenway trails, on-street bicycle facilities, and multi-modal projects. The South County Connector Project impacts several of our projects including the River des Peres Greenway, Deer Creek Greenway, as well as the on-street Bike St. Louis, and Gateway Bike Plan routes. Our concerns include the following:

1.) Impact on Local Taxpayer Investment
Currently in the District’s 5-year Capital Budget, $17,753,000 in projects for the River des Peres Greenway and $8,675,000 for the Deer Creek Greenway are anticipated through 2018. This is a significant commitment by the District using taxpayer funds to create a high quality and connected greenway system. The District’s Board of Directors and staff are committed to making the St. Louis region a better place to live through enhancing and connecting these greenway trails. Previous District investments total over $12 million for the River des Peres Greenway and over $2 million for the Deer and Shady Creek Greenway since the District’s creation in 2000.

The May 30, 2013, open house for the South County Connector displayed a board stating increased connectivity along the River des Peres Greenway Trail as a result of the South
County Connector. Great Rivers Greenway District disagrees with that statement. There are significant impacts to the River des Peres Greenway Trail beginning near Lansdowne Avenue and continuing to Chippewa Street. A roundabout at Weil Avenue would place trail users in direct conflict with vehicular traffic. Great Rivers Greenway District plans to begin reconstruction in 2013 for the section of greenway trail from Gravois to Lansdowne making a direct connection to the MetroLink Station at Shrewsbury and modifying slopes and cross-sections to make ADA improvements. Considering the District’s past, current, and future investments of providing increased connectivity we again disagree with the statement that the South County Connector would provide increased connectivity to the River des Peres Greenway.

2.) Impact to Gateway Bike Plan
The District worked with St. Louis County, MoDOT and East-West Gateway among other entities in the development of the Gateway Bike Plan. The Plan is a 20-year vision to create a regional interconnected system of on-street bicycle routes connecting communities and multiple destinations through the District. A copy of the Plan’s executive summary was sent to you on September 26, 2011. The District remains concerned with maintaining and enhancing the connectivity of a non-motorized transportation system for the St. Louis region.

3.) “Parks Protection Act” requirements in City of St. Louis
Another District concern is River des Peres Park along River des Peres Blvd. The DEIS states the park would have 2.6 acres impacted due to the South County Connector. Great Rivers Greenway District as previously stated has made significant investments into the River des Peres Greenway and greenspace within the corridor. Impacts to open space and parkland within the corridor counter the efforts made by the District. Also, an amendment to the St. Louis City Charter was adopted by a vote of the people in April, 2007. The amendment requires any impact to a City park to go before a vote of the people. Was this considered in the DEIS process?

4.) Current Traffic Counts are Needed
Regarding the South County Connector, the District continues to request traffic counts within the project area. The project’s need is based on traffic estimates dating from 2005 and 2006 and an average annual growth rate of 0.5%. Recent data from the East-West Gateway Council of Governments shows Vehicle Miles Traveled (VMT) decreasing in the St. Louis Region. The data collected spanned from 2007 through 2011 and showed a decrease in VMT for St. Louis County and St. Louis City of 4.5% and 5.5% respectively. The amount decrease in VMT for East-West Gateway’s 8-County jurisdiction was 4.4%, and the national average was 2.8%. With these numbers showing the trend of decreasing vehicles on roadways it seems prudent to conduct new traffic counts and modify the growth rate as needed to validate the need for the project prior to finalizing the EIS.
5.) Degradation/Safety concerns as an impact to existing greenways
The District understands the quality of a user's experience on a greenway trail or on-street bicycle facility is as important as the connectivity of a system. A connection may exist; however, the aesthetic design of a trail or bike and pedestrian facility influences a user's comfort and safety. The District requests conceptualized typical sections and schematics to demonstrate the resulting trail and bike facility experience at key locations along the South County Connector. Cross sections would be helpful at the following locations: 1) Deep Creek at Deer Creek Plaza; 2) the proposed intersection at Big Bend Blvd; 3) the structure over Interstate 44; 4) the proposed intersection at Lansdowne; 5) along River des Peres Blvd.

6.) Complete Street Policy requirements in the City of St. Louis
The District encourages the St. Louis County Council to adopt a Complete Street Policy for all of their roadway projects, including the South County Connector. The planning and design of roadways for all modes of transportation is critically important for improving our communities and raising the quality of life for residents of the region. Careful planning and design for bicycle and pedestrian inclusion must be in any new facility. St. Louis City adopted a Complete Streets policy in 2010 for new roadway projects. A portion of the South County Connector is within St. Louis City it does not appear that this policy was incorporated by St. Louis County.

7.) Federal Highways Administration Planning and Design Policy
FHWA enacted a new Policy Statement on Bicycle and Pedestrian Accommodation Regulations and Recommendations in March, 2010. The policy Title 23 of United States Code 217(g) Planning and Design.--
   1. In General.--Bicyclists and pedestrians shall be given due consideration in the comprehensive transportation plans developed by each metropolitan planning organization and State in accordance with sections 134 and 135, respectively. Bicycle transportation facilities and pedestrian walkways shall be considered, where appropriate, in conjunction with all new construction and reconstruction of transportation facilities, except where bicycle and pedestrian use are not permitted.
   2. Safety considerations.--Transportation plans and projects shall provide due consideration for safety and contiguous routes for bicyclists and pedestrians. Safety considerations shall include the installation, where appropriate, and maintenance of audible traffic signals and audible signs at street crossings. Any facility funded with federal money will need to adhere to these planning and design policies. These policies need to be included in this project.

