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September 28, 2009

**VIA CERTIFIED MAIL**

The Honorable Anne Quinlan  
Secretary  
Surface Transportation Board  
395 E Street, SW  
Washington, DC 20423

225798

Re: Docket No. AB-331 (Sub-No.1X), Bi-State Development Agency of the Missouri-Illinois Metropolitan District-Petition for Exemption

Dear Secretary Quinlan:

Enclosed for filing in Docket No. AB-331 (Sub-No.1X), Bi-State Development Agency of the Missouri-Illinois Metropolitan District-Petition for Exemption, are the executed original and ten copies of the applicant's Petition for Exemption and three electronic copies of same. This firm's check in the amount of \$6,400.00 in payment of the filing fee is also enclosed.

A Certificate of Service is attached to the Petition for Exemption. It should be noted that Amtrak does not operate on the segment of track which is the subject of the Petition for Exemption, therefore Amtrak was not served with a copy of the Petition.

Very truly yours,

Theodore J. Williams, Jr.

TJW;kf  
Enclosure

**FILED**  
SEP 30 2009  
SURFACE  
TRANSPORTATION BOARD

**FEE RECEIVED**  
SEP 30 2009  
SURFACE  
TRANSPORTATION BOARD

ENTERED  
Office of Proceedings  
SEP 30 2009  
Part of  
Public Record

225790

BEFORE THE  
SURFACE TRANSPORTATION BOARD



Docket No. AB-331 (Sub-No.1X)

BI-STATE DEVELOPMENT AGENCY  
OF THE MISSOURI-ILLINOIS METROPOLITAN DISTRICT  
--DISCONTINANCE EXEMPTION--  
CITY OF ST. LOUIS, MO

PETITION FOR EXEMPTION

BI-STATE DEVELOPMENT AGENCY OF THE  
MISSOURI-ILLINOIS METROPOLITAN DISTRICT

By its attorneys,

Theodore J. Williams, Jr.  
John P. Lord  
Williams Venker & Sanders LLC  
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St. Louis, MO 63102  
(314) 345-5000  
(314) 345-5055 facsimile

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BEFORE THE  
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Docket No. AB-331 (Sub-No.1X)

BI-STATE DEVELOPMENT AGENCY  
OF THE MISSOURI-ILLINOIS METROPOLITAN DISTRICT  
--DISCONTINUANCE EXEMPTION--  
CITY OF ST. LOUIS, MO

---

PETITION FOR EXEMPTION

Petitioner, Bi-State Development Agency of the Missouri-Illinois Metropolitan District ("Bi-State"), pursuant to 49 U.S.C. § 10502, petitions for exemption from the requirements of 49 U.S.C. § 10903, et seq., and the implementing regulations at 49 C.F.R. § 1152.1, et seq., to effect the discontinuance of freight rail transportation on a portion of its railroad line (the "Line"), extending from Milepost 1.8 in the City of St. Louis, Missouri to Milepost 3.23 in the City of St. Louis, Missouri, a distance of approximately 1.43 miles, and as grounds therefore states as follows:

1. Bi-State is a body, corporate and politic, organized and existing under a 1949 Compact between the States of Missouri and Illinois, ratified by the Congress, P.L. 743, approved August 31, 1950, 64 Stat. 568, as amended. Its principal offices are located at 707 North First Street, St. Louis, MO 63102.

2. Bi-State operates a 46-mile, light rail public transportation system ("MetroLink"). MetroLink is the light rail component of an integrated urban mass transit system which also provides bus service and specialized transportation for the disabled.

This transit system is subsidized by local sales taxes, federal and state grants and subsidies, and by fares paid by passengers.

3. MetroLink provides public light rail transportation to the St. Louis region's employers, sports and entertainment venues, academic centers, medical facilities, tourist attractions, Scott Air Force Base and Lambert-St. Louis International Airport.

4. Bi-State and MetroLink have never owned any equipment to move railroad freight cars. Neither has ever been a common carrier of freight.

5. An 8.14 mile segment of the right-of-way upon which MetroLink operates was acquired by Bi-State from the Wabash Railroad Company and the Norfolk and Western Railway Company pursuant to the Notice of Exemption filed June 6, 1989, in Finance Docket No. 31425, Bi-State Development Agency of the Missouri-Illinois Metropolitan District Acquisition and Operation Exemption--Norfolk and Western Railway Company and Wabash Railroad Company. Pursuant to this authorization by the Interstate Commerce Commission ("ICC"), Bi-State assumed the obligations of a common carrier on the acquired right-of-way.

6. On or about August 27, 1990 the ICC authorized Bi-State to discontinue freight operations on a 6.71-mile portion of the right-of-way previously conveyed to Bi-State by the Wabash Railroad Company and the Norfolk and Western Railway Company. Bi-State still has common carrier obligations for the remaining 1.43 miles of right-of-way ("the Line").

7. Since on or about June 15, 1989, Bi-State fulfilled its common carrier obligations to shippers located on the Line by utilizing contract operators, i.e. Rail Switching Services of Missouri, Inc. and Respondek Railroad Corporation. Respondek

Railroad Corporation owns Squaw Creek Railroad. The most recent freight rail switching services were provided by Squaw Creek Railroad.

8. Bi-State now wishes to discontinue freight rail transportation on the Line.

9. Currently, there are only two active shippers remaining on the Line: Ray-Carroll County Grain Growers, Inc., 4040 Duncan, St. Louis, MO 63110 and U.S. Metals Company, 311 South Sarah Street, St. Louis, MO 63110.

10. Federal Mogul is an industry located on the Line and its address is 3700 Forest Park Avenue, St. Louis, MO 63108. The industry track which connects with the Line at this location has been removed.

11. The property located on the Line at 500 Spring Avenue, St. Louis, MO 63110 is vacant.

12. A map showing the Line; the location of the two remaining shippers on the Line; nearby highways; and the MetroLink light rail system is attached hereto as Attachment No. 1.

13. Respondek Railroad Corporation through its subsidiary, Squaw Creek Railroad, most recently performed switching services for these two shippers pursuant to a contract with Bi-State. This contract expired December 1, 2008 and Respondek declined to continue services for the final option year of the contract. After the contract expired, Respondek removed its freight car moving equipment from the Line. Respondek indicated that it would no longer provide the desired switching services on the Line because it was no longer profitable to do so. This is a factor of the low volume of car movements required by the two remaining shippers.

14. Car movements performed on behalf of the two remaining shippers in 2008 consisted of 89 cars--20 of which were grain cars moved for Ray-Carroll County

Grain Growers, Inc. and 69 of which carried metal products for U.S. Metals Company. These movements collectively produced less than \$22,000 in revenue. In September and November 2008, no cars were moved on behalf of the shippers.

15. In an effort to continue to fulfill its common carrier obligations on the Line, Bi-State solicited new contractors to perform the switching services previously performed by Respondek, through Squaw Creek Railroad. No proposals were received by Bi-State by the June 12, 2009 due date. Only two potential contractors attended a pre-proposal conference on May 29, 2009. The prospective bidders indicated at this conference that the cost of providing switching services to the two remaining shippers on the Line was greater than the freight revenue created by these services.

