

Sam Page
County Executive



Jacob W. Trimble, AICP
Acting Director of Planning

July 19, 2022

St. Louis County Boundary Commission
225 South Meramec Avenue
Suite 821T
Clayton, Missouri 63105

RE: Proposed Manchester Annexation (BC 2201)

Dear Commissioners:

This report represents St. Louis County's analysis of the annexation proposed by the City of Manchester (Manchester Annexation Area). Its submittal is in accordance with the 21 day written comment period provided by state statute. It is intended as a comparative analysis of this proposal that can serve as a guide to the Boundary Commission in its deliberations.

If the Commission requires additional information, please let us know and we will respond promptly.

Best Regards,

A handwritten signature in blue ink, appearing to read "J. Trimble".

Jacob W. Trimble, AICP | Acting Director of Planning

**PROPOSED ANNEXATION BY THE
CITY OF MANCHESTER**

Report on BC2201

Prepared by Saint Louis County Department of Planning

Submitted to Saint Louis County Boundary Commission

Tuesday, July 19, 2022

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I. Introduction

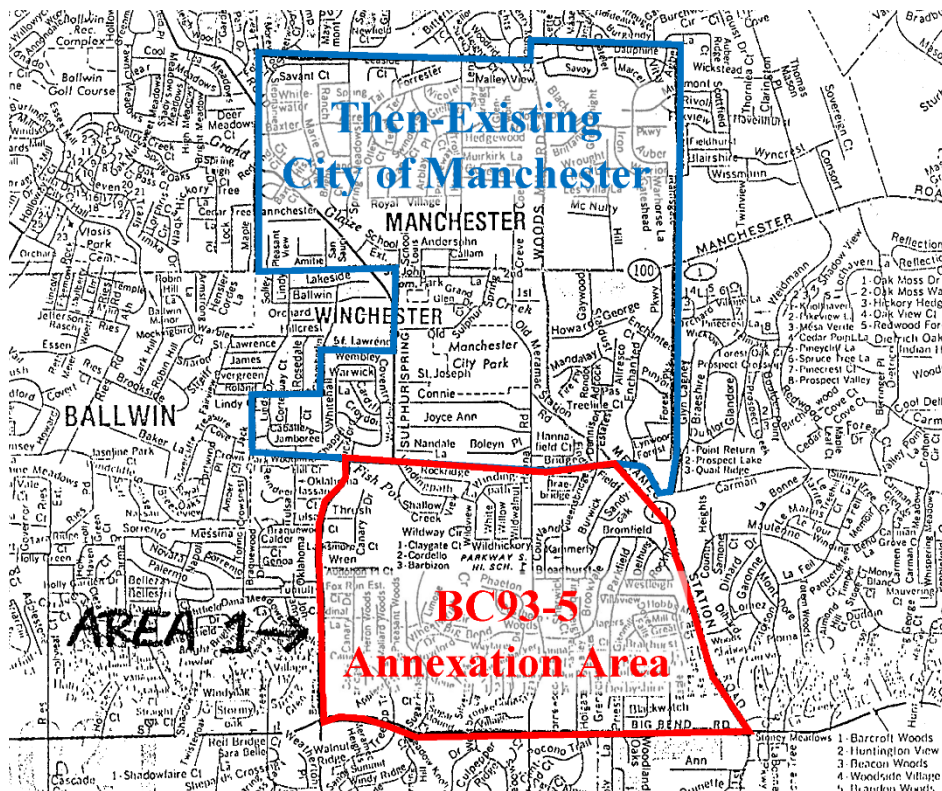
I.A Purpose of Report

The purpose of this report is to provide information regarding a proposed annexation of 1,466 acres of unincorporated Saint Louis County (“County”) by the City of Manchester (“City”). This analysis is based on a review of the Plan of Intent submitted to the Boundary Commission by the City, the presentation made by the City at the June 29, 2022, Public Hearing of the Boundary Commission, comments from those present at the June 29, 2022, Public Hearing, and a comparison of data provided by the City and County.

I.B History of Boundary Change Proposals in Area

Over the last 30 years the City has conducted several annexations in the general area. In 1993, the City attempted to annex a large area of unincorporated County from State Highway 141 east to Barrett Station Road that encompassed approximately 906 acres. This proposal received approval from the Boundary Commission but was defeated by voters in the proposed annexation area in 1994. Map 1 shows the boundaries of the proposed annexation in 1993.

Map 1: 1993 Attempted Annexation by the City of Manchester¹

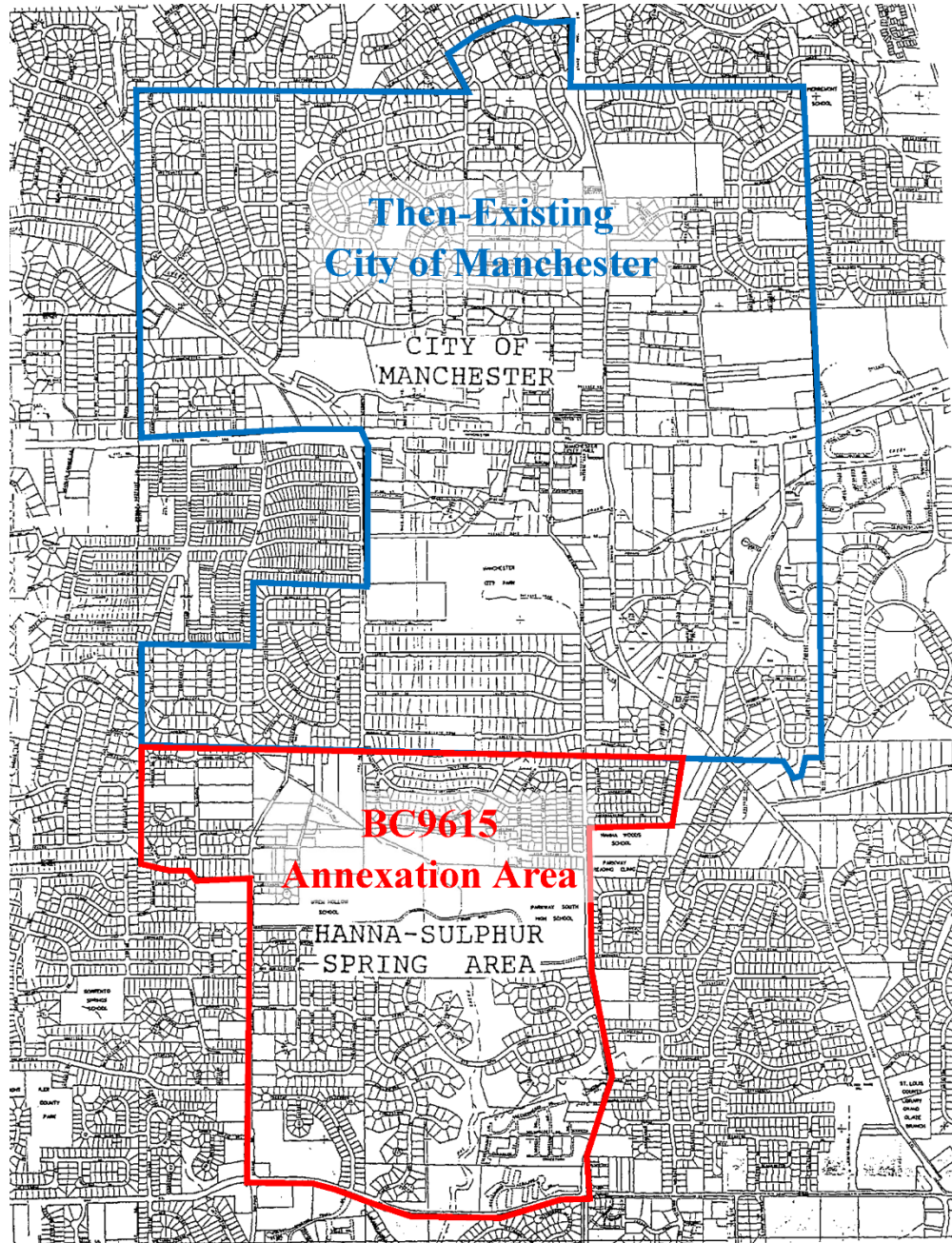


¹ Source: BC93-5 Area 1, Plan of Intent. Boundaries denoting existing City of Manchester and the annexation area added by St. Louis County Planning.

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In 1997, the City successfully annexed 595.88 acres immediately south of its previous boundary, effective October 1, 1997. That area, extending south to Big Bend Road roughly between Hanna Road on the east and Sulphur Spring Road on the west, had a population of 3,309 persons and was approved with a 55 percent majority in the annexation area. Map 2 shows the boundaries of the successful 1997 annexation.

Map 2: 1997 Annexation by City of Manchester²

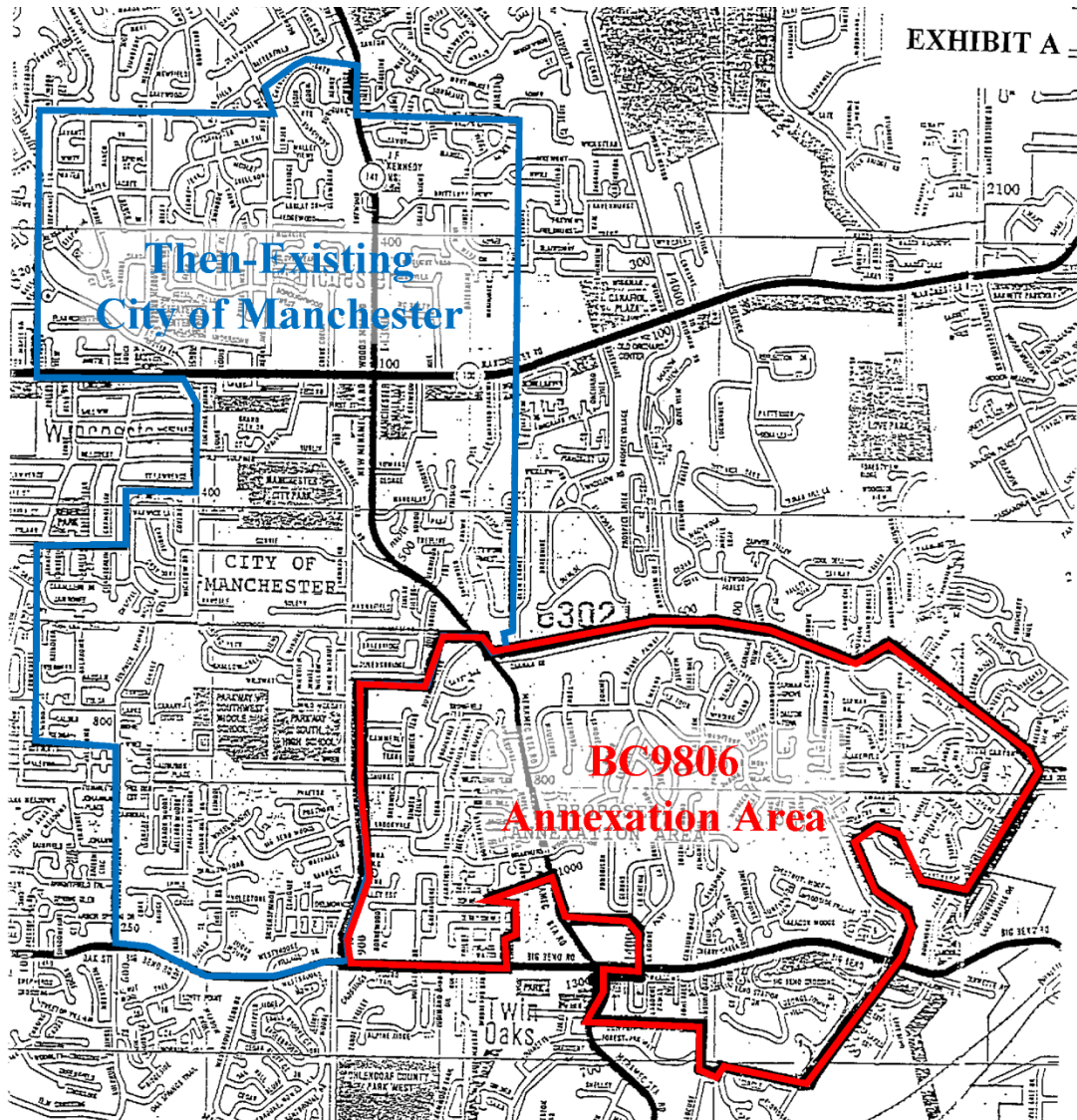


² Source: [BC9615 Hanna-Sulphur Spring Area, Plan of Intent](#). Boundaries denoting existing City of Manchester and the annexation area added by St. Louis County Planning.

