PRUITT HOMES AND IGOE APARTMENTS PUBLIC HOUSING COMPLEX

FINAL ENVIRONMENTAL IMPACT STATEMENT

ST. LOUIS HOUSING AUTHORITY
1221 Locust Street
St. Louis, Missouri 63113

September, 1974

Prepared By:
St. Louis Area Office
Kansas City Regional Office
U.S. Department of Housing and Urban Development
911 Walnut Street
Kansas City, Missouri 64106
Mr. Joseph Badaroco, President  
Board of Aldermen  
City Hall - Room 232  
12th & Market Streets  
St. Louis, Missouri 63101

Dear Mr. Badaroco:

Re: Final Environmental Impact Statement  
Demolition of Pruitt-Igoe Public Housing Complex  
St. Louis, Missouri

Pursuant to Section 102(2)(C) of P.L. 91-190 and implementing Federal regulations, I am forwarding for your information the Final Environmental Impact Statement for the referenced project.

The Draft Environmental Statement was distributed for review and comment on May 8, 1974. Comments received on the draft have been taken into account in the preparation of the final statement. Comments received and HUD discussion of these comments are consolidated in a special section of the final statement.

Copies of this Final Environmental Impact Statement are available for reading or acquisition from the Information Centers in the HUD Regional Office in Kansas City, Missouri and the HUD Area Office in St. Louis, Missouri. Copies may be purchased from the Environmental Law Institute, 1346 Connecticut Avenue, N.W., Washington, D.C. 20036.

Sincerely,

[Signature]
Edmer E. Smith  
Regional Administrator

Enclosure
# TABLE OF CONTENTS

## I. DESCRIPTION OF PROPOSED ACTION
- A. General Description ........................................ 1
- B. Location .................................................. 2
- C. History and Status of Project ............................. 2

## II. DESCRIPTION OF EXISTING ENVIRONMENT
- A. Physical Elements ......................................... 9
  - Climate .................................................. 9
  - Soil and Geology .......................................... 10
  - Topography ............................................. 10
  - Drainage ................................................. 10
  - Air Quality ............................................. 11
  - Noise .................................................... 13
- B. Biological Elements ....................................... 14
  - Vegetation, Wildlife and Natural Areas .................. 14
- C. Cultural Elements .......................................... 15
  - Historic Sites ........................................... 15
  - Land Uses ............................................... 15
  - Schools ................................................. 18
  - Parks and Recreation .................................... 20
  - Religious Facilities ..................................... 20
  - Health Services .......................................... 21
  - Police ................................................... 21
  - Fire Protection ........................................... 23
  - Infrastructure ........................................... 24
  - Demographic Characteristics ............................. 24
  - Employment and Commercial Facilities .................. 25
- D. Aesthetic Elements ......................................... 25
  - Pruitt-Igoe Image ........................................ 25

## III. RELATIONSHIP OF PROPOSED ACTION TO LAND USE PLANS, POLICIES AND CONTROLS
- Regional Planning ........................................... 29
- Missouri State Highway Commission ......................... 30
- St. Louis Plan Commission .................................. 30
- St. Louis Land Clearance for Redevelopment Authority ... 31
- Model City Agency ........................................... 31
- Public and Private Opinion .................................. 32

## IV. PROBABLE IMPACT OF PROPOSED ACTION ON THE ENVIRONMENT
- A. Physical Impact ........................................... 35
  - Demolition ................................................ 35
  - Removal of Debris ....................................... 39
  - Disposal of Debris ....................................... 40
  - Climate, Soil, Geology and Topography .................... 44
  - Drainage .................................................. 44
  - Air Quality ............................................... 44
  - Noise ..................................................... 46
Letter from St. Louis Housing Authority in Regard to Relocating Pruitt-Igoe Residents

Letter of Comment to Draft EIS from Missouri State Park Board

Letter of Comment to Draft EIS from St. Louis Housing Authority

Letter of Comment to Draft EIS from Department of Army, Corps of Engineers, St. Louis District

Additional Letters Received Relative to Draft EIS
This document examines the impact on the environment of the proposed demolition of the Pruitt-Igoe Public Housing Complex in St. Louis, Missouri. The Captain Wendell Oliver Pruitt Homes were completed in September, 1955; and the William L. Igoe Apartments were completed in May, 1956, under the provisions of the United States Housing Act of 1937, P.L. 412, as amended. The complex consists of 30 10-story buildings and includes 2,422 dwelling units. Originally there were 32 buildings in the complex but two buildings were demolished by HUD as a part of a controlled demolition experiment in 1972. The project area covers 57.28 acres and is located approximately one and one-half miles north and west of downtown St. Louis.

In June, 1973, the St. Louis Housing Authority, with concurrence of its Board of Commissioners, elected to cease operation of its Pruitt-Igoe Complex. Since that decision, the Housing Authority has provided housing for the residents of Pruitt-Igoe in its other facilities, or at the option of the residents, assisted them in locating other than public housing. (See Exhibit N, Letter from the St. Louis Housing Authority to Mr. Elmo O. Turner, Director, St. Louis Area Office, HUD, dated March 18, 1974.) As of May 3, 1974, all tenants were moved from the project and relocated by the Housing Authority.

Due to the continued deterioration of the physical, social and aesthetic environment in the Pruitt-Igoe Complex, and the extremely
high cost of rehabilitating the project, with uncertain results, the Department of Housing and Urban Development proposes to demolish the project. Because of the massive scale of demolition and solid waste disposal required, it is appropriate to prepare an Environmental Impact Statement.

1. Name of Action: Administrative

2. Brief Description of Action: The project consists of the complete demolition of 30 11-story buildings and appurtenant facilities and the removal of the rubble from the site.

3. Summary of Beneficial and Adverse Environmental Impacts:

  **Beneficial** - The removal of uninhabitable, vandalized, vermin-infested buildings -- occupancy of which posed dangers to the tenants in the form of physical assault and vandalism, and unreliable elevator and heating systems. The stigma of Pruitt-Igoe stymied the efforts of the Land Clearance for Redevelopment Authority and the Model City Agency to develop north St. Louis. The cost of maintaining Pruitt-Igoe severely drained the financial resources of the Housing Authority forcing the Authority to use funds from financially healthy projects for maintenance, and restricting the Authority's ability to adequately maintain all its projects. The former tenants of Pruitt-Igoe are benefiting by occupying other dwellings which offer far better physical, social, and aesthetic surroundings.
Adverse - Consumption of large amounts of fuel for hauling away of an unusually huge volume of rubble; prolonged disruption of traffic in the area due to long period of time required to demolish the project and remove rubble; generation of higher than normal levels of noise and air pollution during time required to demolish buildings and clear site; and decline in enrollment of schools and patronage of health facilities.

4. Alternatives Considered:

A. Secure the buildings and leave the complex as is.

B. Completely rehabilitate the buildings to provide a lower density, mixed income, residential environment and provide highly developed commercial, institutional and recreational areas.

C. Partially demolish the project.

D. Rework the site using the rubble to create a park with new land forms.

5. Federal, State and local agencies and other parties from which written comments relative to the Draft Environmental Impact Statement have been received:

Federal

Senator Stuart Symington

Advisory Council on Historic Preservation

Department of the Army, Corps of Engineers, St. Louis District
Department of Health, Education and Welfare, Region VII, Kansas City, Missouri

Department of the Interior, Missouri Basin Region, Denver, Colorado

Department of Transportation, Region VII, Kansas City, Missouri

Environmental Protection Agency, Region VII, Kansas City, Missouri

Office of Economic Opportunity, Region VII, Kansas City, Missouri

State

Air Conservation Commission, State of Missouri

Department of Community Affairs, State of Missouri (A-95 Clearance)

Missouri Department of Conservation

Missouri State Highway Commission

Missouri State Historic Preservation Officer and Director Missouri State Park Board

Local/Regional

East-West Gateway Coordinating Council

Laclede Gas Company

Southwestern Bell Telephone Company

St. Louis Housing Authority

St. Louis Regional Commerce and Growth Association

Union Electric Company

6. Dates Statements made available to Council on Environmental Quality and public:

Draft: May, 1974

Final September, 1974
I. DESCRIPTION OF THE PROPOSED ACTION

A. General Description

The Pruitt-Igoe Public Housing Project, St. Louis, Missouri consists of two separate projects totaling 30 11-story buildings; the Captain Wendell Oliver Pruitt Homes and the William L. Igoe Apartments. Pruitt Homes, containing 1,477 dwelling units, was completed in September, 1955 at a cost of $21,689,412. The Igoe Apartments, containing 945 units, were completed in May, 1956 at a cost of $14,438,146. This adds to a total of $36,127,557. The units are vacant at this time.

The proposed action is complete demolition of Pruitt-Igoe and removal of the rubble from the property. The purpose of this action is to relieve the St. Louis Housing Authority, the City of St. Louis, and the Federal Government of the crushing financial burden of an uninhabitable public housing project and to erase for the neighborhood, the City, and the country, the stigma which Pruitt-Igoe has become. Ironically, this action will help to realize the national goal of a "decent home and suitable living environment for every American family," as established by the Housing Act of 1949 and reaffirmed in the Housing Act of 1968.

Statement from letter written to Mayor John Poelker by Housing Authority Director, Thomas Costello, May 18, 1973: "From a fiscal standpoint, the closing down of Pruitt-Igoe would, in our estimation, effect a savings in excess of $1 million annually... In this computation, we have projected that 50 percent of the tenant rentals would be transferred to other units which would assist the other developments approximately $150 million."
B. Location

Pruitt-Igoe is bounded by Jefferson Avenue on the west, Cass Avenue on the north, 20th Street on the east, and Carr Street on the south. The project area covers 57.28 acres and is located approximately one and one-half miles north and west of downtown St. Louis (see maps, Exhibit A). The Pruitt-Igoe complex is located within the Model City area and is adjacent to the following Model City neighborhoods: Yeatman, Montgomery Hyde-Park, Carr Central, and Murphy-Blair. It is just to the north and west of the DeSoto-Carr Urban Renewal Area.

C. History and Status of Project

The area immediately adjacent to and surrounding the Pruitt-Igoe site has always featured essentially a working class and lower income population occupying relatively deteriorated structures. During the 19th Century and early 20th Century, the area was occupied largely by Irish, German and Italian ethnic groups. Most of the immigrants were poverty stricken when they settled in St. Louis and consequently they moved into the least expensive and most dilapidated dwellings in the City. As these groups improved their socio-economic status, they began to move into better quality housing in other parts of St. Louis, leaving their previous housing to the black migrants from the South. Few of these families had adequate funds to restore their dilapidated dwellings. Thus, the area continued to deteriorate. As deterioration proceeded, many families would leave the area as soon as they could afford to do so and the buildings remained vacant.
Pruitt-Igoe was conceived in 1951, and the *Architectural Forum* (1951) heralded its unique vision as follows:

Replacing ramshackle old houses jammed with people, and rats, will be 11-story apartment houses which, even unbuilt, have already begun to change the public housing pattern in other cities. Skip-stop elevator service will be combined with open galleries every third floor to build vertical neighborhoods for poor people in a city, which up to now, have lived 90 percent in single houses. Compared with the unimaginative public housing prototypes the architects were given to match, the new plans save not only people, but money, and as instructive as the buildings is the site design; a city-purchased park will be stretched out to wind through the area like a river.

The design was not implemented until several cuts were made to save money. Those amenities that were discarded included landscaping, painting the concrete walls of the galleries and stairwells, insulation of steam pipes, screening on gallery windows, and public toilets on the ground floor.

Pruitt and Igoe were completed in 1956. Pruitt was built for black occupancy; Igoe for integrated occupancy. The white population was never sizable in relation to the black population. This discouraged further white occupancy and the project eventually become entirely black.

At the time Pruitt-Igoe was opened, the City was undertaking a massive urban renewal program in the Mill Creek area, immediately west of
downtown. As block after block was demolished, the poor blacks of Mill Creek were forced to seek housing elsewhere. For many, Pruitt-Igoe became home.

Mill Creek was one of the most deteriorated slums in the country. The families living there were poor almost to the point of destitution. The family size was large, with as many as three generations sharing a single dwelling. Unfortunately, Pruitt-Igoe had mostly one and two-bedroom units, which forced families to live in overcrowded conditions.

"It proved unattractive to elderly because the elevators stopped at only three of the eleven floors, necessitating much climbing of stairs. Moreover, each building had only one elevator, which was often out of order. People who worked, or wanted to, found the location impractical because it was isolated from the business section and not easily accessible to public transportation. During the first five years, the vacancy rate averaged 15 percent, more than twice the figure at which a project is economically viable. This meant little money was available for maintenance. To make matters worse, the vacant units were attractive to vandals."  

Several attempts have been made over the years to do something about Pruitt-Igoe. In July, 1962, HUD (then HHFA) and HEW announced a Concerted Services Program for Pruitt-Igoe and committed over $5 million of HEW funds to the project area for a four-year period. "According to the testimony of Professor Lee Rainwater of Washington University before the

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Barron's, January 10, 1972
Ribicoff Subcommittee of the Senate Government Committee in December, 1966, the only tangible result was an increase in the number of social workers assigned to the project. . . HUD found that the 'results of this effort were not discernible'.

"In 1964, the Federal Government authorized the expenditure of $7 million to repair damage and create four and five-bedroom units out of the smaller ones. But it gave up after spending $5 million; vandals were destroying faster than workmen could build."

Other proposals for the rehabilitation of Pruitt-Igoe have been made by the Authority, special HUD Task Forces, survey teams, and outside interests, but they have all been rejected for one reason or another. Perhaps the dilemma can be summed up by a statement that appeared in a report submitted to the Secretary of HUD on February 28, 1967 by a special Pruitt-Igoe survey team:

"The problem is extremely difficult to resolve. The unsuitability of the physical environment for family living, the high concentration of the disadvantaged, the low level of welfare assistance, the high unemployment rate for non-white population, and the difficulty of access to the principal employment centers exacerbate the problem and make it difficult to formulate solutions with any confidence in their efficiency."

3 Ibid.
4 Ibid.
5 Pruitt-Igoe Background Paper, HUD
On February 15, 1969, the tenants of Pruitt-Igoe and other public housing in St. Louis began what was to become the nation's longest rent strike up to that time -- nine months. The rent strike, various community pressures, and a report written by a team of HUD consultants led to the resignation of both the Executive Director and the entire Board of Commissioners. A rent agreement was then signed with the striking tenants, the St. Louis Civic Alliance for Housing was formed, new Commissioners were appointed, and the Authority staff was halved. The Authority then began to redirect its operations.

One of the most significant actions of the revamped Authority has been to implement the recommendation of the Civic Alliance to consolidate the many vacancies in certain projects, including Pruitt-Igoe. The Authority correctly believed that there would be a vast cost savings on maintenance and utility costs if some buildings were closed. Second, there was a belief that resident security would be improved if there were fewer vacancies in occupied buildings. Third, there was a dwindling demand for accommodations in Pruitt-Igoe and a widespread belief that the units were not habitable. This consolidation, which began in early 1970, was accomplished by vacating entire structures -- with families in those structures being moved into other sections of Pruitt-Igoe and other public housing. By mid-December, 1970, 23 of the Pruitt-Igoe buildings, containing more than 1,900 dwelling units, were completely vacant.

On November 10, 1970, Terence K. McCormack, Acting Director of the St. Louis Civic Alliance for Housing, wrote to HUD enclosing the results of a study the Alliance had performed to ascertain the cost
of completely redeveloping or rehabilitating Pruitt-Igoe. The rehabilitation costs were estimated to be $38,757,000 -- $2 million more than the original cost of building Pruitt-Igoe. The cost of completely demolishing the Complex and redevelopment was estimated at $22,100,000. The high costs of either proposal could not be accepted by HUD.

Early in 1971, HUD authorized preparation of a plan for the complete rehabilitation of Pruitt-Igoe. A task force was organized and a consortium consisting of Skidmore, Owings and Merrill of Chicago, Illinois; Harland Bartholomew and Associates of St. Louis, Missouri, and others were employed to undertake the development of a comprehensive plan for the complete rehabilitation and redevelopment of Pruitt-Igoe. The result of this undertaking by the task force and consultants was the "Pruitt-Igoe Action Program" which evaluated the reuse of the existing buildings and site for industry, offices, business, institutional use, market housing, public housing, and combinations of all such uses. After extensive study and consideration of the Action Plan the only practical alternative that emerged was the complete demolition of Pruitt-Igoe -- thus releasing the site (57 acres) for other uses.

As previously stated, the St. Louis Housing Authority, with concurrence of its Board of Commissioners, elected to cease operation of the Pruitt-Igoe Complex in June 1973. In August, 1973, after lengthy discussions and a meeting with H. R. Crawford, Assistant Secretary for Housing Management, HUD, Mayor John H. Poelker announced, "We will proceed with plans to completely vacate Pruitt-Igoe. . . .we will attempt to have Pruitt-Igoe vacant by next spring. . . . all Pruitt-Igoe buildings will be
razed. . . . renovation funds will be used in other public housing
to provide for rehousing of Pruitt-Igoe residents. . . ."

Since that date the Housing Authority has satisfactorily relocated
those remaining residents to other public housing, and in some cases
at the option of the resident, to other than public housing. As of
May 3, 1974, all tenants had been moved and the Pruitt-Igoe Complex
was secured.
II. DESCRIPTION OF EXISTING ENVIRONMENT

A. Physical Elements

1. Climate

The St. Louis area's climate can be categorized generally as humid continental with moderately cold winters and hot, humid summers. Monthly mean temperatures range from 32°F in January to 79°F in July. The maximum recorded temperature was 115°F in July, 1954 and the minimum recorded temperature was -23°F in January, 1884.

Precipitation averages approximately 40 inches annually. The maximum rainfall for a 24-hour period of 8.8 inches was recorded in August, 1946. The average annual snowfall is 17 inches. The heaviest precipitation generally occurs from April through June and the least precipitation from December through February.

Winds are generally southerly, averaging nine miles per hour. The City has an average of 102 clear days per year. "A major factor to be considered in the demolition of a building mass as large as Pruitt-Igoe is the relationship between climate and air pollution. St. Louis is located in a belt of relatively low probability of days of total air or weather stagnation. St. Louis can expect between 0 and 10 days of weather stagnation per year compared with some areas in the country which have well over 100 per year. Daily thermal-type inversions will dissipate around mid-morning to noon of any given day, depending upon the meteorological conditions which persist at the given time."

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Blaine J. Rhodes, City of St. Louis Division of Air Pollution Control, letter to A. J. Wilson, dated November 14, 1973.
2. **Soil and Geology**

Soil in the project area generally is sandy loam underlain by clay. The load bearing capacity is above average. Being a developed area, there is no evidence of erosion and the potential for erosion is not significant. The sandy loam soil is quite permeable, whereas the clay generally being the deeper subsoils, is rather impermeable.

The area is underlain by limestone bedrocks at depths varying from 15 feet to 50 feet. There are no known major faults in the project area.

3. **Topography**

There are no special topographic features which would hinder demolition or redevelopment. None of the project land is in a flood plain, has steep slopes or has a potential for landslides, mudslides or subsidence. Major earthquakes do not occur in the project area. There are underground utility lines, but they are in known locations.

The topography of the Pruitt-Igoe site is relatively flat. The land slopes gently downward from the southwest to the northeast quadrant of the site. Mean elevation is 510 feet above sea level.

4. **Drainage**

Surface runoff and drainage is presently accommodated by the combined sewers serving the area. Drainage is generally considered adequate; however, when heavy prolonged rains occur, some minor ponding, due to obstruction of drainage inlets, does occur.
5. Air Quality

Existing air pollution levels in the Pruitt-Igoe area have been estimated for the following pollutants: dustfall, sulfation and suspended particulates.

Dustfall: Utilizing data from the Division of Air Pollution Control, the 1972 dustfall levels were computed. Sites closest to the Pruitt-Igoe area were used to extrapolate dustfall levels at the center of the Pruitt-Igoe complex. Levels at Pruitt-Igoe for 1972 were 46.6 tons per square mile per month, approximately 75.3 percent higher than the average of all the sites in the City.

Sulfation: This is a measure of total sulphur compounds in the air. The same monitoring sites used to measure dustfall were used to determine sulfation levels at Pruitt-Igoe. The 1972 Pruitt-Igoe sulfation average was found to be 0.73 micrograms of $SO_3$ per 100 square centimeters per day. This average is approximately 12 percent higher than the average of all sites in the City.

Suspended Particulates: Estimates of suspended particulates in the vicinity of the Pruitt-Igoe complex indicated the probable geometric mean in 1972 to have been 99.16 micrograms per cubic meter.

The City of St. Louis, Division of Air Pollution Control, operates a continuous air quality monitoring network. A total of 10 monitoring stations, strategically located throughout the City and county provide averages of 10 parameters on an hourly, eight-hour and twenty-four hour basis. Values in the Pruitt-Igoe project area have been extrapolated as follows:
### TABLE I

<table>
<thead>
<tr>
<th></th>
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<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Oxidant (OX)</td>
<td>0 to 1.10</td>
<td>0.01</td>
<td>0.08 (hr.)</td>
</tr>
<tr>
<td>Nitrogen Dioxide (NO₂)</td>
<td>0 to 0.12</td>
<td>0.01</td>
<td>--</td>
</tr>
<tr>
<td>Nitrogen Oxide (NO)</td>
<td>0 to 0.10</td>
<td>0.01</td>
<td>--</td>
</tr>
<tr>
<td>Total Hydrocarbons (THC)</td>
<td>1.5 to 2.5</td>
<td>1.60</td>
<td>--</td>
</tr>
<tr>
<td>Carbon Monoxide</td>
<td>2.0 to 7.0</td>
<td>3.50</td>
<td>9.00 (8 hr.)</td>
</tr>
<tr>
<td>Coefficient of Haze (COH)</td>
<td>0 to 1.0</td>
<td>0.20</td>
<td>0.40</td>
</tr>
</tbody>
</table>

Wind Speed - 1972 average about 8.8 mph with about 20 percent less than 5.0 mph.

Wind Direction - predominately SSE to ESE (27 percent of the time).

Temperature - varies with season.

In June, 1967, the Division of Air Pollution Control conducted incineration surveys of the units in the Pruitt-Igoe Complex. Forty-three (43) "Economy Brand" incinerators were existing at the time. The units were rated at 500 lbs. per hour burning capacity based on 20 lbs. of refuse per square foot of grate area per hour. The units were identical and all were single-chambered incinerators. The particulate emission factor for refuse incinerators in this type of unit is 28 lbs. of particulate per ton of refuse burned.

Expected refuse generation at Pruitt-Igoe was 55,000 lbs. of refuse per day (assuming full occupancy). The particulate emissions from

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Table represents data from 1972-1973 records of City of St. Louis, Division of Air Pollution Control.
this refuse would be 770 lbs. per day, or 138.5 tons per year.

Air Pollution Ordinance 54699, enacted March 27, 1967, sets out criteria for incinerators as noted in Sections 15 and 16. The type of units surveyed at Pruitt-Igoe became illegal as of September 27, 1970, because they were not a multiple-chamber design (see Section 15C, Ordinance 54699).

The St. Louis Housing Authority experimented with two alternatives for correcting the air pollution problems associated with refuse disposal. The alternatives were to install scrubbers on the incinerators or to convert to compaction equipment. At the present time, compaction equipment is being installed in all Housing Authority locations, except Pruitt-Igoe.

The Housing Authority has found that to convert the Pruitt-Igoe incinerators to bring them into compliance would cost $13,000 per incinerator for compaction equipment, or $23,000 per incinerator for scrubbing equipment. Thus, the cost of bringing Pruitt-Igoe into compliance with existing air pollution regulations would cost $990,000 with scrubbers, or $558,000 with compaction equipment.

On November 2 and 3, 1972, the Division of Air Pollution Control cited the Housing Authority with 19 violations against Pruitt-Igoe incinerators for excessive smoke.

6. Noise

At present, comprehensive legislation regulating noise is non-existent at the State and local level. At the Federal level the
General Services Administration does have a set of construction noise specifications (see Exhibit C). The noise levels in the specifications are not to be exceeded at a distance of 50 feet from the equipment being used. Noise readings were obtained from the Missouri Highway Commission for the intersection of Franklin and 20th Streets. This intersection is 2 blocks south of Pruitt-Igoe, which is bounded on the east by 20th Street. Unfortunately, the traffic flowing by the point where the measurements were taken does not flow by Pruitt-Igoe, unless it turns off Franklin Avenue onto either Jefferson Avenue or 20th Street. A noise specialist at the EPA Regional Office in Kansas City, Missouri has stated that the noise measurements immediately adjacent to Pruitt-Igoe would be comparable. These measurements were taken on August 20 and 21, 1971. No significant changes have taken place since then which would significantly alter these readings. There are no airports in the vicinity, nor is Pruitt-Igoe within an airport approach zone.

A summary of the readings is attached in Exhibit D. These readings indicated the noise level of a busy street.

B. Biological Elements

1. Vegetation, Wildlife and Natural Areas

No natural areas exist in Pruitt-Igoe. The only grassy area is DeSoto Park, which extends to 20th and Cass Streets. Wildlife is non-existent in this urban setting.
C. Cultural Elements

1. Historic Sites

There are no special natural or man-made features of historic note on or in proximity to the Pruitt-Igoe site, nor are there any structures on or being considered for nomination to the National Register of Historic Places. James L. Wilson, Missouri State Historic Preservation Officer advises, "...there are no historic or pre-historic resources that will be affected by the demolition," and therefore offers no objection to the removal of the buildings. (See Exhibit 0.)

2. Land Uses

The DeSoto-Carr Urban Renewal Area, which is adjacent to Pruitt-Igoe, is an area consisting of extensive blight and physical decay with all of the existing structures vacant and vandalized and in advanced stages of deterioration.