16. One prospective bidder indicated that it might perform switching operations pursuant to a long-term contract with Bi-State which featured an escape clause for the prospective bidder, but no escape clause for Bi-State. Additionally, this prospective bidder indicated that it would require contracts with high monthly minimum revenue guarantees, with the minimum guarantee to be borne by Bi-State. These monthly minimum revenue guarantees are as follows: a) \$5,000 per month minimum revenue if Bi-State assumes all Federal Railroad Administration ("FRA") reporting and compliance responsibilities; and b) \$7,000 per month minimum revenue if the contractor assumes all FRA reporting and compliance responsibilities. Because of the low number of car movements on the Line and the small amount of revenue produced by these movements, these minimum revenue guarantees would create an unacceptable financial hardship for Bi-State such that Bi-State cannot agree to a contract for switching services on the Line under these terms.

17. After it was clear that no prospective contractors would submit acceptable bids, Bi-State investigated the possibility of purchasing rail freight equipment which might enable Bi-State to perform switching services on the Line. However, the cost of this equipment is prohibitive because of Bi-State's strict budgetary limitations and the low volume of car movements performed on the Line on behalf of the two remaining shippers.

18. Bi-State's restricted budget sustains its primary function of providing public passenger transportation services to the St. Louis region. Bi-State cannot divert any of its limited resources from this primary function to cost-ineffective switching operations for only two shippers.

19. Because Bi-State itself cannot provide switching services on the Line and because no contractors are willing to do so, Bi-State issued an embargo of the Line on August 3, 2009. (BSDA 000109).

20. The two remaining shippers on the Line have access to transportation alternatives, i.e. trucks. Both shippers are situated within one-half mile of Missouri Highway 40/Interstate 64, which is a major arterial highway in the St. Louis region. This proximity to Missouri Highway 40/Interstate 64 also provides easy access to and connections with Interstates 55, 64, 70, 170, 270 and 255.

21. Both shippers utilize trucks heavily. In fact, U.S. Metals has its own fleet of trucks. Accordingly, discontinuance of freight rail transportation on the Line is wholly warranted.

22. In the near future, Bi-State must rebuild a bridge by which MetroLink passes over South Vandeventer Avenue in the City of St. Louis. This bridge is on the Line and has also been used to carry light freight rail equipment on the Line. Because of

budgetary restrictions and its operating needs, Bi-State plans to rebuild the Vandeventer bridge to specifications appropriate for light freight rail equipment. This would prohibit the use of heavy freight rail equipment on the bridge. Rebuilding the bridge to heavy freight rail equipment specifications would cost approximately \$400,000 more than rebuilding to light freight rail equipment specifications. Rebuilding the bridge to more expensive heavy rail equipment specifications in order to accommodate the potential freight rail needs of only two shippers would be a very inefficient use of Bi-State's limited resources.

23. No stations will be closed as a result of Bi-State's proposed discontinuance of its freight rail transportation on the Line.

24. Based on information and belief, the Line does not contain federally granted rights-of-way.

25. Before this Petition was filed, Bi-State consulted with the two remaining shippers located on the Line.

26. There is no reasonable alternative to the discontinuance of freight rail transportation on the Line.

27. Detailed scrutiny by the Board under 49 U.S.C. § 10903 is not necessary to carry out the rail transportation policy of 49 U.S.C. § 10101. An exemption will minimize Bi-State's administrative costs and expenses that would otherwise be associated with pursuing the proposed discontinuance through a full application proceeding. An exemption will expedite regulatory action and will reduce regulatory barriers to discontinuance consistent with 49 U.S.C. § 10101(2) and (7). An exemption will also foster sound economic conditions in the transportation industry consistent with 49 U.S.C. § 10101(5).

28. This Board is empowered to exempt a proposed discontinuance of freight rail transportation on a railroad line if, under 49 U.S.C. § 10502, it determines that (1) an application is not necessary to carry out the transportation policy of 49 U.S.C. § 10101: and, (2) either (a) the transaction or service is of limited scope, or (b) an application is not needed to protect shippers from the abuse of market power. The proposed discontinuance of Bi-State's freight rail transportation on the Line clearly satisfies all of these exemption standards.

a. Applicable Standards for Exemptions. The applicable statutory provision, 49 U.S.C. § 10502, charges the Board "with the responsibility of actively pursuing exemptions for transportation and service that comply with the section's standards." American Trucking Associations, Inc. v. I.C.C., 656 F.2d 1115, 1119, (5th Cir. 1981). A review of the applicable statutory standards demonstrates that the proposed discontinuance should be exempted.

b. Rail Transportation Policy. The proposed discontinuance of freight rail transportation is on a Line which is only 1.43 miles long and serves only two shippers. Both of these shippers have ample transportation alternatives. Detailed scrutiny of the proposed discontinuance of freight rail transportation on the Line pursuant to the provisions of 49 U.S.C. § 10903, et seq., and the regulations of 49 C.F.R. § 1152.1, et seq., would not further the goals and objectives of the rail transportation policy articulated in 49 U.S.C. § 10101. To the contrary, exempting the proposed discontinuance from the otherwise applicable regulatory requirements would advance at least two of these policies: "to minimize the need for Federal regulatory control over the rail transportation system" and "to reduce regulatory barriers...to exit from the industry." 49 U.S.C. § 10101(2) and (7).

c. Limited Scope. The proposed discontinuance is of limited scope. As previously noted, the Line is very short and it serves only two shippers, both of which have ample transportation alternatives. These shippers collectively required only 89 rail car movements in 2008 and these car movements generated less than \$22,000 in freight revenue.

d. Protection of Shippers from Abuse of Market Power. As previously noted, Bi-State maintains that the proposed discontinuance is of limited scope. Therefore, a determination on the market power issue is not required. However, Bi-State also submits that the Board will be able to conclude that regulation of the transaction is unnecessary to protect shippers from an abuse of market power. First, Bi-State is not a freight railroad. Bi-State provides urban light rail passenger service. Therefore, Bi-State has no freight market power and cannot be accused of abusing market power. Second, the two remaining shippers on the Line have very limited railroad needs. Regulation of the proposed discontinuance, in lieu of permitting it to go forward pursuant to an exemption, would in no way afford the remaining shippers any greater protection from an abuse of market power than they already enjoy.

29. The lead agency for the preparation of the Final Environmental Impact Statement for the St. Louis MetroLink Project, dated September 1987, was the Urban Mass Transportation Administration of the U.S. Department of Transportation, and pertinent portions of this statement accompany this Petition. (See Attachment No. 2) Although Bi-State believes that no further environmental analysis is required by this Board, it is serving copies of this Petition upon each of the appropriate Federal and State agencies so that they will have notice of its filing and the opportunity to make their views known to this Board if they believe such action to be warranted.

30. Consistent with the I.C.C.'s holding in Ex Parte Docket No. 274 (Sub-No. 18), Rail Abandonments--Consideration of Possible Sale or Subsidy of Rail Line in Analysis of an Abandonment Application Under 49 U.S.C. 10903 (unreported), served February 21, 1990, the Board is able to take note of the fact that the proposed discontinuance of freight operations is designed to facilitate MetroLink's completion of its core function of providing public light rail transportation services and thereby, as the Final Environmental Impact Statement, at pages S-1 & 2, observed, to (a) improve transportation service to increase mobility, (b) provide public transportation service which is financially attainable, (c) stimulate economic expansion and job creation and (d) enhance the physical and social environment of the St. Louis metropolitan area. These goals can best be served if the exemption request were granted. (See Attachment No. 2)

31. Bi-State cannot provide switching services for the two shippers on the Line and, despite its extensive and good faith efforts, Bi-State cannot find a contractor that is willing to perform these limited services. Bi-State has tried to accommodate the limited needs of the two shippers on the Line in every possible way. The only remaining alternative is discontinuance of freight rail operations on the Line.