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In 1999, the City annexed 1,280 acres between Carman Road on the north and Big Bend Road on the south and between Dougherty Ferry Road on the east and Hanna Road on the west. That annexation was approved by 75 percent of voters in the annexation area and increased the city’s size by 8,813 persons. Map 3 shows the boundaries of the successful 1999 annexation.

Map 3: 1999 Annexation by the City of Manchester³



I.B.i 2004 Annexation Proposal: BC 0404 Carman-Manchester Area

In 2004, the City proposed to annex a 1,260-acre area bounded on the west and south by the City limits along Carman Road, on the southeast by Dougherty Ferry Road, on the east by Grand Glaize Creek, and on the north partially by the Town and Country city limits and partially by a line along the southern limits of Queeny Park and the northern boundaries of the Longwood Estates and

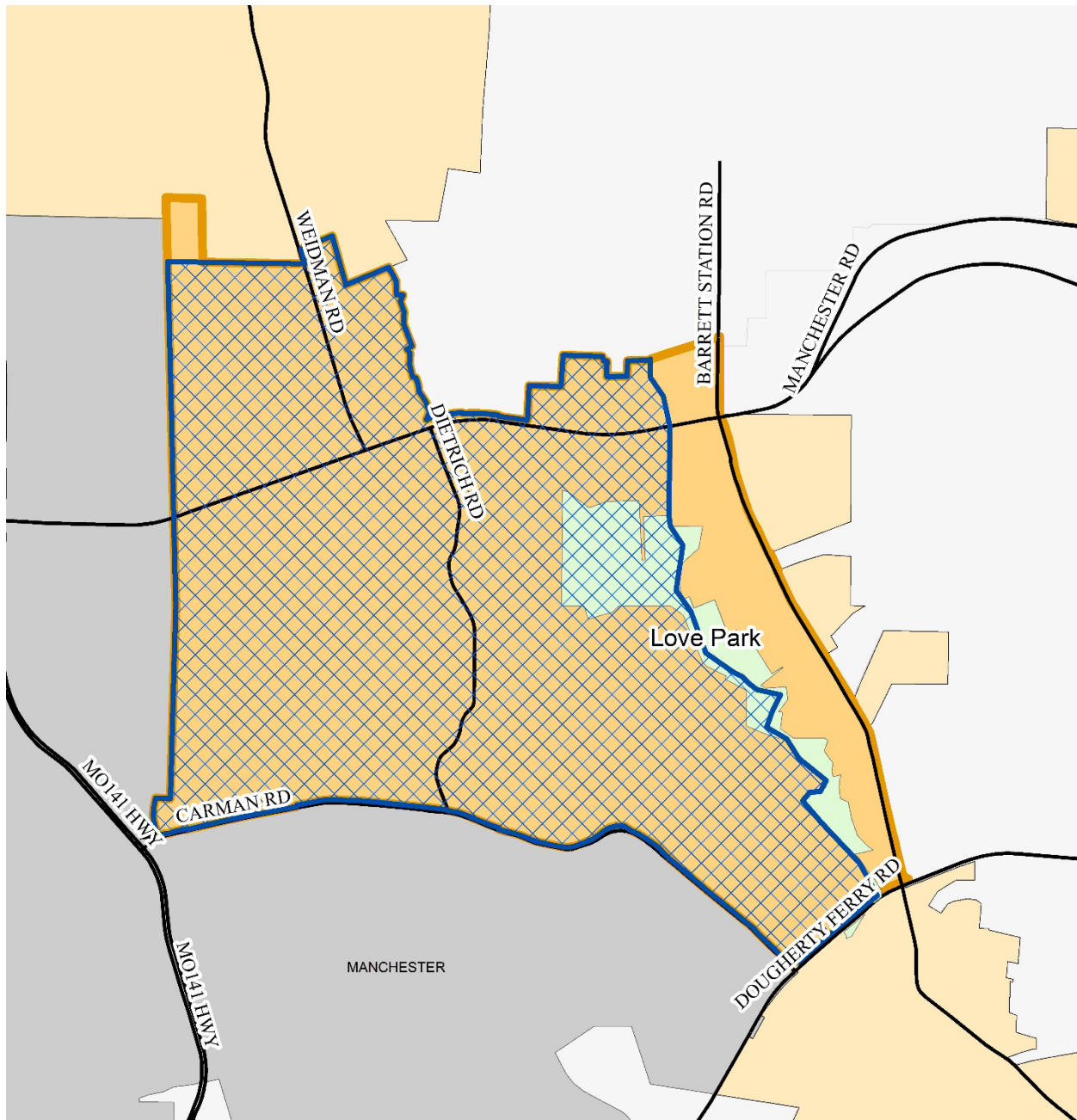
³ Source: [BC9806 Carman-Manchester Area, Plan of Intent](#). Boundaries denoting existing City of Manchester and the annexation area added by St. Louis County Planning.








Waycliffe Estates Plat 4 subdivisions. This proposed annexation area is by and large the same geography as the current annexation proposal before the Commission. The 2004 annexation proposal was disapproved by the Boundary Commission. The Commission's rationale for disapproval as stated in their Summary of Decision⁴ included concerns about the creation of two small and isolated unincorporated areas by the proposed annexation, an increase in taxes for residents in the annexation area without a commensurate increase in the quality of services provided, zoning incompatibility between parcels developed under the Planned Environment Unit (PEU) procedure and the proposed zoning by the City, and the impact of lost revenue on the County's ability to provide quality and efficient services. Many of the issues present in the 2004 annexation proposal can be found in this iteration of what is essentially the same proposal. Map 4 on page 5 shows a comparison of the 2004 proposal and the current proposal.

⁴ [St. Louis County Boundary Commission](https://boundarycommission.com/proposals/carman-manchester-area-2/). (2005). *Summary of Decision Proposal For Annexation Of The Carman-Manchester Area*. <https://boundarycommission.com/proposals/carman-manchester-area-2/>

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Map 4: Comparison of BC0404 and BC2201 Proposed Annexation Boundaries



-  BC2201 Proposed Annexation Area
-  BC0404 Proposed Annexation Area
-  Love Park
-  Major Roads
-  City of Manchester
-  Unincorporated STLCO
-  Incorporated STLCO



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II. Geographic Information

II.A General Description of the Area Proposed to be Annexed

The 1,466-acre area proposed for annexation adjoins much of the City’s eastern boundary. The area is bounded on the west and south by the City limits; on the southeast by Dougherty Ferry Road; on the east by Barrett Station Road; and on the north partially by the Town and Country city limits and partially by a line along the southern limits of Queeny Park, the northern boundaries of the Longwood Estates and Wycliffe Estates Plat 4 subdivisions, and the northern boundary of the parcel occupied by Pierremont Elementary School.

Basic data for the proposed annexation area is shown in Table 1. The residential dwelling units in the proposed annexation area are a mixture of single-family and multi-family units. There are 2,865⁵ housing units in total: 1,477 single-family units, 984 condos, and 402 apartments.

Table 1: Basic Annexation Area Data

Area ¹	1,466 acres (2.29 sq. miles)
Population ²	6,549
Dwelling Units ²	2,865
Total Assessed Valuation ¹	\$201,600,850
Assessed Valuation Per Capita ¹	\$30,783.46

¹St. Louis County Department of Planning

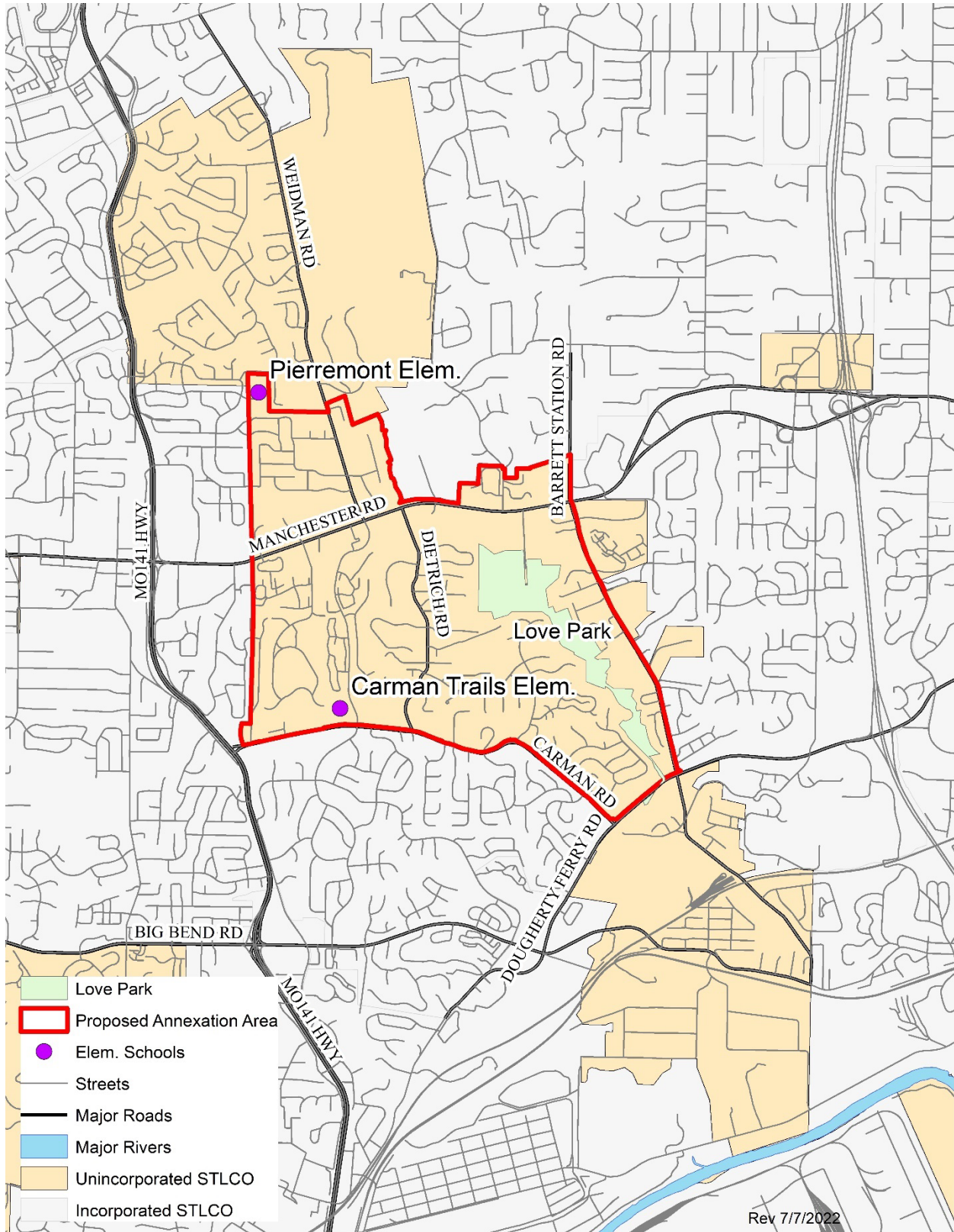
²2020 Census State Redistricting Data (Public Law 94-171) Summary File—Missouri.

