



St. Louis Audubon Society

P.O. Box 220227 St. Louis, MO 63122 www.stlouisaudubon.org

January 25, 2017

St. Louis County Department of Planning
41 S. Central Avenue
Clayton, MO 63105

Re: St. Louis Audubon Society Comments on Proposed Installation of Legacy Ice Foundation Ice Arena Complex at Creve Coeur Lake Memorial Park.

The St. Louis Audubon Society is opposed to the siting of the proposed St. Louis Ice Center in Creve Coeur Lake Memorial Park (CCLMP) for the following reasons:

1. The park is an internationally recognized Important Bird Area (IBA) as designated by the National Audubon Society in 2006. It is part of the St. Louis Urban Oases IBA, which includes Forest Park and Tower Grove Park. All three were recognized for the high quality habitat they provide for many bird species within the already heavily urbanized St. Louis Metropolitan area. This designation holds important significance; and habitat destruction within or adjacent to an IBA is strongly discouraged.
2. CCLMP is one of the top birding locations in the St. Louis region because of the notable number of bird species in the park—230 have been recorded, over half of those typically seen across the entire state. St. Louis Audubon recommends that a study be conducted that reviews the potential impacts to migratory birds and breeding habitats within the Park and surrounding lands. The wetlands at CCLMP provide habitat for many migrating waders, waterfowl, and shorebirds. There is evidence of breeding American Bittern at Creve Coeur Lake, and Least Bittern, Pied-billed Grebe, and Common Moorhen have all been observed there during respective breeding seasons. King, Virginia, and Black Rails have been observed there as well. This park provides stopover habitat for many passerine (song bird) migrant species in spring and fall, in addition to breeding habitat for many birds excluded from the surrounding urban landscape.
3. The proposed parkland intended for the Ice Arena was purchased through the federal Land and Water Conservation Fund, designated 6-F, and restricted for outdoor recreation use only. The Arena would be predominantly an indoor use facility and would need a waiver from the National Park Service. We believe outdoor recreation and wildlife habitat are the best uses of the space.
4. The site is in the 100 year flood plain. 1,500 paved parking spaces will be included, which will cause a number of trees to be cut down and replaced with pavement. We are unaware of any plans to use pervious paving or LEED building specifications in the building and lots construction. This construction interferes with the park's ability to absorb storm water and minimize downstream flooding.



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5. The operation of the Ice Complex will cause significant air, noise and light pollution due to increased traffic, facility lighting and chiller operations.
6. The increased traffic will cause safety hazards in the park. Some traffic will come down from the East on Marine Avenue from Dorsett on a narrow, curvy road that has no shoulder and a 4 or 5 foot drop on either side of the road. Also, Marine Avenue near the lake has several crosswalks with no stoplights, and high traffic could cause danger to the park users who cross the street. In addition to individual games and practice sessions, the Arena is intended to support tournaments which could more than max out the 1,500 planned parking spaces. If any of the games include the sale of alcoholic beverages, the traffic issues could be even greater.
7. This is public park land. Colleges and professional teams do not typically play sports in public County parks. We believe private land would be a better location for such a large facility.
8. As the years pass and the building and equipment wear down, it could likely create a costly risk to the County for maintenance, remodeling, or removal. Unless the County receives revenue from the facility, the building and parking will clearly be a net financial liability for the County Parks and taxpayers.

Should the project be approved, the developer should be required to purchase and provide to the county an equivalent amount of land for addition to CCLMP as replacement open space. Also, any approved building should be required to incorporate Bird Friendly Building Design techniques, such as those developed by the American Bird Conservancy. Such approaches reduce bird mortality by minimizing or preventing entirely bird collisions with windows and other clear or reflective surfaces.

St. Louis Audubon activity participates in the management and restoration of the flora and fauna of CCLMP by partnering with County Parks staff to remove invasive plant species, install native plants and remove trash from the watershed. Our efforts involve broad partnerships of other organizations and agencies and typically include external funding, some of which has been used to purchase equipment for County Parks. Since 2009, we have coordinated more than 50 projects that involved over 2,600 volunteers and secured over \$75,000 in grant funding for CCLMP efforts.

Respectfully submitted,

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