32. Because there are no contractors willing to perform these limited freight rail services on behalf of Bi-State and Bi-State cannot perform these services, a discontinuance of freight rail operations on the Line would not have any impact on labor.

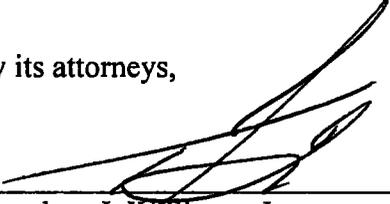
WHEREFORE, Petitioner, Bi-State Development Agency of the Missouri-Illinois Metropolitan District, asks that, pursuant to 49 U.S.C. § 10502, it be exempted from the requirements of 49 U.S.C. § 10903, et. seq., and the implementing regulations of 49 C.F.R. § 1152.1, et. seq., to effect the discontinuance of its freight rail transportation on

its line of railroad, extending from milepost 1.8 in the City of St. Louis, Missouri to milepost 3.23 in the City of St. Louis, a distance of approximately 1.43 miles.

Respectfully submitted,

BI-STATE DEVELOPMENT AGENCY OF THE  
MISSOURI-ILLINOIS METROPOLITAN DISTRICT

By its attorneys,



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Theodore J. Williams, Jr.  
John P. Lord  
Williams Venker & Sanders LLC  
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St. Louis, MO 63102  
(314) 345-5000  
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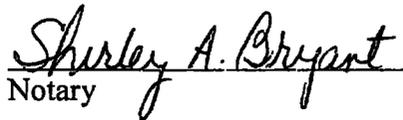
CITY OF ST. LOUIS        )  
  )  
STATE OF MISSOURI        )

**VERIFICATION**

Larry B. Jackson, having been duly sworn, declares that he is the Vice President, Procurement, Inventory Management and Supplier Diversity for Metro St. Louis, that he is authorized to make this verification, that he has read the foregoing Petition for Exemption and that its contents are true and correct to the best of his knowledge.

  
Larry B. Jackson

Subscribed and sworn to before me,  
A Notary Public for the State of  
MISSOURI, this 28<sup>th</sup> day of  
September, 2009

  
Notary

My Commission Expires: MARCH 25, 2011



CERTIFICATE OF SERVICE  
FOR  
PETITION FOR EXEMPTION

The undersigned hereby certifies that a copy of the foregoing Petition for Exemption AB-331 (Sub-No.1X), was served by First Class Mail (or by Certified Mail, if indicated) on the 26<sup>th</sup> day of September, 2009.

**Significant Users**

Ray-Carroll County Grain Growers, Inc.  
4040 Duncan  
St. Louis, MO 63110

U.S. Metals Company  
311 South Sarah Street  
St. Louis, MO 63110

**Proximal Industries**

Federal Mogul  
3700 Forest Park Avenue  
St. Louis, MO 63108

**State Officials and Federal Agencies**

**(VIA CERTIFIED MAIL)**

Office of Governor Jay Nixon  
200 Madison Street  
Jefferson City, MO 65102

Missouri Department of  
Transportation  
Central Office  
105 W. Capitol Avenue  
Jefferson City, MO 65102

Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

Missouri Department of Economic  
Development  
301 W. High Street  
P.O. Box 1157  
Jefferson City, MO 65102

Department of Natural Resources  
Division of Parks and Recreation  
P.O. Box 176  
Jefferson City, MO 65102

National Park Service  
Midwest Region  
1709 Jackson Street  
Omaha, NE 68102

UM Extension South East Region  
6458 State Highway 77  
Benton, MO 63736

U.S. Department of Transportation  
Federal Railroad Administration  
1200 New Jersey Ave., SE  
Washington, DC 20590

MTMCTEA  
Attn: Railroads for National Defense  
720 Thimble Shoals Boulevard, #130  
Newport News, Virginia 23560-2574

USDA Forest Service  
1400 Independence Ave, SW  
Washington, DC 20250-0003

U.S. Department of the Interior  
National Park Service  
Recreation Resources Assistance Div  
1849C. Street, NW  
Washington, DC 20240

U.S. Railroad Retirement Board  
844 North Rush Street  
Chicago, IL 60611-2092

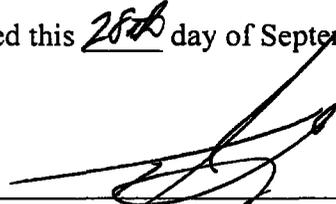
Headquarters – Railway Labor  
Executive Association  
400 North Capitol Street, Suite 850  
Washington, DC 20001

**Headquarters of Labor Organizations Representing Employees**

Amalgamated Transit Union  
5025 Wisconsin, NW  
Washington, DC 20016

International Brotherhood  
of Electrical Workers  
900 Seventh Street, NW  
Washington, DC 20001

Dated this 25th day of September, 2009



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Theodore J. Williams, Jr.  
John P. Lord  
Williams Venker & Sanders LLC  
100 North Broadway, Suite 2100  
St. Louis, MO 63102  
(314) 345-5000  
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# Attachment No. 1



**LEGEND**

- The Line
- MetroLink
- MetroLink Station
- Major Highway
- Secondary Highway
- County Boundary
- Hydrology



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ATTACHMENT NO. 1

ST. LOUIS METRO LINK PROJECT

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FINAL  
ENVIRONMENTAL  
IMPACT  
STATEMENT

---



SEPTEMBER 1987

U.S. DEPARTMENT OF TRANSPORTATION  
URBAN MASS TRANSPORTATION ADMINISTRATION



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EAST-WEST GATEWAY COORDINATING COUNCIL



ATTACHMENT NO. 2

ST. LOUIS METRO LINK PROJECT  
St. Louis City and County, Missouri  
East St. Louis and St. Clair County, Illinois

FINAL ENVIRONMENTAL IMPACT STATEMENT

Submitted Pursuant to the National Environmental Policy Act  
42 U.S.C. 4332(2) (c)

by the

U.S. DEPARTMENT OF TRANSPORTATION  
URBAN MASS TRANSPORTATION ADMINISTRATION

and

EAST-WEST GATEWAY COORDINATING COUNCIL

9-23-87  
Date of Approval

  
for UMTA      Lee Waddleton  
Regional Administrator

9-21-87  
Date of Approval

  
for EWGCC      Jerry F. Costello  
Board Chairman

U. S. DEPARTMENT OF TRANSPORTATION  
URBAN MASS TRANSPORTATION ADMINISTRATION

EAST-WEST GATEWAY COORDINATING COUNCIL

FINAL ENVIRONMENTAL IMPACT STATEMENT

Pursuant to Section 102(2)(c), of the National Environmental Policy Act of 1969; Sections 3(d) and 14 of the Urban Mass Transportation Act of 1964, as amended; Section 106 of the National Historic Preservation Act of 1966; and Section 4(f) of the Department of Transportation Act of 1966.