II.B Compactness and Other Boundary Issues

The Plan of Intent indicates that the proposed annexation area is roughly 45 percent contiguous to the existing boundary of the City, meeting the statutory requirement of at least 15 percent of the annexation area to be adjacent to the proposing municipality. The proposed annexation area is the heart of a large existing unincorporated area. Although the proposed annexation is geographically reasonable for the City, it would create very awkward boundaries within this part of unincorporated County. The proposed annexation would lead to practical difficulties and inefficiencies in the provision of services to the residents of the remaining unincorporated area surrounding this proposed annexation. Map 5 on page 7 shows the proposed annexation area within the context of the larger, existing unincorporated area.

⁵ There are two dwelling units within commercial developments.

Map 5: Proposed Annexation Area with Surrounding Unincorporated Area



II.B.i Creation of Difficult-to-Serve Unincorporated Areas

The proposed annexation would take roughly the middle third of an unincorporated area that extends from the northern end of Queeny Park on the north to the Meramec River between Kirkwood and Valley Park on the south. Basic data for the existing contiguous unincorporated area, similar to that shown in Table 1 for the proposed annexation area, is shown in Table 2. The existing unincorporated area is large enough that if it were a municipality, it would be the 21st most populous in St. Louis County (between Berkeley and Town and Country). This unincorporated area has a larger population than the nearby municipalities of Des Peres, Valley Park, and Ellisville. The existing land area of the City is 5.03 square miles; smaller than the 5.58 square miles that is the existing unincorporated area which this proposal would split apart. This illustrates that the existing unincorporated area is able to be fully and efficiently served by the County.

Table 2: Basic Data for Existing Unincorporated Area

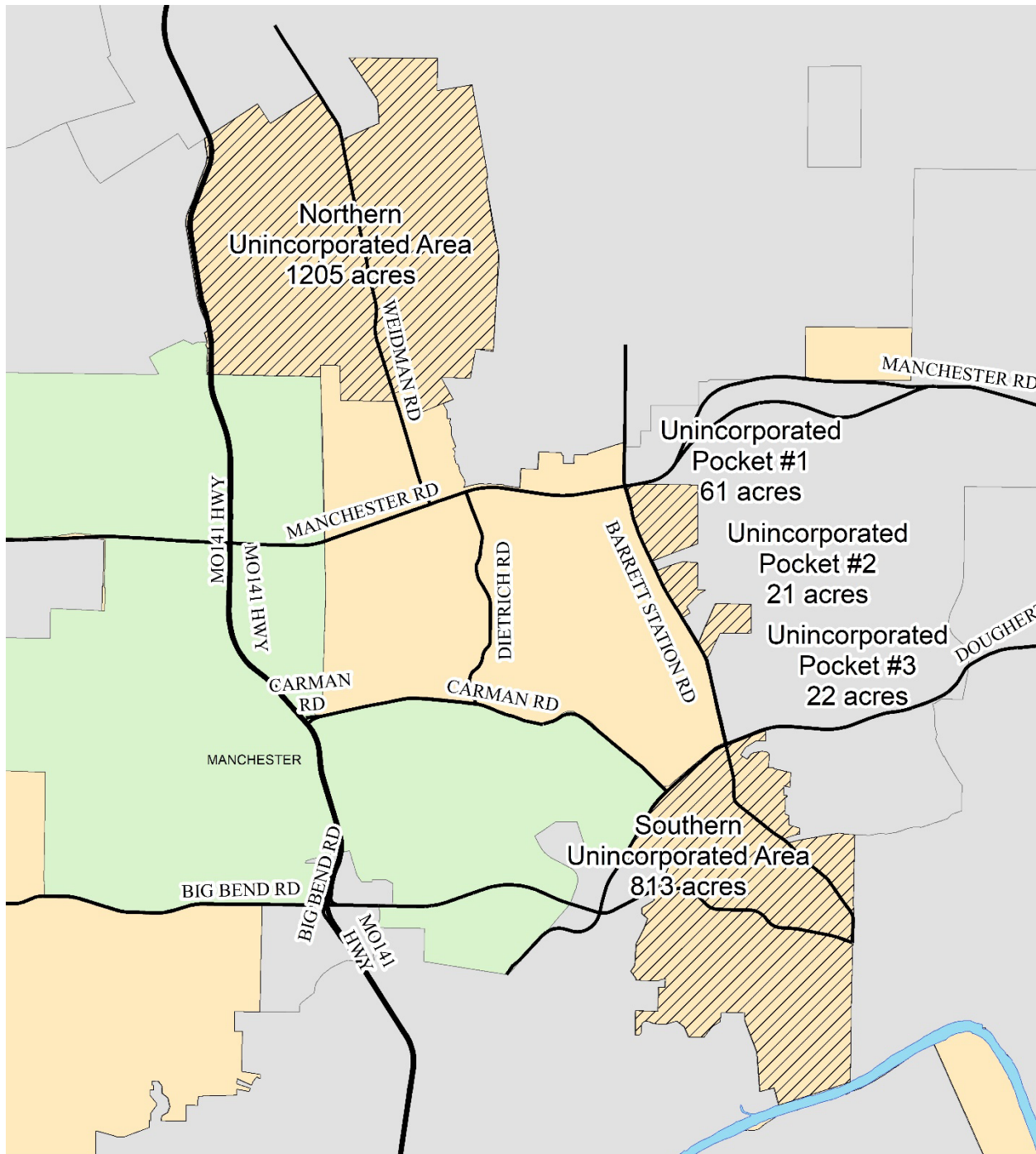
Area ¹	3,571 acres (5.58 sq. miles)
Population ²	10,701
Dwelling Units ²	4,603
Total Assessed Valuation ¹	\$339,902,300
Assessed Valuation Per Capita ¹	\$31,763.60

¹St. Louis County Department of Planning

²2020 Census State Redistricting Data (Public Law 94-171) Summary File—Missouri.

The proposed annexation would create five separate small unincorporated areas, three of which meet the statutory definition of an unincorporated pocket and one of which would not meet the statutory requirements to be eligible for consideration as an established unincorporated area. As defined by RSMo 72.407, an unincorporated pocket is an unincorporated area where the average residential density is greater than one dwelling per three acres *and* the population is less than 500 residents. Similarly, RSMo 72.400 defines an established unincorporated area as an unincorporated area approved by the voters to remain unincorporated. To be eligible for consideration as an established unincorporated area, RSMo 72.422 states that the unincorporated area must either contain a population of not less than 2,500 or be contiguous with an existing established unincorporated area. Map 6 on page 9 illustrates the five isolated unincorporated orphans created by the proposed annexation. The three isolated unincorporated areas east of Barrett Station Road meet the statutory definition of an unincorporated pocket and the unincorporated area south of the proposed annexation area would not be eligible for consideration as an established unincorporated area. The relevant unincorporated pocket and established unincorporated area criteria – population, size, housing units, density, and contiguousness to existing established unincorporated area – are shown in Table 3 on page 10.

Map 6: Unincorporated Orphans Created by Proposed Annexation



-  Unincorporated Areas/Pockets
-  Major Roads
-  Major Rivers
-  Unincorporated STLCO
-  Municipal Boundaries

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Table 3: Unincorporated Pocket and Established Unincorporated Area Criteria in Unincorporated Orphans Created by Annexation

Area	Population¹	Size²	Housing Units¹	Density^{2,3}	Contiguous with Established Unincorporated Area
Northern Area	3,172	1205 acres	1215	1.01	No
Pocket 1	261	61 acres	156	2.56	No
Pocket 2	35	21 acres	10	0.48	No
Pocket 3	25	22 acres	7	0.32	No
Southern Area	660	813 acres	350	0.43	No

¹2020 Census State Redistricting Data (Public Law 94-71) Summary File-Missouri

²St. Louis County Department of Planning

³Density equals units per acre

By creating these definitions of unincorporated pocket and established unincorporated area, the State is acknowledging that there are practical difficulties in providing services to areas this small and that are isolated from the rest of the County’s unincorporated geography. By fragmenting the geography of this unincorporated area, the economies of scale the County leverages to provide efficient local services are eroded. While the County will continue to provide local government services to its remaining 309,000 unincorporated residents, including to the unincorporated orphaned areas created by the proposed annexation, it is indisputable that fragmenting the geography of the existing unincorporated area would lead to an inefficiency in the delivery of services to those areas.

Of particular note are the three unincorporated pockets created by the proposed annexation, as seen in Map 7 on page 12. In the Boundary Commission’s Statement of Decision for BC 0404 Carman-Manchester Area, the Commission found that the proposed annexation created “awkward boundaries” and resulted in two unincorporated orphans “being functionally isolated and fragmented areas” where County service provision would be difficult.⁶ The eastern boundary of the 2004 proposal was the midline of the Grand Glaize Creek, west of Barrett Station Road. The unincorporated pockets east of Barrett Station Road created by this proposed annexation are even more isolated than the unincorporated orphan that would have been created by the 2004 proposal.

Furthermore, the City’s Plan of Intent implies that the unincorporated pockets created by the proposed annexation should be annexed by Des Peres as indicated on Des Peres’ Map Plan. There are multiple issues with this assertion in the City’s Plan of Intent. The Map Plan iteration referenced by the Plan of Intent expired on June 30, 2022. There is nothing requiring Des Peres to submit a Map Plan in the next cycle, or to include the three unincorporated pockets east of Barrett Station Road on their next Map Plan should they submit one. There is no way to know what areas Des Peres will include in their Map Plan in the next cycle. Additionally, Map Plans are not an expression of a municipality’s intention to propose annexation of an unincorporated area, but rather a statutory requirement should a municipality desire to reserve the ability to propose an annexation during the Map Plan cycle.

⁶ St. Louis County Boundary Commission. (2005). *Summary of Decision Proposal For Annexation Of The Carman-Manchester Area*. <https://boundarycommission.com/proposals/carman-manchester-area-2/>

During the Boundary Commission’s Map Plan Public Hearing on September 25, 2018, the City of Des Peres presented their Map Plan to the Commission. Des Peres stated during the hearing that their policy is to only annex areas of unincorporated County at the request of the residents in the proposed annexation area.⁷ Additionally, Des Peres raised the specific issues related to Fire Districts and annexation borne from Chapter 72.418 RSMo.⁸ State statute prevents a municipality that provides fire protection from supplanting upon annexation the services of a fire protection district that serves an unincorporated area. The annexing municipality is also required to “pay annually to the fire protection district an amount equal to that which the fire protection district would have levied on all taxable property within the annexed area.”⁹ Des Peres provides fire protection services through their Department of Public Safety. At the public hearing Des Peres indicated that the financial burden of annexation is prohibitive and that they have no plans to lobby the State to change the law as it relates to fire districts and annexation.¹⁰

The Boundary Commission’s rules charge the Commission with reviewing the proposed municipal borders to ensure they are logical and reasonable for both the annexing municipality and the County. The *existing* boundaries are logical and reasonable for both jurisdictions. The *proposed* boundaries would only result in splitting the existing large unincorporated area leading to difficulties in service provision. The County finds that the creation of three unincorporated pockets and two other isolated unincorporated areas is detrimental to the residents of the unincorporated areas adjacent to the annexation area and does not create a logical and reasonable municipal boundary.