Almost every conceivable land use may be found in the neighborhoods immediately adjacent to Pruitt-Igoe. The predominant use is residential. However, the largest category of land use is vacant land. The following table summarizes existing land uses in the areas immediately adjacent to the Pruitt-Igoe site:
TABLE II

EXISTING LAND USES IN AREAS ADJACENT TO PRUITT-IGOES SITES

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Proportion of Total Land</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential</td>
<td>28%</td>
</tr>
<tr>
<td>Commercial</td>
<td>11%</td>
</tr>
<tr>
<td>Industrial</td>
<td>3%</td>
</tr>
<tr>
<td>Transportation</td>
<td>6%</td>
</tr>
<tr>
<td>Public, Semi-Public</td>
<td>12%</td>
</tr>
<tr>
<td>Vacant</td>
<td>39%</td>
</tr>
</tbody>
</table>

Frequently, industrial and trucking activities are interspersed among residential uses. Marginal land uses, such as junk and salvage yards, also occur adjacent to residential areas, thus contributing to the general deterioration of the Pruitt-Igoe neighborhood. Although the data used to prepare Table II was collected in 1971, the information is still valid, as the only substantial change in land use has been an increase in the amount of vacant land. The increase in vacant land is due to the unchecked deterioration in building conditions and the consequent razing of structures (see Exhibit B). During the years 1972 and 1973, a total of 337 structures, containing 1,345 dwelling units, were demolished in the area surrounding Pruitt-Igoe. The increased vacant land and structural loss manifests itself in a

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8 This data was collected in 1971 as input to the preparation of a land use plan for the Model City area.

9 Demolition Permit Records of the City of St. Louis.
population loss for the area surrounding Pruitt-Igoe. For example, between 1960 and 1970, the population in this area declined 37 percent -- from 79,311 to 49,915.

The area surrounding Pruitt-Igoe is one of the oldest sections in St. Louis, which is one of the oldest cities in the United States. Settled in 1764, St. Louis was incorporated as a town in 1809 and as a city in 1822. Most of the brick row structures which remain standing date from the period 1880 to 1910. Of the total structures, 70 percent have been found to be more than 70 years old, and 93 percent are more than 50 years old. This helps explain the occurrence of such a high degree of deterioration. As of now, only 9 percent of the units in the Model City area are considered sound, as opposed to 84 percent which are considered deteriorated. (See Exhibit B.)

It will become clear in a later section, where the physical conditions of Pruitt-Igoe are discussed, that Pruitt-Igoe's drastic physical deterioration is not an anomaly in its neighborhood. Rather, Pruitt-Igoe reflects and is reflected by the general condition of the neighborhood in which it is located. Pruitt-Igoe is special because of its massive size. It overwhelms the good and the bad in the surrounding physical environment.

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10 1960 and 1970 Census of Population Figures

11 1971 Building Survey conducted by City Plan Commission
3. Schools

Pruitt-Igoe was served by four public elementary schools: Carr Lane School, located at 1004 North Jefferson Avenue; Blewett School, located at 1927 Cass Avenue; Pruitt School, located at 1212 North 22nd Street; and Franklin School, located at 814 North 19th Street. All of these schools were built in the 1950's to serve Pruitt-Igoe. Table III summarizes a ten-year period's enrollment trend for each public school, together with the proportion of pupils who were Pruitt-Igoe residents.

<table>
<thead>
<tr>
<th>TABLE III</th>
</tr>
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<tbody>
<tr>
<td><strong>SCHOOLS:</strong></td>
</tr>
<tr>
<td>Enrollment 1960-1961</td>
</tr>
<tr>
<td>% Living in Pruitt-Igoe</td>
</tr>
<tr>
<td>Enrollment 1965-1966</td>
</tr>
<tr>
<td>% Living in Pruitt-Igoe</td>
</tr>
<tr>
<td>Enrollment 1970-1971</td>
</tr>
<tr>
<td>% Living in Pruitt-Igoe</td>
</tr>
<tr>
<td>Enrollment 1973</td>
</tr>
<tr>
<td>% Living in Pruitt-Igoe</td>
</tr>
</tbody>
</table>

*7th and 8th Grades - 9th Grade not included

Data obtained from St. Louis Board of Education
As the table indicates, the proportion of Pruitt-Igoe students has declined sharply at each school during the period 1960-1973. This trend corresponds to a sharp loss of population at the Pruitt-Igoe Complex during the same period. The sharpest decrease occurred at Blewett School where the percentage of Pruitt-Igoe students dropped from 100 percent in 1960-1961 to 9 percent in 1973; while the least decrease occurred at Franklin School, which relatively few Pruitt-Igoe students have attended due to the distance involved. Total enrollment at all four schools has declined drastically from 1960 to 1973, in response to the steep population losses which have occurred in the areas adjacent to Pruitt-Igoe. As mentioned previously, between 1960 and 1970, the population in the area surrounding Pruitt-Igoe declined by 37 percent.

At the present, the Pruitt Elementary School has been closed; the Blewett Elementary School has been converted to a middle school for grades 7, 8, and 9 with all of its students being bussed from the neighborhoods of Walbridge and Walnut Park, thus relieving the overcrowded Northwest High School; the Carr Lane Elementary School will remain open with students in grades 4 through 8 being transferred from the Divoll Elementary School, which is being closed; and the Franklin Elementary School, which had been planned for closing, will remain open. This information was obtained from Mr. James E. McClelland, Director, Maintenance and Construction, Board of Education of St. Louis Public Schools in a telephone conversation on August 16, 1974.
Pruitt-Igoe was served by two Catholic parochial schools: St. Bridget, which served grades 1-6; and St. Leo's, which served grades 7-8. In 1961, there were five parochial schools serving Pruitt-Igoe and surrounding neighborhoods. By 1965, only three schools were left. The Archdiocese School Office feels that the closing of the schools was due to the declining population, the costs of maintaining the school buildings, and the difficulty in obtaining competent teachers. The type of detailed information that was obtained from the St. Louis Board of Education (Table III) is not obtainable from the Archdiocese.

4. Parks and Recreation

Park and recreational facilities available to Pruitt-Igoe residents are (1) Murphy Park (9.6 acres) located immediately adjacent to the east with facilities for baseball and football; (2) DeSoto Recreation Center in DeSoto Park (18.35 acres) with a swimming pool, gym, and space for arts and crafts; and, (3) Crunden Library at 2008 Cass Avenue.

5. Religious Facilities

<table>
<thead>
<tr>
<th>Protestant</th>
<th>Catholic</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bible Way Church of Christ</td>
<td>Sacred Heart (Catholic)</td>
</tr>
<tr>
<td>First Baptist</td>
<td>St. Augustine's (Catholic)</td>
</tr>
<tr>
<td>Grace Hill Episcopal</td>
<td>St. Laborius (Catholic)</td>
</tr>
<tr>
<td>Greeley Presbyterian</td>
<td>St. Leo (Catholic)</td>
</tr>
<tr>
<td>Providence</td>
<td>St. Stanislaus (Catholic)</td>
</tr>
<tr>
<td>Zion Lutheran</td>
<td></td>
</tr>
</tbody>
</table>
6. **Health Services**

Health services were provided to Pruitt-Igoe residents by the Pruitt-Igoe Medical Action Center located at 2407 O'Fallon Avenue, and the Jefferson Municipal Health Center at 1421 North Jefferson Avenue, near Cass Avenue.

The Pruitt-Igoe Medical Action Center offered medical treatment for minor illnesses and injuries, a weight reduction program, prenatal care and limited gynecological care. This facility, funded by the Model City Agency, served Pruitt-Igoe residents almost exclusively, was closed during the relocation of Pruitt-Igoe tenants. Its personnel are now affiliated with other clinics.

The Jefferson Municipal Health Center offers comprehensive child health care, prenatal classes, obstetrics and family planning, X-rays and TB treatment. The boundaries of this facility, operated by the Health Division of the City of St. Louis, extend beyond the Pruitt-Igoe area. Service is still being provided to residents of the area.

7. **Police**

Pruitt-Igoe is served by the Fourth District Police Station located at 1200 North Clark Avenue. The boundaries of this District are the Mississippi River on the east, Chouteau Avenue on the south, Jefferson Avenue on the west, and North Market Street on the north. For the District as a whole, the percent of total City crime has declined from 17.7 in 1955, when Pruitt-Igoe was being completed and was partially occupied, to 8.8 percent in 1972, when Pruitt-Igoe
was occupied by approximately 600 families.

Table IV shows crimes against persons in 1972 in Pruitt-Igoe and adjacent census tracts. This table shows a high crime rate in Pruitt-Igoe and the surrounding area, as compared to the rest of the City. However, Table V, which shows total index crimes committed between 1969 and 1972 in Pruitt-Igoe, clearly indicates the tremendous decline in crime, from a high of 931 crimes in 1969 to a low of 210 crimes in 1972. Another comparison shows that in October, 1972, 22 index crimes were reported in Pruitt-Igoe; in October 1973, the total index crimes had been reduced to 17.

TABLE IV
CRIMES AGAINST PERSONS IN PRUITT-IGOE AND ADJACENT CENSUS TRACTS

<table>
<thead>
<tr>
<th>Census Tract</th>
<th>Murder No.</th>
<th>Per 1000</th>
<th>Rape No.</th>
<th>Per 1000</th>
<th>Aggravated Assault No.</th>
<th>Per 1000</th>
</tr>
</thead>
<tbody>
<tr>
<td>1213</td>
<td>14</td>
<td>1.3</td>
<td>12</td>
<td>1.1</td>
<td>104</td>
<td>9.4</td>
</tr>
<tr>
<td>1201</td>
<td>6</td>
<td>1.3</td>
<td>6</td>
<td>1.3</td>
<td>44</td>
<td>9.8</td>
</tr>
<tr>
<td>1203</td>
<td>6</td>
<td>0.8</td>
<td>9</td>
<td>1.2</td>
<td>80</td>
<td>10.7</td>
</tr>
<tr>
<td>1261</td>
<td>3</td>
<td>0.5</td>
<td>10</td>
<td>1.7</td>
<td>52</td>
<td>9.1</td>
</tr>
<tr>
<td>City-Wide</td>
<td>205</td>
<td>0.3</td>
<td>512</td>
<td>0.8</td>
<td>32.6</td>
<td>5.2</td>
</tr>
</tbody>
</table>

1972 data from St. Louis Police Department. Crimes per 1000 population obtained from 1970 Census Data. Tract No. 1213 includes both Pruitt-Igoe and Vaughn Apartments Public Housing Projects. Tracts No. 1201, 1203 and 1261 are adjacent to the Pruitt-Igoe tract on the north.
TABLE V

Metropolitan St. Louis Police District
Crime Comparison by Pauly Block
Pruitt-Igoe Housing Project
Block 4-75

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Crimes</td>
<td>931</td>
<td>391</td>
<td>210</td>
<td>210</td>
</tr>
</tbody>
</table>

The conclusion must be drawn that among the variables accounting for the decrease in crime, the one variable that most contributes to the decrease is the tremendous decline in the area's population. Other factors contributing to the decrease in crime were the addition of City of St. Louis police foot patrols, the Housing Authority's own efforts at security and maintenance, and the efforts of the Tenant Affairs Board.

8. Fire Protection

The project site is served by Engine Company No. 5, which is approximately five blocks away. This firehouse has two pumpers and one hook and ladder mobile unit, and is located at 2123 North Market Street. The District Five Chief personally responds to all fires and can call for additional fire equipment and resources if needed. Fire hydrants line the major streets and service roads. Adequate fire protection presently exists in the area.

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Index crimes are murder, rape, robbery, aggravated assault, larceny and auto theft.

This fact, and the information for Table V, were supplied during a personal interview on December 28, 1973, with Dr. Arthur Meyer of St. Louis University, who is the statistician for the Police Department.
9. **Infrastructure**

Pruitt-Igoe is served by all utilities as follows:

**Water** - provided by the City of St. Louis, Department of Public Utilities, Water Division

**Sanitary Sewerage** - Metropolitan Sewer District

**Lighting** - City of St. Louis, Department of Public Utilities, Water Division

**Gas** - Laclede Gas Company

**Telephone** - Southwestern Bell Telephone Company

10. **Demographic Characteristics**

Exhibit E describes a Pruitt-Igoe population that was very young -- the largest single age group was the 5-13 group; had an unusually high number of large families, was extremely poor and lacked a male head of household in 80 percent of the families. This data was collected in 1972. In a January, 1972 article in *The Plain Truth*, St. Louis Housing Authority Director, Thomas P. Costello, stated: "In 1966, the 'known' population had reached 10,564 -- 72.5 percent of which were minors. Further, 67.2 percent of the families were without male heads; 20.8 percent of the families had gross incomes of under $2,500 per year. . .The unemployment rate for residents of Pruitt-Igoe has always been high. . .In 1966, only 35.5 percent of the families derived their sole source of income from employment."

According to the census, in 1970 the tract in which Pruitt-Igoe is located had a total population of 11,124; 99 percent of which were black. The median family income was $3,325, and 56.3 percent of the families in the tract had incomes below the poverty
level of $3,479 for a family of four. Of the approximately 2,800 households in the census tract, 1,668 were receiving some form of welfare as of March, 1972. The median number of school years completed was 8.6, one of the lowest figures in the City. The unemployment rate was 19 percent.

11. Employment and Commercial Facilities
Other than a Brown Shoe Company factory in the neighborhood, there are no employment centers. Commercial facilities are comprised of marginal corner store type of operations. These are mostly food stores.

D. Aesthetic Elements
1. Pruitt-Igoe Image
   It is appropriate here to quote from observations of Pruitt-Igoe which have been made in recent years.

   In a memorandum dated July 13, 1970, Betty Thompson of the Pruitt-Igoe District Community Corporation wrote: "According to a survey made by our Housing Specialist, 30 percent of buildings in the area are substandard, 70 percent of the residents live in dilapidated, rat-infested buildings. . . There are none of the following rooms on ground floor level: playground, automatic wash house, day care center. . ."

   The Pruitt-Igoe Neighborhood Corporation wrote a pamphlet called "A Dream Deferred" in 1966. It was written by the Pruitt-Igoe residents and neighbors. Excerpts follow:

   Missouri Division of Welfare, St. Louis City Office.
"Tenants of Pruitt-Igoe are subjected to inconveniences which residents of more affluent areas of the community would not tolerate. No box for deposit of mail... telegrams are seldom delivered. Some large St. Louis department stores refuse to deliver furniture to residents... Filth and stagnation characterize the grounds. Broken glass, rusty cans and other metal scraps, garbage and litter are abundant. Hardened mud exists where grass should have flourished. Only unswept, broken sidewalks and equally dirty, cracked streets and pavements provide access between buildings and entrances and exits to the outside world.

"When one drives or walks into Pruitt-Igoe, he is confronted by a dismal sight. Glass, rubble and debris litter the streets, the accumulation is astonishing... abandoned automobiles have been left in parking areas; glass is omnipresent; tin cans are strewn throughout, paper has been rained on and stuck in the cracked, hardened mud. Pruitt-Igoe from without looks like a disaster area. Broken windows are apparent in every building. Street lights are inoperative... As the visitor nears the entrance to a building, the filth and debris intensify. Abandoned rooms under the building are receptacles for all matter of waste. Mice, roaches, and other vermin thrive in these open areas..."
"The infamous skip-stop elevator is a revelation even for those considering themselves prepared for anything. Paint has peeled from the elevator walls. The stench of urine is overwhelming; ventilation in the elevators is non-existent. . . When the visitor emerges from the dark, stench-filled elevator on to one of the building's gallery floors, he enters a grey concrete caricature of an insane asylum. Institutional grey walls give way to institutional grey floors. Rusty institutional-type screens cover windows in which no glass exists. Radiators once used to heat those public galleries have been, in many buildings, stripped from the walls. Incinerators, too small to accommodate the quantity of refuse placed into them, have spilled over -- trash and garbage are heaped on the floors. Lightbulbs and fixtures are out; bare hot wire often dangles from malfunctioning light sockets."

An article in Barron's on January 10, 1972, is introduced with a quote from Senator Abraham A. Ribicoff: "I can't imagine a more horrible way to live than Pruitt-Igoe." In the body of the article is the statement: "Pruitt-Igoe is a disgrace, a human disaster area. . . Children fall out of windows or into elevator shafts in Pruitt-Igoe's highrise buildings, or burn themselves on exposed steam pipes (insulation was eliminated as an economy measure), or cut themselves on the broken glass outside."
Several photographs showing exterior and interior conditions are appended as Exhibit F.
III. RELATIONSHIP OF PROPOSED ACTION TO LAND USE PLANS, POLICIES AND CONTROLS

1. Regional Planning

The East-West Gateway Coordinating Council, the St. Louis Area Council of Governments and regional A-95 clearinghouse, have submitted the following comments:

Our primary concern is the amount of consideration given to alternatives to the proposed demolition. . . . Our concern with alternatives is particularly prompted by the impact the proposed demolition will have on the housing market for the area. Pruitt-Igoe is located in planning district nine as delineated in the Regional Housing Plan for the St. Louis Metropolitan Area. This district has an estimated need for 5,700 additional standard units as of April, 1970, the second highest need for any planning district in the region, and the highest in the Missouri portion.

The Pruitt-Igoe Action Plan, completed in April, 1972 proposed demolition, rehabilitation and new construction in the Pruitt-Igoe complex which would result in over 2,000 standard dwelling units. Therefore, we are concerned with (1) the rationale for rejection of the Action Plan as well as other alternatives to total demolition, and (2) expectations for future use of the land with respect to residential development.

Alternatives will be discussed more specifically later in the Statement, but as shown in the Existing Environment and History Status portion of this document, the case for demolition of Pruitt-Igoe is
quite clear. Because of the nature of the surrounding neighborhoods, which are as troubled as Pruitt-Igoe, but on a lesser scale; it cannot be assured that rehabilitation and/or redevelopment would be successful in eliminating the type of problems which have beset the project.

As noted previously, the cost of rehabilitation was estimated at $38 million in 1970; the cost of complete redevelopment, including commercial, institutional and park areas was $30 million. This, in addition to the outstanding debt obligation of approximately $25 million, makes redevelopment and/or rehabilitation financially infeasible. No private interests have recently come forward to underwrite part or all of the costs, and the local and Federal Government cannot underwrite the cost. Finally, HUD no longer has any programs which could help to underwrite redevelopment and/or rehabilitation costs.

2. Missouri State Highway Commission
The Missouri State Highway Commission states that "...if the Pruitt-Igoe Complex is demolished, we suggest that previous to redevelopment, the Highway Commission be contacted so that this and other lands in the area may be considered for the development of an optimum transportation corridor in the area."

3. St. Louis City Plan Commission
The City Plan Commission states that "... the proposed demolition is fully consistent with current plans, policies and controls for both the Pruitt-Igoe and the surrounding Model City Area." See Exhibit G for full text of the City's comments.
4. St. Louis Land Clearance for Redevelopment Authority

Mr. David Hrysko, Director of Planning for the Land Clearance for Redevelopment Authority, states that: "the contemplated demolition of the Pruitt-Igoe housing development will eliminate many of the problems which have served as obstacles to the redevelopment of the DeSoto-Carr area and the near north side in general... The existence of Pruitt-Igoe and the negative physical and social environments which have been created by it, have greatly prohibited the future growth of areas surrounding Pruitt-Igoe... It is important to recognize that the availability and subsequent development of the 57 acres, in and of itself, although extremely important, may not necessarily be the major consideration in determining the value attributed to the release of the 57-acre Pruitt-Igoe tract of land. Possibly more important is the 'catalytic' function that development of the site may have on influencing additional redevelopment activity in areas surrounding the Pruitt-Igoe site." The entire text of Mr. Hrysko's comments is appended as Exhibit H.

5. St. Louis Model City Agency

Mr. Arthur Kennedy of the City of St. Louis Model City Agency states the following: "...the demolition of Pruitt-Igoe can only have a positive effect on our efforts in the Model Cities Program to develop the Carr Central, Montgomery-Hyde Park and Yeatman neighborhoods. The elimination of the overwhelming blighting effect of the massive, vacant and vandalized buildings will eliminate a deterrent to investment in these nearby neighborhoods which has retarded our efforts of the past..."
"Finally, I believe a point needs to be raised about the importance in moving ahead in an expeditious manner to complete the demolition of Pruitt-Igoe. As you are surely aware, the St. Louis Model Cities Program, during all of the years of its operation, has been plagued by the uncertainty and false starts on efforts to do something about Pruitt-Igoe. I, along with the Chairman of the Model Cities Board, served on the special task force...which worked for over a year to develop a Pruitt-Igoe renewal plan. This plan was subsequently rejected by HUD as being economically unfeasible. In that report, it was the unanimous recommendation of the task force that should such a finding be made, then the alternative action should be the demolition of the project. I reiterate that this was the position adopted by the task force... The action to demolish, therefore, is direct coordination with our previous recommendations."

The entire text of Mr. Kennedy's comments is appended as Exhibit I.

6. **Private and Public Opinion**

In its review, the East-West Gateway Coordinating Council also included the following comments:

The immediate social impact has already presented problems. Of the 587 families living in the complex at the time of the demolition announcement, 90 have moved out. A group of the tenants has initiated a court case against the Housing Authority for unwarranted evictions. The relocation program, the extent to which relocation monies are available and the nature and status of the court case should be addressed.
Jack Saunders, Community Services Advisor in the St. Louis Area Office of HUD, in the last months of 1973, met with a wide variety of individuals and citizen groups (see Exhibit J for lists). Several times, discussions of Pruitt-Igoe's demolition and its effect on the context of other activities in the black community arose. The opinions should be viewed in the context of the black community's past experiences with government and housing in the City of St. Louis. Mr. Saunders, summarizing the feelings of the citizens he has met with, states: "Traditionally, St. Louis renewal programs have provided minimal, marginal opportunities to low-income persons for improving their life styles. Citizens and professionals alike indicated that decisions of this nature (development/redevelopment) are arbitrary and the process is most unpleasant for those receiving the brunt of the negative activity conducted under the pretentious name of 'progress'."

Mr. Saunders has been told by these groups and citizens that they perceive the chain of events leading to the construction of the Convention Center and the demolition of Pruitt-Igoe as an indication that there is a plan between the City and the major businessmen to eliminate poor, black people from the Convention Center area. This would include the eventual demolition of the Cochran Apartments, a public housing project near Pruitt-Igoe.

The real concern of these citizens is that the reuse of the Pruitt-Igoe land is being planned without consideration of the low-income and black community's needs.
Exhibit K contains letters from groups and citizens concerning the demolition of Pruitt-Igoe.

On February 25, 1974, a suit was filed on behalf of the former residents of Pruitt-Igoe. The suit seeks to establish the rights of the former tenants to the benefits of the Uniform Relocation Act. A motion to dismiss the action was filed by all the defendants. The Court has not yet ruled on this motion.
IV. PROBABLE IMPACT OF PROPOSED ACTION ON THE ENVIRONMENT

A. Physical Impacts

1. Demolition

Demolition of Pruitt-Igoe involves 30 11-story buildings and appurtenant facilities, the most significant being seven boiler plants. Based on the experience of the demolition of two Pruitt-Igoe buildings in March, 1972, it is estimated that the rubble will have a volume of approximately 270,000 cubic yards and weigh 351,000 tons. The composition of the rubble, exclusive of boiler plants, will be brick, mortar and steel reinforcing rods.

It has been determined by seeking professional opinions that the brick has no salvage value because it has no antique value, and the brick and mortar will not separate upon demolition making them too costly to clean and salvage. However, as described later, the bricks may be recycled for other uses.

Most of the valuable metals in the buildings have been stripped by vandals. However, the boiler plant metal is salvageable and the scrap market for steel is excellent at this time.

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17 This information obtained from Marvin Veesaert, General Aggregate Corporation, who, from experience with many types of demolition, estimated that the type of rubble from Pruitt-Igoe would weigh 1.3 tons per cubic yard.

18 Individuals interviewed: Sidney Jacks, St. Louis Housing Authority; Ronald Hayden, Hayden Lumber and Wrecking Co.; Buddy Hackman, Alcoa Wrecking Co.; Arnold Spirtos, Spirtos Wrecking Co.
The Housing Authority will not remove the foundations from the site, as this is too expensive. A small amount of the rubble will be used to fill the foundations.

Demolition is proposed to be by blasting. Other techniques, such as headache ball, jackhammer, and high speed saw will be used only if blasting presents a danger to a nearby structure or utility line. However, precise information on the need for alternative demolition methods has not yet been determined.

It should be noted that other types of demolition techniques produce some adverse effects as follows:

1. They raise air pollution levels over a longer period of time than does blasting.

2. They are as noisy as blasting, but the noise is continuous and basically lasts throughout a working day.

3. They take far longer to demolish a building and thus prolong the time for removal of the rubble from the site.

4. Unlike blasting, which immediately kills all rodents in a building, these alternative techniques attract rodents to the workers' lunch scraps and simultaneously allow the rodents to escape to other areas.

According to the Federal Register, Volume 38, Number 66, Page 8829, Subpart B - National Emission Standards for Asbestos:

"any owner or operator of a demolition operation who intends to demolish...any apartment buildings having more than four..."
dwelling units, structure, facility, installation, or portion thereof which contains any boiler, pipe or load supporting structural member that is insulated or fireproofed with friable material shall comply with the requirements set forth in this paragraph. The requirements are that the Administrator of EPA be advised 20 days prior to demolition of the intent to demolish; that friable asbestos material shall be wetted and removed prior to wrecking load supporting structural members, that no pipe or load supporting structural members covered with friable asbestos shall be dropped or thrown to the ground, that no friable asbestos debris shall be dropped or thrown to the ground or from any floor to any other floor - for structures 50 feet or higher, friable asbestos debris shall be transported to the ground in dust-tight chutes or containers. The bid specifications and contract will require adherence to these requirements."

The City of St. Louis Building Commission has prepared a draft "Suggested Additional Precautions for Demolition" which describes various precautions for damage prevention. A summary of the most important provisions is described as follows:

1. The Contractor shall file a complete description of how the explosives will be deployed, including total quantity and types of explosives, temporary storage location, public security measures and delivery and routes approved by the ICC.