RESPONSIBLE AGENCY

Lead Agency: Urban Mass Transportation Administration  
Cooperating Agency: East-West Gateway Coordinating Council

TITLE OF PROPOSED ACTION

St. Louis Light Rail Transit Project ("Metro Link Project")

ABSTRACT

The primary focus of this Final EIS is a major transit capital investment in the St. Louis central/airport corridor which connects Metro East, downtown St. Louis, and the Airport/McDonnell Douglas complex. Five primary alternatives were considered to improve transit in the corridor: 1) no-action; 2) transportation systems management (TSM); 3) busway; 4) light rail transit (LRT); and 5) light rail transit with shuttle bus service (to Clayton). The LRT/bus shuttle, known locally as the Metro Link project, is the locally preferred alternative, which has been refined in the preliminary engineering study, including the consideration of three intermediate length options, and compared with updated no-action and TSM alternatives. The following effects of the preferred alternative are considered: transportation; economic development; displacement; neighborhood; visual and aesthetic; air quality; noise and vibration; ecosystem; water; energy; historic, archaeological, and cultural; parkland; and financial effects.

This Final EIS includes revisions to the Draft EIS; a summary of the comments and recommendations received on the Draft EIS; a list of persons, organizations, and public agencies commenting on the Draft EIS; and responses to substantive comments raised in the review and consultation process. Changes in the text of the Draft EIS are indicated in this Final EIS by a solid vertical line in the margin.

FOR FUTHER INFORMATION ON THE FINAL EIS, CONTACT:

Charles L. Donald  
Urban Mass Transportation  
Administration, Region VII  
6301 Rock Hill Road, Suite 100  
Kansas City, Missouri 64131  
(816) 926-5053

Douglas R. Campion  
East-West Gateway Coordinating  
Council  
911 Washington Avenue  
St. Louis, Missouri 63101  
(314) 421-4220

Robert W. Stout  
Urban Mass Transportation  
Administration  
400 Seventh Street, SW  
Washington, D.C. 20590  
(202) 366-0096

The Final EIS was made available on OCT 9 1987

## SUMMARY

### S.1 PROJECT PURPOSE

The automobile has become the dominant mode of travel in the St. Louis area while the region's public transportation system has declined. This results in several problems in the St. Louis area:

- o Slow transit service in the corridor;
- o Diminishing transit accessibility to major activity centers;
- o Reduced transit revenues;
- o A greater demand for low-cost parking at major employment centers;
- o Reduced reliability of transit performance resulting from traffic congestion; and
- o Inability to attract transit patrons of choice.

The decline in the level of transit service in the region has reduced the mobility of the people who use it, including both transit dependents and those who prefer to use transit. Further, the lack of a reasonable alternative to the automobile makes the region vulnerable to energy shortages and inhibits the area's ability to meet air quality goals. The region's elected officials, therefore, are seeking to develop an effective public transit service to meet mobility, energy, environmental, and financial goals. These goals for improved transit are stated below along with selected (parenthetical) examples of the kinds of objectives which must be achieved in order to meet the goals:

1. Improve transportation service to increase mobility (increase speed, comfort, and reliability of public transportation and increase accessibility to activity centers and the region as a whole);
2. Provide public transportation service which is financially attainable (maximize operating efficiency and revenue, and minimize operating costs and public subsidy);
3. Stimulate economic expansion and job creation (enhance opportunities for public/private development partnerships and increase local government tax receipts); and

4. Enhance the physical and social environment (improve air quality, lower noise levels, and conserve energy plus avoid displacing homes and businesses).

## S.2 ALTERNATIVES CONSIDERED

Table S-I lists the alternatives along with their respective numeric designation which were studied during the Alternatives Analysis/Draft Environmental Impact Statement (AA/DEIS) and those which were studied during the Preliminary Engineering/Final Environmental Impact Statement (PE/FEIS) phase. Five primary alternatives were examined in the AA/DEIS: 1) No-Action; 2) Transportation Systems Management (TSM); 3) Busway; 4) Light Rail Transit (LRT) from East St. Louis to Clayton and Lambert Airport; and 5) Light Rail from East St. Louis to the airport with connecting shuttle bus service to Clayton. The No-Action, TSM, and LRT/Bus shuttle alternatives, the latter of which is the locally-preferred alternative, were updated and refined during preliminary engineering (PE). The updated No-Action and TSM alternatives are described below, along with brief descriptions of the two unchanged alternatives, which are not discussed further in this document. The locally-preferred alternative is fully described in the following section; it is referred to as Alternative 3 throughout this FEIS. Also, three intermediate length options were considered in the FEIS: building LRT from East St. Louis westward to the Central West End station (3a); to the Delmar station (3b); or to the UMSL-South station (3c).

Table S-II gives the year 2000 transit-system level of service for the No-Action, TSM, and LRT/Bus shuttle alternatives.

The No-Action alternative, Alternative 1, is defined as maintaining the Bi-State bus routing, headways, and fleet in service on December 2, 1985 and programmed north Missouri corridor improvements without change through the design year 2000. This definition reflects the first changes made in the Bi-State Development Agency's Transit Action Plan (TAP), which is a program to completely reorganize Bi-State bus service to improve the responsiveness of transit service to the needs of Missouri and Illinois residents and to address changing population/employment patterns and serve major new activity centers. This

TABLE S-1  
 TRANSIT ALTERNATIVES STUDIED  
 IN THE AA/DEIS AND PE/FEIS

<u>Description</u>	<u>Identifying Number Used in the</u>	
	<u>AA/DEIS</u>	<u>PE/FEIS</u>
No-Action	1	1
TSM	2	2
Busway	3	-*
LRT with Alternative LRT Connections to Clayton	4A-4F	-*
LRT/Bus Shuttle	5	3**
LRT (Central West End)	-***	3a
LRT (Delmar)	-***	3b
LRT (UMSL-South)	-***	3c

\* These alternatives were not updated or studied further during the Preliminary Engineering phase.

\*\* This is the locally-preferred alternative.

\*\*\* These alternatives were developed after the Alternatives Analysis phase and circulation of the Draft Environmental Impact Statement.

TABLE S-II  
YEAR 2000 TRANSIT SYSTEM LEVEL OF SERVICE  
BY ALTERNATIVE

<u>Mode</u>	<u>1</u> <u>No-Action*</u>	<u>2</u> <u>TSM</u>	<u>3 LRT/</u> <u>Bus Shuttle</u>
<u>Bus</u>			
Vehicle Miles (in thousands)	26,283	26,801	24,588
Seat Miles (in millions)	1,314	1,340	1,230
Fleet Size (peak- hour vehicles)	616	628	566
<u>LRT</u>			
Vehicle Miles (in thousands)	--	--	1,478
Seat Miles (in millions)	--	--	189
Fleet Size (total vehicles)	--	--	31
<hr/>			
TOTAL VEHICLE MILES	26,283	26,801	26,004
TOTAL SEAT MILES (in millions)	1,314	1,340	1,411
Percentage Increase in Vehicle Miles Over No-Action (Over TSM)	-- (-0.2%)	2.0% --	-0.8% (-2.7%)
Percentage Increase in Seat Miles Over No-Action (Over TSM)	-- (-2.0%)	2.0% --	7.9% (5.8%)

\* The No-Action alternative assumes maintenance of the Bi-State service provided in December 1985 and programmed north Missouri corridor improvements without change through the design year 2000.

existing level of service involves 616 buses on 134 routes during the a.m. peak period, 53 of which provide express, rapid, or park-n-ride service (to seven Missouri and 14 Illinois park-n-ride lots) and 81 of which provide local service.