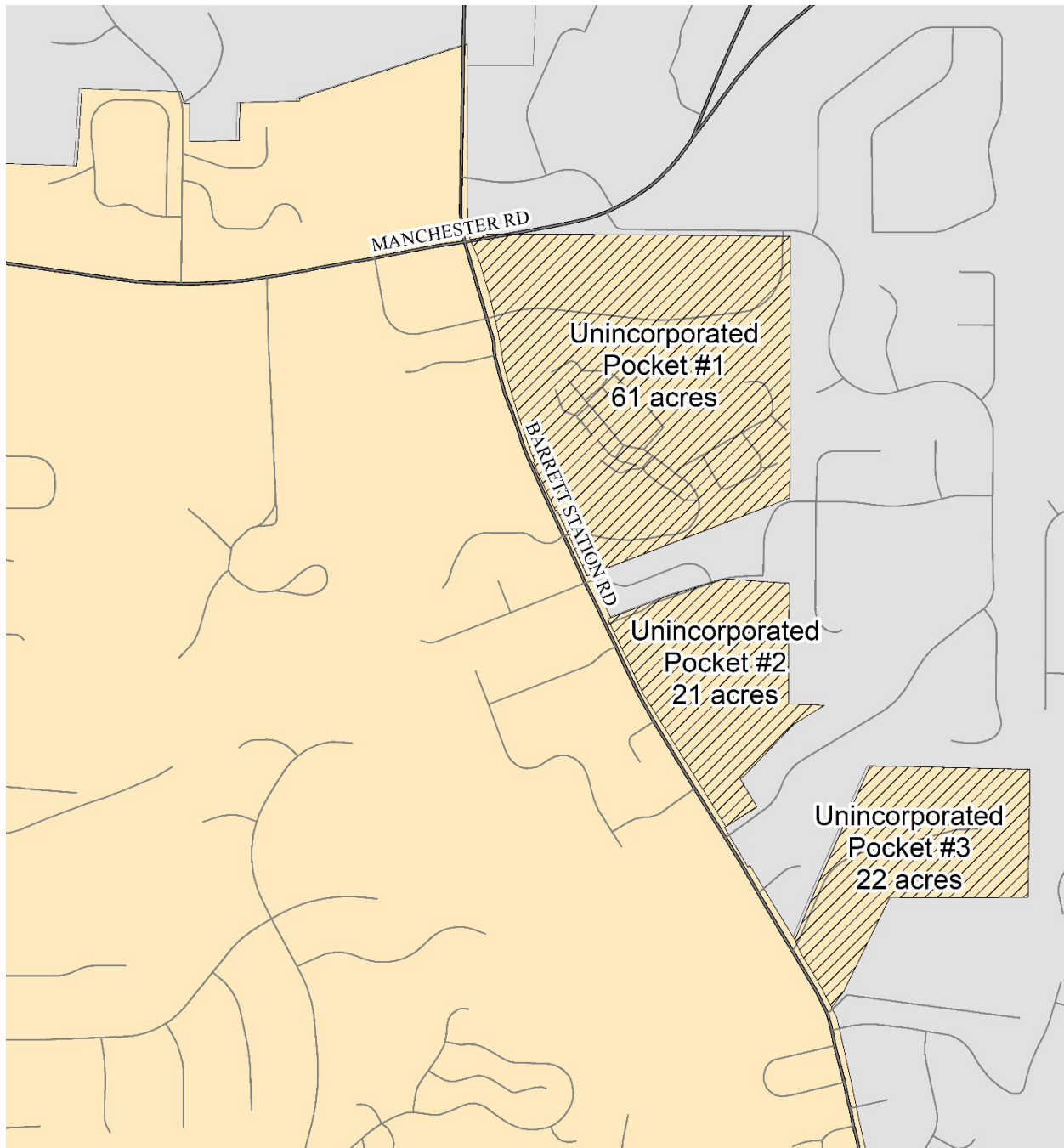
⁷ St. Louis County Boundary Commission (2018). ‘[Item 1.C: Presentation of Des Peres](#)’. *Minutes of St. Louis County Boundary Commission Map Plans Public Hearing 18 September 2018*, Walnut Room, The Lodge @ Des Peres.

⁸ Ibid.

⁹ Missouri Revised Statutes: Mo. Rev. Stat. § 72.418 (2000).

¹⁰ St. Louis County Boundary Commission (2018). ‘[Item 1.C: Presentation of Des Peres](#)’. *Minutes of St. Louis County Boundary Commission Map Plans Public Hearing 18 September 2018*, Walnut Room, The Lodge @ Des Peres.

Map 7: Unincorporated Pockets Created by Annexation



-  Unincorporated Areas/Pockets
-  Streets
-  Major Roads
-  Major Rivers
-  Unincorporated STLCO
-  Municipal Boundaries



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III. Land Use and Zoning

III.A Existing Land Use and Zoning

The proposed annexation area straddles one of the County’s primary commercial corridors and contains a mixture of land uses including commercial, industrial/utility, residential, and institutional land uses. Table 4 lists the number and percentage of parcels in the annexation area by land use type and Map 8 on page 14 illustrates the existing zoning in the annexation area. The majority of the land in the proposed annexation area is developed with residential properties. There is, however, a significant number of commercial developments along the Manchester Road corridor, many of which are occupied by multiple different businesses.

Table 4: Land Use in the Annexation Area

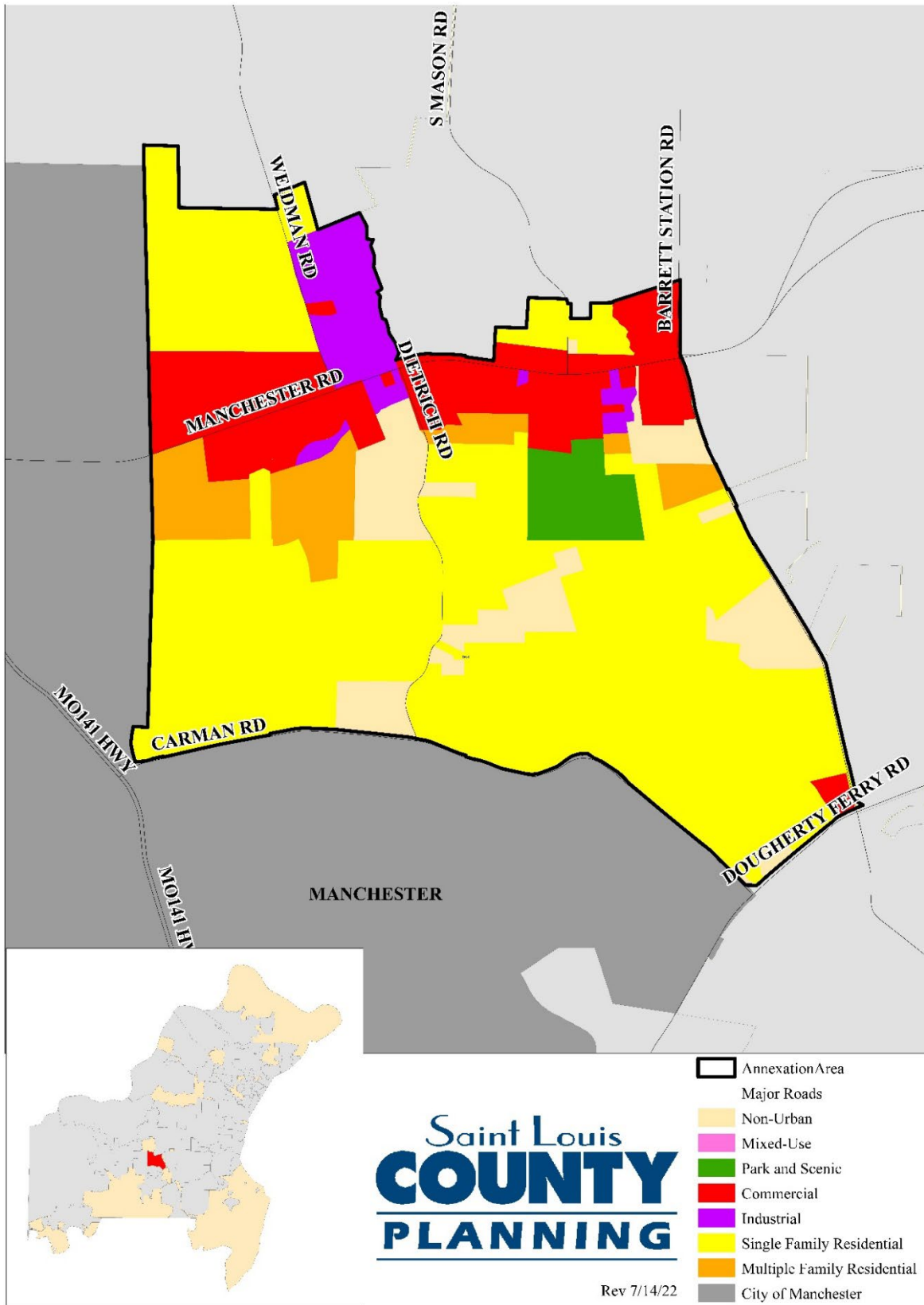
Land Use Type	Number of Parcels	Percentage of Parcels	Acres	Percentage of Land Area
Commercial	97	4.56%	213.65	16.60%
Industrial/Utility	13	0.61%	39.49	3.07%
Institution/Government	9	0.42%	82.04	6.37%
Single-Family	1478	69.42%	513.05	39.86%
Multi-Family	409	19.21%	181.96	14.14%
Recreation/Parks	6	0.28%	45.03	3.50%
Vacant/Agriculture ¹	117	5.50%	211.94	16.47%

¹Includes common ground areas of subdivisions

There are 25¹¹ different zoning classifications in the St. Louis County Zoning Ordinance, as well as a floodplain overlay district. Of the 25 County zoning classifications, 13 can be found in the proposed annexation area: R-1 Residence District, R-1A Residence District, R-2 Residence District, R-3 Residence District, R-6 Residence District, R-6A Residence District, R-6AA Residence District, C-2 Shopping District, C-3 Shopping District, C-8 Shopping District, M-3 Planned Industrial District, PS Parks and Scenic District, and NU Non-Urban District.

¹¹ The “KP” Karst Preservation District is only found within an approximately 4 square mile area of north St. Louis County in the community of Old Jamestown.

Map 8: Existing Zoning in the Annexation Area



III.B Proposed Land Use and Zoning

As outlined in their Plan of Intent, the City’s proposed zoning for the annexation area presents difficulties for both residents and businesses wishing to exercise their property rights and for City planning staff in administering zoning and land use regulations. Page 61 of the Plan of Intent states that the City proposes to amend their Zoning Code to read:

Article IV, Section 405.170 A) Annexed Land

Land incorporated through annexation or merger shall retain its existing zoning classification and have the same land use, area, height, yard, and intensity of use regulations as authorized by the St. Louis County Zoning Ordinance in effect at the time the land is incorporated and until a change in zoning is initiated in accordance with Chapter 405, Article XVIII. Any application for a building permit shall be processed in the customary manner as it would have been prior to annexation or merger.

The Plan of Intent indicates that zoning changes will only occur when initiated by a property owner and that the City does not intend to initiate the rezoning of property within the proposed annexation area.

The City’s expressed plan for implementing zoning and land use classifications to the annexation area is poorly conceived. At first glance, the County and City zoning classifications and regulations look the same; both County and City have R-1, R-2, R-3, R-4, R-5, R-6, C-1, and C-2 designations. However, the zoning classifications of the County and the City are not mirrors. For example, the minimum lot requirements of the County’s R-1 Residence District are not the same as the minimum lot requirements the City’s R-1 Single-Family Residential District. These differences between County and City zoning classifications that are named the same but have different regulations will lead to confusion among residents when attempting to exercise their property rights and among City staff responsible for administering land use regulations and preserving the property rights of their residents.

Additionally, there are several parcels in the annexation area developed under the C-8 Planned Commercial District procedure. Each C-8 Planned Commercial District has a site-specific ordinance passed by County Council that regulates the development of that parcel. These site-specific ordinances frequently reference the regulations of the St. Louis County Zoning Ordinance. It would be impossible to adopt the County’s zoning classifications without also adopting the entirety of the St. Louis County Zoning Ordinance. A similar problem exists for residential areas developed under the County’s Planned Environmental Unit procedure, which allows for reduced lot sizes and reduced setbacks while maintaining the overall density (units per acre) as specified in the underlying zoning district as trade-off for increased amenities and flexible subdivision design. The City’s plan results in the administration of two zoning ordinances – the County’s and the City’s – which would be a burdensome task for a small municipal Planning Department with

a part-time director¹² and would likely result in delays, difficulties, and confusion for property owners and their contractors.

