November 21, 2019

Testimony Before the St. Louis County Tax Increment Financing Commission
Regarding the Maryland Park Lake District Proposal

David Stokes, Great Rivers Habitat Alliance

Honorable Members of the Commission,

Thank you for the opportunity to testify before this commission tonight. My name is David Stokes. I am the executive director of Great Rivers Habitat Alliance, a nonprofit, conservation organization dedicated to preserving floodplains and wetlands for recreation, agriculture, and hunting along the Confluence of the Mississippi, Missouri, and Illinois rivers. The ideas presented here are my own.

As the St. Louis region recovers from yet another major flood event, the City of Maryland Heights is moving ahead with a plan that will do all it can to ensure the next flood is even worse. City officials want to use enormous tax subsidies to address flooding issues along Hwy. 141 and Page Avenue. Rest assured, they are not doing this out of any concerns for public safety. They are doing this because they look at this property that has been under water three times in recent years and think to themselves, “Let’s pave it over.”

There are few, if any, examples of worse public policy than using local tax subsidies to develop the floodplain. It combines many elements of bad policy, including
subsidy-based development, which replaces investment decisions based on basic economic fundamentals with decisions based on fragmented municipal goals. As you would expect, the track record of these plans is terrible. For all the projections of economic success that they planners at PGAV gave you for this project, please remember that planners made the same predictions about the Hazelwood Mills Mall project not far away and they were completely wrong. The overwhelming majority of independent, economic research finds no evidence that a subsidy-based approach to development – where the short-term needs of an individual city are paramount - succeeds in growing the economy.

This plan, however, gets worse. As severe flooding has indisputably become more frequent and more dangerous in recent decades, Maryland Heights officials intend to turn thousands of acres of farmland and floodplain into asphalt and concrete. In the next flood, the city will take millions of gallons of water and pump it back into the river to flood someone else. Of course, when they take those thousands of acres that currently can safely hold the water and remove the land from the floodplain, that “someone else” they will flood will be someone whose land previously was not in the floodplain and is not prepared for it. Really, though, who cares who they flood? That is not Maryland Heights’ problem.

Thanks to changes in Missouri state law governing tax increment financing (TIF), this commission has a rare opportunity to stand athwart history and yell “Stop!” If this commission rejects the $151 million subsidy proposal by Maryland Heights, then the overall project will be substantially limited. Maryland Heights will contend that economic growth and property rights are being limited, but what would really be limited is the ability to force other taxpayers to fund the private gains of one
city and a small group of landowners while putting everyone else in danger. More importantly, the county would be taking a stand against environmental damage by opposing this floodplain project.

Flooding in our region is getting more frequent and more severe, but that is not by random chance nor bad luck with rain. It is getting worse because we have taken away the places Mother Nature intended for the water to go. To give one example, 45 of the 87 highest crests recorded along the Missouri River in St. Charles have been since 2000 for an area whose records go as far back as 1844. This proposal in Maryland Heights is the latest in a long line of terrible municipal decisions that have failed our region both economically and environmentally. If Maryland Heights city leaders will not do the right thing and stop this lunacy, St. Louis County leaders must at least limit the damage by rejecting the TIF request.

The primary reasons for increased flooding are overdevelopment within our floodplains and overreliance on levees in a failed attempt to control our great rivers. Increased precipitation from climate change has made the situation untenable. Numerous scientific studies have proven that an overreliance on levees combined with rampant floodplain development and wetlands destruction is making floods more severe. Channelizing our large rivers with too many levees has been the primary cause of the increase in flooding on our major rivers,\(^1\) flooding is more frequent as river water heights increase,\(^2\) flooding is more severe as river constriction increases water speeds,\(^3\) and larger rivers, such as the Missouri, are now flooding more like the dangerous flash flooding usually seen in smaller rivers,\(^4\) with a significantly increased threat to safety when that happens.
This TIF proposal will make these problems worse. It should be rejected. Thank you for the opportunity to address this commission today.

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