The TSM alternative, Alternative 2, provides for the completion of Bi-State's TAP program as well as service-level expansion exceeding the TAP program's financial constraints in order to accommodate projected demand which cannot be served with the current bus service levels that are held constant in the No-Action alternative. (See Figure S-1.) Upgrading existing (No-Action) park-n-ride lots and adding more park-n-ride lots, freeway bus ramps, and other bus stop improvements will complement the TSM bus service reorganization and expansion. The freeway bus ramps include a ramp at: a) northbound I-55/I-44 to Gravois/Russell; b) the I-70 reversible lanes with eastbound-on and westbound-off ramps to/from Kingshighway; and c) the I-70 reversible lanes to North Broadway. Miscellaneous bus stop improvements include providing: a) a bus turnout and stop at the I-55 interchange with 4500 South Broadway; a bus turnout, stairs, and a stop at: b) Lindbergh and Page and c) Lindbergh and Olive; and d) a pedestrian overpass at Lindbergh and Corporate Square.

The Busway alternative, AA/DEIS Alternative 3, incorporates TSM improvements with special bus lanes to speed the flow of buses operating in the priority corridor during peak periods. The busway concept involves channeling multiple bus routes into a single high-speed corridor connecting outlying areas to the core area, with limited intermediate stops.

The LRT alternative, AA/DEIS Alternative 4, incorporates some TSM improvements with a light rail route connecting major activity centers in the region. LRT stations will be provided at selected major cross streets and at multiple points in core areas; several park-n-ride lots will be developed in outlying areas. Bus routes will be modified as appropriate to connect with LRT. Some track segments will be developed across or in existing street rights-of-way in which case trackage will be constructed flush with the roadway pavement to permit mixed (LRT

and auto) traffic operations. Six alternative LRT Clayton connections (4A-4F) involve development at grade, on structure (where right-of-way is constricted), and in tunnel (where traffic congestion may otherwise be a problem). Options along I-70 will avoid mixed-traffic operating conditions along Natural Bridge Road.

### S.3 PREFERRED ALTERNATIVE

The LRT/Bus shuttle alternative is preferred locally. This alternative, referred to as Alternative 3 in this FEIS, involves 18 miles of light rail alignment extending from Metro East and downtown St. Louis to Lambert-St. Louis International Airport and the McDonnell Douglas industrial area. The shuttle bus component of the alternative will connect the St. Louis Galleria plus the County Government Center in Clayton and points in between with the LRT alignment. The alternative incorporates some TSM bus service improvements, and involves a number of bus service modifications designed to integrate the proposed LRT alignment with the existing bus network. Figure S-2 shows the locally preferred alternative.

The LRT alignment will use the existing Eads Bridge rail deck and the Washington Avenue/Eighth Street tunnel to be acquired from the Terminal Railroad Association of St. Louis (TRRA) through downtown St. Louis, the northernmost edge of TRRA right-of-way from downtown to Grand Boulevard, and the Norfolk & Western (N&W) trackage from Grand to a point north of Natural Bridge Road. Railroad freight operations will be accommodated on separate parallel tracks along part of the LRT alignment and potentially on a time-sharing basis over part of the LRT alignment. New right-of-way will be developed in downtown East St. Louis, in the vicinity of Kiel Auditorium in downtown St. Louis where the alignment will tie in with the existing baggage tunnel beneath the train shed at St. Louis Union Station, and from the University of Missouri at St. Louis (UMSL) along I-70 to the airport. An unused railroad facility between Jefferson and Twenty-First Street immediately southwest of Union Station will be adapted to become the LRT maintenance and storage facility.