2. The public shall be barred from the site for a distance of no less than 300 feet during the period from two hours before
delivery of explosives to the site to not less than four hours after demolition. The public shall be barred from a distance of no less than 100 feet during the period while the building site is being cleared, leveled and graded.

3. There will be no magazine storage of blasting agents permitted at the site. A single blast occurrence shall be trucked in properly marked vehicles and parked or located as prescribed by the Building Code, Federal and ICC Regulations.

4. The Contractor must submit for approval a mechanical or electrical monitoring system, whereby each charge under separate delay and location can be verified as expended or unexpended.

5. Wherever the use of explosives is anticipated within 300 feet of privately owned buildings or structures and/or any public sewer and/or any public utility service, such as gas, electric, telephone, or water which service other than Pruitt-Igoe; the use of explosives shall be predicated on a full and complete pre-blast seismic and photographic survey of such buildings or structures and a seismic survey of such utility services.

6. Basement slabs and foundations are to be broken and cracked sufficiently to permit drainage of filled basement areas.

The effect of the proposed specifications is to protect the public from the dangers of flying mortar; from the danger of undetonated blasting caps and from the danger of service disruption to areas outside of Pruitt-Igoe due to damage to utilities. These provisions are merely proposals as of this time.
2. Removal of Debris

Removal of the brick and mortar rubble from the site will be by truck. One truck trip one-way to a dumping place will involve an average of 18 tons per load. At this rate, it will take approximately 19,500 loads to remove the rubble. This will create the consumption of a large amount of fuel at a time when fuel is scarce. Assuming a round trip of 20 miles, and with the knowledge that average fuel consumption of a heavy truck is three miles per gallon, one trip would use 6.66 gallons of fuel. At 19,500 loads, this would mean the consumption of 129,870 gallons of fuel.

The cost of moving the rubble to a disposal site 11 miles away equals $1.45 per ton (this figure was available). Assuming an average load of 18 tons, the cost of one load would be $26.10. Assuming 19,500 loads, the cost of hauling the rubble would be $508,950. Obviously, as mileage goes up or down, the cost per ton also varies.

The large number of truck trips required to remove the rubble implies that it will take many months to clear the site. The removal of the previously demolished two buildings took three months. At this rate, removal of the rubble from the 30 remaining buildings will take from 12 to 45 months, depending on the capacity of the contractor. This length of time necessary for rubble

19 See Footnote 17 for source of information for entire paragraph.

20 Ibid.
removal extends the time when vehicular and pedestrian traffic will be disrupted; noise will be created by heavy equipment and trucks, and the City will need to protect the site.

3. Disposal of Debris

Because of the deficiency in municipal waste disposal sites in the St. Louis area; if the Pruitt-Igoe debris has to be disposed of in these sites, this would definitely be a negative impact. However, the Pruitt-Igoe debris is inert and clean - known as demolition debris. Therefore, it can be disposed of in ways which municipal refuse cannot. The possibilities of disposal sites are listed as follows:

a. For use as fill in mined-out quarries. Two quarries contacted expressed interest. The quarries would charge $1.20 per ton for dumping the rubble.

b. As fill for abandoned strip mines in St. Clair County, Illinois. Due to the distance, the hauling costs would be extremely high. This means of disposal would constitute reuse, rather than mere disposal of the rubble, and thus have a positive environmental impact.

The disposal of the 30 buildings will be made in accordance with established regulations and practices of the Federal Government, the State of Missouri and the City of St. Louis.
The Environmental Protection Agency's "Guidelines for Thermal Processing and Land Disposal of Solid Wastes" sets forth steps which must be taken to properly dispose of solid waste. HUD compliance with these guidelines is required by Section 211 of the Solid Waste Disposal Act of 1965, as amended. Compliance with the guidelines is required of a Federal agency if the agency has jurisdiction over any real property or facility which involves it in solid waste disposal activities. The provisions of the Guidelines which are relevant to this decision may be summarized as follows:

1. A facility may only accept wastes it has been designed to accept.

2. Site selection and utilization shall comply with appropriate Federal, State or local health, environmental, planning and solid waste management agency requirements and plans.

The State of Missouri has published solid waste rules and regulations. The following sections are applicable:

"(2.1.1) All solid waste except the materials listed in Requirements may be accepted for disposal at an approved sanitary landfill without special approval from the Division. (Since the Pruitt-Igoe material is inert, it does not need special approval.)

Section III - Demolition Landfill Rules and Regulations
3.3.0 Scope

3.0.1 These demolition landfill rules and regulations are intended to provide for land disposal of certain solid wastes
which do not present the potential water pollution and public health hazards associated with municipal solid wastes and hazardous wastes.

3.1.0 Solid Wastes Accepted

3.1.1 Requirement: Only the following solid waste materials shall be accepted for disposal in a demolition landfill: demolition wastes, construction wastes, brush, wood wastes, tires, inert plastics, soil, rock, concrete and nondecomposable inert solids insoluble in water. The demolition and construction wastes shall not contain more than a minor amount of metals.

3.2.0 Solid Wastes Excludes

3.2.1 Requirement: All other wastes not specifically listed in Requirement 3.1.1 shall be excluded from disposal in a demolition landfill. Any of the solid wastes listed in Requirement 3.1.1 which has been combined, mixed or contaminated with any other wastes not listed shall be excluded.

The East-West Gateway Coordinating Council published in June, 1973, a document entitled Interim Recommendations on Solid Waste Disposal in the Metropolitan St. Louis Area. The Interim Recommendations document estimates solid waste disposal needs for the five-year period, 1973-1978. The summary includes the following points:

1. Provisions must be made for disposing of 17 million tons of solid waste in the next five years. Existing operational
disposal facilities have only 10.3 million tons estimated capacity, however, and facilities must be developed for the remaining estimated 6.7 tons.

2. Sanitary landfill sites outside the City of St. Louis will have to be used during the interim period since there are no suitable sites within the City. Residential, commercial, demolition and industrial wastes are presently disposed of in the western parts of Madison and St. Clair Counties in Illinois, and northern Jefferson County, Missouri.

Intermediate Recommendations also discusses the logistics of moving solid waste. "The distance from the area in which solid waste is generated to the disposal site is a critical factor in determining disposal costs... The estimates of cost per mile range as high as $0.83 per mile per truck. At this rate, a 20-mile trip to a disposal facility would cost $16.60, or for a full 17 cubic yard packer truck carrying refuse with a density of 500 lbs. per cubic yard, the cost would be $3.90 per ton."

When the two buildings were demolished at Pruitt-Igoe in March, 1972, 871 loads in 20 cubic yard trucks were hauled at a cost of

---


$51,000. This averages to a cost of approximately $58.00 per trip, including on-site work.

The Interim Recommendations were adopted by the East-West Gateway Coordinating Council and are included in the Council's "Comprehensive Solid Waste Management Plan for the Metropolitan St. Louis Area" which is presently being printed.

4. Climate, Soil, Geology and Topography
Completion of the proposed action would not effect the regional climate and no major impacts on soil or bedrock formations is anticipated. Upon the removal of the debris there should be no major revisions to the topography.

5. Drainage
Existing storm water collection systems are adequate and storm water will continue to be discharged through existing storm sewers and surface drainage ways. During demolition, the possibility of obstruction, plugging up or damaging sewers, inlets or drainage ways, is always present. To minimize this condition, precautionary practices with close supervision of machinery and men will be required. Demolition waste rubble will require some adjustments to correct surface water runoff. However, there should be no major revision to the existing storm drainage patterns.

6. Air Quality
Because of the effect that meteorological conditions have on the amount of air pollution which may be caused by demolition proceedings, it is impossible to predict precisely the impact of the demolition of the
30 remaining buildings of Pruitt-Igoe on the environment. The Division of Air Pollution has stated: "From an air pollution standpoint, it is the recommendation of this Division that demolition occur as quickly and as efficiently, from a dust standpoint, as possible. It therefore, indicates that the complex be razed by blasting, utilizing all such safety precautions as deemed necessary by other agencies within the jurisdiction of the Department of Public Safety. It is the experience of this agency that other methods, i.e., 'headache ball,' jackhammers and other piecemeal attempts at demolition prolong periods of exceptionally high dust emissions beyond limits considered tolerable.

"From an air pollution standpoint, it makes no difference as to either the hour of the day or the day of the week as to when demolition takes place.

"...The Division of Air Pollution Control requires other temporary measures be taken in order to minimize dust, such as temporary enclosures, continuous hosing, building saturation, area and roadway wetting, etc.

"It is the feeling of this Division that if Pruitt-Igoe is demolished, that it can be accomplished and expedited in the minimum time duration possible, utilizing maximum preventative techniques for restoration of excessive pollutants. We feel this may best accomplished by blasting techniques, even though the short-time emissions may prove higher than other demolition techniques which may continue for many months."
Air quality will be effected by demolition and removal of debris, but these problems would not be expected to become severe. The fact that air quality in the project area is often poor due to existing sources of metropolitan pollution may make even smaller sources of pollution particularly objectionable.

7. Noise

As stated in the Existing Environment section, comprehensive legislation regulating noise is non-existent at the State and local level and the City of St. Louis is in the process of preparing noise regulations. HUD does have guidelines for the evaluation of noise impact in Circular 1390.2. When redevelopment takes place, the guidelines in Handbook 1390.2 will be adhered to. See Exhibit L for standards for construction sites and internal residence noise levels.

The type of noise which will be generated will be noise from demolition, on-site work and the movement of trucks in and out of the site. This type of noise will fall into the 85 to 125 decibel noise level range (see Exhibit M). The noise generated by demolition by blasting will last only a few minutes. That of on-site work and truck traffic could last for up to 45 months. The noise will not take place during sleeping hours and will be intermittent so that the adverse effect will not be totally disruptive.

B. Cultural Impacts

1. Land Uses

At this time, the City of St. Louis has no plans for the reuse of
the 57 acres which will be released after removal of the rubble. No negative impact is expected from future reuse because of protection by the City's zoning ordinance, and other regulatory controls; the anticipated noise ordinance and other City codes and ordinances.

The zoning for the Pruitt-Igoe area is flexible enough to provide for any land use but heavy industry. Since this is the only type of use which would have a chance of adversely affecting the environment with noise, heavy equipment, air and water pollution, it is expected that the future reuse of the land will not adversely affect the environment.

As stated in letters of review by the Plan Commission, the Land Clearance for Redevelopment Authority and the Model City Agency, the demolition of Pruitt-Igoe is expected to have a salutary effect on the 57 acres in the future and a more immediate effect on the developability of surrounding land. Prior to any redevelopment of the land, an Environmental Impact Statement discussing the specific proposal will be written. HUD will reserve the right to give final approval to any proposals which may occur.

2. Schools

As discussed earlier, four elementary schools served Pruitt-Igoe. Table III showed that total enrollment had declined drastically in all four schools. The impact on the schools serving the area has already been experienced with the closing of Pruitt-Igoe. Realizing this the Board of Education has acted by closing some of the schools
serving the area and consolidating others as previously discussed under Schools, Section II, Description of Existing Environment.

3. Health Facilities

As with the schools, the impact on the health facilities serving Pruitt-Igoe and the surrounding area has been effected. The Pruitt-Igoe Medical Action Center, which served exclusively the residents of Pruitt-Igoe, has been closed and its personnel are now affiliated with other clinics.

The Jefferson Municipal Health Center, which offers comprehensive child health care, prenatal classes, obstetrics and family planning, x-rays and treatment of TB, is operated by the Health Division of the City of St. Louis and served a much larger area than just Pruitt-Igoe. This facility is continuing to operate and provide health services to the residents of the area. It is likely, that the boundaries of the health district served by the Jefferson Municipal Health Center, will be shifted to the west, particularly, since the Courtney Health Center has opened to the east.

4. Recreation and Parks

Recreation facilities will be impacted positively by the demolition of Pruitt-Igoe. Stated earlier was a summary of existing recreational facilities and services in the Pruitt-Igoe area. The DeSoto Recreation Center will continue to operate after demolition of Pruitt-Igoe. A major problem which has constrained use of the recreation center for neighborhood residents is that Pruitt-Igoe residents had declared the recreation center part of
their "turf" and refused to allow non-residents to use the facilities. With the elimination of Pruitt-Igoe, the center should begin to attract a greater number of neighborhood residents.

5. **Fire Protection**
   Adequate fire protection for the area is as inconsequential a problem as primary utility services. The only problem that may be encountered by the fire department will be the increased truck traffic serving the site. However, during the removal of debris existing roadways will be used in such a way so as not to affect the movement of traffic. Emergency vehicles should be able to travel this section with the same speed and safety.

6. **Police Protection**
   Dr. Arthur Meyer, statistician of the St. Louis Police Department, believes that the demolition of Pruitt-Igoe will have little effect on the deployment of police personnel in District Four. Crime in the neighborhood has been declining for years, primarily because of the population decline. The vandalism and violence which plagued Pruitt-Igoe peaked several years ago and, thus, the police have had a declining role for some time.

7. **Infrastructure**
   The Southwestern Bell Telephone Company indicates that demolition will not disturb their operations, as all on-site facilities serve the Pruitt-Igoe complex only. The St. Louis Water Department, Metropolitan Sewer District, Laclede Gas Company and Union Electric
Company all feel that precautions will have to be taken to protect their facilities, as their facilities serve areas outside Pruitt-Igoe. This might require demolition of some buildings or parts of buildings by methods other than blasting. The precise areas of concern could not be determined at the time of writing the Impact Statement. Adjustments can be accomplished without disruption of service to neighborhood users.

C. Aesthetic Impact

The description of Pruitt-Igoe in the section on existing environment clearly shows a human habitat which provides more misery and discomfort than anything else. The removal of Pruitt-Igoe from the 57 acres on which it now stands will leave a large open area. As desolate as a huge unused and fenced tract of land might be, it must be compared with the existing environment. Those who have seen Pruitt-Igoe in its present condition will agree that the elimination of the damaged buildings and the filth and vermin accompanying them can only beneficially affect the environment.
V. ALTERNATIVES TO PROPOSED ACTION

A. Redevelopment and Rehabilitation

In early 1971, HUD authorized preparation of a plan for the complete rehabilitation of Pruitt-Igoe. "The Department is prepared to commit substantial funds to implementing an acceptable plan." A Task Force was convened and a consortium consisting of Skidmore, Owings and Merrill of Chicago; Harland Bartholomew and Associates of St. Louis; along with other firms and individuals specializing in the analysis of social problems, was hired to undertake the preparation of the plan. HUD paid $150,000 for the plan.

"The Pruitt-Igoe Action Program evaluated the reuse of Pruitt-Igoe buildings and land for industry, offices, business, institutional, market housing, public housing, public and private housing, and combinations of all such uses. Evaluation of current markets showed that there would be no immediate use of this particular site for industrial, office or institutional use because there was other land and buildings currently available at equivalent or better cost in equivalent or better locations. The site, therefore, offers its major potential as a residential area with the inclusion of those community and commercial activities which would relate to residential use."

In describing the Development Plan, the consultant "... emphasized the need in any redevelopment of Pruitt-Igoe of a viable economic and..."
family-size mix adding a minimum of 40 percent new families to the existing Pruitt-Igoe community. . . Every effort in the Redevelopment Plan was made also to provide definable community areas at a residential cluster scale different from the massive existing Pruitt-Igoe and combining low, medium, and high-rise units. New street patterns, parking and open space shopping facilities are proposed also to provide that quality of life that should be available in an urban location."

The most important conclusions of the consultant and the Task Force were:

1. It is possible to redevelop Pruitt-Igoe;
2. It requires the combined effort of the political, civic and community elements of Metropolitan St. Louis;
3. It requires vigorous continuation of Federal and local program in the surrounding neighborhoods;
4. If the above supporting programs are not forthcoming, the Action Program recommends the complete demolition of Pruitt-Igoe. . .

The cost of the consultants' recommendations for residential development was $22,110,029, of which $4,735,113 was to be borne by the Federal Government and the remainder by private developers. This, combined with costs for commercial, park and institutional development, added to a total of $30,058,576.

Before any firm steps were taken to implement the proposal, HUD spent about $275,000 to test various demolition techniques and to test the

\[25\]

Ibid, page 5
feasibility of partial demolition of the buildings, while keeping the remaining portion of the building intact. This test was successfully carried out on March 16, 1972.

It must be understood that at the time of completion of the Pruitt-Igoe Action Program, only $9,389,000 of the bonded indebtedness had been paid off, leaving a balance of $26,000,000. The Housing Authority had incurred additional indebtedness of $5,757,000 for modernization expenditures. The Barron's article (January 10, 1972) quotes Skidmore, Owings and Merrill as follows:

"Previous studies show that while the existing buildings may be remodeled into good housing, the cost of doing so is such as to leave them with little, if any, residual value that may be assigned to this debt. Further, some of this debt has been incurred for purchase of the site. When purchased, the site was covered by buildings which had to be removed. The value of the site today is probably in the vicinity of $10,000 to $12,000 per acre, about 10 percent of the price paid for it. There is simply no practical or conceivable program for this site that can carry this debt. Virtually all of it will have to be written off."

The second and third conclusions of the Action Program could not be met. The City and Housing Authority had no money for additional large expenditures concerning Pruitt-Igoe. The civic and community elements showed no interest. The Federal Government could not guarantee the level of funding in the area in future years. The final blow came in
early 1973, when the moratorium and pending termination of HUD programs which would have been involved in the redevelopment of Pruitt-Igoe was announced.

Both the St. Louis Civic Alliance for Housing and the Pruitt-Igoe Action Program contemplated the redevelopment of the Pruitt-Igoe site and immediate neighborhood and the rehabilitation and/or partial demolition of some of the buildings. The proposals would completely change the appearance of the buildings, redesign the site, lower densities, and provide easily accessible commercial social services. The estimated cost of making these improvements was $22 million for redevelopment and $38 million for rehabilitation. The costs would have to be borne in addition to the outstanding bonded indebtedness of $26 million.

The impact of redevelopment/rehabilitation on the physical environment is as follows:

Removal and disposal of debris - The Pruitt-Igoe Action Program recommended complete demolition of 12 buildings and partial demolition of ten buildings. This would generate approximately one-half the volume of rubble that complete demolition would create. Thus, there would exist, though on a smaller scale, the adverse effects of fuel consumption in hauling and a substantial amount of time needed to remove the rubble from the site.

Land reuse - Redevelopment/rehabilitation of Pruitt-Igoe would constitute a productive use of the land. Design criteria would
specify a variety of housing types at a scale and in a style which would be visually pleasing and convenient to use. The housing, which is not planned to be public housing, would be on the tax rolls. However, since the land could possibly be redeveloped under Section 353 of the Missouri Revised Statutes, tax payments might be deferred. Residential land use, using modern design standards and built in accordance with the City's codes, would not pollute the environment from either air, water, or noise aspects. One question mark is the effect of deteriorated surrounding areas on the viability of a renewed Pruitt-Igoe.

The effect of redevelopment/rehabilitation of Pruitt-Igoe on the social environment is tentative at best. On one hand, the lowered densities and mixed incomes and the well designed dwelling units would seem to provide a social environment more conducive to constructive social interaction and a more positive outlook on the world. On the other hand, there is no assurance that the social environment will be improved, when the problems of unemployment, undereducation, discrimination and deterioration of surrounding areas can be expected to remain unsolved in the foreseeable future. The provision of sound housing cannot counter these problems.

The effect of redevelopment/rehabilitation on the aesthetic environment would undoubtedly be beneficial. The redesign and rehabilitation of the buildings, as shown in the Pruitt-Igoe
Action Program, would create visually attractive buildings, which would contain dwellings of comfortable dimensions. The style and dimensions of the buildings would be varied and compatible, creating an architecturally integrated community.

As previously indicated, the redevelopment/rehabilitation of Pruitt-Igoe would cost between $20 and $40 million. It is felt that the success of this venture is tentative because of the continuing problems of the minority and low-income people who would become tenants, and because of the continuing deterioration of the surrounding neighborhoods.

B. Securing of Existing Buildings and Site

This alternative is most akin to maintenance of the status quo, except that the buildings would remain unoccupied.

The securing of existing buildings would not have an adverse effect on the noise, air pollution, and solid waste aspects of the physical environment. There would be no fuel used for rubble disposal, no generation of noise by demolition and hauling operations, and no generation of dust by demolition and post-demolition operations.

The securing of the buildings would have an adverse effect on land reuse. If the buildings remain and are not reused for any purpose, the productivity of the land economically and socially is nil.

Securing the buildings would have both beneficial and adverse effects on the social environment. On the positive side is the fact that prospective public housing residents would not have to experience
the misery of residing in Pruitt-Igoe. The negative effect is that the continued existence of the buildings would preclude the development of employment generating, recreation or low-income oriented institutional land uses.

By far, the most adverse effect of this alternative, is on the aesthetic environment. As documented in the section on the history and status of Pruitt-Igoe, the buildings were chambers of horrors for the people living within, and offensive to the people in the surrounding neighborhoods who had to live with the monoliths every day. Securing of the buildings would not improve their appearance. Thus, the buildings would continue to perpetuate their ugly influence on the surrounding area.

C. Partial Demolition

This alternative could become a possibility if the $3.5 million allocated for the proposed complete demolition was not enough to cover the costs of demolishing the entire 30 buildings.

Partial demolition would adversely affect the physical environment in the same manner as total demolition. Noise and air pollution would be generated and considerable amounts of fuel would be required for hauling. The extent of adverse impact would depend on the number of buildings demolished.

Land reuse would be adversely affected as the continued existence of some of the buildings would tend to preclude realization of the full potential for development of the cleared land.
As in complete demolition, the social environment would be adversely affected in that enrollment in schools and patronage of health facilities would be diminished.

The aesthetic environment would be most adversely affected, as both buildings and a large amount of vacant land would exist.

Other adverse effects of partial demolition would be that the Housing Authority would have to continue to bear the burden of caring for the property; the costs of demolishing the remaining buildings would continue to rise as time goes by; and the possibility of obtaining a lower cost demolition and hauling contract would be lessened with the smaller scale of work.

D. Rework the Site Using the Rubble to Create a Park with New Land Forms

This alternative involves removal of the buildings, but the rubble would remain on site. The rubble would be shaped into hills, decorative walls, barbecues and other facilities, and the land would be developed into a park.

The impact on the physical environment would be adverse in that the demolition of the buildings will cause air and noise pollution.

Also, the fuel for hauling in soil cover, which could be as much as 200,000 cubic yards, would have to be used. The beneficial effects on the physical environment would occur from the park's flora which would circulate fresh air and lower temperatures in hot weather.

Socially, the park alternative would have outstanding beneficial effects in that the park would provide a source of active and passive
recreation for the entire community.

The aesthetic benefits also could be outstanding, as the beauty of a well-designed park would substantially offset the deterioration of the surrounding neighborhoods. There is, however, an existing City park on the south periphery of the Pruitt-Igoe site which tends to preclude official interest at this time; and finally, of greater importance, the development of a park, no matter how innovative and unique, would preclude the ability to effect a total new pattern of land use.
VI. PROBABLE ADVERSE ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED

It can be stated that there will be no adverse effects which are long-term or permanent in nature, or which might not have occurred in the next one to five years naturally, due to the continuing decline of the population of Pruitt-Igoe and of the surrounding neighborhoods. The adverse effects may be summarized as follows:

1. Amount of fuel used to haul the rubble away will be at least 129,870 gallons. This comes in the midst of serious fuel shortages and rising fuel prices.

2. Based on the experience gained from the previous demolition of two Pruitt-Igoe buildings, the rubble will take from 12 to 45 months to remove from the site; depending upon the capacity of the contractor and the number of problems encountered. This will prolong the adverse aesthetic effects of Pruitt-Igoe, the disruption of vehicular and pedestrian traffic in the neighborhood, the production of heavy equipment and truck noise and the need for City protection of the site.

3. Noise will occur from demolition, on-site work, and the generation of truck traffic moving into and out of the site. All will be at the 85 to 125 decibel level (see Circular 1390.2, Appendix 2, page 1). Because this noise will be intermittent and will not take place during sleeping hours, it will not be totally disruptive.

4. Air Pollution levels will rise during demolition. The precise level cannot be predicted because it depends on weather conditions.
5. Enrollment in the schools serving Pruitt-Igoe will further decline and in fact, this decline has already taken place. With the closing of Pruitt-Igoe the schools serving the area were consolidated. For a description of how this consolidation was implemented, see Schools, Section II, Description of Existing Environment.

6. Health facilities, particularly the Pruitt-Igoe Medical Action Center, will be negatively affected. As previously mentioned, the Pruitt-Igoe Medical Action Center has closed and its personnel are now affiliated with other clinics. This closing occurred at the time the Pruitt-Igoe Complex ceased operation and its residents were relocated by the St. Louis Housing Authority. The remaining health facilities serving the area are continuing to provide their services to the residents of the surrounding neighborhood.
VII. RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

This section is a statement of trade-off's between short-term environmental losses and long-term gains and vice-versa; and whether the proposed demolition would foreclose future options with respect to Pruitt-Igoe.

Based on the foregoing portions of this Environmental Impact Statement, it can be said that the demolition of Pruitt-Igoe involves the burden of short-term environmental losses and the reward of long-term gains to the environment. It has been shown conclusively that Pruitt-Igoe has no viability as it now exists. Countering this is the possibility of recycling of the rubble to reclaim a strip mine or reclaim a quarry. Equally important, 57 acres of land one and one-half miles from downtown St. Louis will be freed for development, with the possibility of providing employment for people in the surrounding neighborhoods, enlarging the City's ever-diminishing tax base and attracting other desperately needed new development to the near north side.

