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Mr. Tyler Schwartze, Executive Director
Conservation Federation of Missouri
728 W. Main Street
Jefferson City, MO 65105-1559

Dear Mr. Schwartze:

The people and leaders of St. Charles County have always had a keen interest in wildlife conservation and continue to do so. Representative Darius Heald, from our county, sponsored the first game law passed in Missouri and, by the time of the Civil War, the Mississippi Flyway in St. Charles County was recognized as an excellent hunting ground. When the federal government announced in 1929 its intention to establish a wildlife sanctuary in each state, former Missouri Governor Frederick Gardner and August A. Busch, both landowners in the county, suggested the Baldwin Farm in St. Charles County. Busch stated, "I am familiar with the game value of lands in this region, as I believe I have one of the most successful shooting grounds in the State at my duck preserve at St. Peters, Mo., about 8 miles north of St. Charles. I have seen as many as 10,000 game birds rise in flight from my land – truly a beautiful sight." He added, "If I didn't have two boys whose enthusiasm for duck hunting exceeds what mine was at its height, I would turn over my St. Peters place to the state tomorrow."

More recently, county government worked with Great Rivers Habitat Alliance to challenge in court the funding of the 370 Industrial Park. When that effort was unsuccessful, we worked to convince the General Assembly to ban the use of Tax Increment Financing (TIF) in the floodplain in St. Charles County. Presently, our Heritage Museum has an extensive exhibit on the history of hunting and conservation in the county. Given those facts, I must accept your invitation to respond to your organization's resolution in opposition to St. Charles City's Proposed Riverpoint Development near Bangert Memorial Wildlife Area.

I am disappointed that it contains untrue and misleading statements that we have seen in correspondence from less informed, and less respected, organizations than your own. As many have pointed out before, on such an issue, everyone is entitled to their own opinion but not their own facts. The key word in the title of your resolution is "near." St. Charles County has a long-term lease on Bangert Island and has made it clear to the city, which became our landlord after

the Conservation Commission sold it the island, that we will not tolerate changes that degrade the island's present use as a county park.

Regarding your contention there will be "negative impacts" to the Katy Trail I would ask you to look at the rerouted trail around our Family Arena. The city proposes to reroute the trail, as the county did 20 years ago around the arena, away from a busy five-lane highway to a much more scenic route along the Missouri River.

I do not understand your claim that the project will fill 120 acres of floodplain. The 80 acres on the south end of the development were filled back in the 1970s, when no permits were required. Did your organizations pass any resolutions opposing the extensive fill that was allowed for a casino across the Missouri River in Maryland Heights or the fill in the Mississippi River floodplain just north of the Chain of Rocks Bridge for another casino that was never built?

You complain that 15.5 acres of productive wetland will be lost, yet I am sure you know that any wetland loss will have to be mitigated under federal law. You also contend the plan "no longer calls for a water feature." Instead of a lake, I am told the city is talking to the Corps of Engineers about a wetlands area.

You admit that Riverpointe is in an "urban" area. This is why its very narrow floodplain was specifically exempted from the legislation banning the use of TIF in our floodplain. (The city has agreed not to use TIF to finance Riverpointe in consideration for our Road Board building the streets.) I believe your organization could do more to discourage floodplain development by passing a resolution in favor of Senate Bill No 22, sponsored by Senator Koenig, that would ban TIFs in St. Louis County floodplain - what is left of it. Over 43 percent of St. Charles County is floodplain, while St. Louis city and county do not have one-tenth that much. I see you also passed a resolution to "Encourage Levee Setbacks on the Missouri River to Provide Floodplain Connectivity and a Sustainable Strategy to Mitigate Flooding and Benefit Fish, Wildlife and Landowners." Why were no such resolutions passed when the Monarch-Chesterfield and Howard Bend levee districts took thousands of acres out of the floodplain in St. Louis County? These were the "past projects" your resolution refers to that "have resulted in constricting the floodplain and contributed to the ongoing process raising water levels and velocity of the river during frequent flood events." Why are projects in St. Charles County treated differently by your organization?

Sincerely,



Steve Ehlmann
St. Charles County Executive