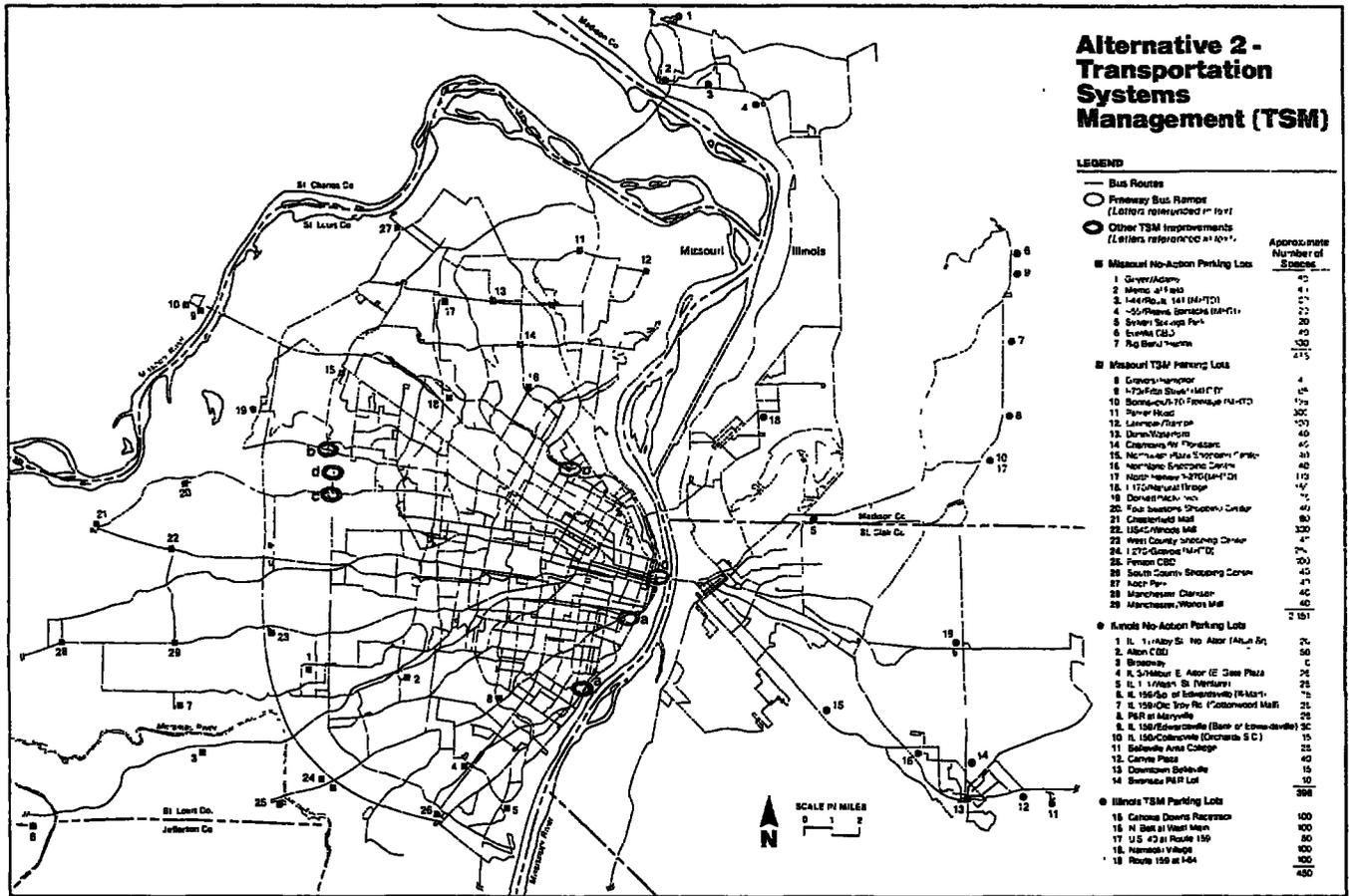


Figure S-1

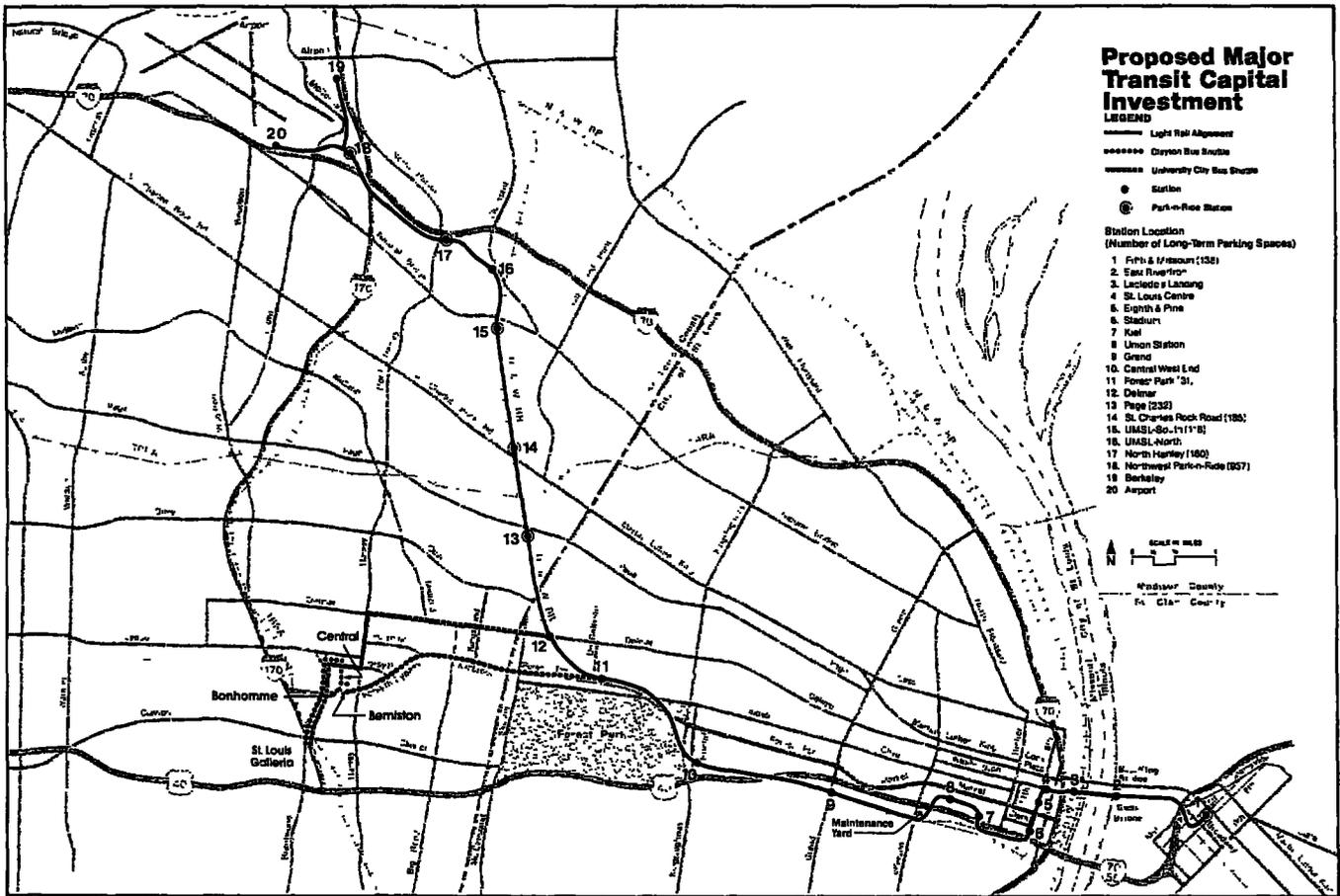


Figure S-2



The LRT alignment will include a total of 20 stations, six of which will initially include 1,801 park-n-ride parking spaces, as shown in Figure S-2. The station platforms will be high level permitting ready access for elderly and handicapped patrons. Both center and side platforms will be used depending on the station location. A variety of compatible materials and finishes will be specified in the station design, and landscaping will be incorporated where appropriate. Closed-circuit television, lighting, public emergency telephones plus security personnel staffing will be used to enhance safety for system users. A proof-of-payment barrier-free fare collection system will be used. An initial fleet of 31 articulated light rail vehicles will be required to serve the projected year 2000 patronage.

The Bi-State Development Agency, the region's bus system operator, will operate the LRT system. A cost savings will accrue with Bi-State operating both the LRT and bus functions.

#### S.4 COSTS AND SIGNIFICANT TRANSPORTATION AND ENVIRONMENTAL IMPACTS

Table S-III provides a summary comparison of costs and significant impacts for each of the alternatives studied during PE. These cost estimates include right-of-way, vehicle purchases, contingency (at 10 percent for construction and five percent for vehicles), engineering design and construction management (at 16 percent), and inflation (at four percent annually). The TSM alternative will cost \$38.3 million in escalated dollars, and the LRT/Bus shuttle alternative will cost \$258 million plus the value of real property assets (\$83.8 million) in escalated dollars, based on a four-year construction schedule with revenue service by late 1991. If the construction schedule is not met, revenue service may be delayed and costs could increase at a rate of approximately four percent per year. The intermediate-length LRT alternatives will cost less in proportion to their shorter length. The operating costs for the TSM alternative is estimated to be about five percent more than the cost of the No-Action alternative, and the LRT/Bus shuttle alternative operating costs will be about seven percent more than those of the No-Action alternative.

The guideway facilities will service a year 2000 daily ridership ranging from 37,127 for the LRT/Bus shuttle alternative, Alternative 3, to 16,256 for LRT Alternative 3a. The TSM alternative will

TABLE S-III  
SUMMARY OF COSTS AND SIGNIFICANT IMPACTS

Impact Measures	1 No- Action	2 TSM	3 LRT/Bus Shuttle	3a LRT/Bus (CWE)	3b LRT/Bus (Delmar)	3c LRT/Bus (UMSL- South)
Project Cost (in millions of 1984/escalated dollars)*	0	\$ 29.7/ 38.3	\$262.75/ 341.7	\$154.3/ 200.6	\$169.8/ 220.9	\$190.9/ 248.3
Annual Operating Cost (in millions of 1984 dollars)	\$ 86.8	\$ 91.2	\$ 93.0	\$ 94.6	\$ 94.7	\$ 94.6
Deficit Per Trip (in 1984 dollars)	\$ 1.41	\$ 1.43	\$ 1.33	\$ 1.48	\$ 1.45	\$ 1.41
Daily New Linked Trips**	0	6,181	14,706	6,314	7,608	10,391
Daily Guideway Ridership	0	0	37,127	16,256	19,956	27,982
Average Systemwide Transit Travel Time for Year 2000 Riders (in minutes)	44.3	43.3	40.1	41.9	41.5	40.8
Reduced Daily Parking Requirements at Major Activity Centers***	0	2,818	6,685	2,870	3,458	4,723
Development Potential Near Station Sites (in millions of 1984 dollars)	0	0	\$ 488.2	\$364.5	\$393.4	\$440.2
Increased Operating Deficit (in millions of 1984 dollars)	0	\$ 3.4	\$ 2.0	\$ 5.4	\$ 5.0	\$ 4.4
Equivalent Annual Cost Per New Rider (Federal/Total Index in 1984 dollars)	0	n.a.	\$ 6.09/ 8.95	\$288.29/ 373.84	\$ 27.90/ 36.99	\$ 10.21/ 13.98
Equivalent Annual Cost Per Hour of User Benefit (Federal/Total Index in 1984 dollars)	0	n.a.	\$ 2.96/ 4.01 to \$ 5.44/ 7.37	n.a.	n.a.	n.a.