8.) Impact on vision of 600 mile River Ring
Great Rivers Greenway is planning, designing, and constructing an eventual 600 mile River Ring system of off-street greenway trails and on-street bicycle facilities. The
projects impacted by the South County Connector are part of this larger system and when there are impacts to these projects the entire River Ring system is negatively impacted. St. Louis County adopted the River Ring Plan by Ordinance (Ordinance 4941) in 2006 making the River Ring a part of St. Louis County’s Master Plan. The District requests the County’s continued commitment to establishing and maintaining the connectivity of the River Ring system and the quality of the experience for the region’s citizens. This commitment, along with more detailed improvements, should be included in the final document.

9.) Previous District requests for information
Great Rivers Greenway District is including a May 30, 2013 letter requesting information from St. Louis County Highways in preparation for the District’s Planning Committee meeting. The District is still seeking information requested in this letter. Again, the District feels its concerns need to be addressed and this information is pertinent to those concerns as well as the entire study. Finally, the District has had several meetings with St. Louis County Highways and Traffic staff. We are open to continued discussion and specifically would like to understand if there is an unmet traffic congestion issue this project would solve.

Sincerely,

Susan Trautman
Executive Director

cc: County Executive Charlie Dooley
    Gary Earls, St. Louis County
    Sheryl Hodges, St. Louis County
    Mayor Francis Slay, City of St. Louis
    Mayor Felicity Buckley, Shrewsbury
    Mayor James P. White, Maplewood
    Mayor Gerry Welch, Webster Groves
    Ed Hillhouse, East-West Gateway Council of Governments
    John Nations, Bi-State Development Agency
    Greg Horn, MoDOT District 6
    Todd Waelterman, St. Louis City Streets
    Rich Bradley, BPS St. Louis City
    County Councilman Pat Dolan
    County Councilman Steve Stenger
    County Councilman Colleen Wasinger
    County Councilman Kathleen Kelly Burkett

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County Councilman Mike O’Mara
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County Councilman Greg Quinn
Aldermen Joe Vaccaro
Alderman Donna Baringer
Alderman Larry Amowitz
Alderman Fred Wessels
Alderman Scott Ogilvie
Ann Mack, Trailnet
May 30, 2013

John Hicks, Transportation Development Analyst
Saint Louis County Department of Highways and Traffic
Division of Highway Planning
121 South Meramec
Clayton, Missouri 63105

RE: South County Connector Project

Dear Mr. Hicks:

Great Rivers Greenway has been reviewing the DEIS and is preparing a formal response by the July 19th due date for public comments. In order to prepare a response, the District’s Planning Committee will be meeting on Monday, June 3 at 9am to review the project and begin to outline comments.

We are pleased that you are able to attend the meeting and we have identified some preliminary questions that have been generated so far. I anticipate further questions will come up at the meeting but please be prepared to respond to the following:

1) What are the proposed Average Daily Traffic counts on the new South County Connector?

2) Are there any more recent traffic counts than the 2005 and 2006 shown in Table 2-2 of the Traffic Analysis Memo? How have volumes in the area changed recently? (decreased, increased or stable)

3) How was the growth rate of 0.5% per year (listed on page 2-5) determined? If a lower growth rate were utilized, how would this impact the purpose and need?

4) If the roadway is needed, could lower classification/design speed/posted speed limit be utilized?
   - DEIS is proposing 4 lane major arterial with a 40 mph speed (SCC low-build)
   - Would a 2 lane section handle the proposed Average Daily Traffic?
   - Could a 35 mph speed be utilized for either a 2 or 4 lane section?

5) On page S-12 and 13 states “During the design process, the County will continue to coordinate with the participating agencies to assess appropriate transit,

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bicycle and pedestrian access within the corridor". Great Rivers Greenway would like to see more of this addressed during the DEIS process to ensure the South County Connector’s EIS right-of-way (project footprint) includes sufficient property for sidewalks and trails.

6) What is the proposed Right of Way (ROW)/footprint to be cleared (Fig 4-3)? Will it include the sidewalk and trail as shown?

7) How will bike and pedestrian connectivity be provided at re-built intersections (Laclede Station, Big Bend, Lansdowne, Watson) including the trail to trail connections and local sidewalks to trail connections?

8) What will cross sections (road, trail and creek) look like along Deer Creek Center?

9) Great Rivers Greenway would like to see the typical section on structure (Fig 4-5) include a wider sidewalk/path. Is this possible?

10) Will retaining walls be used in fill sections or 3:1 side slopes? How will this impact the location of relocated trail?

11) Will impact (takings) to River Des Peres Park require a vote of City residents? If so can this be "De Minimus?"

12) Please clarify "De Minimus Criteria" finding for Parks and Trail; Has this finding been approved by FHWA, others, requiring no further action for mitigation?

We anticipate additional questions will be raised at the meeting but we hope you can provide responses to these questions.

Sincerely,

[Signature]

Todd Antoine, AICP
Director of Planning