The demolition of Pruitt-Igoe will foreclose future options with respect to the use of the Pruitt-Igoe buildings. However, as explained previously, considering the enormous cost involved in reclaiming Pruitt-Igoe with the knowledge that the private market has evinced no interest and that re-opening the buildings for housing may fail - the risk simply is too great. What the demolition of Pruitt-Igoe does not foreclose is the reuse of the land. Time will help the public forget the tragedy of what existed on the 57 acre site and interest in the site for new, productive uses will have the chance to develop.
As noted previously, all suggested means of disposal of the rubble will recycle the rubble materials, thus prolong the usefulness of the material.
It is believed that no irretrievable and irreversible commitments of resources will arise from the demolition of Pruitt-Igoe. The adverse impacts are either transitory in nature, as with noise and air pollution, or inevitable, as with the decline of school enrollment. For the most part, material sources involved in the demolition will be non-recoverable. However, in terms of total national resources, the uses of explosives is infinitesimal. The use of diesel fuel assumes importance only because of the "energy crises." Rather than curtailing the use of environment, meaning the 57 acres of land, demolition of Pruitt-Igoe will expand the potential uses.
IX. HOW INTEREST OF FEDERAL POLICY OFFSETS ADVERSE IMPACTS

Finding solutions to the problems of Pruitt-Igoe has perplexed HUD since the early 1960's. The public housing program has been an important means of housing low-income people since it came into being in 1937. Pruitt-Igoe, the outstanding failure of public housing, has been a stigma on public housing for many years. Although public housing can claim many successes, the nationwide reputation of Pruitt-Igoe has prevented many needy communities from taking advantage of the program.

It is strongly believed by HUD that the stigma of Pruitt-Igoe must be permanently removed. The need to remove Pruitt-Igoe offsets all adverse effects on the environment, all of which are temporary and not of large magnitude. None of the other alternatives discussed will accomplish the same effect as total demolition and removal of the rubble, which will enable the use of the land to take on an entirely different character, and will put an end to the drain on the resources of HUD and the City of St. Louis.
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| Senator Stuart Symington                                     | 1. The proposed demolition of Pruitt-Igoe seems to be the best solution to the tragic problems of this project. We support your proposal and hope the demolition and disposal of resultant rubble will be carried out as expeditiously as possible.  
  ** ** **                                                                                     | 1. Noted.                                                                                                                                         |
| Advisory Council on Historic Preservation                    | 1. Show evidence the National Listing of Historic Places published in the Federal Register has been consulted.  
  a. If no National Register property listed is affected by project a section detailing this determination must appear.  
  2. Show evidence of contact with State Historic Preservation Officer and include a copy of his comments in the Statement.  
  ** ** **                                                                                     | 1. See Section II, C 1.                                                                                                                               |
| Department of Health, Education, and Welfare, Region VII, KCMO | 1. It is felt that the impact on Department of Health, Education, and Welfare programs will be minimal and that they have been adequately discussed in the Draft Statement.  
  ** ** **                                                                                     | 1. Noted.                                                                                                                                         |
| Department of the Interior, Missouri Basin Region Denver, Colorado | 1. Section II  
  We suggest that it may be appropriate to reconsider the second paragraph, page 6, in the final statement. Some of our reviewers arrived at an opposite conclusion from the rationale presented. | 1. Noted.                                                                                                                                         |
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| Department of Interior                        | 2. On page 24, it is stated that there are no adjacent features being considered for inclusion in the National Register of Historic Places, however, this assertion is not documented. The final statement should reflect support of this statement by the State Historic Preservation Officer.  
3. Section III  
The discussion of debris disposal commencing on page 43, does not adequately address probable impacts upon fish and wildlife. The Bureau of Sport Fisheries and Wildlife has reviewed and investigated the application for permit under the authorization of the Fish and Wildlife Coordination Act, and determined that severe adverse effects on the riverine habitat would occur. It has recommended that the Corps not issue the required permit.  
4. We note on page 56, that a proposal has been made to leave the debris on site and develop the area for a city park. This certainly is a viable disposal alternative and as such, should be added to the list presented in this subsection. | 2. See letter from James Wilson, Missouri State Historic Preservation Officer, appended as Exhibit O.  
3. Noted and concur. See letter from Corps of Engineers appended as Exhibit Q.  
4. Noted. The alternative of a park was discussed at some length on pages 56 and 57 of Draft Environmental Impact Statement and again in the Final EIS under Section V (D) |
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<td>Department of Interior</td>
<td>5. We have serious concerns over the conclusion drawn in the last paragraph of the section. While reuse of the rubble is an objective, the three alternatives mentioned are not without negative impact on the environment. In open river reaches devoid of side channels, the shallow main channel border areas provide valuable habitat for fishes. The narrow border of land found between flood control levees and the river is usually the only riverine wildlife habitat remaining in metropolitan areas. Shoreline fills cause destruction of habitat with resultant losses to fish and wildlife. This section should be revised to address these negative impacts.</td>
<td>5. Noted. There will be no dumping of debris or rubble in rivers, open river reaches or side channels. Thus, there will be adverse impacts on aquatic habitat or riverine wildlife.</td>
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<td>Missouri Basin Region</td>
<td>6. It also should be noted that abandoned strip mine lands have certain wildlife values. Depending on the chemical nature of the spoil in the strip mine, these areas can be revegetated either by plantings or natural succession. Often they can develop into good habitat supporting a diverse fauna, and we cannot agree with the implication that all strip mine lands are without value. These impacts should be addressed in this subsection.</td>
<td>6. Noted.</td>
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## COMMENTS RECEIVED RE: DRAFT PRUITT-IGOE ENVIRONMENTAL IMPACT STATEMENT

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<td>Department of Interior</td>
<td>7a. <strong>Section IV</strong></td>
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<td>Missouri Basin Region</td>
<td>We are pleased to see that the alternative to rework the site using the rubble to create a park is included along with the various development proposals. Leaving the rubble on site would not only be a significant cost reduction measure, but would eliminate the potential adverse impacts of the other three debris disposal proposals. This alternative should be given serious consideration.</td>
<td>7a. If part of the rubble was left on site to form mounds, it is very unlikely that there would be a financial saving. Due to the nature of the rebar and rubble, substantial preparatory work as well as considerable clean dirt would be required to cover over the rebar and rubble. Equally important, it would preclude the right to effect a total new pattern of land use. It should also be noted that there is a city owned park area on the south periphery of the Pruitt property.</td>
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<td>Denver, Colorado, (Cont'd)</td>
<td>7b. <strong>Section IV</strong></td>
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<td>However, there is a potential adverse impact of such a proposal: our rodent control experts advise that the covered rubble piles would be attractive to burrowing rodents, particularly rats. The inescapable voids left when covering these piles of rubble with soil would harbor many of these pests and control measures would be imperative. This adverse impact and the control measures should be discussed in the final statement.</td>
<td>7b. The contractor will be required to provide proper rodent control and extermination procedures prior to building demolition. Total removal of debris should further reduce the possibility of future rodent infestation of this site. Additionally, City Health Department will supervise and monitor.</td>
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<td>8. <strong>Section V</strong></td>
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<td>Both the adverse effects which cannot be avoided and the irreversible commitments or resource sections should address the impacts on fish and wildlife habitat which could occur should either the Mississippi River fill or the strip mine land disposal alternatives be selected. In addition, these subsections should reflect the permanency of these impacts, should the alternative be implemented.</td>
<td>8. Noted.</td>
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<tr>
<td>Department of Transportation</td>
<td>1. Indicate whether Exhibit A-1 or A-2 correctly illustrates the boundaries of the 57 acres.</td>
<td>1. Both exhibits are correct. A-1 shows the location of the project in relationship to the whole city and surrounding suburbs. A-2 shows the location of the project in relationship to the Model Cities Area and immediately adjacent neighborhoods.</td>
</tr>
<tr>
<td></td>
<td>2. Indicate truck routes and disposal sites so that maintenance needs, disruption of local traffic, and special safety requirements can be better identified.</td>
<td>2. The St. Louis Housing Authority, the agency responsible for awarding demolition contract, advises that the truck routes and disposal sites will be determined by the contractors bidding for the work and that approvals by all political entities and agencies will be obtained prior to the execution of a contract. See Exhibit P, letter from the St. Louis Housing Authority dated August 9, 1974.</td>
</tr>
<tr>
<td></td>
<td>3. Letters from which excerpts have been taken would be meaningful if letters were reproduced in full. Particularly interested in Missouri Highway Commission's letter quoted on Page 35. * * *</td>
<td>3. Noted. Correspondence from agencies commenting on the Draft EIS or from agencies from which information was obtained in order to prepare the initial EIS are included as exhibits in the Final Statement.</td>
</tr>
<tr>
<td>Responding Agency/Office</td>
<td>Comments Received</td>
<td>HUD Response</td>
</tr>
<tr>
<td>--------------------------</td>
<td>------------------</td>
<td>--------------</td>
</tr>
<tr>
<td>Environmental Protection Agency, Region VII KCMO</td>
<td>1. The report states &quot;The noise will not take place during sleeping hours and will be intermittent so that the adverse effect will not be totally disruptive.&quot; It would appear from the data provided that the area is already subject to high noise levels with L10 readings of 72 to 76 dBA (Exhibit D). The January 1, 1975, noise levels on the equipment to be used are not to exceed 75 to 95 dBA at 50 ft. (Exhibit C), however, these levels are above those normally acceptable (Exhibit L). The statement should be expanded to identify the operating hours and the noise mitigation measures that will be implemented at the demolition site, the disposal site and along transport route.</td>
<td>1. The contractor will be allowed to choose his operating hours provided that the contractor's noise levels are below those as required by applicable city, state, and federal laws and regulations. The supervising engineer of the St. Louis Housing Authority will be required to periodically at random and without warning measure the sound levels to enforce this requirement.</td>
</tr>
<tr>
<td></td>
<td>2. The document, Interim Recommendations on Solid Waste Disposal in the Metropolitan St. Louis Area, published by the East-West Gateway Coordinating Council, was cited on page 14, of the statement as saying that estimates of costs per mile of packer truck transport range as high as $0.83. Trucks to be used for the removal of the demolition refuse are not comparable to municipal waste vehicles. We recommend that this example be replaced with data on the type of equipment to be used on the project. The last paragraph on page 14 of the statement, provides some actual costs of transporting demolition wastes for disposal. This example should include the distance of the haul and define the expenses indicated as &quot;on-site work.&quot;</td>
<td>2. Meaningful data on the type and size of vehicles to be used for the removal of rubble is not available until such time as bids for the contract are received. Also, data on distance of haul is unavailable as disposal sites are not known at this time, and are to be determined by the contractor. The contractor will be required to follow all applicable Federal, State and local regulations relative to the disposal of debris. &quot;On-site&quot; work is defined as implementing those precautions necessary to protect from damage such permanent facilities as electrical vaults, storm drain and sewer openings, etc.</td>
</tr>
</tbody>
</table>
3. The average load of rubble is estimated at 18 tons (page 42). The statement should recognize that present state regulations allow trucks with five axles to carry a gross weight of 73,000 lbs. (36.5 tons). The use of the larger vehicles with a load of 25 to 30 tons per trip would significantly reduce the number of trips and the noise and air pollution from the vehicles.

4. The transport routes for the demolition refuse and the associated with the transport of refuse should be identified in the final statement. Possible impacts include noise, loss of debris during transport, traffic congestion and damage to streets.

5. The draft statement identified several alternative disposal sites. The final statement should specify the selected site and assess the associated impacts. If landfill is selected the statement should assure that Missouri State regulations on demolition landfills will be met.

6. According to the statement, the demolition rubble is composed of brick, mortar and steel reinforcing rods (page 39). The description of the buildings and area indicate the presence of other materials including garbage and refuse. A determination of the amount of these non-inert materials should be included. This is of particular importance if the material is to be used to construct a river front dock or as quarry fill since it may degrade water quality. It may be advantageous to remove all non-inert materials from the buildings prior to demolition. If this is done, the impacts associated with the disposal of this material should be considered.
Environmental Protection Agency, Region VII KCMO (Cont'd)

7. Under the State of Missouri Solid Waste Rules and Regulations cited on page 13 of the draft statement, demolition and construction wastes shall not contain more than a minor amount of metals. The quantity of metal allowable in the rubble should be defined since the buildings do contain a sizeable amount of metal (e.g., reinforcing rods, window frames, plumbing and heating pipes, wiring, etc.). If the quantity of metal is found to be significant the statement should identify measures which will be taken to reclaim this material.

8. The statement indicates the building foundations will not be removed. It is proposed to break and crack the basement floors to permit drainage of water from the filled basement areas. The statement should explain how this is to be done and identify the impacts of the action. Possible significant impacts include damage to public utilities and other structures in the surrounding area. It is indicated that the prohibitive expense of removing the basement and foundation structures is the reason for leaving the foundations. By leaving these structures, the future use of this 57 acres may be limited to surface use only. The final statement should discuss the impacts which may result from not removing the foundations and floors.

HUD Response

7. In so far as practical, the contractor will remove metal items from the rubble for salvage or recycling. However, the final choice will be the responsibility of the contractor governed by existing regulations and laws.

8. The contract specifications will require the contractor to remove all material from the basement including the removal of tanks. The contractor will then be required to break in the basement floors. Generally, this is performed through the dropping of a headache ball on the concrete floor, although the contractor may use his discretion as to the methods of accomplishment of this task. While the foundations will be left intact, the contractor will be required to break the foundations for a distance of at least two feet below grade level. This procedure is not uncommon in cities as old as St. Louis and does not preclude or make prohibitive future building on the site.
<table>
<thead>
<tr>
<th>Responding Agency/OFFICE</th>
<th>Comments Received</th>
<th>HUD Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environmental Protection Agency, Region VII KCMO (Cont'd)</td>
<td>9. The future use of the area following demolition should be discussed, and the impacts of the future uses should be identified and assessed in the final statement as they are of significance in determining the total impact of the project. 10. The statement should also recognize and evaluate the impacts resulting from contaminated runoff from the project area. Contaminative materials may include erodible soil particulates, fuel spills, building refuse and other pollutants during and following demolition. Measures for control of dust and suspended particulates during demolition of the structures, transport of the refuse and deposition at the disposal site should be identified. 11. The section on alternatives should discuss the possible use of the buildings for other than low income housing. It should also indicate if the alternative of selling or giving the land and facilities to private ownership was considered. This would add the land to the tax roles and possibly provide employment and/or housing for people of the area.</td>
<td>9. There are no plans for the future use or redevelopment of the site at this time. An Environmental Impact Statement will be required at such time future development is planned. 10. The contractor will be required to follow the various city, state, and federal pollution regulations that appertain. 11. This was discussed and considered. See Section V, Alternatives to Proposed Action, particularly the Pruitt-Igoe Action Program.</td>
</tr>
<tr>
<td>RESPONDING AGENCY/OFFICE</td>
<td>COMMENTS RECEIVED</td>
<td>HUD RESPONSE</td>
</tr>
<tr>
<td>------------------------------------------</td>
<td>-----------------------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Environmental Protection Agency, Region VII KCMO (Cont'd)</td>
<td>12. Cost estimates are provided for several alternative plans for the disposition of the Pruitt-Igoe Complex. These include rehabilitation and/or redevelopment of the complex as well as complete demolition followed by redevelopment. However, none of these alternatives are the proposed action, i.e., complete destruction of the housing complex without any proposed redevelopment. Therefore, the final statement should also include a cost estimate of the proposed project. 13. The statement identifies the St. Louis Housing Authority, the City of St. Louis and the U.S. Department of Housing and Urban Development as agencies having interests in and authority over various aspects of the Pruitt-Igoe Complex and in its demolition. The statement should identify which of these agencies owns the land and buildings. This is of significance in determining the responsibility for compliance with the various environmental regulations. 14. The circulation list presented in the summary section statement should include the Missouri Division of Health, Bureau of Solid Waste Management.</td>
<td>12. The Department of Housing and Urban Development has agreed to provide the St. Louis Housing Authority with financial assistance in demolishing Pruitt-Igoe. Unable to project costs of demolition until bids are received. 13. St. Louis Housing Authority presently holds title to the Pruitt-Igoe land subject to a Declaration of Trust in favor of the Government and the bondholders. Without some action on the part of HUD, this will continue to be true after demolition. 14. Noted. Will send copy of Final Environmental Impact Statement as recommended.</td>
</tr>
</tbody>
</table>
### Comments Received Re: Draft Pruitt-Igoe Environmental Impact Statement

#### Responding Agency/Office

<table>
<thead>
<tr>
<th>Office of Economic Opportunity, Region VII, KCMO</th>
<th><strong>Comments Received</strong></th>
<th><strong>HUD Response</strong></th>
</tr>
</thead>
</table>
| Air Conservation Commission State of Missouri   | 1. No adverse comments regarding the slated demolition.  
2. The demolition should be expeditiously completed.  
* * *  
1. We are glad that you have previously contacted the St. Louis City Division of Air Pollution Control. This local agency should be given prime consideration.  
2. Dust will obviously be a major problem. Blasting, transporting, debris storage and other project phases are to be carefully controlled. Please see that all contractors are aware of the restrictions imposed by Regulation IX of the Air Quality Standards and Air Pollution Control Regulations for the St. Louis Metropolitan Area.  
3. Regulations also prohibit open burning, or the creation of excessive odors or smoke. Past experience says that a massive project as this will produce refuse that can be burned. The final impact statement should make reference to the fact that open burning will not be conducted.  
* * *  | 1. Noted.  
2. Noted.  | 1. Noted. The St. Louis Housing Authority will continue to consult with the City's Division of Air Pollution Control.  
2. Noted. All pertinent requirements as provided for in applicable regulations and laws will be included in the specifications for bidding on the demolition contract.  | 3. Noted. See item 2 above. |
<table>
<thead>
<tr>
<th>RESPONDING AGENCY/OFFICE</th>
<th>COMMENTS RECEIVED</th>
<th>HUD RESPONSE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Department of Community Affairs, State of Missouri</td>
<td>1. State Clearinghouse forwarded only comments from the State Highway Commission and the Department of Conservation. All other State agencies had no comments or recommendations.</td>
<td>1. No response necessary</td>
</tr>
<tr>
<td>Missouri Department of Conservation</td>
<td>1. Page 43 - The discussion of debris disposal does not include the park proposal presented on page 56. The statement on line 3, page 44 ignores the fact that dumping rubble in the Mississippi would have an adverse impact on aquatic life and increase the flood crest by filling the river channel.</td>
<td>1. While the creation of a park is a viable alternative and was mentioned as such, a discussion of the use of the debris for this purpose was not included as it is not likely to receive favorable consideration. There are existing a number of neighborhood parks serving the area. No rubble will be dumped in the river nor will be used to construct any dikes or levees. See Exhibit Q, Corps of Engineers letter dated July 24, 1974.</td>
</tr>
<tr>
<td></td>
<td>2. Page 56 - The park proposal could include utilization of suitable building foundations as small ponds or fish lakes. The need for 200,000 cubic yards of soil to cover the building rubble could for the most part be met with sand dredged from the Mississippi and either piped or hauled to the site.</td>
<td>2. Noted. A check with the Corps of Engineers reveals that dredged sand cannot be piped. The hauling of such material is possible, but would equal the adverse impact of hauling the demolition rubble away from the site.</td>
</tr>
<tr>
<td>RESPONDING AGENCY/OFFICE</td>
<td>COMMENTS RECEIVED</td>
<td>HUD RESPONSE</td>
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<td>--------------------------</td>
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</tbody>
</table>
| Missouri Department of Conservation (Cont'd) | 3. Page 60  
   a. The advantages of park development on the rubble as opposed to hauling to the Mississippi for fill with attendant aquatic habitat losses, are not discussed.  
   b. The possibility of depositing the rubble along the Mississippi River for park development is not discussed. Such a use could have benefits to a large segment of the public. | 3.  
   a. No aquatic habitat losses as rubble will not be dumped in the Mississippi River. See Corps of Engineers letter appended as Exhibit Q.  
   b. No such site is known to be available and there is no sponsoring agency. |
| Missouri State Highway Commission | 1. Find Statement to reflect adequately concerns of the Commission, however, recommend that any re-development emphasize the provision for adequate highway facilities in the area. Also, prior to any redevelopment recommend that the Commission be contacted so that the area may be considered for the development of an optimum transportation corridor. | 1. Prior to the redevelopment of the 57 acres all such alternatives will be discussed and an Environmental Impact Statement will be prepared thus offering further input by concerned agencies. |
| Missouri State Historic Preservation Officer and Director, Missouri State Park Board | 1. There are no objections to the demolition of Pruitt-Igoe as there are no pre-historic or historic resources affected by the demolition of the Pruitt-Igoe Public Housing Complex. | 1. Noted. Letter appended as Exhibit O. |
## Comments Received Re: Draft Pruitt-Igoe Environmental Impact Statement

<table>
<thead>
<tr>
<th>Responding Agency/Office</th>
<th>Comments Received</th>
<th>HUD Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>East-West Gateway Coordinating Council, St. Louis, Missouri</td>
<td>1. There should be a clear explanation of where and how disposal of the rubble will be accomplished. While the statement discusses several alternatives, none is actually proposed as the best choice. There is not sufficient information provided in the statement to permit a knowledgeable recommendation as to the choice of one type of disposal site over another.</td>
<td>1. Can not discuss until demolition contract is awarded. The choice of disposal site(s) is that of the contractor, so long as he fully complies with all applicable federal, state and local regulations and laws.</td>
</tr>
<tr>
<td></td>
<td>2. The impact - social, economic and physical - the one kind of disposal site over another must be more adequately surfaced. The alternative of disposing of the rubble on site by using it in the development of a park should be explored further in the statement.</td>
<td>2. Same as 1 above. See response to Department of Interior comment number 7a.</td>
</tr>
<tr>
<td></td>
<td>3. A more precise estimate of the amount of solid waste anticipated should be made and documented.</td>
<td>3. Unable to estimate. To be estimated by contractor.</td>
</tr>
<tr>
<td></td>
<td>4. The statement should explain whether or not parking areas will be included in the disposal plan.</td>
<td>4. It is expected that some roadways and paved areas may be left intact for possible future use or as an aid to future construction.</td>
</tr>
<tr>
<td></td>
<td>5. The impact of the project, particularly the disposal phase, on the area's transportation system should be assessed to determine the degree of disruption, congestion, etc. (if any) which is anticipated.</td>
<td>5. Truck routes will be determined by contractor after receiving appropriate approvals and permits from applicable public entities.</td>
</tr>
<tr>
<td>RESPONDING AGENCY/OFFICE</td>
<td>COMMENTS RECEIVED</td>
<td>HUD RESPONSE</td>
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<tr>
<td>East-West Gateway</td>
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<tr>
<td>Coordinating Council,</td>
<td></td>
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<tr>
<td>St. Louis, Missouri</td>
<td></td>
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<tr>
<td>(Cont'd)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Laclede Gas Company</td>
<td></td>
<td></td>
</tr>
<tr>
<td>St. Louis, Missouri</td>
<td></td>
<td></td>
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</table>

**6. Alternatives for use of the site on an interim basis following completion of the project should be explored. It should, at the very least, be insured that weeds will be cut, and the grounds not allowed to become a dumping area, but be kept in a safe, environmentally aesthetic and health condition.**

**7. The concept of implementing a method to control the spread of rodents before the first phase of the project begins, should be explored in the draft statement.**

---

**1. Our comments are entirely concerned with references on pages 39, 40, and 47, of the Statement to the precautions which will have to be taken to protect those utility facilities which must remain in the area, and are necessary in providing to adjacent areas.**

**2. Laclede's primary concern is for a 24 inch cast iron low pressure gas main, which extends through the entire Pruitt-Igoe area and is essential to maintenance of adequate service to areas outside Pruitt-Igoe.**

**6. During the interim period the Authority will maintain the grounds as to provide safe and healthy conditions including the cutting of weeds.**

**7. See response to Department of Interior comment number 7b.**

---

**1. The St. Louis Housing Authority has met with the various utilities, public and private, which traverse or supply the demolition site. The Authority will require the contractor to properly preserve the utilities during the demolition. In addition, the contractor will be required to provide sufficient surety to cover any conceivable contractor damage to any part of these utility systems.**

**2. Techniques such as seismic metering and x-ray, will be used prior to and after demolition to insure the integrity of the gas main and other utilities such as sewers.**
<table>
<thead>
<tr>
<th>Responding Agency/Office</th>
<th>Comments Received</th>
<th>HUD Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Laclede Gas Company</td>
<td>3. Laclede’s letter of February 28, 1974, to the St. Louis Housing Authority, explains our concern for the 24 inch gas main in detail. Appreciate if those entrusted with completing final plans for demolition, consult with and offer Laclede the opportunity to participate in decisions for demolition which might affect the 24 inch gas main.</td>
<td>3. In completing the final plans for demolition, Laclede Gas and other concerned utilities will have the opportunity to participate for the purpose of insuring the integrity of their systems and equipment.</td>
</tr>
<tr>
<td>St. Louis, Missouri (Cont’d)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>1. Demolition of the buildings will not affect telephone service to other areas. We have removed all of our salvageable facilities from the site and are not now involved with the timing or method of demolition as far as damage to our facilities is concerned.</td>
<td>1. Noted.</td>
</tr>
<tr>
<td>Southwestern Bell Telephone Company</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>1. Believe that complete demolition of the Pruitt-Igoe project will greatly benefit the City of St. Louis, by providing the city with a large tract of land available for redevelopment.</td>
<td>1. Noted.</td>
</tr>
<tr>
<td>St. Louis Regional Commerce and Growth Association</td>
<td>2. Believe it is essential that the demolition be accomplished quickly with appropriate safeguards to insure a minimum of disruption, and/or damage to the surrounding area. Secondly, it is absolutely essential that the land be redeveloped without delay.</td>
<td>2. Noted.</td>
</tr>
<tr>
<td>RESPONDING AGENCY/OFFICE</td>
<td>COMMENTS RECEIVED</td>
<td>HUD RESPONSE</td>
</tr>
<tr>
<td>-------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>--------------</td>
</tr>
<tr>
<td>St. Louis Regional Commerce and Growth Association (Cont'd)</td>
<td>3. The RCGA is prepared to assist the city in its planning for this area, as well as, to provide information and assistance to prospective developers. * * * *</td>
<td>3. Noted.</td>
</tr>
<tr>
<td>Union Electric Company St. Louis, Missouri</td>
<td>1. We feel that the statements covering the effects of the demolition work on Union Electric facilities are satisfactory, although not specific. Our letter of February 8, 1974, to the St. Louis Housing Authority covers in detail the precautions that we feel will be necessary to protect our facilities, and to insure continuity of service in the surrounding area.</td>
<td>1. Expressed concerns are noted and appropriate precautions will be covered by specifications in the demolition contract bidding documents.</td>
</tr>
</tbody>
</table>
LOCATION MAP
Vicinity Map