III.C Comparison of City and County Zoning

The following analysis compares the provisions of existing County zoning in the area proposed for annexation with the most similar City zoning districts. The Plan of Intent makes little to no mention of the City's specific zoning districts or regulations.

III.C.i Examples of Differences Between County and City Zoning

The City's zoning ordinance includes minimum floor area requirements whereas the County's zoning ordinance does not. While this requirement would not immediately result in any non-conformities because the City is proposing to adopt the County zoning classifications and regulations, it is possible that a parcel developed under County regulations could become non-conforming if a change in zoning to a City zoning classification occurs.

Setback requirements within the City's Residential Districts are stricter than in the County. For example, the County requires properties zoned R-1 Residence District to have a front yard setback of 30 feet, and side and rear yard setbacks of 15 feet. The City's R-1 Single-Family Residential District requires a front yard setback of 30 feet, a rear yard setback of 35 feet or 25% of the depth of the lot up to 50 feet, and a side yard setback of 10 feet or 10 percent of the lot width up to 25 feet. The imposition of these setbacks on existing developments upon a change in zoning could create non-conformities and cause problems if property owners wish to add decks, garages, sheds, or additions to their houses.

III.C.ii Floodplain Management

The annexation area contains a substantial amount of floodplain acreage. A large number of residential and commercial properties and part of Love Park are located in the floodplain of Grand Glaize Creek and therefore have the floodplain overlay zoning. The County's floodplain overlay district limits the permitted and conditional uses within the floodplain and stipulates the portion of single-family lots that must be outside of the floodplain area. The floodplain overlay district mirrors the most current FEMA Federal Flood Insurance Maps and the ordinance establishing the overlay district is updated when FEMA updates their maps. The County recognizes Letters of Map Amendment (LOMAs) and Letters of Map Revision (LOMRs) when reviewing development proposals within the floodplain. Additionally, the County's Zoning Ordinance requires a minimum 25-foot stream buffer to protect blue line streams that might not otherwise be protected by the floodplain overlay district.

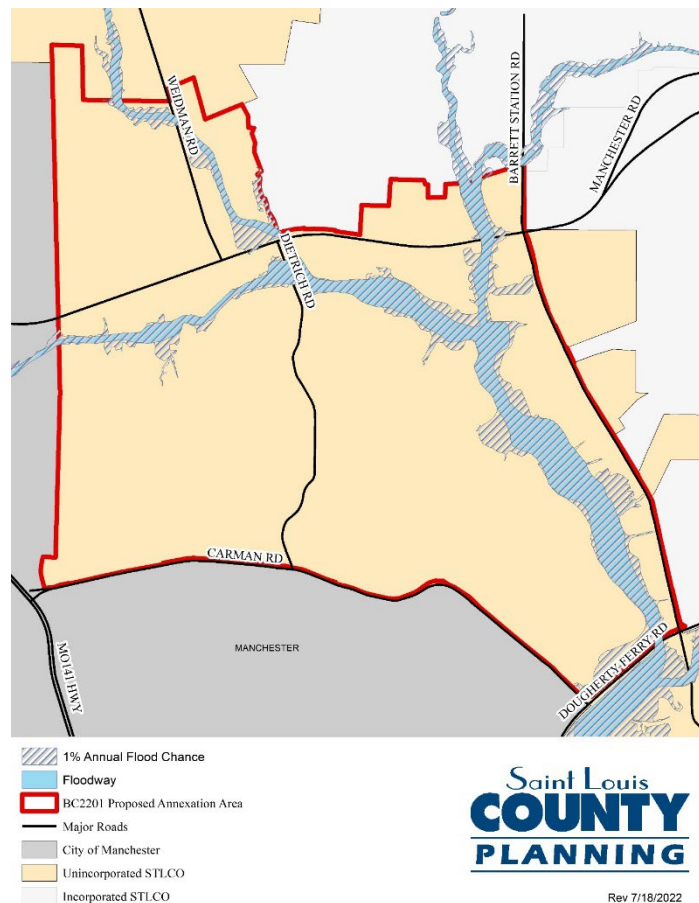
Further regulating the floodplain is Chapter 1008 SLCRO – Floodplain Management Regulations which provides guidance, rules, and regulations for development in the floodplain. In fact, a

¹² [Ordinance 21-2335](#), effective December 6, 2021 appointed the current Director of Planning, Zoning, and Economic Development for the City, and enumerated the terms of said employment.

comparison of the text of the County’s Floodplain Management Regulations (Chapter 1008 SLCRO) and the City’s Floodplain management ordinance shows that large sections are identical. Map 9 illustrates the floodplain overlay district within the proposed annexation area.

The Plan of Intent states that the City has a floodplain management ordinance that is more protective of riparian areas. This claim reflects a misrepresentation of how the County’s floodplain zoning and management works. The City asserts that the “County overlay approach to floodplains result in rigid boundaries that do not change with the ever-changing path of the floodplain.”¹³ The City further states that their floodplain ordinance “regulates the natural boundaries of the floodway in accordance with the Federal Flood Insurance Rate Maps (FIRMS) and not prescribed zoning district boundaries.”¹⁴ The “prescribed zoning district boundaries” that the City claims are unresponsive to the changing floodplain mirror the floodplain and floodway as described by the FIRMS; *they are one and the same*. As FEMA updates their maps, so does the County update the floodplain zoning district to match. The County’s floodplain zoning district, floodplain management ordinance, numerous floodplain management staff, allows it to be the most effective and highest-capacity manager of the floodplain.

Map 9: Floodway and Floodplain in the Annexation Area



¹³ BC2201 – City of Manchester Annexation – Plan of Intent

¹⁴ BC2201 – City of Manchester Annexation – Plan of Intent

IV. Financial Impacts of Proposed Annexation

IV.A Existing and Proposed Tax Rates in the Annexation Area

The City levies a property tax at the rate of \$0.3150 per \$100 of assessed valuation for both residential and commercial real property and at the rate of \$0.3300 per \$100 of assessed valuation for household and commercial personal property¹⁵. This tax is in addition to the property tax and personal property tax rates levied by the County and all other taxing jurisdictions. Table 5 on page 19 lists the residential real property, commercial real property, and personal property tax rates for the annexation area before and after the proposed annexation. The City's property tax rate fluctuates over time in concert with the demands placed on them to finance services like public facilities or routine road maintenance. The current property tax levy of \$0.3150 encompasses the regular property tax rate of \$0.0350 per \$100 of assessed valuation plus the \$0.2800 tax levy incurred by the passage of Proposition S.

It is important to note that the majority of the real and personal property tax rate is set by taxing jurisdictions other than the County or the City. For a resident in the proposed annexation area, the County accounts for approximately 5.92 percent of the real property tax bill; the rest goes to fund other taxing jurisdictions – State of Missouri, St. Louis Community College, Special School District, Metropolitan Zoological Park & Museum District, Developmental Disability Productive Living Board, County Library, Parkway School District, Metropolitan Sewer District, and West County EMS Fire Protection District. Appendix D provides a comparison of the percentage of the overall tax bill dedicated to each taxing jurisdiction before and after annexation. The City levies a 5.0% utility tax rate, which is equal to the County rate. However, Missouri State Statute restricts the County from raising its utility tax rate, while municipalities do not have this restriction¹⁶. Examples of municipalities with utility tax rates in excess of 5 percent include Maryland Heights (5.5%), St. Ann (6%), Ballwin (7%), Shrewsbury (7.25%), and University City (9%).

¹⁵ St. Louis County Rate Book, 2021.

¹⁶ RSMo 66.300 authorizes first class counties with populations over 600,000 to impose a public utility license tax not in excess of five percent of gross receipts.

Table 5: Property Tax Rates in the Annexation Area – Before and After Annexation

Taxing Jurisdiction	Residential	Commercial	Personal Property
State of Missouri	0.0300	0.0300	0.0300
St. Louis County	0.4180	0.4670	0.5230
St. Louis Community College Special School District	0.2787	0.2787	0.2787
Metro. Zoological Park & Museum District	1.0158	1.0158	1.0158
Dev. Disability – Productive Living Board	0.2455	0.2455	0.2455
County Library	0.0710	0.0840	0.0900
Parkway School District	0.2060	0.2340	0.2600
MSD	3.6390	4.8988	4.2608
Fire- West County EMS	0.1041	0.1041	0.1041
Total - Before Annexation	7.0641	8.5819	8.1279
Manchester	0.3150	0.3150	0.3300
Total - After Annexation	7.3791	8.8969	8.4579

The City also levies a sales tax of 1.2500% on top of the existing sales tax rates set by the State and County making the sales tax rate in the City 8.9880%. Table 6 provides a comparison of the sales tax rates in unincorporated County and in the City. People shopping along the highly commercialized Manchester Road corridor will experience an increase sales tax paid on their purchases. Additionally, residents of the proposed annexation area will see a steep increase in sales taxes when they go to purchase a vehicle should annexation proceed. The State of Missouri requires sales tax for the purchase of a vehicle be assessed based on where the purchaser lives, not where the purchase is made. Table 7 on page 20 illustrates the increase in sales tax paid by residents in the proposed annexation area when purchasing a new or used vehicle. Residents in the proposed annexation area could end up paying hundreds more in sales taxes for each vehicle purchase.

Table 6: Sales Tax Rates in the Annexation Area – Before and After Annexation

Taxing Jurisdiction	Sales Tax	Food Sales Tax
State of Missouri	4.2250	1.2250
St. Louis County	3.5130	3.1250
Total - Before Annexation	7.7380	4.3500
Manchester	1.2500	1.2500
Total - After Annexation	8.9880	5.6000
Percent Increase	16.5%	28.74%

Table 7: Increase in Sales Tax Paid on Car Purchase

Sales Tax Paid on Car Purchase	
Average new car price ¹⁷	\$47,000
Taxes Paid	
Before Annexation	\$3,636.86
After Annexation	\$4,224.36
Increase	\$587.50
Sales Tax Paid on Used Car Purchase	
Average used car price ¹⁸	\$28,205
Taxes Paid	
Before Annexation	\$2,182.50
After Annexation	\$2,535.07
Increase	\$352.56

IV.B Impact on Area Residents and Property Owners

Annexation by the City would result in higher real property taxes, personal property taxes, sales taxes, and sewer lateral fees for residents and property owners in the proposed annexation area. An owner of a residence valued at \$300,000 (assessed value of \$57,000) would see an increase of \$179.55 per year in their real property taxes. Assuming \$50,000 market value in personal property, the typical household would pay an additional \$54.45 in personal property taxes annually.

Commercial properties are subject to a higher property assessment ratio set by the State, meaning they are assessed at 32 percent of actual value rather than the 19 percent applied to residential property and 12 percent applied to agricultural property. Therefore, a commercial property valued at \$4,000,000 (assessed value of \$1,280,000) would see an increase in property tax of \$4,032.00. Commercial personal property and manufacturing equipment is assessed at 33.3 percent and taxed at the same rate as household personal property.

Tables 8, 9, and 10 on page 21 provide examples of the estimated tax increase for residential real property, commercial real property, and personal property should the proposed annexation be successful.

¹⁷Source: Preston, B. (2022, January 21). *Average new-car price tops \$47,000, an all-time high*. Consumer Reports. Retrieved June 24, 2022, from <https://www.consumerreports.org/car-pricing-negotiation/average-new-car-price-all-time-high-a4060089312/#:~:text=For%20the%20first%20time%20ever,an%20online%20marketplace%20for%20cars.>

¹⁸Source: Tucker, Sean. (2022, January 21). *Average use car price now over \$28,000*. Kelly Blue Book. Retrieved June 28, 2022, from <https://www.kbb.com/car-news/average-use-car-price-now-over-28000/>.