\* The project costs of the LRT/Bus shuttle alternatives include the minimally required value of physical assets to be donated and used as the local share. These donated asset values in 1984 dollars are: \$64.4 million for Alt. 3; \$34.7 million for Alt. 3a; \$38.8 million for Alt. 3b; and \$44.7 million for Alt. 3c.

\*\* Daily New Linked Trips are the additional daily trips each alternative, if implemented, will generate by comparison with the no-action alternative. A linked trip is a complete trip from origin to ultimate destination, including walking to and from one's car and/or transit vehicle, plus transfers.

\*\*\* Reduced Daily Parking Requirements are computed as one-half the daily new linked trips divided by an average auto occupancy of 1.1 persons per car.

provide transit travel-time savings of about one minute over the No-Action alternative. The LRT/Bus shuttle alternative, Alternative 3 will yield an average systemwide savings of about three minutes per transit trip compared with the TSM alternative. The total LRT/Bus Alternative 3 travel-time savings have an estimated annual value of \$10.5 million for year 2000 riders. The action alternatives are expected to reduce the demand for parking spaces at corridor activity centers between about 2,800 (TSM) and 6,700 (LRT/Bus shuttle) spaces daily. The action alternatives will not significantly affect highway traffic volumes in 2000 and will cause minimal interference with cross traffic.

The table also provides a measure for each alternative of the combined capital and operating cost required to attract each new transit rider. The lower the index, the more cost-effective is the alternative. The indices are computed both for each alternative's federal involvement and for the alternative's total (federal and local) participation. Similar indices are provided for the equivalent cost per hour of user benefit. Alternative 3 -- LRT/bus shuttle is the most cost effective of the alternatives.

Implementing any of the alternative transit improvements will potentially enhance land development opportunities and continued development of downtown St. Louis. The most significant difference among the alternatives is that the LRT options also provide a number of station sites which are attractive for development. More of this development is likely to be refocused rather than net growth. The development is expected to occur as a result of improving accessibility, concentrating passenger volumes, reducing site-specific parking requirements, and demonstrating a long-term public commitment at station locations. Specifically, these LRT development factors are expected to enhance developments like St. Louis Union Station and Laclède's Landing which will be more closely tied with the core area of downtown and with each other.

By creating additional people traffic, LRT could strengthen retail sales in the corridor. It will increase office absorption within the corridor by enhancing its competitiveness and permitting economic

benefits to accrue sooner to both the public and private sector. It will enhance the tourism/convention package by connecting the airport, numerous hotels, the convention center, and multiple entertainment destinations. The East-West Gateway Coordinating Council estimates that a total of \$488.2 million in capital investment entailing 6,758 construction jobs could occur at sites near LRT stations through the year 2000. (These numbers differ from AA/DEIS numbers presented for the preferred alternative because of increased development activity.)

Building the LRT system will displace nine single-family dwelling units, three small businesses, and four parking lot operations; the residential displacements occur as a result of alignment changes made following completion of the AA/DEIS and public hearing. Adequate relocation options and assistance are available. While any displacements could become controversial, the project's residential displacements are not expected to be controversial, because they are caused by an alignment shift made in response to citizen comments raised during the AA/DEIS project stage. Thus, the locally-preferred alignment is now in the I-70 corridor from which some residents have expressed interest in relocating because of highway and airport approach zone noise. Building LRT is not expected to adversely affect any neighborhoods. Multiple mitigation measures will be pursued to assure that the LRT project fits visually with its surroundings.

Air and noise impacts are expected to be relatively minor. LRT-generated noise levels will fall below appropriate guidelines in most locations. In those few locations where LRT will generate noise greater than the guidelines, the ambient conditions resulting from I-70 and airport operations are so high that LRT's additive effect will be negligible.

Effects on ecosystems, water, and energy consumption are expected to be minor.

No historic, archaeological, or cultural properties will be displaced by the LRT project. Constructing LRT will affect eight historic properties including two national historic landmarks, Eads Bridge and Union Station; the effects are expected to be largely positive. The

project will have no adverse effect on six of the eight historic properties, and a Memorandum of Agreement has been processed to document satisfactory mitigation of the project's effects on the two national historic landmarks. Changes made in the Laclede's Landing LRT station entrance/exits to Eads Bridge reflect State Historic Preservation Office comments and coordination.

#### S.5 AREAS OF CONTROVERSY

The major controversial areas identified in the AA/DEIS were:

- o Building any of the LRT alignments to Clayton (Clayton connection LRT alternatives 4A through 4F) was opposed by some residents and officials in University City and Clayton. The locally-preferred alternative eliminates these options and substitutes bus shuttle service favored by those opposed to the Clayton LRT connections.
- o Operating LRT in mixed-traffic on Natural Bridge Road was opposed by some Normandy-area residents and officials. The locally-preferred alternative eliminates this mixed-traffic operating condition with an exclusive LRT alignment along I-70.

#### S.6 ISSUES TO BE RESOLVED

Agreements with the N&W and TRRA railroad companies are being reviewed by those railroad companies and will be completed in advance of a decision to fund the LRT project. Freight operating conditions will be finalized during final engineering design on the LRT system.

The value of the local match assets which include Eads Bridge, the Washington Avenue/Eighth Street tunnel, and railroad line right-of-way, awaits a final determination, which will be made as a part of the federal decision to fund the LRT project.

Agreements with the Missouri Highway and Transportation Department (MHTD) and the Federal Highway Administration (FHWA) to use the I-70 right-of-way will be finalized during final engineering design on the LRT system.

The use of value capture and joint development techniques will be resolved in final design.

#### S.7 MAJOR CHANGES BETWEEN THE DEIS AND FEIS

The No-Action, TSM, and LRT/Bus shuttle alternatives from the AA/DEIS were refined in the PE phase to reflect changed study-area conditions and the findings of the more detailed analysis undertaken as a part of PE. The project's design year was assumed to be the year 2000 during PE rather than the year 1995 which was used in the AA/DEIS.

Changes in No-Action Alternative. The No-Action alternative was redefined to be the Bi-State bus routing, headways, and fleet in service on December 2, 1985 and programmed north Missouri corridor improvements, as opposed to the AA/DEIS date of June 13, 1983. The updated definition reflects the first changes made (in the Southwest corridor and Illinois) as a part of Bi-State's Transit Action Plan (TAP), which is a program to completely reorganize Bi-State bus service to improve the efficiency and effectiveness of transit service in the region.

Changes in the TSM Alternative. The TSM alternative was redefined in PE to reflect future system changes which Bi-State is considering as a part of its TAP program in its north, south, and north-west corridors. These changes include bus service changes and the addition of numerous park-n-ride lots. The better structuring of routes and related improvements achieved with the TAP program result in the greater efficiency secured with the TSM alternative in PE. TAP program changes rendered many AA/DEIS TSM recommendations inappropriate; specific AA/DEIS TSM bus service routing and headway modifications are no longer meaningful as a result of the substantial systemwide changes included in the TAP program. In addition, AA/DEIS TSM proposals for signal preemption and a Locust Street bus mall were deleted after further investigation, while the upgrading of existing (No-Action) park-n-ride lots was added to the definition of TSM.

Differences in TSM vehicle and seat miles (which are about 10 percent less in the PE study compared with the AA/DEIS) and in TSM

peak-period bus requirements (which are about 16 percent less in the PE study compared with the AA/DEIS) are accounted for by the revised TSM definition. Similarly, the decrease in TSM patronage achieved in PE (152,200 compared with 175,500 in the AA/DEIS, or a decline of 13 percent) is a result of the revised TSM definition and refinements made in the travel forecasting models during PE.