Legend:
- Model Cities Boundary
- Model Cities Neighborhood Boundaries
- Public Housing
- Bus Routes

Exhibit A-2
### BUILDING CONDITIONS BY NEIGHBORHOODS (BY DWELLING UNITS) 1960-1970

<table>
<thead>
<tr>
<th></th>
<th>Montgomery-Hyde Park</th>
<th>Murphy-Blair</th>
<th>Pruitt-Igoe</th>
<th>Carr-Central</th>
<th>Yeatman</th>
<th>Total Model City</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sound</td>
<td>2055</td>
<td>152</td>
<td>3643</td>
<td>131</td>
<td>2867</td>
<td>*</td>
</tr>
<tr>
<td></td>
<td>47%</td>
<td>5%</td>
<td>71%</td>
<td>3%</td>
<td>84%</td>
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</tr>
<tr>
<td>Deteriorated</td>
<td>1982</td>
<td>2574</td>
<td>1246</td>
<td>4022</td>
<td>411</td>
<td>264</td>
</tr>
<tr>
<td></td>
<td>46%</td>
<td>87%</td>
<td>24%</td>
<td>88%</td>
<td>12%</td>
<td>85%</td>
</tr>
<tr>
<td>Dilapidated</td>
<td>313</td>
<td>220</td>
<td>211</td>
<td>428</td>
<td>151</td>
<td>48</td>
</tr>
<tr>
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<td>7%</td>
<td>8%</td>
<td>5%</td>
<td>9%</td>
<td>4%</td>
<td>15%</td>
</tr>
<tr>
<td>Total</td>
<td>4350</td>
<td>2946</td>
<td>5100</td>
<td>4581</td>
<td>3429</td>
<td>312</td>
</tr>
</tbody>
</table>

* Pruitt-Igoe Excludes Public Housing Projects (2,870 Units)

**Source:**
- 1971, Building Conditions Survey
- 1970, Land Use Survey, City Plan Commission
### CONSTRUCTION NOISE SPECIFICATIONS

17.1 Equipment to be employed on this site shall not produce a noise level exceeding the following limits in dB(A) at a distance of 50 feet from the equipment under test in conformity with the Standards and Recommended Practices established by the Society of Automotive Engineers, Inc., including SAE Standard J 952 and SAE Recommended Practice J 184:

<table>
<thead>
<tr>
<th>Equipment</th>
<th>Effective Date</th>
<th>January 1, 1975</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>July 1, 1972</td>
<td></td>
</tr>
<tr>
<td>Earthmoving</td>
<td></td>
<td></td>
</tr>
<tr>
<td>front loader</td>
<td>79</td>
<td>75</td>
</tr>
<tr>
<td>backhoes</td>
<td>85</td>
<td>75</td>
</tr>
<tr>
<td>dozers</td>
<td>80</td>
<td>75</td>
</tr>
<tr>
<td>tractors</td>
<td>80</td>
<td>75</td>
</tr>
<tr>
<td>scrapers</td>
<td>88</td>
<td>80</td>
</tr>
<tr>
<td>graders</td>
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<td>75</td>
</tr>
<tr>
<td>truck</td>
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<td>75</td>
</tr>
<tr>
<td>paver</td>
<td>89</td>
<td>80</td>
</tr>
<tr>
<td>Materials Handling</td>
<td></td>
<td></td>
</tr>
<tr>
<td>concrete mixer</td>
<td>85</td>
<td>75</td>
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<tr>
<td>concrete pump</td>
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<td>75</td>
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<tr>
<td>crane</td>
<td>83</td>
<td>75</td>
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<tr>
<td>derrick</td>
<td>88</td>
<td>75</td>
</tr>
<tr>
<td>Stationary</td>
<td></td>
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<td>pumps</td>
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<td>75</td>
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<tr>
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<tr>
<td>pile drivers</td>
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<tr>
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<td>88</td>
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<tr>
<td>rock drills</td>
<td>98</td>
<td>80</td>
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<tr>
<td>pneumatic tools</td>
<td>86</td>
<td>80</td>
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<tr>
<td>Other</td>
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</tr>
<tr>
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<td>75</td>
</tr>
<tr>
<td>vibrator</td>
<td>76</td>
<td>75</td>
</tr>
</tbody>
</table>
COUNTY: CITY OF ST. LOUIS
RTE: U-755

JOB NO: 6-U-755-23

DETAILED LOCATION: FRANKLIN ST. BTWN. 20TH & 21ST STS., 12 FT. NORTH OF CENTERLINE OF NEAR LANE FRANKLIN ST.

Graphic Sound Level Recordings

By

Dr. Wm. S. Gatley & R. H. Schaffart
Univ. of Mo. - Rolla

Resulting Levels in dBA:

<table>
<thead>
<tr>
<th>Date</th>
<th>8-26-71</th>
<th>8-26-71</th>
<th>8-26-71</th>
<th>8-26-71</th>
<th>8-27-71</th>
</tr>
</thead>
<tbody>
<tr>
<td>Time</td>
<td>1215</td>
<td>1605</td>
<td>2028</td>
<td>2305</td>
<td>0833</td>
</tr>
<tr>
<td>Reading Interval</td>
<td>5 Sec.</td>
<td>5 Sec.</td>
<td>5 Sec.</td>
<td>5 Sec.</td>
<td>5 Sec.</td>
</tr>
<tr>
<td>Min</td>
<td>56</td>
<td>54</td>
<td>57</td>
<td>60</td>
<td>60</td>
</tr>
<tr>
<td>Max</td>
<td>85</td>
<td>90</td>
<td>84</td>
<td>88</td>
<td>90</td>
</tr>
<tr>
<td>(ARITH. MEAN) L50:</td>
<td>63</td>
<td>66</td>
<td>68</td>
<td>69</td>
<td>68</td>
</tr>
<tr>
<td>(Accumulated %)L10:</td>
<td>72</td>
<td>73</td>
<td>73</td>
<td>74</td>
<td>76</td>
</tr>
<tr>
<td>Aver. Energy:</td>
<td>68</td>
<td>72</td>
<td>70</td>
<td>71</td>
<td>76</td>
</tr>
<tr>
<td>Aver. Energy (From Integrating Graphic Recording):</td>
<td>68</td>
<td>72</td>
<td>70</td>
<td>70</td>
<td>73</td>
</tr>
</tbody>
</table>

Scale Horiz. 1 in. = 12 Sec.
Vert. 1 in. = 10 dBA

The figures shown express sound levels in decibels. The readings were taken about two blocks from the Pruitt-Igoe site and are typical of a busy city street.
## Pruitt-Igoe Profile

This profile shows graphically, on separate scales, several socio-economic measures of Pruitt-Igoe residents.
INTERIOR VIEW OF UNOCCUPIED APARTMENT
EXTERIOR VIEW
EXTERIOR VIEW
EXTERIOR VIEW
Mr. Kenneth Lange  
Program Manager  
Department of Housing and  
Urban Development  
Area Office  
210 North 12th Street  
Saint Louis, Missouri  63101  

Subject: Pruitt-Igoe Environmental Impact Statement  

Dear Mr. Lange:  

Your letter of December 20 requested my comments on the pending demolition of Pruitt-Igoe on land use plans, policies and controls for the affected area.  

In June 1972, the City Plan Commission adopted a Comprehensive Plan for the Model City Area which includes and surrounds the Pruitt-Igoe complex, and a copy was furnished earlier for your files. This plan recognized the planning recommendations of the Pruitt-Igoe Action Program prepared by the joint resident-city-federal task force. The rehabilitation recommendations of the task force could not be implemented due to lack of sufficient funding but the report did recommend that if the rehabilitation was not possible, the complete demolition of Pruitt-Igoe was recommended.  

In my view, the proposed demolition is fully consistent with current plans, policies and controls for both the Pruitt-Igoe Area and the surrounding Model City Area. With the removal of deteriorated Pruitt-Igoe structures, the total environment of the surrounding community will take on a more positive character and will set the stage for the development of future new construction. It is, of course, obvious that the removal of dwelling units will reduce the load on existing community facilities in the area.
We look forward to working closely with you on the development of a full-range of programs to continue the total Model City rehabilitation and construction effort.

If any further information is required to respond to your inquiry of December 20, please do not hesitate to contact me.

Sincerely,

[Signature]

Norman Murdoch
Director of Planning and Development

NM:MP:ns
Mr. Elmo Turner  
Area Director  
Department of Housing and Urban Development  
210 North Twelfth Street  
St. Louis, Missouri 63101  

ATTENTION: Kenneth Lange  
Re: Pruitt-Igoe Environmental Impact Statement

Dear Mr. Turner:

In accordance with a request from Mr. Kenneth Lange of your office, and his letter of December 20, 1973 relative to the above referenced subject matter, we are transmitting information pertaining to the preparation of an Environmental Impact Statement for Pruitt-Igoe. Particularly, our comments will relate to the pending demolition of Pruitt-Igoe and the subsequent release of 57 acres of land as it relates to the Authority's plans for the DeSoto-Carr Urban Renewal Area.

The contemplated demolition of the Pruitt-Igoe housing development will eliminate many of the problems which have served as obstacles to the redevelopment of the DeSoto-Carr Area and the near north side in general. The demolition of the various structures comprising Pruitt-Igoe will not only serve to eliminate the numerous problems associated with Pruitt-Igoe, but help to create an atmosphere which will be conducive to the redevelopment of areas surrounding the Pruitt-Igoe site. The existence of Pruitt-Igoe, and the negative physical and social environments which have been created by it, have greatly prohibited the future growth of areas surrounding Pruitt-Igoe. Further, the existence of Pruitt-Igoe has had tremendous adverse effects on future growth and potential redevelopment activity which otherwise might have materialized if Pruitt-Igoe had not had such a detrimental impact on areas in close proximity to the Pruitt-Igoe site and the City of St. Louis as a whole.

Redevelopers have been extremely reluctant to undertake redevelopment activity in areas which are in close proximity to Pruitt-Igoe because of numerous and far-reaching negative effects stemming from the Pruitt-Igoe development. The elimination of Pruitt-Igoe, and the numerous problems related to it, will serve to create an atmosphere conducive to encouraging new redevelopment activity. The demolition of Pruitt-Igoe is not contrary to the objectives of the Redevelopment Authority.

The release (availability) of 57 acres of land as a result of the demolition of Pruitt-Igoe will further serve to encourage substantial redevelopment of not only the Pruitt-Igoe site, but areas adjacent to and surrounding the Pruitt-Igoe
Area. The availability of 57 acres of land, in and of itself, will provide the inducement for large scale redevelopment activity. The large tract of land, whether developed entirely or subdivided into smaller portions, will also influence the redevelopment of land in close proximity to the 57 acre site. It is important to recognize that the availability and subsequent development of the 57 acres, in and of itself, although extremely important, may not necessarily be the major consideration in determining the value attributed to the release of the 57 acre Pruitt-Igoe tract of land. Possibly, more important is the "catalytic" function that development of the site may have on influencing additional redevelopment activity in areas surrounding the Pruitt-Igoe site. The availability of a tract of land of this magnitude should enable a more comprehensive approach to be employed by potential redevelopers in their initiation of redevelopment activity.

In addition to the foregoing, the redevelopment activity which is expected to materialize on the Pruitt-Igoe site will create an entirely different atmosphere upon the areas immediately adjacent to the Pruitt-Igoe site and on the entire near north side. As opposed to being negative in its influence on surrounding areas, as was the existence of Pruitt-Igoe, new development activity will have an extremely positive effect on the physical, social, cultural and economic considerations, not only on the DeSoto-Carr Area, but also the City of St. Louis as a whole. The release of the 57 acre Pruitt-Igoe tract of land is in accord with the Authority's plans and objectives for the DeSoto-Carr Urban Renewal Area.

We hope this information will be of service to you and if we can be of any further assistance relative to this matter, please don't hesitate to let us know.

Sincerely,

David M. Hrysko
Director of Planning

cc: Kenneth Lange
Mr. Kenneth Lange
Program Manager
Area Office
Dept. of Housing & Urban Development
210 North 12th Street
St. Louis, Missouri 63101

Dear Mr. Lange:

I am writing in response to your letter of December 20 concerning the impact of the demolition of Pruitt-Igoe on development plans in the Model Cities Area.

First, let me indicate that pursuant to the action of the Saint Louis Housing Authority in announcing the closing of the Pruitt-Igoe Housing Project, we have taken the action to relocate all service programs out of the area. We are continuing to provide services from nearby locations for the residents who have not as yet moved.

Second, the demolition of Pruitt-Igoe can only have a positive effect on our efforts in the Model Cities Program to develop the adjacent Carr Central, Montgomery-Hyde Park, and Yeatman neighborhoods. The elimination of the overwhelming blighting effect of the massive vacant and vandalized buildings will eliminate a deterrent to investment in these nearby neighborhoods which has retarded our efforts of the past.

Concerning the future use of the fifty-seven acre tract which will result from the demolition, it is my conclusion from conversations with the Mayor and other City officials that there are no defined plans for its re-use at this time. In general, however, re-use which would provide more standard housing for Model City residents would be in direct coordination with the major goals of the Model Cities program. In no way can there be any conflict with the goals articulated by the Model Cities Board.

Finally, I believe a point needs to be raised about the importance in moving ahead in an expeditious manner to complete the demolition of Pruitt-Igoe. As you are surely aware, the Saint Louis Model Cities Program during all of the years of its operation has been plagued by the uncertainty and false starts on efforts to do something about Pruitt-Igoe.

EXHIBIT I
I, along with the Chairman of the Model Cities Board, served on the special task force chaired by Mr. A. J. Wilson from the Mayor's Office which worked for over a year to develop a Pruitt-Igoe renewal plan. This plan was subsequently rejected by HUD as being economically unfeasible. In that report it was the unanimous recommendation of the task force that should such a finding be made, then the alternative action should be the demolition of the project. I reiterate that this was the position adopted by the task force which included residents, City officials and HUD officials. The action to demolish, therefore, is in direct coordination with our previous recommendations.

It is important that rapid action be taken so that the broader Model Cities area can be stabilized with the removal of the uncertainty of Pruitt-Igoe.

Thank you very much for your continuing interest in our Model Cities Program.

Sincerely,

[Signature]

Arthur J. Kennedy
Director
DISCUSSION PARTICIPANTS

PRUITT - IGOE FUTURE

Harold Antoine, Director, Human Development Corporation
Arthur Kennedy, Director, Model Cities
Dan Franklin, Administrator Board of Education
Judge Wayman Smith
Mrs. E. Troup, 2440 Cass - Pruitt-Igoe Resident
Mrs. P. Sanders, 2440 Cass - Pruitt-Igoe Resident
Mrs. M. Robinson, 2440 Cass - Pruitt-Igoe Resident
Mr. E. Porter, Resident, Pruitt-Igoe
Mr. Elmer Hammond, former Pruitt-Igoe resident
Mr. T. P. Costello, Executive Director, St. Louis Housing Authority
Gwen Giles, Director, St. Louis Human Relations Council
Margaret Bush Wilson, Attorney
Joseph Clark, Safety Director, City of St. Louis
Major A. Warren, North Side Coordinator, Metro Police
Captain E. Moran, 4th District Metro Police
Dan MacDonald, Health and Welfare Council
Alderman L. Woodson, St. Louis City
Henry W. Lee, Jr., Board Metropolitan St. Louis Sewer District
Margaret Young, Carr Square Management
Lorretta Hall, DeSoto-Carr P.A.C.
Mel Harlstead, DeSoto-Carr P.A.C.
Mabel Coney, Cochran T.A.B., Rep.
Alderman Board President J. Badaracco, St. Louis City
John Bass, City Comptroller
Lou Berra, Special Assistant to Mayor Poelker
Edward Tripp, Director of Welfare, St. Louis City
Paul Nelson, Director of Welfare, State of Missouri - St. Louis Office
Bill Harrison, Director of Urban Programs, Washington University
Mary Cummings PhD, Social Systems, Washington University
Dempster Holland PhD, Urban Affairs, St. Louis University
D. Harrison PhD, Social Practicum, Washington University
Mrs. M. Simpson, Resident Pruitt-Igoe
Mrs. E. McCowan, Resident Pruitt-Igoe
Rev. R. Lowe, Resident Pruitt-Igoe
Mr. H. Adams, Director of Model Cities Citizen Participation
Senator Ray Howard, State of Missouri
Congressman William L. Clay
Pearlie Evans, Advisor
Macler Sheppard, Jeff Vander Lou Inc.
Terry MacCormick - Teamsters

EXHIBIT J
Mr. Frank Boykin
Board of Commissioners
1300 Delmar
St. Louis, Missouri 63103

Dear Frank:

It is with deep regret, stern apprehension and much consideration that we, the Tenant Affairs Board and tenant representative in Pruitt-Igoe make a decision that will jointly cause with the Board of Commissioners the closing down of a Public Housing dream, that through neglect, misuse and city and federal apathy, has turned into a world-wide Public Housing nightmare.

Therefore unless funds can be made available from the City and Federal Government, to meaningfully upgrade the Pruitt-Igoe Community to safe, sanitary living conditions then we have no other alternative but to agree with the recommendation of Mr. Costello, Executive Director and the Board of Housing Commissioners for the closing down of Pruitt-Igoe and the relocation of its tenants.

We are in agreement with this plan only if the following stipulations are adhered to namely: that an honest attempt be made by the Housing Authority to relocate and house all the residents, and that the Authority pay moving costs for all residents within or without the proposed shut-down schedule as long as they qualify according to the occupancy manual and procedures established jointly by the Tenant Affairs Board and the Housing Board of Commissioners. Also, that there be no decision for land reuse made (highway development, new housing developments, etc.) without the joint discussion and consideration of the Tenant Affairs Board and Housing Commissioners, and thirdly that the existing lighting system in Pruitt-Igoe be reactivated for the safety of residences in Pruitt-Igoe waiting to be relocated.

As stated above, the decision to close down Pruitt-Igoe has not been an easy one, and its closing is a responsibility that we all...
Mr. Frank Boykin  
June 4, 1973

must share; residents, Housing Authority, City, State and Federal officials. If our governments did not learn from the failures of Pruitt-Igoe then it is feared that the closing of Pruitt-Igoe and the uprooting of family and lifestyle will become an unexcusable way of life for Public Housing residents across the country who are already living in substandard and poorly maintained housing.

Sincerely yours,

Ted J. Catlin  
President

Ruby Russell (Mrs.)  
Tenant Representative  
Pruitt-Igoe

cc: T.P. Costello  
C. Grover  
T.A.B.  
T.M.C.  
H.U.D.  
Mayor Poelker  
File
January 2, 1974

The Honorable John H. Poelker
Mayor
City Hall, Room 200
St. Louis, Missouri 63103

Dear Mayor Poelker:

As you know, Downtown St. Louis, Inc. is an organization of more than 350 businesses and professional firms of all kinds and sizes devoted to the development and promotion of downtown as the largest business and activity center in the metropolitan area.

My experience with downtown developments leads me to believe that a cleared site is adherently more attractive to a developer than one requiring demolition. For this reason and because of the negative image created by abandoned buildings, I hope that the empty buildings of Pruitt-Igo can be raised as soon as possible.

Kind regards.

Yours sincerely,

Edward A. Ruesing,
Executive Director

cc: Mr. James E. Brown
    Mr. Ethan A. H. Shepley, Jr.

EXHIBIT K-3
CHART: EXTERNAL NOISE EXPOSURE STANDARDS FOR NEW CONSTRUCTION SITES (Measurements and projections of noise exposures are to be made at appropriate heights above site boundaries)

<table>
<thead>
<tr>
<th>GENERAL EXTERNAL EXPOSURES</th>
<th>AIRPORT ENVIRONS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>CNR ZONE */</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>UNACCEPTABLE</td>
<td></td>
</tr>
<tr>
<td>Exceeds 80 dB(A) 60 minutes per 24 hours</td>
<td>3</td>
</tr>
<tr>
<td>Exceeds 75 dB(A) 8 hours per 24 hours</td>
<td></td>
</tr>
<tr>
<td>(Exceptions are strongly discouraged and require a 102(2)C environmental statement and the Secretary's approval)</td>
<td></td>
</tr>
<tr>
<td>DISCRETIONARY -- NORMALLY UNACCEPTABLE</td>
<td></td>
</tr>
<tr>
<td>Exceeds 65 dB(A) 8 hours per 24 hours</td>
<td>2</td>
</tr>
<tr>
<td>Loud repetitive sounds on site</td>
<td></td>
</tr>
<tr>
<td>(Approvals require noise attenuation measures, the Regional Administrator's concurrence and a 102(2)C environmental statement)</td>
<td></td>
</tr>
<tr>
<td>DISCRETIONARY -- NORMALLY ACCEPTABLE</td>
<td></td>
</tr>
<tr>
<td>Does not exceed 65 dB(A) more than 8 hours per 24 hours</td>
<td></td>
</tr>
<tr>
<td>ACCEPTABLE</td>
<td></td>
</tr>
<tr>
<td>Does not exceed 45 dB(A) more than 30 minutes per 24 hours</td>
<td>1</td>
</tr>
</tbody>
</table>

*/ See Appendix 1 for explanations of Composite Noise Rating (CNR) and Noise Exposure Forecast (NEF).
(2) Interior Noise Exposures (for new and rehabilitated residential construction).

(Note: the standards listed below are performance standards. The means required for achieving them will depend on, among other things, the external noise levels, the equipment and layout used in the building, and the noise attenuation characteristics of the building's floors and walls. These standards assume open windows unless other provision is made for adequate ventilation.)

(a) "Acceptable":

Sleeping Quarters. For the present time, HUD field personnel should consider existing and projected noise exposure for sleeping quarters "acceptable" if interior noise levels resulting from exterior noise sources and interior building sources such as heating, plumbing, and air conditioning

-- do not exceed 55dB(A) for more than an accumulation of 60 minutes in any 24-hour period, and

-- do not exceed 45dB(A) for more than 30 minutes during night time sleeping hours from 11 p.m. to 7 a.m., and

-- do not exceed 45dB(A) for more than an accumulation of eight hours in any 24-hour day.

Other Interior Areas. HUD personnel should exercise discretion and judgement as to interior areas other than those used for sleeping. Consideration should be given to the characteristics of the noise, the duration, time of day, and planned use of the area.

(3) Insulation Between Dwelling Units

(a) "Unacceptable"

For multifamily structures, including attached single family units, floors and dividing walls between dwelling units having Sound Transmission Class (STC) of less than 45 are always unacceptable.
APPENDIX 2. SOUN D LEVELS FOR COMMON NOISES 
(Non-technical table for general perspective and background)

<table>
<thead>
<tr>
<th>Noise Description</th>
<th>dB(A)</th>
</tr>
</thead>
<tbody>
<tr>
<td>JET PLANE, 100 FT. AWAY</td>
<td>130</td>
</tr>
<tr>
<td>PNEUMATIC RIVETER</td>
<td></td>
</tr>
<tr>
<td>ROCK MUSIC WITH AMPLIFIER</td>
<td>120</td>
</tr>
<tr>
<td>THRESHOLD OF FEELING PAIN</td>
<td></td>
</tr>
<tr>
<td>THUNDER; DANGER OF PERMANENT HEARING LOSS</td>
<td>110</td>
</tr>
<tr>
<td>INTERNAL COMBUSTION AIRCRAFT ENGINE, 15 FT. AWAY</td>
<td></td>
</tr>
<tr>
<td>BOILER SHOP; POWER MOWER</td>
<td>100</td>
</tr>
<tr>
<td>SUBWAY TRAIN PASSING STATION</td>
<td></td>
</tr>
<tr>
<td>ORCHESTRAL CRESCENDO, 25 FT. AWAY; NOISY KITCHEN</td>
<td>90</td>
</tr>
<tr>
<td>CITY TRAFFIC (inside car); PNEUMATIC DRILL, 20 FT. AWAY</td>
<td></td>
</tr>
<tr>
<td>PERSISTENT NOISE IMPAIRS HEARING FOR SPEECH COMMUNICATION (85 DECIBELS)</td>
<td>80</td>
</tr>
<tr>
<td>BUSY STREET</td>
<td></td>
</tr>
<tr>
<td>INTERIOR OF DEPARTMENT STORE</td>
<td>70</td>
</tr>
<tr>
<td>AUTOMOBILE (AVERAGE) AT 35 to 40 M.P.H.</td>
<td></td>
</tr>
<tr>
<td>ORDINARY CONVERSATION, 3 FT. AWAY</td>
<td>60</td>
</tr>
<tr>
<td>VACUUM CLEANER, 3 FT. AWAY</td>
<td></td>
</tr>
<tr>
<td>QUIET AUTOMOBILE AT LOW SPEED</td>
<td>50</td>
</tr>
<tr>
<td>AVERAGE OFFICE</td>
<td>40</td>
</tr>
<tr>
<td>QUIET OFFICE</td>
<td></td>
</tr>
<tr>
<td>CITY RESIDENCE</td>
<td>30</td>
</tr>
<tr>
<td>QUIET COUNTRY RESIDENCE</td>
<td>20</td>
</tr>
<tr>
<td>WHISPER, 5 FT. AWAY</td>
<td></td>
</tr>
<tr>
<td>RUSTLE OF LEAVES</td>
<td>10</td>
</tr>
<tr>
<td>THRESHOLD OF HEARING</td>
<td>0</td>
</tr>
</tbody>
</table>

Sound levels can be measured with a meter and expressed in decibels. When used this way, the decibel is based on a comparison with the faintest sound that can be heard. The decibel scale is logarithmic; decibel levels cannot be added arithmetically. (See Appendix 1 and HUD noise assessment manuals for further discussion.)
March 18, 1974

Mr. Elmo O. Turner
Area Director
Department of Housing
& Urban Development
210 North 12th Street
St. Louis, Missouri 63101

Dear Mr. Turner:

This is to advise that the St. Louis Housing Authority is currently placing Pruitt-Igoe tenants in replacement housing.