Table 8: Residential Property Tax Estimates After Annexation

Market Value	\$150,000	\$300,000	\$450,000
Assessed Value (19%)	\$28,500	\$57,000	\$85,500
Estimated Tax			
Unincorporated	\$2,013.27	\$4,026.54	\$6,039.81
Manchester	\$2,103.04	\$4,206.09	\$6,309.13
Increase	\$89.77	\$179.55	\$269.33

Table 9: Commercial Property Tax Estimates After Annexation

Market Value	\$1,000,000	\$4,000,000	\$8,000,000
Assessed Value (32%)	\$320,000	\$1,280,000	\$2,560,000
Estimated Tax			
Unincorporated	\$27,462.08	\$109,848.32	\$219,696.64
Manchester	\$28,470.08	\$113,880.32	\$227,760.64
Increase	\$1,008.00	\$4,032.00	\$8,064.00

Table 10: Personal Property Tax Estimates After Annexation

Market Value	\$25,000	\$50,000	\$75,000
Assessed Value (33%)	\$8,250	\$16,500	\$24,750
Estimated Tax			
Unincorporated	\$670.55	\$1,341.10	\$2,011.66
Manchester	\$697.78	\$1,395.55	\$2,093.33
Increase	\$27.22	\$54.45	\$81.68

One of the many benefits to residents in unincorporated County is the best in region residential sewer lateral program. A comparison of the County’s sewer lateral program and the City’s sewer lateral program can be found in Table 11 on page 22. The City has a \$750 application fee whereas the County has no application fee. The annual assessment for the sewer lateral program in the County is \$28; in the City the annual assessment for their sewer lateral program is \$50. The City caps the cost of repairs that they will cover at \$6,000. There is no cap in the County’s sewer lateral program; the County will cover the full cost of the repair. It is the County’s economies of scale that allows them to cover the full cost of repairs. The County’s sewer lateral repair fund is large enough to be able to handle the expense of the occasional repair cost that is higher than average. The City’s sewer lateral repair program is not robust enough to be able to handle those occasional high costs and is the reason their program has a coverage cap.

Since 2016, the County residential sewer lateral repair program has allocated \$249,232 across 87 projects¹⁹ in the annexation area with the average cost of repair around \$2,800. During that time

¹⁹ There are two projects that are out for bid and have not been funded yet.

there were four repairs in excess of the \$6,000 cap imposed by the City; two of those repairs fell in the same year. The most expensive sewer lateral repair in the annexation area was \$13,600.

Table 11: Residential Sewer Lateral Repair Program Comparison

	St. Louis County	Manchester
Annual Tax	\$28	\$50
Application Fee	\$0	\$750
Coverage	no cap	up to \$6,000

IV.B.i Manchester Prop S Bond Issue

In 2018, voters in the City passed Proposition S, a \$16.7 million general obligation bond issue to fund repairs to city streets and sidewalks. The bond terms are for 20 years, meaning they would expire around the year 2040. Proposition S resulted in a \$0.2800 tax levy per \$100 of assessed value of real property. All residents in the City, including the currently unincorporated residents that are subject to the proposed annexation, would have to be assessed the tax levy authorized under Proposition S. The Plan of Intent states, and City officials reiterated at Public Hearing, that they plan on offering a rebate on the tax levy incurred by Proposition S to residents in the proposed annexation area because the planned improvements are already scheduled, and they would not see the related infrastructure improvements where they live.

The County has several concerns with this proposal. Article X, Section 3 of the Missouri Constitution requires the uniform application of taxes upon the same class or subclass of subjects within the territorial limits of the taxing authority.²⁰ While a taxing authority may assess different tax rates between different classes of property, the taxing authority must demonstrate a reasonable basis for the difference in rates.²¹ Here, the City proposes to create two distinct classes of resident property owners with one class of residents paying a higher rate of taxes. There is no indication that the class paying higher taxes will receive additional or enhanced services. Rather, the proposal looks only to differentiate based on the point in time in which the property was incorporated into the City. Separation of property owners in the City based on this timing of incorporation does not qualify as a reasonable basis for differentiating between the classes of taxpayers. The City’s statement that infrastructure improvements will not be available to the annexed area is both vague and speculative, and consequently does not provide a reasonable basis for different tax rates. Therefore, the City’s proposal to “tax and rebate” runs afoul of the Missouri Constitution’s requirement for the uniform application of taxes.

Additionally, even if it is subsequently determined that what the City proposes is legal, there is no guarantee that future City Councils in Manchester will continue to support the rebate program over the 20 year life span of the general obligation bonds. There are significant administrative burdens that this type of property tax rebate scheme would impose on the City.

²⁰ See *508 Chestnut, Inc. v. City of St. Louis*, 389 S.W.2d 823, 830-831 (Mo. 1965).

²¹ *Michael Jaudes Fitness Edge, Inc. v. Dir. of Revenue*, 248 S.W.3d 606, 611 (Mo. 2008).

Furthermore, it is possible that once these bonds expire in 20 years and the roads and sidewalks in the City are in need of repair again, there could be a new bond issue that levies an additional tax on residents to pay for that new debt service. Municipal bonds are a common method for smaller capacity municipalities to finance basic services like road maintenance or construction of public facilities, a practice that the City has utilized in the past. In 2002, City residents passed Proposition P, authorizing the City to issue \$6.5 million in general obligation bonds to finance the land acquisition, design, and construction of a new centralized police facility with public meeting space. The bonds from Proposition P were retired in 2018, just before the bonds for Proposition S were issued.

IV.C Impact on Businesses

Businesses do not have the same capacity to make their voice heard in the same way that residents can because they are not a voting constituency. The increased sales tax revenue generated by the commercial activity in the proposed annexation area would be a boon for the City. There are additional costs, however, that will be solely borne by businesses in the annexation area. The Plan of Intent makes little mention of the impact of annexation on businesses, especially in terms of the increased costs to businesses.

Commercial property owners will see an increase in their real and personal property taxes if annexation goes through. The Plan of Intent does not mention that the City imposes three different types of annual business license fees – service license fee, merchant license fee, and bank license fee – a new expense for businesses in this commercial corridor that are already running up against tight margins and inflationary pressure. The County’s nominal flat-rate merchant license fee²² of \$5 applies to both incorporated and unincorporated areas: therefore, this small cost to businesses would remain at the current level. The City’s business license fees would be an additional cost to businesses. The service license fee is \$50.00 for the first 1,000 square feet and \$0.10 for each square foot over 1,000. For example, a beauty salon occupying 1,500 square feet of space would have to pay an annual licensing fee of \$100. The bank license fee is a flat \$500. The merchant license fee is based on total gross receipts and is charged at graduated rates as shown in Table 12. A business with gross receipts of \$1,000,000 would be required to pay \$800 in merchant license fees; each million dollars in excess of \$1,000,000 would incur an additional \$500 in merchant license fees.

Table 12: Manchester Merchant License Fee Schedule

Total Gross Receipt Amount	Rate
Portion of gross receipts \$500,000 or less	0.0009
Portion of gross receipts \$500,001 to \$1,000,000	0.0007
Portion of gross receipts over \$1,000,000	0.0005

²² Applies to businesses selling retail or wholesale and to manufacturers.

IV.D Impact on St. Louis County

The total annual revenue loss that County government could experience as a result of the proposed annexation is estimated to be \$2,838,379. A breakdown of County revenue loss by funding source is provided in Table 13. The Plan of Intent states that the estimated County revenue loss as a result of annexation is \$2,269,289, only one quarter of one percent of the County’s FY 2022 budget of \$889,986,658. This assertion, while factually correct, is not reflective of the actual impact of the revenue loss to the County. Only 59% of the County’s budget is dedicated to general funds; that is the funds used to provide local government services. The rest of the budget is comprised of dedicated funds such as the Public Transit Fund, Spirit Airport Enterprise Fund, Highway Capital Construction Funds, Debt Service Fund, and Special Revenue Fund. Of the general funds, only 69% are allocated to the General Revenue Fund; the rest is distributed to the Park Maintenance Fund, Health Fund, and Road & Bridge Fund.

The FY 2022 General Revenue Fund budget is \$352,888,538. This is the fund that the loss in revenue will impact. The County’s estimated revenue loss is approximately 0.8% of the General Revenue Fund. This is not an insignificant amount. The estimated revenue loss is more than the FY 2022 budget for the Department of Planning. The impact of the lost revenue from this proposed annexation is substantial and would severely hamper the County’s ability to continue to provide quality and efficient services to its unincorporated residents.

Table 13: Projected Annual Revenue Loss to St. Louis County

Source	One-Year Estimate
Sales Tax	
1 cent tax ¹	\$1,141,884
Prop P (Public Safety) ²	\$360,195
Total Sales Tax	\$1,502,079
Gross Receipts (5%)	
Utility	
<i>Residential</i> ³	\$331,250
<i>Commercial</i> ⁴	\$399,017
Cable ⁵	\$25,695
Total Gross Receipts	\$755,962
Intergovernmental	
Gasoline Tax ²	\$190,052
Cigarette Tax ²	\$12,116
MO Highway User (CART) ⁵	\$95,196
Road & Bridge Tax ⁵	\$235,058
Total Intergovernmental	\$532,422
Sewer Lateral ²	\$41,048
Municipal Fines ²	\$6,868
Total	\$2,838,379

¹St. Louis County Treasurer's Office

²Planning Department estimates

³Based on annual utility cost of \$2,500 per household

⁴Based on 20% of commercial improvement assessed value

⁵St. Louis County Department of Transportation

IV.E Impact on Annexing Municipality

Table 14 compares the County’s and the City’s estimates of new revenues for the City if the annexation is successful. The Plan of Intent provides projected annual revenue from the annexation area for the next 3 years but does not provide a detailed accounting of the different sources of that revenue. The County estimates that the City will receive \$4,896,680 in revenue from the annexation area; the City’s Plan of Intent estimates a revenue gain of \$3,873,727. The Plan of Intent indicates that the City plans to spend an estimated \$3,621,713 in the annexation area. The Plan of Intent does not mention specific projects proposed to be funded by the increased revenue. Rather, the City’s planned expenditures related to the annexation area primarily consist of increased staffing and equipment for the police and public works departments, generally referenced capital improvements, and undetermined stormwater improvements.

Table 14: Projected Annual Revenue Gain by City of Manchester

Source	County Estimated Amount	City Estimate Amount ⁷
Property Tax		
Residential	\$427,172	
Commercial	\$207,578	
Redistributed Countywide One-Cent Sales Tax	\$968,663	
Local Option Sales Tax (1.25%) ¹	\$1,210,829	
Prop P (Public Safety)	\$360,195	
Utility ²		
Residential	\$331,250	
Commercial	\$339,017	
Cable ²	\$25,695	
Gasoline Tax ³	\$190,052	
Cigarette Tax ⁴	\$12,116	
MO Highway User (CART) ⁵	\$264,099	
County Road and Bridge Tax ⁶	\$211,681	
Sewer Lateral ⁷	\$94,450	
Municipal License Fees and Fines ⁸	\$253,883	
Total	\$4,896,680	\$3,873,727

¹St. Louis County Department of Planning estimate

²Assumes average annual residential utility bill of \$2,500 and commercial utility consumption as 20% of improvement value

³Based on estimated \$29.02 per capita

⁴Based on estimated \$1.85 per capita

⁵St. Louis County Department of Transportation estimate

⁶Rate is \$.105 per \$100 of assessed valuation

⁷Manchester Plan of Intent

⁸Per capita fine & forfeiture revenue multiplied by population of annexation area, based on Manchester's 2021 Annual Comprehensive Financial Report

IV.F Traffic Generation Assessment

The Manchester Road Corridor Traffic Generation Assessment (TGA) Road Trust Fund (No. 549) encompasses the proposed annexation area. The TGA Trust Fund covers Manchester Road, Weidman Road and Dietrich Road, and the north side of Carman Road. The continuation of the TGA Road Trust Fund is important to meeting the needs of area residents and the traveling public for road improvements in the area. The Plan of Intent states that the City will require continued participation in the fund by any new development and notes that the City has maintained participation in the Big Bend-Oak-Kiefer Creek Corridor TGA Trust Fund (No. 543) following its previous annexation on the south side of Carman Road. It should be noted that the City would need to pass a resolution for the continuation of the Manchester Road Corridor Traffic Generation Assessment (TGA) Road Trust Fund (No. 549) in the affected area if the annexation were approved.

