



June 6, 2019

Mayor Dan Borgmeyer
200 North 2nd Street
4th Floor, Room 400
Saint Charles, MO 63301

Subject: MCE Concerns Regarding the Proposed Bangert Island Riverfront Transformation Project

Dear Mayor Borgmeyer:

The Missouri Coalition for the Environment (MCE) is grateful for the opportunity to provide comments on the proposed Bangert Island Riverfront Transformation Project. MCE is a non-profit, grassroots, citizen action group committed to clean water, clean air, clean energy, and a healthy environment. Our mission is to educate, organize, and advocate in defense of Missouri's people and the environment. We are particularly interested in the restoration and protection of floodplains and wetlands along the Missouri River, and we are concerned that this proposed development:

- Does not properly address potential environmental impacts to Bangert Island
- Does not take into consideration the cumulative impacts of a number of floodplain developments along the Missouri River
- Does not include robust opportunities for public participation.

As a result of these concerns, MCE is opposed to the Bangert Island Riverfront Transformation Project.



Environmental Impacts to Bangert Island

Bangert Island is beloved by many because of its wild and rustic character. It is a hotspot for off-road cyclists, nature-enthusiasts, local runners, and hikers hoping to catch a view of the Missouri River from one of its most historic reaches. MCE is concerned that the City of St. Charles has not properly studied what kinds of environmental impacts may occur as a result of excavating a portion of Bangert Island to create a lake (or “water quality basin” as it is referred to on the development’s website) and lining the facing bank with mixed-use development.

There is no doubt that drawing more people to a mixed-use development will have impacts on the recreational space. We would expect any development of this scale to increase run-off (from increased paved and impervious surfaces) and increase pollution (such as litter and noise). We are concerned that the Transformation project has not properly assessed the extent of potential environmental impacts.

Cumulative Impacts on Flooding

Decades of intensive management and development along the Missouri River have stripped it of its natural recourse for high-water events -- wetlands and floodplains. There are over 300 levees in Missouri that have cut the river off from much of its floodplain; over 40 of those levees have breached so far this year. The proposed Bangert Island Riverfront Transformation Project would join the proposed Maryland Park Lake District development and the existing Chesterfield Valley developments in paving over and raising even more acres out of our precious remaining floodplains in this short stretch of the Missouri River. The developers involved in all of these floodplain development projects claim that there will be minimal impacts to flooding, but there are no efforts to assess the cumulative impacts of all of these developments combined.

We are facing a historic and devastating year of spring flooding along the Missouri River. The river’s spring runoff was the highest ever recorded in over 120 years of record-keeping¹, and we can no longer look to the past as a guide for future conditions. These unprecedented levels of water in the system mean that something, somewhere has to give. The combined developments in Chesterfield, Maryland Heights, and now St. Charles will increase disaster risk for vulnerable communities down river.

As of this writing, the Missouri River is 10 feet over flood stage in St. Charles and expected to crest at 35.7 feet -- 10.7 feet above flood stage. Small business owners all along the Katy Trail are suffering from decreased summer traffic.² Given the magnitude of flooding and rain events we are experiencing this year and the frequency with which these flooding events are occurring year after year, we are concerned that the City of St. Charles provides a wholly inadequate

¹“Missouri River’s March-April runoff highest ever recorded in 121 years,” Published on May 7, 2019
https://missoulia.com/outdoors/missouri-river-s-march-april-runoff-highest-ever-recorded-in/article_1bbc5e80-d31f-5482-a188-3abc-e775ed51.html

²“Missouri River Flooding Dries Up Business Along Katy Trail,” Published on June 4, 2019
https://www.stltoday.com/news/local/state-and-regional/missouri-river-flooding-dries-up-business-along-katy-trail/article_8770a9e6-b448-5b12-b86c-730c5b56a4ce.html



response to the questions “Will the project cause flooding elsewhere on the Missouri River” and “Won’t the development flood?” on the development’s FAQ page.

Public Participation and Consultation

MCE urges the City of St. Charles to actively engage the public in the decision-making process for this proposed development. Members of the community deserve to be active participants in this process, not simply passive consumers of a plan. MCE is not aware of any public meetings or consultations that have taken place to-date. While we understand that the information has been made publicly-available through the website, the City has not done enough to seek out the reactions of the public or provide fora where the concerns of the public may be heard and addressed.

Thank you for the opportunity to present these comments. If you have any questions about the information presented above or if you would like to discuss MCE’s comments further, please do not hesitate to reach out at the contact information below.

Sincerely,



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