Five hundred thirty-seven (537) families and individuals have been moved since August 24, 1973. Approximately 73% of these families have moved into public housing. The remainder have been placed in other housing resources.

By this letter we wish to assure you that adequate housing resources are available for the ninety-seven (97) families and individuals still to be moved.

Sincerely yours,

T. P. Costello
Executive Director
June 28, 1974

Mr. Elmer E. Smith  
Regional Administrator  
Department of Housing and Urban Development  
Federal Building  
911 Walnut Street  
Kansas City, Missouri  64106

Dear Mr. Smith:

Re: Draft Environmental Impact Statement  
Demolition of Pruitt-Igoe Public Housing Complex  
St. Louis, Missouri

As no historic or pre-historic resources will be affected by the demolition of the Pruitt-Igoe Public Housing Complex, I have no objections to the removal of these structures.

It might be pointed out that the case of Pruitt-Igoe offers a clear demonstration of the fallibility of Urban Renewal projects. Because of this sort of result, which was touted as a be-all and an end-all in the early 1950's, preservationists have every reason to be skeptical of the panacea-type results promised in new projects wherever they appear. Why should we expect the projects at St. Joseph, Cape Girardeau and elsewhere which are destroying fine examples of the building art, to have any better outcome?

Urban Renewal can indeed be a beneficial tool in improving our cities, but with this demonstration of fallibility, I can never embrace it as the only answer to urban blight. For these reasons I am pledged to the incorporation of historic preservation as part of the planning process.

Sincerely,

Christopher S. Bond  
Governor

James L. Wilson  
Director

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Kirksville  
Hubert E. Lay, Member  
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cc: Ann W. Smith  
Louis S. Wall  
Terry Rehma

You Are Always Welcome in Missouri State Parks and Historic Sites
August 9, 1974

Mr. Elmo O. Turner, Area Director
Department of Housing & Urban Development
210 N. 12th Street
St. Louis, Missouri 63101

Attn: Mr. K. Lange  
Re: Pruitt-Igoe

Dear Mr. Turner:

Per discussions between Mr. Harry Bearman of the HUD Regional Office and Mr. Sidney Jacks of our staff on July 23, 1974, we are enclosing the Authority's response to the Check List concerning Pruitt-Igoe Environmental Impact Statement.

We trust this information is satisfactory for your purposes.

Sincerely,

T. P. Costello  
Executive Director

Enclosure
1. Page 1 - Dept. of Transportation # 2

The truck routes and disposal sites will be determined by the contractor. However those routes and disposal sites will be approved by all necessary political entities and agencies prior to the execution of the contract award.

2. Page 4 - Laclede Gas Company # 2

The St. Louis Housing Authority has met with the various utilities, public and private, which traverse or supply the demolition site. The Authority will require the contractor to properly preserve the utilities during the demolition. In addition the contractor will be required to provide sufficient surety to cover any conceivable contractor damage to any part of these utility systems.

3. Page 5 - Fred H. Porterfield # 2

The Valmeyer Illinois drift mine quarry is probably beyond an economical haul distance. Our records indicate the quarry is 41 miles from the Pruitt-Igoe site.

4. Page 4 - Fred H. Porterfield # 3

In so far as is practical, the contractor will remove metal items from the rubble for salvage or recycling. However, the final choice will be the responsibility of the contractor.

5. Page 8 - Environmental Protection Agency # 1

The contractor will be allowed to choose his operating hours provided that the contractor's noise levels are below those as required by applicable city, state, and federal laws and regulations. The supervising engineer of the Authority will be required to periodically at random and without warning measure the sound levels to enforce this requirement.

6. Page 22 - Environmental Protection Agency # 4

Refer to reply # 1
7. Page 9 - Environmental Protection Agency # 6

The total volume of non-inert materials is relatively insignificant as measured against the total volume of material. However, the specifications will require that the contractor shall remove the non-inert material prior to removal of the debris from the site.

8. Page 10 - Environmental Protection Agency # 7

Refer to reply # 4

9. Page 10 - Environmental Protection Agency # 8

The contract specifications will require the contractor to remove all material from the basement including the removal of tanks. The contractor will then be required to break in the basement floors. Generally this is performed through the dropping of a headache ball on the concrete floor, although the contractor may use his discretion as to the methods of accomplishment of this task. While the foundations will be left intact the contractor will be required to break the foundations for a distance of at least two feet below grade level.

10. Page 10 - Environmental Protection Agency # 9

At this time, no definite plan has been developed for the future use of the site.

11. Page 11 - Environmental Protection Agency # 10

The contractor will be required to follow the various city, state, and federal pollution regulations that appertain.

12. Page 11 - Environmental Protection Agency # 11

In the previous study by Skidmore, Omen and Merrill no encouragement was given to such use.

13. Page 11 - Environmental Protection Agency # 12

The practical prospects of achieving financing, public or private for such alternative plans is remote.

14. Page 12 - Environmental Protection Agency # 13

Title to the real estate is vested in the St. Louis Housing Authority as recorded by the Recorder of Deeds of the City of St. Louis

15. Page 14 - David O. Meeker # 2

Refer to reply # 2
16. Page 14 - David O. Meeker # 3

The utilities were adequate in the past and appear to be quite adequate for the future for residential use.

17. Page 6 - David O. Meeker # 6

The Authority presently considering the possible use of a local black citizens group in the reuse planning.

18. Page 15 - David O. Meeker # 7

It is likely that future use of the site may or may not require some removal of the existing foundations. However, at the most, only selected portions of the existing foundations will require removal. The remaining foundation, being below grade, will remain.

19. Page 15 - David O. Meeker # 9

Refer to reply # 1

20. Page 15 - David O. Meeker # 11

This has been determined to be economically infeasible.

21. Page 17 - U. S. Dept. of Interior # 3, # 4 and # 7a

It is unlikely that the rubble will be allowed as river fill. If part of the rubble was left on site to form mounds, it is very unlikely that there would be a financial saving. Due to the nature of the rebar and rubble, substantial preparatory work as well as considerable clean dirt would be required to cover over the rebar and rubble. Equally important, it would preclude the right to effect a total new pattern of land use. It should also be noted that there is a city owned park area on the south periphery of the Pruitt property.

22. Page 19 - Dept. of Interior # 7b

The contractor will be required to provide proper rodent control and extermination procedures prior to building demolition. Total removal of debris should further reduce the possibility of future rodent infestation of this site.


It is expected that some roadways and paved areas may be left intact for possible future use or as an aid to future construction.


During the interim period the Authority will maintain the grounds as to provide safe and healthy conditions including the cutting of weeds.
Mr. Elmer E. Smith
Regional Administrator
Department of Housing and Urban Development
Federal Building
911 Walnut Street
Kansas City, Missouri 64106

Dear Mr. Smith:

The St. Louis District, Army Corps of Engineers has reviewed the draft environmental statement for Pruitt Homes and Igoe apartments Public Housing Complex as prepared by the Department of Housing and Urban Development. We find that the statement is an adequate assessment of the relationship of the proposed action to activities and projects under the jurisdiction of this District.

As outlined in the section "Disposal of Debris" (p. 43), we have no project which could make use of the type and quantities of debris that would be produced from the demolition of the Pruitt-Igoe Complex. Such debris would not be suitable for construction or reconstruction of dikes, levees, or any contract work which presently relates to Corps of Engineers projects in the St. Louis District.

It should also be noted that a permit from the Corps of Engineers must be obtained prior to spoil of debris in the river. Criteria for granting permits are covered by Corps of Engineers guidelines, as well as by a memorandum of understanding between the Corps and the Department of the Interior. Prior to granting a permit for excavation, fill or dredging in the river, coordination must occur with the appropriate agency of the Department of the Interior, and any sources of disagreement must be resolved. In the case of the permit for which the City of St. Louis has applied relative to constructing a fill along the right bank of the Mississippi River between miles 184.7 and 185.7 for purposes of disposing of the debris from Pruitt-Igoe, the Bureau of Sport Fisheries and Wildlife has expressed concern over the possible detrimental effects to aquatic life this action might produce.
Coordination with the Bureau of Sport Fisheries and Wildlife over this matter has delayed a final decision on the permit. However, because unauthorized dumping by the City of St. Louis has already occurred in the river at this site, all processing of the permit has been discontinued by this District pending a decision by the Office of Chief of Engineers as to whether to pursue legal or administrative sanctions against the unauthorized actions.

Thank you for giving us the opportunity to review this draft impact statement.

Sincerely yours,

THORVALD R. PETERSON
Colonel, CE
District Engineer
May 30, 1974

Mr. Elmer E. Smith, Regional Administrator
Region VII, Department of Housing and
Urban Development
Federal Building, 911 Walnut Street
Kansas City, Missouri 64106

Dear Elmer:

Thank you for sending a copy of the Draft Environmental Impact Statement on the Pruitt-Igoe public housing complex.

The proposed demolition of Pruitt-Igoe seems to be the best solution to the tragic problems of this project. Certainly, the benefits from complete removal of this blight on St. Louis far outweigh the adverse effects, which would only be temporary. The 57 acres where Pruitt-Igoe stands, and the surrounding neighborhoods could be productive land, which is now being wasted because of the stigma attached to the project.

We support your proposal and hope the demolition and disposal of resultant rubble will be carried out as expeditiously as possible.

Sincerely,

[Signature]

Stuart Symington

SS:fs
May 29, 1974

Mr. Elmer E. Smith
Regional Administrator
U.S. Department of Housing and Urban Development
Federal Building
911 Walnut Street
Kansas City, Missouri 64106

Dear Mr. Smith:

This is in response to your request of May 8, 1974, for comments on the environmental statement for the proposed demolition of the Pruitt-Igoe Public Housing Complex, St. Louis, Missouri. Pursuant to its responsibilities under Section 102(2)(C) of the National Environmental Policy Act of 1969, the Advisory Council on Historic Preservation has determined that while you have discussed the historical, architectural, and archeological aspects related to the undertaking, the Advisory Council needs additional information to adequately evaluate the effects on these cultural resources. Please furnish additional data indicating:

a. Compliance with Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470(f)). The Council must have evidence that the most recent listing of the National Register of Historic Places has been consulted (see Federal Register, February 19, 1974, and monthly supplements each first Tuesday thereafter) and that either of the following conditions is satisfied:

1. If no National Register property is affected by the project, a section detailing this determination must appear in the environmental statement.

2. If a National Register property is affected by the project, the environmental statement must contain an account of steps taken in compliance with Section 106 and a comprehensive discussion of the contemplated effects on the National Register property. ("Procedures for the Protection of Historic and Cultural Properties" are detailed in the Federal Register of January 25, 1974, pp. 3366-3370).

To insure a comprehensive review of historical, cultural, archeological, and architectural resources, the Advisory Council suggests that the

EXHIBIT R

The Council is an independent unit of the Executive Branch of the Federal Government created by October 15, 1966 to advise the President and Congress in the field of Historic Preservation.
environmental statement contain evidence of contact with the appropriate State Historic Preservation Officer and that a copy of his comments concerning the effects of the undertaking upon these resources be included in the environmental statement. The State Historic Preservation Officer for Missouri is Mr. James L. Wilson, Director, Missouri State Park Board, P.O. Box 176, 1204 Jefferson Building, Jefferson City, Missouri 65101.

Should you have any questions or require any additional assistance, please contact Jordan Tannenbaum (202-254-3974) of the Advisory Council staff.

Sincerely yours,

Ann Webster Smith
Director, Office of Compliance
Mr. Elmer E. Smith  
Regional Administrator  
Department of Housing and Urban Development  
Federal Building  
911 Walnut Street  
Kansas City, Missouri 64106

Dear Mr. Smith:

RE: Draft Environmental Impact Statement  
Demolition of Pruitt-Igoe Public Housing Complex  
St. Louis, Missouri

The opportunity to review the above referenced draft environmental impact statement is appreciated. Our review is limited to the impact which the demolition of the 30 existing buildings have on the programs of the Department of Health, Education, and Welfare.

As you know, HEW has in the past provided considerable social, health, and educational services within the boundaries defined by the Pruitt-Igoe housing project as well as the geographic area of the Model Cities which serves the housing project described. Had the Pruitt-Igoe housing complex been fully inhabited at the present time, the demolition of removal of this project would have had a serious impact on services in the area. Decline in resident population of the past four years, however, has resulted in a decline in service requirements with a corresponding redirection of service priorities within the geographic area of North St. Louis. It is felt, therefore, that the impact on Department of Health, Education, and Welfare programs will be minimal and that they have been adequately discussed in the Draft Statement.

Sincerely,

William H. Henderson  
Regional Environmental Officer
Mr. Elmer E. Smith  
Regional Administrator  
Department of Housing and  
Urban Development  
Federal Building, 911 Walnut Street  
Kansas City, Missouri 64106

Dear Mr. Smith:

The draft environmental impact statement prepared upon the proposal to demolish the Pruitt-Igoe housing complex in St. Louis, Missouri, has been reviewed by Bureaus of this Department which have particular concerns.

Our comments follow, organized by sections of the statement.

Section II

We suggest that it may be appropriate to reconsider the second paragraph, page 6, in the final statement. Some of our reviewers arrived at an opposite conclusion from the rationale presented.

On page 24, it is stated that there are no adjacent features being considered for inclusion in the National Register of Historic Places, however, this assertion is not documented. The final statement should reflect support of this statement by the State Historic Preservation Officer.

Section III

The discussion of debris disposal commencing on page 43 does not adequately address probable impacts upon fish and wildlife. The Bureau of Sport Fisheries and Wildlife has reviewed and investigated the application for permit under the authorization of the Fish and Wildlife Coordination Act and determined that severe adverse effects on the riverine habitat would occur. It has recommended that the Corps not issue the required permit.
We note on page 56 that a proposal has been made to leave the debris on site and develop the area for a city park. This certainly is a viable disposal alternative and as such, should be added to the list presented in this subsection.

We have serious concerns over the conclusion drawn in the last paragraph of the section. While reuse of the rubble is an objective, the three alternatives mentioned are not without negative impact on the environment. In open river reaches devoid of side channels, the shallow main channel border areas provide valuable habitat for fishes. The narrow border of land found between flood control levees and the river is usually the only riverine wildlife habitat remaining in metropolitan areas. Shoreline fills cause destruction of habitat with resultant losses to fish and wildlife. This section should be revised to address these negative impacts.

It also should be noted that abandoned strip mine lands have certain wildlife values. Depending on the chemical nature of the spoil in the strip mine, these areas can be revegetated either by plantings or natural succession. Often they can develop into good habitat supporting a diverse fauna, and we cannot agree with the implication that all strip mine lands are without value. These impacts should be addressed in this subsection.

Section IV

We are pleased to see that the alternative to rework the site using the rubble to create a park is included along with the various development proposals. Leaving the rubble on site would not only be a significant cost reduction measure but would eliminate the potential adverse impacts of the other three debris disposal proposals. This alternative should be given serious consideration.

However, there is a potential adverse impact of such a proposal: our rodent control experts advise that the covered rubble piles would be attractive to burrowing rodents, particularly rats. The inescapable voids left when covering these piles of rubble with soil would harbor many of these pests and control measures would be imperative. This adverse impact and the control measures should be discussed in the final statement.
Section V

Both the adverse effects which cannot be avoided and the irreversible and irretreivable commitments of resources sections should address the impacts on fish and wildlife habitat which could occur should either the Mississippi River fill or the strip mine land disposal alternatives be selected. In addition, these subsections should reflect the permanency of these impacts, should the alternative be implemented.

We appreciate the opportunity to review the statement, and we hope that these observations will assist you in production of your final statement.

Sincerely yours,

William L. Rogers
Special Assistant to the Secretary
June 19, 1974

Mr. Elmer E. Smith
Regional Administrator
Department of Housing and Urban Development
911 Walnut Street
Kansas City, Missouri 64106

Dear Mr. Smith:

We have reviewed the Department of Housing and Urban Development's Draft Environmental Impact Statement for the Pruitt Homes and Igoe Apartments Public Housing Complex, and the Department of Transportation's comments are as follows:

1. It is difficult to determine the exact limits of the project and the facilities present on the 57 acres referred to throughout the Statement. The description on Page 1 of the boundaries of the area and Exhibit A-1 include Desoto-Carr Park, DeSoto Community Center, Pruitt School, St. Stanislaus Catholic Church, and at least one other church. Exhibit A-2 illustrates a smaller area excluding some of the above facilities and decreases the number of streets that may be impacted by truck traffic from the Pruitt-Igoe complex. An indication as to whether Exhibit A-1 or A-2 correctly illustrates the boundaries of the 57 acres involved is needed.

2. The movement of 19,500 18-ton loads through the city could create structural damage to streets not suited to prolonged heavy truck traffic. We suggest the Final indicate disposal sites and truck routes so that maintenance needs, disruption to local traffic, and special safety requirements can be better identified.

3. The letters from which excerpts have been taken would be more meaningful if the letters were reproduced in full. We are particularly interested in the Missouri State Highway Commission's letter quoted on Page 35.

We appreciate the opportunity to review and comment on this Draft Statement and look forward to receiving the Final.

Sincerely,

(R. R. Waesche)
RADM USCG (Ret.)
Secretarial Representative
Region VII

cc:
Mr. John B. Kemp
July 11, 1974

Mr. Elmer E. Smith  
Regional Administrator  
U. S. Department of Housing and Urban Development  
Federal Building, 911 Walnut Street  
Kansas City, Missouri 64106

RE: Pruitt Homes and Igoe Apartments  
Public Housing Complex  
St. Louis, Missouri 63103

Dear Mr. Smith:

We have reviewed the draft environmental impact statement for the project identified above. The project and statement are rated ER-2 indicating we have environmental reservations about various aspects of the project and request the following comments be addressed in the final statement:

The report states "The noise will not take place during sleeping hours and will be intermittent so that the adverse effect will not be totally disruptive." It would appear from the data provided that the area is already subject to high noise levels with $L_{10}$ readings of 72 to 76 dBA (Exhibit D). The January 1, 1975, noise levels on the equipment to be used are not to exceed 75 to 95 dBA at 50 ft. (Exhibit C), however, these levels are above those normally acceptable (Exhibit L). The statement should be expanded to identify the operating hours and the noise mitigation measures that will be implemented at the demolition site, the disposal site and along the transport route.

The document *Interim Recommendations on Solid Waste Disposal in the Metropolitan St. Louis Area,* published by the East-West Gateway Coordinating Council, was cited on page 14 of the statement as saying that estimates of costs per mile of packer truck transport range as high as $0.83. Trucks to be used for the removal of the demolition refuse are not comparable to municipal waste vehicles. We recommend that this example be replaced with data on the type of equipment to be used on the project. The last paragraph on page 14 of the statement provides

EXHIBIT R
some actual costs of transporting demolition wastes for disposal. This example should include the distance of the haul and define the expenses indicated as "on-site work."

The average load of rubble is estimated at 18 tons (page 42). The statement should recognize that present state regulations allow trucks with five axles to carry a gross weight of 73,000 lbs. (36.5 tons). The use of the larger vehicles with a load of 25 to 30 tons per trip would significantly reduce the number of trips and the noise and air pollution from the vehicles.

The transport routes for the demolition refuse and the impacts associated with the transport of refuse should be identified in the final statement. Possible impacts include noise, loss of debris during transport, traffic congestion and damage to streets.

The draft statement identified several alternative disposal sites. The final statement should specify the selected site and assess the associated impacts. If land fill is selected the statement should assure that Missouri State regulations on demolition landfills will be met.

According to the statement, the demolition rubble is composed of brick, mortar and steel reinforcing rods (page 39). The description of the buildings and area indicate the presence of other materials including garbage and refuse. A determination of the amount of these non-inert materials should be included. This is of particular importance if the material is to be used to construct a river front dock or as quarry fill since it may degrade water quality. It may be advantageous to remove all non-inert materials from the buildings prior to demolition. If this is done the impacts associated with the disposal of this material should be considered.

Under the State of Missouri Solid Waste Rules and Regulations cited on page 13 of the draft statement, demolition and construction wastes shall not contain more than a minor amount of metals. The quantity of metal allowable in the rubble should be defined since the buildings do contain a sizable amount of metal (e.g., reinforcing rods, window frames, plumbing and heating pipes, wiring, etc.). If the quantity of metal is found to be significant the statement should identify measures which will be taken to reclaim this material.
The statement indicates the building foundations will not be removed. It is proposed to break and crack the basement floors to permit drainage of water from the filled basement areas. The statement should explain how this is to be done and identify the impacts of the action. Possible significant impacts include damage to public utilities and other structures in the surrounding area. It is indicated that the prohibitive expense of removing the basement and foundation structures is the reason for leaving the foundations. By leaving these structures the future use of this 57 acres may be limited to surface use only. The final statement should discuss the impacts which may result from not removing the foundations and floors.

The future use of the area following demolition should be discussed and the impacts of the future uses should be identified and assessed in the final statement as they are of significance in determining the total impact of the project.

The statement should also recognize and evaluate the impacts resulting from contaminated runoff from the project area. Contaminative materials may include erodible soil particulates, fuel spills, building refuse and other pollutants during and following demolition. Measures for control of dust and suspended particulates during demolition of the structures, transport of the refuse and deposition at the disposal site should be identified.

The section on alternatives should discuss the possible use of the buildings for other than low income housing. It should also indicate if the alternative of selling or giving the land and facilities to private ownership was considered. This would add the land to the tax roles and possibly provide employment and/or housing for people of the area.

Cost estimates are provided for several alternative plans for the disposition of the Pruitt-Igoe Complex. These include rehabilitation and/or redevelopment of the complex as well as complete demolition followed by redevelopment. However, none of these alternatives are the proposed action, i.e., complete destruction of the housing complex without any proposed redevelopment. Therefore, the final statement should also include a cost estimate of the proposed project.

The statement identifies the St. Louis Housing Authority, the City of St. Louis and the U. S. Department of Housing and Urban Development as agencies having interests in and authority
over various aspects of the Pruitt-Igoe Complex and in its
demolition. The statement should identify which of these
agencies owns the land and buildings. This is of significance
in determining the responsibility for compliance with the various
environmental regulations.

The circulation list presented in the summary section of
the statement should include the Missouri Division of Health,
Bureau of Solid Waste Management.

We appreciate the opportunity to review this draft environ-
mental impact statement. Please send this office a copy of the
final environmental impact statement when it is submitted to the
Council on Environmental Quality.

Sincerely yours,

Jerome H. Svore
Regional Administrator
June 25, 1974

Mr. Elmer E. Smith  
Regional Administrator  
Department of Housing and Urban Development  
Federal Building, 911 Walnut Street  
Kansas City, Missouri 64106

Subj: Draft Environmental Impact Statement  
Demolition of Pruitt-Igoe Public Housing Complex  
St. Louis, Missouri

Dear Mr. Smith:

Our Field Representative has evaluated the impact on the environment of the demolition of Pruitt-Igoe Public Housing Complex, St. Louis, Mo. and has no adverse comments regarding the slated demolition.

He expressed the thought that the demolition should be expeditiously completed with a strong emphasis on the remaining relocation program of the low-income residents of the area.

Sincerely yours,

WILLIAM L. SHOVELL  
Chief, Public and Private Relations Division

EXHIBIT R
July 9, 1974

Mr. Elmer E. Smith
Regional Administrator
Department of Housing and Urban Development
Federal Building, 911 Walnut Street
Kansas City, Missouri 64106

Dear Mr. Smith:

Reference is made to your May 8, 1974 letter concerning demolition of the Pruitt-Igoe housing complex.

We are glad that you have previously contacted the St. Louis City Division of Air Pollution Control. This local agency should be given prime consideration.

Dust will obviously be a major problem. Blasting, transporting, debris storage and other project phases are to be carefully controlled. Please see that all contractors are aware of the restrictions imposed by Regulation IX of the Air Quality Standards and Air Pollution Control Regulations for the St. Louis Metropolitan Area.

Regulations also prohibit open burning, or the creation of excessive odors or smoke. Past experience says that a massive project as this will produce refuse that can be burned. The final impact statement should make reference to the fact that open burning will not be conducted.

If you need a copy of the mentioned set of regulations, please let me know.

Very truly yours,

Frederick W. Ott
Air Pollution Control Engineer

FWO/wb
Mr. Elmer E. Smith  
Regional Administrator  
Department of Housing and Urban Development  
Federal Building, 911 Walnut Street  
Kansas City, Missouri 64106

Dear Mr. Smith:

Subject: Draft Environmental Impact Statement for the Demolition of Pruitt-Igoe Public Housing Complex, St. Louis, Missouri  
DOCA 74050047

The Office of Planning, as the designated State Clearinghouse, has coordinated a review of the above referred draft environmental impact statement with various concerned or affected state agencies pursuant to Section 102(2)(c) of the National Environmental Policy Act.

Enclosed please find the comments received. None of the other state agencies involved in the review had comments or recommendations to offer at this time.

We appreciate the opportunity to review the statement and anticipate receiving the final environmental impact statement when prepared.

Sincerely,

Terry L. Rehma  
A-95 Coordinator

TLR:dk  
Enclosures  
cc: East-West Gateway Coordinating Council
May 23, 1974

GENERAL: A-95 Review
Application No. 74050047

Mr. Terry Rehma
State Clearinghouse Coordinator
Department of Community Affairs
Office of Planning
505 Missouri Boulevard
Jefferson City, Missouri 65101

Dear Mr. Rehma:

The Draft Environmental Impact Statement by the U.S. Department of Housing and Urban Development for the demolition of the Pruitt-Igoe Public Housing Complex in St. Louis may involve the future development of highways.

If the Pruitt-Igoe Public Housing Complex is demolished, we suggest that previous to redevelopment, the Highway Commission be contacted so that this and other lands in the area may be considered for the development of an optimum transportation corridor in the area.