V. Provision of Services

V.A. Existing and Proposed Services

The provision of services to its residents is local government’s primary responsibility and function. The County takes pride in providing high quality services to its constituents that is based on a model of direct contact with professional staff. Currently, the County is the provider of local services to the proposed annexation area. In addition, the City contracts with the County for a number of services meaning that residents in the annexation area will not see a change in those services. Table 15 lists basic local services provided in the proposed annexation area and identifies the current and proposed provider of those services.

Table 15: Current and Proposed Service Provider

Service	Current Provider	Proposed Provider
Police Protection	St. Louis County	City of Manchester
Fire Protection/EMS	West County EMS and FPD	West County EMS and FPD
Street and Bridge Maintenance ¹	St. Louis County, MoDOT, and Private	St. Louis County, MoDOT, Private, and City of Manchester
Snow Removal	St. Louis County, MoDOT, and Private	St. Louis County, MoDOT, Private, and City of Manchester
Sidewalk Improvement and Repair	St. Louis County, MoDOT, and Private	St. Louis County, MoDOT, Private, and City of Manchester
Parks and Recreation	St. Louis County	St. Louis County and City of Manchester
Refuse Collection, Recycling, Yard Waste	St. Louis County (contract)	City of Manchester (contract)
Street Lighting	Subdivision Trustees and Property Owners	City of Manchester
Planning, Zoning, and Subdivision Regulations	St. Louis County	City of Manchester
Building Code, Mechanical Permits, and Inspections	St. Louis County	St. Louis County
Residential Occupancy Permits and Inspections	St. Louis County	City of Manchester and St. Louis County
Health Services - Vector Control and Animal Control	St. Louis County	St. Louis County
Sewer Lateral Repair Program	St. Louis County	City of Manchester
Municipal Court	St. Louis County	City of Manchester

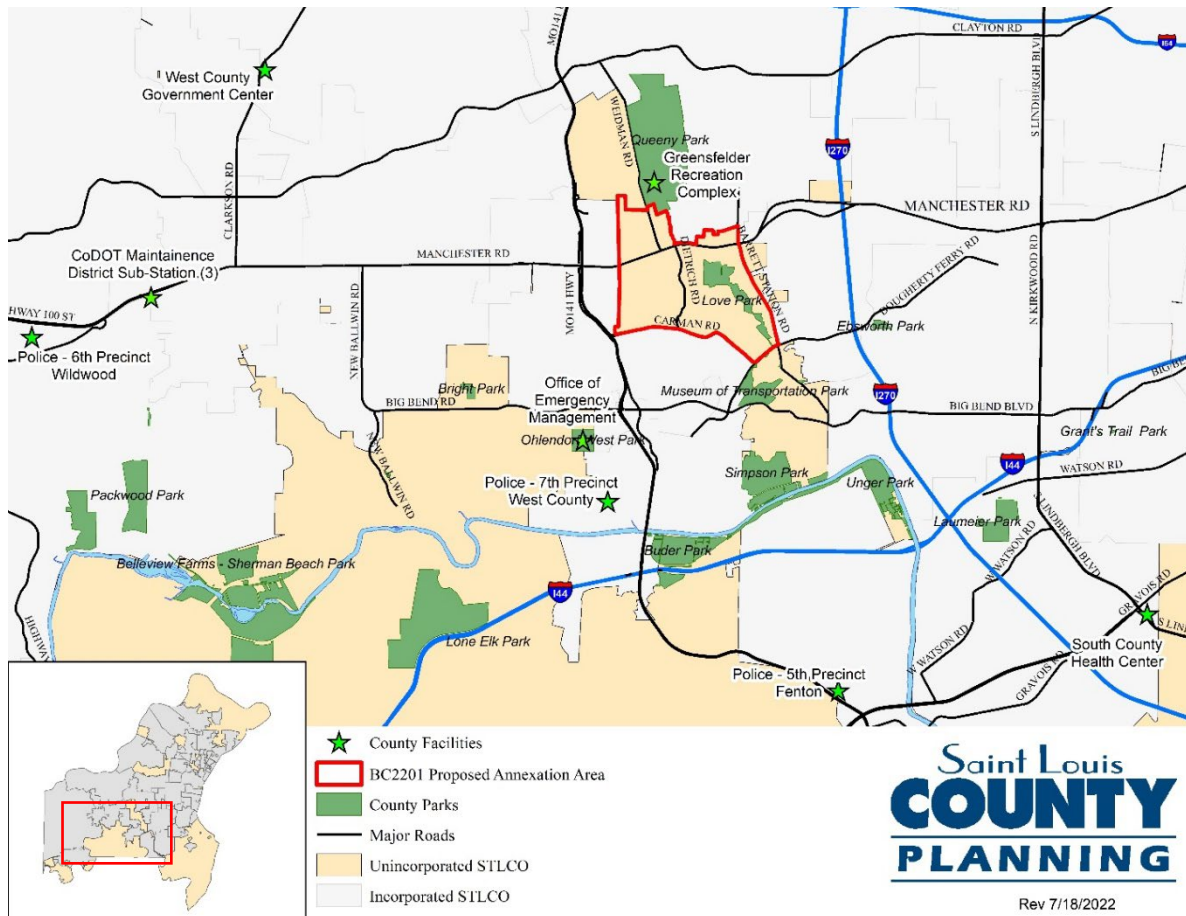
V.B. St. Louis County as a Service Provider

As one of the largest providers of local services in the state of Missouri, St. Louis County offers a full range of services to unincorporated residents (see Table 15 on page 27). In west county, the County operates the West County Government Center offering a variety of services to residents. The area is also served by the West County Police Precinct located at 232 Vance Road. There are over 165 employees in the Department of Transportation and Public Works providing road maintenance, fleet maintenance, and snow removal services for the annexation area. The County has other employees who work exclusively in west County, such as inspectors from the Office of Neighborhood Preservation. The County Parks Department maintains Love Park, located in the proposed annexation area, as well as several nearby parks including Queeny Park. Other departments serving the County residents include the Departments of Health, Human Services, and Planning. Map 10 on page 29 shows the location of County facilities located in west St. Louis County.

The size of the County creates economies of scale that allow for the County to maintain a large professional staff with the depth and breadth of knowledge to be able to provide assistance to constituents that is difficult for smaller jurisdictions to match. The City provides quality services in its own right, but these economies of scale allow for the County to provide the same or better services, and more services, at a lower cost per unit of service provision. The City employs a total of 133 full and part-time staff²³. County Transportation and Public Works alone employs more people at the maintenance stations that service the annexation area than the City employs in total. If the proposed annexation were to go through, residents of the annexation area would lose access to a number of the high-quality services that they have come to rely on from the County.

²³ [City of Manchester FY 2022 Budget](#)

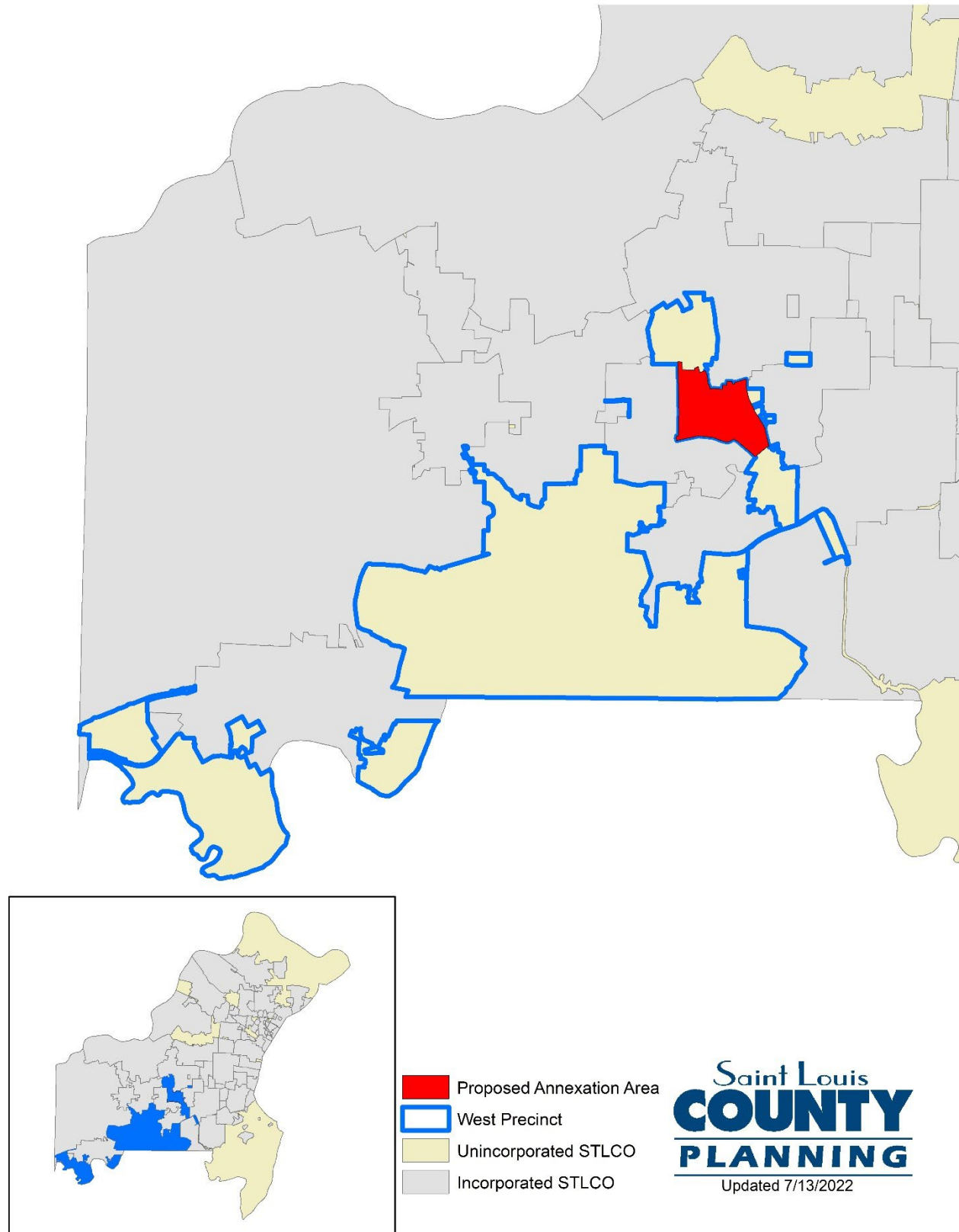
Map 10: County Facilities in West St. Louis County



V.B.i St. Louis County Police Department

The St. Louis County Police Department is the largest and highest capacity law enforcement agency in the County. It is one of only 21 agencies in the United States to receive the TRI-ARC Excellence Award, receiving triple accreditation for Law Enforcement, Public Safety Communications, and Public Safety Training Academy from the Commission on Accreditation for Law Enforcement Agencies (CALEA), an international law enforcement accrediting institution. The County Police Department has over 1,200 commissioned officers and over 300 professional staff members. The proposed annexation area is located in the West Precinct which has 80 commissioned police officers. The annexation area itself is approximately one beat – a patrol area that has 6 officers assigned to it. Map 11 on page 30 shows the proposed annexation area within the context of the West County Precinct.