Changes in the LRT/Bus Shuttle Alternative. The LRT/Bus shuttle alternative was thoroughly evaluated in the PE phase and a number of changes in operations, alignment, and station locations were made from the AA/DEIS solution.

LRT headways were adjusted to provide the same 20-minute peak and 30-minute off-peak service on both legs at the end of the line rather than the constant 30-minute headway at the Airport and the 15-minute peak and 60-minute off-peak headway proposed to McDonnell Douglas (Berkeley) in the AA/DEIS. Also, separate parallel freight trackage is proposed in the Page and Sarah Street areas where N&W switching occurs, thus minimizing and potentially eliminating the time-sharing feature of the AA/DEIS operating plan. Through-freight movements will be eliminated and each switching area will be accessed from opposite ends of the line. These features complement a PE decision to use high-level platforms at each LRT station, compared with the base case assumption of low-level platforms in the AA/DEIS. The high-level platforms will maximize handicapped accessibility and minimize loading and unloading time, particularly given the selection of a proof-of-payment fare collection system over the on-board fare collection system, which was also considered in the AA/DEIS.

Multiple affected communities and agencies reviewed the alignments developed and evaluated during the PE phase to refine the AA/DEIS I-70 alignment options. The preferences of the City of Berkeley, Normandy-area municipalities, and UMSL led to the selection of an LRT alignment around the north and east sides of UMSL and the north side of the Washington Park Cemetery, generally paralleling I-70, as opposed to the AA/DEIS base-case Natural Bridge alignment.

The LRT/Bus shuttle alternative alignment and station locations in East St. Louis were also changed during the PE phase. The modifications eliminate mixed-traffic operating conditions on Broadway and on the one-way loop proposed in the AA/DEIS, and consolidate the AA/DEIS park-n-ride and walk-up LRT stations at one location in the East St. Louis core area at Fifth and Missouri Streets.

The LRT/Bus shuttle alternative was also modified in the PE study to eliminate mixed-traffic operations on Fifteenth Street in downtown St. Louis by shifting the alignment eastward closer to Fourteenth Street. This location permits developing a station at Fourteenth and Spruce (Kiel) as opposed to the AA/DEIS Fifteenth and Clark station location. The changed station location will provide better spacing between this station and the Union Station LRT station at Eighteenth Street, and it will be closer to the Mart Building, the Police Station/ Academy, City Hall, and the Municipal Courts.

In addition to the above-described station location adjustments made as a part of alignment changes, other stations were shifted, or in one case deleted, to reflect land use conditions and plans which have changed since the preparation of the AA/DEIS. AA/DEIS Old Post Office and Gateway Mall stations were consolidated into one station at Eighth and Pine Streets midway between the two AA/DEIS stations.

The Union Station LRT station was shifted eastward underneath Eighteenth Street to avoid interfering with the Union Station parking lot and to provide direct access to the REA block, a redevelopment opportunity. This station and/or the Kiel station will serve the proposed Amtrak terminal now to be located at the foot of Sixteenth Street (which will be grade-separated over the LRT alignment near Clark). Therefore, the proposed AA/DEIS LRT station between Twentieth and Twenty-First Streets intended to serve a proposed Amtrak station (when in service) is no longer needed and has been deleted.

The AA/DEIS LRT station at Kingshighway with pedestrian access to Euclid was shifted to Euclid to fit with the preferences of medical center officials and to be able to develop a high-level platform. The AA/DEIS station located immediately west of DeBaliviere Avenue has been

shifted east of DeBaliviere to avoid conflict with currently underway development and to better accommodate the bus shuttle with a turnaround as well as to provide for potential joint development. The AA/DEIS park-n-ride lot at St. Charles Rock Road was shifted from a shared status in an existing parking lot west of the N&W trackage to surplus N&W right-of-way east of the N&W trackage.

Refinements in the PE modeling resulted in an 11 percent reduction in patronage compared with the AA/DEIS (37,100 guideway trips compared with 41,778). Also, three fewer LRT vehicles are now expected to be needed as a result of the more detailed study undertaken during PE investigations; tighter scheduling and changes in turnbacks cause the reductions.

#### S.8 MITIGATION MEASURES

Relocation assistance will be provided for single-family dwelling unit owners to help them relocate. Commercial displacees will also be compensated for their property and assisted in relocating. LRT construction will be sequenced to maintain necessary vehicular and pedestrian flow on all key roadways. Press releases and signage will be used to alert the public to changes in circulation which will be coordinated with building owners and tenants as well as street and highway departments, as appropriate. All utility relocations will be closely coordinated with each utility company to protect their lines during construction and to minimize any disruption in service.

To reduce the possibility of accidents, railroad style flashers and gates with optional bells will be installed at at-grade street crossings, except at the three Broadway crossings in East St. Louis, where traffic lights will be installed. The height, opacity, and other salient features of any fences will be coordinated with municipal officials and neighborhood organizations to avoid adverse safety or security repercussions on adjacent land use activities. A comprehensive station area master planning program has been prepared to ensure compatible development at appropriate locations. Zoning and subdivision regulations that are already in place are expected to be adequate to control development.

To minimize project effects on St. Vincent Park, coniferous trees will be planted in the park along the LRT alignment at the request of the St. Louis County Parks Director, with special emphasis given to the open area near the proposed lake.

To minimize interfering with the UMSL campus, the light rail alignment will be built on structure over East Campus Drive and in cut under Mark Twain Drive. The latter condition will necessitate relocating West Campus Drive as proposed in the University's 1981 UMSL 2000 Master Campus Planning Report. Additionally, the second soccer field proposed in the planning report will be rough graded as a part of building the LRT alignment.

Ultra-light catenary trolley wire and direct suspension trolley wire may be considered in final design to reduce the extent of overhead wiring in visually sensitive areas. Landscaping will be incorporated as a part of station designs, the park-n-ride lot layouts, and along the part of the LRT alignment cutting through the UMSL-North campus. Also, special consideration will be given during final design to station, elevated structure, and retaining wall design on the UMSL campus and to the design of the highly visible I-70/I-170 area LRT bridge structures.

Standard industry practices will be employed to minimize adverse effects on the natural environment during construction. Temporary erosion control measures, prompt reseeding of affected areas with native grasses, and planting of shrubs and trees will be undertaken to minimize harm and restore these areas to their previous condition.

Sprinkling exposed soils, covering the loads of haul trucks, cleaning truck tires as they leave the construction site, and using street cleaners in the vicinity of the work site are among the measures which will be used as needed to satisfactorily mitigate fugitive dust resulting from construction.

Waste materials and debris generated during construction will be properly disposed of in approved sanitary landfills.

All construction activities creating significant noise in residential areas will be limited by construction specifications to

normal daytime hours. Construction noise control measures for work in the vicinity of the hospital complex will be developed during final design in consultation with the city of St. Louis and the affected hospitals.

The Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings will be applied in any alterations affecting the National Historic Landmark Eads Bridge and St. Louis Union Station. Metals in America's Historic Buildings: Uses and Preservation Treatments by Margot Gayle and David W. Look (1980) will be used as a guide in cleaning and repainting Eads Bridge metal surfaces. The appropriate State Historic Preservation Officer will be notified immediately in the event that any archaeological resources are unearthed during construction in order to ascertain their significance.