Very truly yours,

L. V. McLaughlin
Assistant Chief Engineer -
A-95 Review Agent

Jefferson City, Missouri 65101
Telephone (314) 751-2551
MISSOURI DEPARTMENT OF CONSERVATION
2901 North Ten Mile Drive - Jefferson City, Missouri 65101
P. O. Box 180 - Telephone 314 751 4115
CARL R. NOREN, Director
June 10, 1974

Mr. Terry Rehma
Clearinghouse Coordinator
Department of Community Affairs
505 Missouri Boulevard
Jefferson City, Missouri 65101

Re: DOCA - A-95 - 74050047

Dear Mr. Rehma:

We have reviewed the Draft Environmental Statement prepared by the U. S. Department of Housing and Urban Development for the proposed demolition of the Pruitt-Igoe housing complex in St. Louis, Missouri. Our concerns are primarily with the use of the 57 acre site following demolition of the housing complex, and the use of the rubble.

Our specific comments are as follows:

1. Page 43 - The discussion of debris disposal does not include the park proposal presented on page 56 of the report. The statement on line 3, page 44 ignores the fact that dumping the rubble in the Mississippi River would have an adverse impact on aquatic life and increase the flood crest by filling in the river channel.

2. Page 56 - The park proposal could include utilization of suitable building foundations as small ponds or fish lakes.

The need for 200,000 cubic yards of "soil" to cover the building rubble could for the most part be met with sand dredged from the Mississippi River and either piped or hauled to the site.
3. Page 60

(a) The advantages of park development on the rubble, as opposed to hauling the rubble to the Mississippi River for fill with attendant aquatic habitat losses, are not discussed.

(b) The possibility of depositing the rubble along the Mississippi River for park development is not discussed. Such a use could have benefits to a large segment of the public.

In summary, we have no comments on the demolition of the Pruitt-Igoe Housing Complex. We are concerned that the best use be made of the 57 acre site and the rubble created by the demolition. The opportunity to comment is appreciated.

Sincerely,

LARRY R. GALE
ASSOCIATE DIRECTOR

cc: Bureau of Sport Fisheries and Wildlife
Rock Island, Illinois
May 14, 1974

General: Draft Environmental Impact Statement
Demolition of Pruitt-Igoe Public Housing Complex

Mr. Elmer E. Smith
Regional Administrator
Department of Housing and Urban Development
Federal Building
911 Walnut Street
Kansas City, Missouri 64106

Dear Mr. Smith:

We are glad to have your recent letter to which was attached a copy of the Draft Environmental Impact Statement covering the demolition of the Pruitt-Igoe Public Housing Complex. We have reviewed the Draft Statement and find that generally our comments are well expressed at the top of page 35 of the document as follows:

"If the Pruitt-Igoe Public Housing Complex is demolished, we suggest that previous to redevelopment, the Highway Commission be contacted so that this, and other lands in the area, may be considered for the development of an optimum transportation corridor in the area."

We, therefore, recommend that any redevelopment emphasize the provision for adequate highway facilities in this area.

Very truly yours,

W. Bauer, Member
401 Grand Avenue
Kansas City 64108

Robert N. Hunter, Chief Engineer

Bruce A. Ring, Chief Counsel

L. V. McLaughlin, Asst. Chief Engineer

Mrs. Irene Wollenberg, Secretary

Jefferson City, Missouri 65101
Telephone (314) 751-2551

Chief Engineer
July 17, 1974

Mr. Elmer Smith
U.S. Department of Housing
and Urban Development
911 Walnut
Kansas City, Missouri 64106

Re: Draft EIS for Pruitt-Igoe Demolition

Dear Mr. Smith:

At their meeting on June 26, 1974, the Board of Directors of the East-West Gateway Coordinating Council reviewed the draft Environmental Impact Statement for the demolition of Pruitt-Igoe. Prior to this meeting, the Council's technical staff, Environmental Task Force and the Executive Advisory Committee reviewed the statement and recommended its endorsement contingent upon the inclusion in the final EIS of the considerations indicated in the attached reviews by staff and the Environmental Task Force. Further, the Board requests a review by the Council of the final statement. We have enclosed a copy of the Board minutes.

Comments were solicited from the agencies listed on pages three and four of the enclosed staff review and responses received are attached.

If you have any questions concerning our review, please feel free to contact us.

Sincerely,

Eugene G. Moody
Executive Director

EGM/FC/jw

Enclosures
The regular meeting of the Board of Directors of the East-West Gateway Coordinating Council was held in the Council Offices, 720 Olive Street, St. Louis, Missouri, on Wednesday, June 26, 1974 at 2:00 p.m.

In attendance were:

Lawrence K. Roos, Chairman, St. Louis County
Nelson Hagnauer, Vice-Chairman, Madison County
Ralph Smith, Treasurer, Franklin County
Raymond Jefferson, Southwestern Illinois Council of Mayors
Mike Sasyk, Southwestern Illinois Council of Mayors
Douglas Boschert, St. Charles County
A.N. Young, Southwestern Illinois Metropolitan and Regional Planning Commission
Francis Touchette, St. Clair County
James C. Laflin, St. Louis County Municipal League
Roy W. Jordan, Regional Citizen
Dr. Donald J. Burkhalter, Regional Citizen
John Brawley, Bi-State Development Agency
Joseph Badaracco, City of St. Louis
John Fedrick, Regional Citizen
Edward Moore, Regional Citizen

Also in attendance were:
LeRoy Gruber, representing Mayor James E. Williams, City of East St. Louis
Richard Ives, representing Al Sikes, Missouri Department of Community Affairs
A.J. Wilson, representing John H. Poelker, City of St. Louis
Frank Brown, representing Gar Jones, Illinois Department of Transportation
Thelma Renshaw, representing Frank Kirk, Illinois Department of Local Government Affairs
James Meanor, St. Louis Regional Commerce and Growth Association
James Kendrick, Bi-State Development Agency
Phil Taylor, St. Clair County
Robert Baer, St. Louis County
Edward Bodanski, St. Louis Area Drug Abuse Coordinating Council
Alan C. Richter, EWGCC
Matthew D. Melucci, EWGCC
Leland Dole, EWGCC
Dee Joyner, EWGCC
Shelby Peters, EWGCC
Gary McClure, EWGCC
Terry Stuchlik, EWGCC

The meeting was called to order by Chairman Roos.

Motion by Mr. Young, seconded by Mr. Sasyk, to approve the minutes of the May 29, 1974 meeting with the corrected page four.
Motion carried, all voting aye.

Mr. Touchette noted that there was not a quorum at the special meeting of the Board held on June 12, 1974 and suggested that these minutes be set aside and acted on at today's meeting.

Chairman Roos stated that the June 12, 1974 minutes would be added to today's agenda under Old Business, Item 3 c.

Memorandum of Cooperative Understanding between Bi-State and EWGCC regarding Port Development.

Chairman Roos stated that several of the Board Members have suggested that inasmuch as this is a matter of importance and two of our Mayors are not in attendance at today's meeting that it would be desirable to hold this item until either the next meeting of the Board or to call a special meeting to consider this matter.

Motion by Mr. Boschert, seconded by Mr. Jefferson, to table the Memorandum of Cooperative Understanding between Bi-State and EWGCC regarding Port Development until the next regular meeting of the Board.

Motion carried, all voting aye.

Environmental Assessment for FAP Route 409 from Summerfield to Beckmeyer (St. Clair and Clinton Counties).

This review was tabled at the last Board Meeting pending solicitation of comments from Clinton County.

Mr. Moody informed the members of the Board that Clinton County was contacted and have no comments to offer. The staff repeats its recommendation that this project be endorsed.

Motion by Mr. Touchette, seconded by Mr. Sasyk, to endorse the environmental assessment for FAP Route 409 from Summerfield to Beckmeyer.

Mr. Young stated that it was he who brought up the question of whether Clinton County governments and groups had been contacted regarding environmental assessment of Route 409. He stated that he finds that only two out of the ten who were contacted have responded. This will be the sixth highway running from east to west in a span of 19 miles from north to south and our problem is one of north and south traffic rather than east and west traffic. It is amazing that a body such as this is called upon to take a position on environmental assessment of a project after most of the right-of-way has apparently been obtained and bridges built. Mr. Young stated that it appears to him that the 409 project is this far along because, 1) someone was dissatisfied with the location of Interstate 64 and pushed 409 to accomplish this end, 2) it is apparently more important to get a thousand or more fishermen from the St. Louis area to Carlyle Lake in the least possible time on the weekends than it is to move 20,000 workers of the southern 3/4 of St. Clair County, Monroe, Randolph, Perry, and Washington Counties to and from the City of St. Louis daily without having them run the risk of being blocked at up to three railroad crossings. He stated that he would have to record a "no" vote on this item.
Mr. Brown stated that the Illinois Department of Transportation has been attempting to get a north-south highway through. This Environmental Assessment was a requirement of the Federal Highway Administration because it was not under construction before a certain date.

Mr. Wilson stated that this was a project that was approved previously and the item on today's agenda is only whether or not the environmental assessment is adequate. New projects come to us with the project review and environmental assessment side by side. All we are reviewing today is whether or not the assessment of the environmental impact of the project is correct. If it was considered that the assessment was negative then it could have some effect. He stated that Mr. Young's comments have to go along with the package.

Mr. Young stated that he does not see how we can approve this assessment when ten agencies were asked what they think of it and they write back "no comment."

Mr. Touchette and Mr. Sasyk withdrew their motion.

Motion by Mr. Jordan, seconded by Mr. Jefferson, to approve the Environmental Assessment for FAP 409 from Summerfield to Beckmeyer.

Mr. Jordan stated this project has already been approved and is under construction and this is just a matter of the environmental assessment.

Mr. Wilson stated that when the Council approved the 9005 network two months ago we also approved this project.

Judge Smith stated that there are items on this agenda that he did not comment on that he is in favor of, and he is not sure that a lack of comment indicates they are not in favor of this project.

Chairman Roos called for a vote on the motion.

Motion carried, Mr. Young voting no.

The June 12, 1974 Minutes
Chairman Roos stated that as Mr. Touchette has pointed out there was not a quorum at the June 12, 1974 meeting and inasmuch as a motion was made at that meeting it would be in order that this motion be considered again at today's meeting.

Motion by Mr. Badaracco, seconded by Mr. Touchette, that the Chairman of the Council be authorized to negotiate the groundwork of communication between BI-State and EWGCC with reference to the railroad relocation at the same time he is negotiating for the Port, and to activate the special committee.

Motion carried, all voting aye.
State of Missouri "701" Assistance Programs
Authorization is requested for the Council's Executive Director to enter into Third Party contractual agreements by which Franklin County, the City of St. Louis and University City will receive "701" planning funds from the Missouri Department of Community Affairs.

Motion by Judge Smith, seconded by Judge Boschert, to authorize the Executive Director to enter into third party contractual agreements with the Missouri Department of Community Affairs and Franklin County, City of St. Louis and University City.

Motion carried, all voting aye.

Presentation of 1995 Water Facilities Plan Summary
Mr. Moody stated that this Plan Summary is a policy statement of an overview nature and states the Council's feeling in terms of the validity of the land use plan. We will be reviewing individual systems which come to the Council for A-95 review on the basis of these policy statements.

Motion by Mr. Touchette, seconded by Mr. Brawley, to adopt the 1995 Water Facilities Plan Summary as presented by the staff.

Motion carried, all voting aye.

Annual Review of the St. Louis Transportation Study Short-Range Improvement Program.
Mr. Moody stated this program contains a listing of the various projects of the jurisdictions that provide highway facilities and transit facilities they feel are warranted. This is updated annually. The Executive Advisory Committee and the Transportation Task Force of the Regional Forum recommend endorsement.

Motion by Mr. Badaracco, seconded by Mr. Jefferson, to approve the Annual Review of the St. Louis Transportation Study Short-Range Improvement Program.

Motion carried, all voting aye.

Project Recommendations for possible inclusion in the Fiscal Year 1976 Missouri State Highway Commission Five Year Right-of-Way and Construction Program.
The Council had received a request from the Missouri State Highway Commission to recommend projects for possible inclusion in the Commission's five year right-of-way and construction program for fiscal year 1976. In order to insure that these recommendations are the product of an areawide review and consensus of agreement, the Council staff has solicited recommendations from all jurisdictions in the Missouri portion of the region. After examination by the Council transportation staff, the recommendations which were considered to be eligible are attached with the review. Those recommendations not eligible for inclusion in the five year right-of-way and construction program were grouped by the staff for examination by those internal divisions of the Highway Commission responsible for their possible implementation. The staff and the EAC recommend
that this be approved for submittal to the Missouri State Highway Commission contingent upon a listing of approved priorities still to be determined. It is also suggested that recommendations not eligible for the five-year program be forwarded to those internal divisions of the Highway Commission or other outside agencies responsible for their possible implementation.

Motion by Mr. Brawley, seconded by Mr. Badaracco, to approve the proposed changes in the Five-Year Program as recommended by the staff, EAC and the Transportation Task Force.

Motion carried, all voting aye.

Authorization for Council to establish optional Deferred Compensation Plan for its employees.

Several of the public interest associations are now sponsoring a Deferred Compensation Program for public employees. The plan has been approved by the IRS and would cost the Council nothing (except the administration of withholding and the sending of a check once a month to the plan). This would enable the employee to defer compensation as a retirement device.

Motion by Judge Boschert, seconded by Mr. Badaracco, to adopt the following resolution:

WHEREAS, the East-West Gateway Coordinating Council has in its employ certain administrative, professional and technical personnel; and

WHEREAS, said employees are and will be rendering valuable services to the Council, and

WHEREAS, the Council has considered the establishment of a Deferred Compensation Plan for the said employees made available to the Council and to said employee by the International City Management Association Retirement Corporation; and

WHEREAS, said employees often are unable to acquire retirement security under other existing and available retirement plans due to the contingencies of employment mobility; and

WHEREAS, the Council receives benefits under said plans by being able to assure reasonable retirement security to said employee by being more able to attract competent personnel in its service and by increasing its flexibility in personnel management through elimination of the need for continued employment for the sole purpose of allowing an employee to qualify for retirement benefits,

NOW, THEREFORE, BE IT RESOLVED that the Council establish said Deferred Compensation Plan for said employees and hereby authorizes its Executive Director to execute the Master Trust Agreement with the International City Management Association Retirement Corporation.
IT IS FURTHER RESOLVED that the Executive Director may, on behalf of the Council, execute all Deferred Compensation Employment Agreements with said employees and other eligible officials and officers, which are necessary for said persons participation in the plan, except that any Deferred Compensation Employment Agreement for said designated official shall be executed by the Chairman.

Motion carried, all voting aye.

Illinois Department of Transportation Environmental Assessment Improvement for FAP 70 (Illinois Route 157)

This proposed improvement would be from south of State Street to north of Lake Drive and would cost $1,350,000 (Federal $945,000 and State $405,000).

Motion by Mr. Touchette, seconded by Mayor Sasyk, to endorse the request from the Illinois Department of Transportation of their Environmental Assessment for FAP 70 (Illinois Route 157).

Motion carried, all voting aye.

Route I-255, St. Louis County, Missouri

This is an application by the Missouri State Highway Commission to extend I-255 from Telegraph Road to the Jefferson Barracks Bridge. The total estimated cost of the project is $11,546,000 (Federal $10,391,400 and State $1,154,600). The Executive Advisory Committee recommends endorsement.

Motion by Mr. Badaracco, seconded by Mr. Jordan, to endorse the application by the Missouri State Highway Commission to extend I-255 from Telegraph Road to the Jefferson Barracks Bridge.

Motion carried, all voting aye.

Pruitt-Igoe Environmental Impact Statement (draft)

This involves the demolition of Pruitt-Igoe project and the environmental impact thereof. The total cost of the demolition is $3.5 million with special funds from the Executive Office of the President - Office of Management and Budget. The Executive Advisory Committee recommends endorsement of the statement contingent upon the inclusion of all the considerations listed in the staff report under Technical Aspects and that the Board request a staff review of the Final Environmental Impact Statement to determine adherence to the endorsement contingency statement. The Environmental Task Force recommends that the draft environmental assessment be given preliminary endorsement contingent upon expansion of the assessment to address the issues stated in the Environmental Task Force report, and believes that a review of the final impact statement by the Board, staff and Environmental Task Force is warranted on a project of this nature and scope.

Mr. Brawley asked if we will be asked to approve or disapprove the tearing down of Pruitt-Igoe.
Mr. Wilson stated that will not occur in this case because there will be no formal application from the city to HUD. There is a ruling by the OMB that any action by a Federal Agency must have an environmental impact statement prepared and HUD was required to prepare this statement and send it for review. HUD is responding to a requirement of the office of OMB before they can provide the funds in this case.

Motion by Judge Boschert, seconded by Judge Smith, to endorse the Environmental Assessment - Pruitt-Igoe - City of St. Louis with the comments of the Executive Advisory Committee and the Environmental Task Force.

Motion carried, all voting aye.

City of St. Louis High Impact Anti-Crime Program Update
This is the final phase of the High Impact Anti-Crime Program of the Missouri Law Enforcement Assistance Council, Region V and the primary purpose of this grant is to reduce stranger-to-stranger crime and burglary by 5% in 2 years and 20% in 5 years in the City of St. Louis. The Executive Advisory Committee recommends endorsement.

Motion by Mr. Badaracco, seconded by Mr. Jordan, to endorse the final phase of the City of St. Louis' High Impact Anti-Crime Program Update.

Motion carried, all voting aye.

Planning and Implementation of an Emergency Medical System -- two applications
The two applicants are the Alliance for Regional Community Health (ARCH) - the planning phase and the Metropolitan Emergency Dispatch, Inc. (MED, Inc.) - the implementation phase. The project cost for the planning is $45,000 (Federal HEW $45,000). The project cost for the implementation phase is $942,551 (Federal HEW $782,301, Bi-State RMP $40,250 and Local $120,000). The Executive Advisory Committee recommends endorsement contingent upon a written agreement between the agencies.

Motion by Judge Boschert, seconded by Judge Smith, to endorse the Planning and Implementation of an Emergency Medical System -- two applications as recommended by the Executive Advisory Committee.

Motion carried, all voting aye.

Motion by Mr. Badaracco, seconded by Judge Boschert, to adjourn the meeting.

Motion carried, all voting aye.

Respectfully submitted,

Eugene G. Moody, Secretary
Board of Directors
MEMO TO: Board of Directors  
FROM: Environmental Task Force  
Leo A. Drey, Chairman  
Subject: Draft Environmental Assessment, Pruitt-Igoe, Department of Housing  

The Environmental Task Force has reviewed the Draft Environmental Impact Statement concerning the proposed demolition of the Pruitt-Igoe Housing Development and supports the decision of the City of St. Louis, the St. Louis Housing Authority and H.U.D. to remove the remaining vacant Pruitt-Igoe buildings.

Content of the Draft Environmental Impact Statement  
The Task Force found that the statement adequately surfaced the anticipated impact of the demolition phase of the proposal, addressing noise pollution, air pollution and safety factors sufficiently to indicate that there should be no long term deleterious impact on the environment from this phase of the project.

HOWEVER,

THE SECOND PHASE OF PROJECT, DEALING WITH REMOVAL AND DISPOSAL OF THE BUILDING RUBBLE, WAS NOT ADEQUATELY ADDRESSED IN SEVERAL RESPECTS.

Task Force Recommendation:
The Environmental Task Force recommends that the draft environmental assessment be given preliminary endorsement contingent upon expansion of the assessment to address the following issues:

1. There should be a clear explanation of where and how disposal of the rubble will be accomplished.

While the statement discusses several alternatives, none is actually proposed
as the best choice. There is not sufficient information provided in the statement to permit a knowledgeable recommendation as to the choice of one type of disposal site over another.

2. The impact - social, economic and physical - the one kind of disposal site over another must be more adequately surfaced.

The alternative of disposing of the rubble on-site by using it in the development of a park should be explored further in the statement.

3. A more precise estimate of the amount of solid waste anticipated should be made and documented.

4. The statement should explain whether or not parking areas will be included in the disposal plan.

5. The impact of the project, particularly the disposal phase, on the area's transportation system should be assessed to determine the degree of disruption, congestion, etc. (if any) which is anticipated.

6. Alternatives for use of the site on an interim basis following completion of the project should be explored. It should, at the very least, be insured that weeds, etc., will be cut, and the grounds not allowed to become a dumping area, but be kept in a safe, environmentally aesthetic and healthy condition.

7. The concept of implementing a method to control the spread of rodents before the first phase of the project begins should be explored in the draft statement.

8. A mechanism to insure local citizen participation in decisions concerning redevelopment of the site should be delineated in the statement.

A final decision regarding the project by the East-West Gateway Coordinating Council should be made only after the information delineated above (particularly #1, 2, & 3) has been supplied for their consideration.

A review of the final Impact Statement by EWGCC Board, Staff and Environmental Task Force is warranted on a project of this nature and scope and should be requested.
MEMO TO: BOARD OF DIRECTORS

FROM: SARA ROSCOE WILSON
REGIONAL FORUM

SUBJECT: DRAFT ENVIRONMENTAL IMPACT STATEMENT,
PRUITT-IGOE, HUD

The Citizen's Solid Waste Advisory Committee which
has been working closely with technical staff for
the last 1-1/2 years on the Regional Solid Waste
Management Plan, reviewed the Pruitt-Igoe Statement
after the Environmental Task Force had made its
recommendations.

I am, therefore, forwarding the committee's comments
for your attention:

"The Citizens' Solid Waste Advisory Committee to
the EWGCC has reviewed the subject report and
makes the following comments and recommendations:

The Committee is in agreement and supports
the recommendations of the Environmental
Task Force contained in a Memo to the EWGCC
Board of Directors dated June 7, 1974. The
Committee wishes to emphasize a) that HUD
and the Housing Authority work with the
EWGCC Solid Waste Staff to ensure the best
possible disposal site and/or use of the
demolition waste be selected; and b) that
the disposal of the demolition waste on site

THE SAINT LOUIS AREA COUNCIL OF GOVERNMENTS
and conversion to a park be evaluated in much greater depth since this alternative solves the waste disposal problem, eliminates the transportation problems, and would provide a use compatible with the surrounding residential neighborhoods of Desoto Carr, Yeatman, Montgomery-Hyde Park, and with the goals of the Model Cities Program.

The Committee feels the subject EIS did not adequately discuss the alternatives to demolition and redevelopment. Specifically, the Committee had reservations on the adequacy of the park alternative, as discussed above, and on partial use of the buildings. It is suggested the EWGCC staff study or review the need and desirability of a park in this area.

A. E. Bruns, Chairman
Citizens Solid Waste
Advisory Committee-EWGCC
MEMO TO: BOARD OF DIRECTORS

FROM: EWGCC Staff

SUBJECT: A-95 Review: Pruitt-Igoe Draft Environmental Impact Statement (EIS) - St. Louis City

DATE: June 3, 1974

PROJECT IDENTIFICATION

Location: St. Louis City
Jefferson, Cass, 20th, Carr Streets

Nature of Project: Demolition of 30 11-story residential buildings and appurtenant facilities, including seven boiler plants.

EIS Author: Dept. of Housing and Urban Development
St. Louis Area Office
Kansas City Regional Office

Dimensions: Thirty residential and accessory buildings covering 57.28 acres containing 2,422 dwelling units.

Duration: 12-45 months

Project Cost: $3.5 million - Executive Office of The President Office of Management and Budget (special funds)
PROJECT DESCRIPTION

Background: Pruitt-Igoe is a public housing project which was completed in 1956. Initially praised as an architectural success whose innovation would have the most positive impact on public housing, Pruitt-Igoe has deteriorated physically and symbolically into the most infamous of the nation's public housing developments.

The original development cost was $36 million. An attempt in 1964 to rehabilitate and renovate the complex apparently was unsuccessful after $5 million was spent. The present outstanding debt obligation is $25 million.

In 1971, a consortium of consultants under contract to HUD prepared the Pruitt-Igoe Action Program which estimated residential rehabilitation and redevelopment costs for the complex at $30 million. In 1970, the St. Louis Civic Alliance for Housing estimated the rehabilitation cost at $39 million, and estimated total demolition and redevelopment at $22 million.

With an existing debt of $25 million, HUD finds the high costs of rehabilitation/redevelopment unacceptable. A firm decision has been made by HUD, in concurrence with St. Louis City and the St. Louis Housing Authority officials, to completely demolish Pruitt-Igoe and leave the site vacant. Future land use is undetermined at this time.

Current Situation: Following the decision in mid-1973 for total demolition, Pruitt-Igoe was vacated. The last of the 587 families moved in Spring, 1974. A group of tenants initiated a suit against the Housing Authority for relocation monies; a settlement was made out-of-court in May, 1974.

A fence has been erected around the site for safety purposes.

Proposal: HUD proposes to totally demolish Pruitt-Igoe with approximately $3.5 million in special funds from the Office of Management and Budget. The demolition will be by blasting except in instances where there is "danger to a nearby structure or utility line." The foundations will not be removed and "a small amount of the rubble will be used to fill the foundations."

HUD proposes to remove the excess rubble from the site by truck. A dumping place has yet to be determined although a number of landfills have expressed interest.
Applicant's Rationale: The rationale for total demolition is based on the "continued deterioration of the physical, social and aesthetic environments..., and the extremely high cost of rehabilitating the project, with uncertain results."

The Pruitt-Igoe Action Program recommended redevelopment of Pruitt-Igoe as a residential community but finds this alternative viable only if 1) a combined effort is made by the political, civic and community elements of Metropolitan St. Louis and 2) Federal and local programs in surrounding neighborhoods are continued. If these two requirements could not be met, the Program recommends complete demolition. In light of the limited City and Housing Authority resources and lack of civic interest as well as the Federal moratorium on HUD programs, the Action Program's rehabilitation proposal is rendered impotent.

An additional reason for demolition is the negative effect Pruitt-Igoe has had on potential development in adjacent neighborhoods, as stated by the Model City Agency and Land Clearance for Redevelopment Authority.

CLEARINGHOUSE COORDINATION

The agencies and individuals listed below were contacted for their comments on the proposal. A copy of each response received to date is attached. Any additional comments will be forwarded to HUD.

City of St. Louis
  John Poelker, Mayor
  Air Pollution Control Division
  Building Division
  City Plan Commission
  Traffic Division
  Water Division
St. Louis Housing Authority
Land Clearance for Redevelopment Authority
Model City Agency
Human Development Corporation
Council on Human Relations
Lawrence K. Roos, Supervisor, St. Louis County
Francis Touchette, Chairman, St. Clair County Board
Nelson Hagnauer, Chairman, Madison County Board
Douglas Boschert, Presiding Judge, St. Charles County
Marvin Leonard, Presiding Judge, Jefferson County
Ralph Smith, Presiding Judge, Franklin County
Elmer Prange, Chairman, Monroe County Board
James E. Williams, Sr., Mayor, City of East St. Louis
Senator Stuart Symington
Senator Thomas Eagleton
Congressman William Clay
Tenant Affairs Board, St. Louis Public Housing
Rt. Rev. John Shocklee, Housing Authority Board
Jeff-Vander-Lou, Inc.
Grace Hill Settlement House
Carr-Central Neighborhood Corp.
Federation of Neighborhood Organizations
Montgomery-Hyde Park Neighborhood Corp.
Murphy-Blair Neighborhood Advisory Council
Yeatman District Community Corp.
Ms. Margaret Bush Wilson
Greater St. Louis Regional Commerce and Growth
Association
Health and Welfare Council
Bi-State Development Agency
Laclede Gas Company
Union Electric Company
Southwestern Bell Telephone Company
Metropolitan St. Louis Sewer District
Alliance for Regional Community Health
U.S. Army Corps of Engineers
Institute for Urban and Regional Studies, Washington
University
Center for Urban Programs, St. Louis University
Hugh Nourse, University of Missouri
Missouri Commission on Human Rights
American Institute of Planners
American Society of Planning Officials
National Association of Housing and Redevelopment
Officials
National Committee Against Discrimination in
Housing, Inc.

STAFF ANALYSIS

1. Relationship to Plans, Policies and Programs--
The proposed action was found not to be in conflict
with the Regional Land Use Plan and with
Water and Sewer Studies.

In relation to the Regional Housing Plan, Pruitt-
Igoe is located in planning district nine of St.
Louis City. This district has an estimated need
for 5,700 additional standard units as of 1970,
the highest need for any planning district in the
Missouri portion of the region. The Action
Program rehabilitation and redevelopment proposal
would have resulted in over 1,200 units. How-
ever, since this Program will not be pursued (as
indicated above), the demolition will be remov-
ing presently substandard units. The Housing
Plan emphasizes conservation and rehabilitation
where possible but redevelopment when these alter-
 natives cannot or will not be followed.

In this case, as in other redevelopment areas,
the loss of substandard units successfully aids
in achieving the regional goal of a decent home for every family only if those units are replaced. It appears uncertain that future development of the site will be residential and there are no plans to counteract the loss of the 2,422 units thus intensifying the housing problem in the Region.

The Draft EIS could not be evaluated in relation to the Transportation Plan since no information is provided on 1) possible routes trucks may use in hauling the debris from the site or 2) the extent of re-routing necessary.

In relation to the regional Solid Waste situation, the possible impact of disposal of Pruitt-Igoe demolition waste on the existing disposal sites in the region seems to be significant. The Interim Recommendations on Solid Waste Disposal in the Metropolitan St. Louis Area stated that short-term disposal needs were critical and existing disposal sites, even if upgraded to sanitary landfill status, would not be adequate to handle the volume of waste generated in the not-too-distant future. Therefore, present and future demands on such facilities are at a premium, and disposing of Pruitt-Igoe demolition waste in them would only add to an already serious interim problem.

However, specifications for disposal of demolition waste are not as stringent as sanitary landfill requirements both in terms of site preparation and amount of cover material required. Therefore, if disposal is absolutely necessary, disposing should be in a site that would not be as expensive to reclaim as a sanitary landfill. In this way, facilities needed for ordinary types of solid waste would be conserved for that use.

The Draft EIS estimates the rubble will weigh approximately 351,000 tons. The Housing Authority estimates provided to EWGCC approach 830,000 tons for the residential buildings. The Dore Wrecking Company which demolished two Pruitt-Igoe residential buildings in a 1972 demonstration did not have figures for the amount of rubble generated but stated that total demolition will result in a considerably higher tonnage than estimated in the Draft EIS.

2. Technical Aspects--
The following points should be clarified or
addressed in the Final Environmental Impact Statement.

Regarding solid waste:

-- A documented estimate of the amount of debris indicating the source and content of the basis for the estimate.

-- A statement indicating whether the parking lots will be left intact or demolished thus adding to the anticipated rubble.

-- State that the Housing Authority should work with East-West Gateway to continue the search for beneficial disposal sites, i.e., stream fill to stabilize shorelines and highway construction, etc. Two bid documents should be prepared for the demolition project, one asking the contractor to state the intended disposal site and one in which the contractor is required to use a disposal/reclamation site determined by the Housing Authority. The best bid should be selected on a cost/benefit basis.

Regarding transportation:

-- An analysis of the impact on local transportation systems particularly in reference to police, fire and mass transit systems.

-- Determine which local streets can best handle the impact of the trucking and state that truck covering will be required of haulers.

-- Indicate who will accept responsibility for repairing any damage to streets (the City, the hauler's insurance, HUD, etc.).

Regarding land use:

-- A reconsideration of the plan to crack basements and fill them in with rubble if this will hinder site desirability for future development. (Indicate, in general, the problems this may pose from an engineering standpoint.)

-- Indicate plans or alternatives for short-term use of the land prior to potential permanent development.
Regarding housing:

-- The previous EWGCC request for the inclusion in the EIS of the nature and status of litigation brought on by the vacating of Pruitt-Igoe is quoted in the Draft EIS but it is not addressed. Indicate this information in the Final Statement.

Regarding health and safety:

-- Indicate safety measures and responsibility for them during the interim land use period.

-- State that a method to control the spread of rodents, etc. will be required prior to demolition. The Draft EIS states demolition will kill all rodent life but demolition of all buildings will not be simultaneous and the phasing of the blasting will necessarily allow the escape of rodents, etc. unless other measures are taken particularly at the boundaries of the site.

Regarding citizen participation:

-- The Draft EIS states that "prior to any redevelopment of the land, an Environmental Impact Statement discussing the specific proposal will be written. HUD will reserve the right to give final approval to any proposals which may occur." Indicate that a mechanism will be developed to guarantee citizen input and a statement that if citizen preferences are not implemented, justification will be given at that time.

STAFF RECOMMENDATIONS

Proposed Policy: The staff is concerned that the demolition of an unsuccessful public housing development may establish a precedent for other smaller public housing projects locally and for the nation's public housing in general.

Therefore, the staff asks the Board of Directors to re-affirm the policies of conservation and rehabilitation as adopted in the Regional Housing Plan and to go on record as stating that the demolition of Pruitt-Igoe is not a solution but is a measure of last resort due to the magnitude of the commitment of resources required to rehabilitate and this action should not be used as a precedent in dealing with
public housing problems in the region. The staff further asks the Board to re-affirm the importance of the replacement of units lost in areas where there is a need for additional standard units if the goals and objectives of the Regional Housing Plan are to be met.

The Draft EIS states that a number of individuals and groups have expressed concern that the demolition of Pruitt-Igoe will lead to the demolition of Cochran Apartments. A rehabilitation effort, with first year funds included in $1 million of modernization funds, is scheduled for Cochran Apartments and there are no plans for demolition. However, in the event that future plans are developed to use Cochran Apartments for housing other than families, citizen input in the planning process should be guaranteed.

Environmental Impact Statement: The staff recommends that the Board of Directors endorse the Environmental Impact Statement contingent upon the inclusion of all the considerations listed above (under Technical Aspects).

The staff asks that the Board request a staff review of the Final Environmental Impact Statement to determine adherence to the endorsement contingency statement.

NOTE: Copies of the 90-page Draft Environmental Impact Statement are available for review at the Council’s offices.
June 6, 1974

Mr. Eugene Moody
Executive Director
East-West Gateway Coordinating Council
720 Olive Street - Suite 2110
St. Louis, Missouri 63101

Re: Pruitt-Igoe Impact Statement

Dear Mr. Moody:

We have reviewed the Environmental Impact Statement for the demolition of Pruitt-Igoe and have found it to be satisfactory. We hope that the Council will give a positive review so that the Pruitt-Igoe property can again be put into productive use.

Sincerely,

Norman Murdoch
Director of Planning & Development
May 28, 1974

Mr. Eugene G. Moody, Exec. Dir.
East-West Gateway Coordinating Council
720 Olive Street, Suite 2110
St. Louis, Missouri 63101

Dear Gene:

This is in response to your request for comments regarding the Draft Environmental Impact Statement for the demolition of Pruitt-Igoe. We have reviewed the statement and have only one comment concerning the contents:

It is noted that under the present plan it would take from 12 to 45 months to remove the rubble from the site. Assuming that normal procedures are followed it is conceivable that it would be 1979 before the site is completely cleared and made ready for new development. We question the feasibility of this schedule on the grounds that the faster Pruitt-Igoe redevelopment can take place the better the chances of arresting the deterioration of North St. Louis will be so that the entire area can look forward to new life. Further, it is our observation that the conventional public housing projects on the north side have been experiencing declining occupancy. Consequently, an early turn-around in the fortunes of the Pruitt-Igoe area may well help to stabilize the remainder of these projects.

Accordingly, we suggest a speed-up in the plan for removal of rubble from the demolition area.

Sincerely yours,

Dan Macdonald
Executive Director

gk
May 22, 1974

East-West Gateway Coordinating Council
Suite 2110
720 Olive Street
St. Louis, Missouri 63103

Attention: Ms Francine Cullari

RE: Pruitt-Igoe Demolition

Dear Ms Cullari:

In response to your letter post-marked May 21, 1974, in which you requested our comments to the Impact Statement from the Department of Housing and Urban Development, we submitted our suggestions to the City Plan Commission on its input concerning this project sometime ago.

A copy of our "Suggested Additional Precautions for Demolition Utilizing Explosives for Pruitt-Igoe Demolition Project", is attached for your perusal.

Sincerely yours,

[Signature]

Michael E. Werner, Acting Building Commissioner

cc: Files
Suggested Additional Precautions for Demolition
Utilizing Explosives for
Pruitt-Igoe Demolition Project

Add to Bidding Documents and/or Specifications as follows:

1. Demolition Contractor is to obtain a proper permit for the demolition of all buildings at the site and a separate permit for the use of explosives for each building or each use occurrence of blasting agents, which ever is greater.

Based on unsatisfactory safety precautions and/or unsafe use of explosives, the Building Commissioner of the City of St. Louis may refuse subsequent permits for the use of explosives.

2. The Demolition Contractor and the Blasting Contractor, if under subcontract, shall be required to receive approval of the Demolition Contractors' Certification Board of the City of St. Louis prior to the award of this contract.

3. All Laws and Regulations of the City of St. Louis related to Demolition and Demolition Contracting shall be observed.

N.B. : See Law Department for verbage.

4. "Minimum Insurance Coverage"

Suggest $1,000,000 Minimum to cover Blasting Company, particularly for Pruitt-Igoe Demolition, plus Contractor producing proof of insurability upon bidding, such as $1,000,000 blanket policy or letter of intent from Insurance Company.

5. Bidder's Blasting Company shall supply identification of time, location, who worked, performed for, amounts of insurance coverage, Company insured by, and Insurance Issuing Office location, for all building demolition activities, using explosives performed within the United States for the past two (2) years.

"Option to reject by awarding".

Authority for qualification, experience, reasons.

6. That the awarding authority or the Building Commissioner has the right to require that any principal or principals of the blasting company
or corporation and/or the Demolition Contracting Firm to be present at and supervise any and all use or handling of explosives within the City of St. Louis.

7. The Blasting Company shall file with the Building Commissioner a complete and detailed step by step accounting, together with building drawings and a site plan, describing how the use of explosives is to be deployed, along with the application for the Blasting Permit. Said report and drawings to include, but not be limited to:

A. Size, location (by floor and column location), type of explosives, type of primer or detonating device, type of delay, wiring diagram, etc. for each charge under separate primer or delay. Include time by day and hour at which explosives are to be detonated.

B. Total quantity and type of explosives to be used for each building.

C. Temporary storage location of explosives while charges are being set.

D. Protective (flying rock or material) barriers around wall openings and structural members containing charges, etc.

E. Public security measures by barrier location, type and size with vehicle access designations. Security personnel by location and by whom employed. (To include written description of security personnel, assignments and duties, for the separate periods of time).

(1) During the period from 2 hours before delivery of explosives to the site to 12 hours prior to expected detonation of explosives;

(2) During the period from 12 hours prior to expected detonation to the period after detonation as prescribed by Federal Regulations for clearance - but not less than 4 hours;

(3) During the period from clearance as described above until the building site is cleared, leveled and graded.

F. Delivery and routes as approved by ICC for explosives. (To include temporary location of explosives vehicles).

8. All of the above, A thru F, should take into account the following safety rules and regulations:

A. The area around the building at which demolition explosives will
be used, shall be maintained clear of the public and all unauthorized persons for a distance of no less than 300 feet during periods (1) and (2) in 7E above, and 100 feet during period (3) above.

B. There will be no magazine storage of blasting agents permitted at the site. A single blast occurrence supply shall be trucked in properly marked vehicles and parked or located as prescribed by the Building Code, Federal and ICC Regulations. Any and all excess explosives shall be disposed of per ICC, Federal Regulations, and the City Code, no less than 4 hours prior to blasting operations.

C. Once a permit is issued, and if it is established that proper precautions haven't been observed and/or any unsafe measures exist, and/or blasting cannot occur within one (1) hour of scheduled time, continuance to detonation shall be at the discretion of the Building Commissioner.

D. The Blasting Contractor must submit for approval, a mechanical or electrical monitoring system, whereby each charge under separate delay and location can be verified as expended or unexpended.

E. Electric, Telephone, Gas, Sewers, and Water Service need maps?

F. Pre building explosives demolition; Seismic and Photographic Survey:

Wherever the use of explosives is anticipated within 300 feet of privately owned buildings or structures and/or any public sewer and/or any public utility service, such as gas, electric, telephone or water which are to remain in service, i.e. which services areas other than the Pruitt-Igoe Site. Such use of explosives shall be predicated on a full and complete pre-blast seismic and photographic survey of such buildings or structures and a seismic survey of such utility services.

Seismic and photographic surveys must be conducted or approved by the Blasting Contractor's Insurance Company and shall include a pre-blasting survey of one-half the desired quantity of explosives per charge or delay. A summary report of the results of seismic data and photographic surveys will be filed
with the Building Commissioner prior to release of Blasting
Permits for building demolition.

Said summary report to be filed by the Seismic Company
or Insurance Company responsible for pre blast seismic test-
ing and include, but not be limited to, the following informa-
tion:

(1) Peak partical velocity or energy ratio received at the build-
ing, structure or utility service in question, size of ex-
plorives in charge, location of charge versus location of
building, structure or utility service;

Date, time and person or firm involved in explosives
test, and relationship of pre building blast test to actual
building blasting conditions;

(2) Description of quantity, location, firm conducting and find-
ings of photographic survey. Findings shall include potential-
or actual structural problems or defects;

(3) Recommendations as to limits on size, location, etc. on use
of explosives so that structural damage will not occur to
nearby buildings, structures or utility services. (Maximum
criteria peak partical velocity = 1.92 Energy Ratio = 1.0 )
* A separate permit for all blasting to be performed in con-
junction with pre blast seismic surveys will also be required.
* A post blast photograph survey similar to the pre blast
survey will also be required, and a summary given to the
Building Commissioner within one week after the use of
explosives as described in Item 2 above.

9. Successful bidder to furnish copies of approved Federal Forms 4707,
4710 and 4721, from Department of Treasury, Bureau of Alcohol, Tobac-
co and Fire Arms; to the Building Commissioner and the Awarding Author-
ity, prior to award of contract and/or release of permits;

10. Successful bidder must receive a written release from the Fire Marshal
and the St. Louis Bomb and Arson Squad of the St. Louis Police Depart-
ment, prior to release of permit for use of explosives;
11. Successful bidder will be required to observe all OSHA regulations relative to Demolition and Blasting (as described in Department of Labor Occupational Safety and Health Administration, Part II of Federal Register (See Index of page numbers));

12. Successful bidder to notify the Federal Environmental Protection Agency, Kansas City Regional Office as prescribed for demolition operations involving removal of asbestos, insulations or coverings or materials bearing such components;

13. Basements shall be cleared of all boilers, tanks, and similar materials which are likely to create voids or areas susceptible to considerable settlement through deterioration, rusting, etc.;

14. Basement slabs and foundations are to be broken and cracked sufficiently to permit drainage of filled basement areas;

15. This office recommends that no blasting be permitted within 200 feet of the western boundary of Jefferson, the northern boundary of Cass, the southern boundary of Carr (or the libraries, schools, churches, DeSoto Community Center or Fruit Lo School, unless agreements to vacate can be reached). No blasting permitted within 300 feet of Union Electric Substation, or the Laclede Gas Building, no blasting at Building B014 or the Community Service Building, or within 50 ft. of any active underground water, gas, electric, telephone or H.S.D. service.
Mr. Eugene G. Moody  
Executive Director  
East-West Gateway Coordinating Council  
720 Olive Street  
Suite 2110  
St. Louis, Missouri 63101

Dear Mr. Moody:

This is in reply to your letter (signed by Francine Cuilari) received May 22, 1974 requesting our comments on the Environmental Impact Statement by the Department of Housing and Urban Development relative to the demolition of Pruitt-Igoe.

This demolition and the following hoped for redevelopment will not materially affect the Water Division of the City of St. Louis.

Reduced occupancy in the past diminished water requirements to the point where the present zero occupancy and consumption does not effect our system.

The area is surrounded by mains of ample size capable of adequately serving any future development of the area.

As far as this office is concerned the preparation of this elaborate Environmental Impact Statement seems hard to justify.

Very truly yours,

C. B. Briscoe,  
Water Commissioner

CBB/kf
Mr. Eugene G. Moody  
Executive Director  
East-West Gateway Coordinating Council  
720 Olive Street, Suite 2110  
St. Louis, Missouri 63101

Dear Mr. Moody:

This is in response to your recent request for comments on the draft environmental statement for Pruitt Homes and Igoe Apartments Public Housing Complex as prepared by the Department of Housing and Urban Development.

We have reviewed the information contained in this draft statement and find that it is an adequate assessment of the relationship of the proposed action to activities and projects under the jurisdiction of this Engineer District.

Under the possible disposal sites listed on Page 43 of the statement it should be noted that the Department of Housing and Urban Development's proposal for utilizing the Mississippi riverfront is still under consideration by this District, with no action being authorized at this time.

We appreciate having the opportunity to review this draft impact statement.

Sincerely yours,

[Signature]

JACK R. NIEMI  
Chief, Engineering Division
Mr. Eugene G. Moody  
Executive Director  
East-West Gateway Coordinating Council  
720 Olive Street, Suite 2110  
St. Louis, Missouri 63101

Re: Draft Environmental Impact Statement  
Demolition of Pruitt-Igoe Public Housing Complex  
St. Louis, Missouri

Dear Mr. Moody:

Mr. Liberman, President of Laclede Gas Company, has asked me to respond to your letter inviting comments on the above Environmental Impact Statement relating to the demolition of Pruitt-Igoe by blasting.

Our comments are entirely concerned with the references on Pages 39, 40 and 47 of the Statement to the precautions which will have to be taken to protect those utility facilities which must remain in the area and which are necessary in providing service to adjacent areas.

As stated in the attached copy of letter from H. E. Bailey of Laclede to T. P. Costello of the St. Louis Housing Authority dated February 28, 1974, Laclede's primary concern is for a 24" cast iron low pressure gas main which extends through the entire Pruitt-Igoe area and is essential to maintenance of adequate service to many customers outside Pruitt-Igoe. It will be appreciated if those entrusted with completing final plans for the demolition will give
Laclede an opportunity to be fully advised and to participate in decisions for demolition which might affect the 24" gas main above referred to.

Very truly yours,

[Signature]
Richard L. Eckhart

RLE/md
Attachment
c: Mr. Elmer E. Smith
Regional Administrator
Department of Housing and Urban Development
Federal Building, 911 Walnut Street
Kansas City, Missouri 64106

Mr. H. E. Bailey
Mr. T. P. Costello
Executive Director
St. Louis Housing Authority
1221 Locust Street
St. Louis, Missouri 63103

Dear Mr. Costello:

As suggested in your letter of January 22, 1974, we have reviewed existing Laclede Gas Company facilities in the Pruitt-Igoe housing project and the effect that demolition might have on these facilities.

We serve Pruitt-Igoe through a central meter station housed in a small building owned by the Housing Authority and addressed 2700 Cass Avenue. This meter station will be removed and the line serving it abandoned, as soon as gas is no longer required.

Our primary concern is for a 24" cast iron, low pressure main located on an easement in vacated 22nd Street which extends through the entire project. This main is our primary low pressure supply for this entire area; it serves the Pruitt Elementary School, directly, and is essential to maintenance of adequate service to many customers outside Pruitt-Igoe. This main passes over (one location) and through (two locations) underground tunnels connecting various buildings comprising Pruitt-Igoe. We are concerned about the ultimate disposition of these tunnels as well as possible blast effect at the time of demolition. The nearest proximity of this main, to any building, is at 2140 Cass where the main lies 22' west of the west building line. Clearance is less than 50' at three other locations. We are also concerned about debris falling on the ground over our main since this would adversely affect our access to the main should any leaks occur.

There are no Laclede-owned facilities serving the Community Building at 2401 Dickson. Either this building is served directly from the project gas distribution system or by steam from one of the boiler plants. In either case, if this building is preserved, you may wish to consider a new gas supply from a source outside the Pruitt-Igoe complex.

I would also like to point out that the Code of Federal Regulations, Title 49, Part 192, paragraph 192.727, "Transportation of Natural Gas and Other Gas by Pipeline; Minimum Federal Safety Standards" sets up requirements for the abandonment or inactivation of facilities. The natural gas distribution system serving the Pruitt-Igoe complex, and owned by the Housing Authority, is such a facility. If Laclede may be of any service in interpreting or implementing this Code, please feel free to contact me, at any time.

February 28, 1974

3950 Forest Park Boulevard
Saint Louis, Mo. 63108
February 28, 1974

T. P. Costello

I suggest that we meet early in your planning stages to discuss our mutual concerns regarding this demolition project. I can be reached at 231-3800, ext. 513.

Your very truly,

H. E. Bailey
Engineering Department

cc: ODF
Mr. Elmer E. Smith, Regional Administrator
Department of Housing and Urban Development
Federal Building, 911 Walnut Street
Kansas City, Missouri 64106

Dear Mr. Smith:

Thank you for the opportunity of reviewing the draft of the Environmental Impact Statement regarding the demolition of the Pruitt-Igoe public housing complex in St. Louis, Missouri. Our comments follow:

We have stated according to the report, that demolition of the buildings will not affect telephone service to other areas. Please be advised also that we have removed all of our salvageable facilities from the site so we are not now involved with the timing or method of demolition as far as damage to our facilities is concerned.

As a corporation both involved with and greatly concerned with the future of the city and its people, we are very interested in the future of the site. We tend to agree with the statements in the study which indicate that removal of an evident failure will have some positive effect but certainly a planned use for the site which would offer hope would have a far greater effect for the ultimate good. We hope that such a plan will be soon forthcoming.

Thank you for your consideration.

Very truly yours,

Z. E. Barnes
President
May 31, 1974

Mr. Elmer E. Smith
Regional Administrator
Department of Housing and
Urban Development
Federal Building
911 Walnut Street
Kansas City, Missouri 64106

Dear Mr. Smith:

In response to your letter of May 8, 1974, regarding the "Draft Environmental Impact Statement" for the demolition of Pruitt-Igoe, the following comments are submitted on behalf of the St. Louis Regional Commerce & Growth Association.

We believe that complete demolition of the Pruitt-Igoe project will greatly benefit the City of St. Louis by providing the city with a large tract of land available for redevelopment. Its location, adjacent to major building projects currently underway in the downtown area, will enhance its future use. New construction on this land can result in significant benefits such as new jobs, increased earnings and other tax revenue for the city.

In our opinion, there are two very important conditions related to our recommendation of the demolition of this project. First, we believe it is essential that the demolition work be accomplished quickly, with appropriate safeguards to insure a minimum of disruption and/or damage to the surrounding area. Secondly, it is absolutely essential that the land be redeveloped without delay.

The RCGA is prepared to assist the City of St. Louis in its planning for this area as well as to provide information and assistance to prospective developers.

Sincerely,

HARRY T. MORLEY, JR.
Executive Vice-President

cc: Gene Moody
    EWGCC
May 31, 1974

Mr. Elmer E. Smith  
Department of Housing & Urban Development  
Federal Building  
911 Walnut Street  
Kansas City, Missouri 64106

Dear Mr. Smith:

Subject: Draft Environmental Impact Statement  
Demolition of Pruitt-Igoe Public Housing Complex  
St. Louis, Missouri

We have reviewed the Draft Environmental Impact Statement for the Pruitt-Igoe Project and feel that the statements covering the effects of the demolition work on Union Electric are satisfactory, although not specific.

Attached is a copy of my February 8, 1974, letter to the St. Louis Housing Authority on this subject that covers in greater detail the precautions that we feel will be necessary to protect our facilities and to insure continuity of service to our customers in the surrounding areas.

Please contact me if you feel that any additional information is needed for the preparation of the Final Environmental Statement.

Sincerely,

J. P. Woodward

cc: Mr. Eugene G. Moody  
East-West Gateway Coordinating Council  
720 Olive St., Suite 2110  
St. Louis, Missouri 63101

EXHIBIT R