Map 11: St. Louis County Police Department West Precinct



The County Police Department has a number of highly specialized divisions and units including the Bureau of Tactical Support, Special Response Unit, Metro Air Unit, Highway Safety Unit, Police Canine Unit, Crisis Intervention Team, Bureau of Community Engagement’s Community Outreach Unit, and the Division of Criminal Investigation’s Bureau of Crimes Against Persons, Bureau of Crimes Against Property, Bureau of Drug Enforcement, Bureau of Criminal Identification, and the Crime Laboratory. The full resources of the internationally accredited County Police Department are available to the residents in the proposed annexation area; many of the County’s specialized police units also frequently provide support and assistance to municipal police departments within the County.

The West County Precinct’s Neighborhood Policing Unit has extensive relationships with residents, businesses, schools, and religious institutions in the annexation area. This includes 29 Neighborhood Watch groups; a Walk-n-Talk program where officers walk one subdivision per week to meet with and hear directly from residents, an active presence on social media sites such as Facebook and NextDoor; a School Resource Officer (SRO) assigned to Parkway School District; and close relationships with Christ, Prince of Peace Catholic School and the Islamic Foundation of Greater St. Louis.²⁴ The West County Precinct has also begun special enforcements related to an overall increase in property crimes, specifically stolen vehicles and vehicle break-ins. This special enforcement activity is in addition to the officers assigned to the precinct and utilizes the services of the Bureau of Crime Against Property, Special Response Unit, K9, Commercial Vehicle Unit and Metro Air Support Unit. The Walk-n-Talk program, increased social media communication, and special enforcements have all started in the proposed annexation area and will be rolled out to all of the West County Precinct.

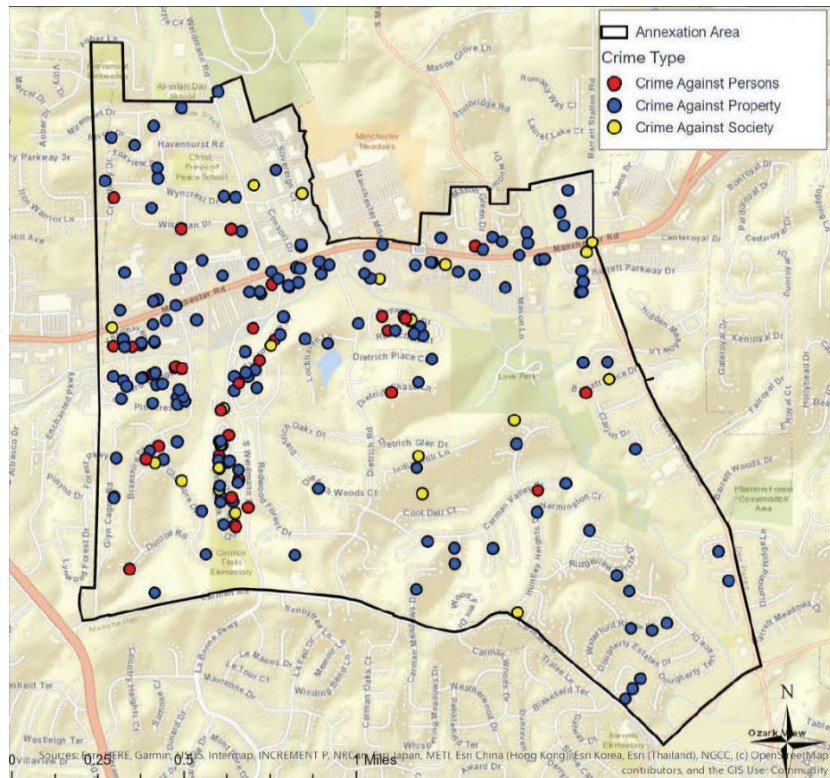
County Police respond to all calls for service; this includes when what is requested is fire or emergency medical services. The average response time for calls for service in the West Precinct for the years 2020 and 2021, as measured from “time dispatched” to “car on scene”, is approximately 1 minute and 45 seconds²⁵. The Plan of Intent presents an inaccurate representation of the way the County Police Department operates by estimating an eight minute response time as being from the West Precinct headquarters building to the annexation area. County Police officers are out on patrol in their assigned beat and responding to calls for service from where they are.

The annexation area generally experiences low crime. The majority of the crime in the area are crimes against property located along the Manchester Road corridor. Maps 12 and 13 on page 32, provided by the St. Louis County Police Department – Bureau of Research and Analysis, show the instances of crime and calls for service in the annexation area for the years 2020 and 2021.

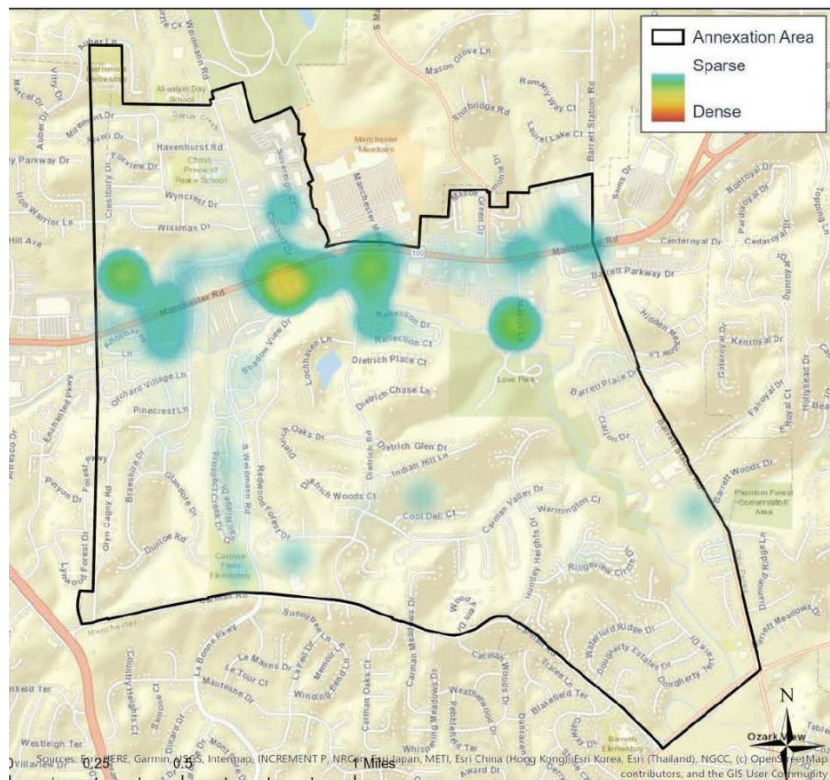
²⁴ The Islamic Foundation of Greater St. Louis, located at 517 Weidman Road, is just outside the proposed annexation area. This mosque provides religious services and is an important institution to the many Muslim citizens living in the proposed annexation area. By not including the mosque in the proposed annexation, the proposal divides the community between two different government entities. The West County Precinct has spent years establishing trust with the religious leaders at the mosques and citizens residing in surrounding neighborhoods.

²⁵ Source: St. Louis County Police Department Bureau of Research and Analysis

Map 12: 2020-2021 Annexation Area Crime Map



Map 13: 2020-2021 Annexation Area Calls for Service Map



The existing unincorporated area is able to be effectively served by the Police Department in large part because of its size. Currently, an officer centrally located in the unincorporated area can quickly respond to calls for service anywhere within their beat. By fragmenting the area covered by the County Police Department, an officer in the northern unincorporated area north of Manchester Road will take longer to respond to a call for service in the southern portion of the unincorporated area south of Dougherty Ferry Road.

If the annexation were to be approved by the Boundary Commission and ultimately voters, the County Police Department would reduce the West County Precinct staffing by six officers. The loss of two elementary schools would cause the Police Department to decrease one School Resource Officer position. It is important to note that while the positions would be eliminated, the officers would not lose their jobs, but rather be reassigned within the Police Department. The estimated cost of providing police service to the annexation area on an annual basis is approximately \$763,950²⁶; that number does not reflect a cost savings to the Department by no longer needing to respond to calls for service in the proposed annexation area because those officers and the vehicles and equipment they use would be utilized elsewhere in the County. The diminished presence of the County Police Department, and its specialized units, experienced criminal investigators, tactical operations, and international law enforcement accreditations, will have a negative impact on the citizens of the proposed annexation area and west St. Louis County in general.

V.B.ii St. Louis County Department of Transportation and Public Works

The proposed annexation area is served by the 165 employees working out of the District 2 Maintenance Station, District 3 Maintenance Station, and the Main Fleet Garage. The District 2 Maintenance Station houses 24 year-round roadway maintenance personnel and 54 employees deployed to this station for snow duty. The District 3 Maintenance Station houses 24 year-round roadway maintenance personnel and 42 employees deployed to this station for snow duty. The District 2 and District 3 Maintenance Stations combined have 5 full-time fleet maintenance employees who are collectively responsible for 376 pieces of equipment used to maintain County roads. These Department of Transportation and Public Works employees work diligently to provide excellent street and sidewalk maintenance and snow removal on the 16.39 miles of road in the annexation area that is maintained by the County. A full accounting of the roads maintained by the County in the annexation area can be found in Appendix D. Of those 16.39 miles of road maintained by the County, 12.88 miles or 79%, have a Pavement Condition Rating (PCR) of 6 or better. The PCR is a sliding scale from 1 to 10 where 10 is brand new and 1 is rubble. The 5-7 PCR range is considered good condition. The City's Plan of Intent states a desire to bring streets that the City would take over upon annexation to a PCR of 7 – only one step above the existing conditions and within the same good condition range. Appendix E lists each County maintained

²⁶ The average cost of one police officer (salary/fringe) is approximately \$106,005. The estimated usage cost, including maintenance, for one patrol vehicle is \$25,608. The average cost of 6 police officers and two vehicles required to cover one beat 24/7/365 equals \$763,950.

road in the proposed annexation area, their length, pavement condition rating, and the year and type of last improvement.

The County currently maintains 16 traffic signals²⁷, seven bridges, and eight culverts in the proposed annexation area. A list of the County maintained traffic signals, bridges, and culverts in the annexation area is provided in Appendix F. Should annexation go through, the maintenance of three of the bridges and two of the culverts would become the responsibility of the City²⁸. There are currently four planned improvements within the proposed annexation area. Table 16 details those planned improvements. The projects include road resurfacing, sidewalk installation, pedestrian improvements, and a full bridge replacement. The total investment by the County for road improvements in the annexation area is \$3,968,178. Two planned improvements, the resurfacing of Barrett Parkway and the full bridge replacement of Wyncrest Drive Bridge No. 266 would become the responsibility of the City should annexation occur before the projects are complete. The Barrett Parkway resurfacing is estimated to cost \$1,263,178 and the Wyncrest Drive full bridge replacement is estimated to cost \$993,000. In 2024, the first full year after annexation, the Plan of Intent indicates the City anticipates spending \$1,120,000 in capital improvements in the annexation area. \$1,120,000 is the total of planned expenditures from the Capital Improvement Fund and Recreation and Stormwater Improvement Fund combined. The total planned expenditure from only the Capital Improvement Fund, the fund used for street repair, sidewalk maintenance, and capital equipment for the police and public works departments, is only \$520,000 in the first full year after annexation. The County’s planned expenditures in the annexation area are more than seven times what the City has indicated they plan on spending on street related capital improvements. The County’s planned improvements for the annexation area are three and a half times more than the City’s total planned capital investment.

Table 16: Transportation and Public Works Planned Improvements in the Annexation Area

Project	Road - Limits	Road Classification	Scope	Estimated Cost²⁹
AR-1743	Weidman Rd. from Turtle Cove Dr. to Manchester Rd.	ARS	Resurfacing, pedestrian improvements at signals and intersections	\$1,662,000
AR-/CR-1818	Barrett Parkway	ARS and CRS	Resurfacing of loop road system around intersection of Manchester Rd. and Barrett Station Rd.	\$1,263,178
CR-1731	Dietrich Rd. north to Carman Rd.	CRS	Fill sidewalk gap along Dietrich Rd.	\$50,000
CR-1292	Wyncrest Drive Bridge No. 266	CRS	Full bridge replacement.	\$993,000

²⁷ All of the County maintained traffic signals are on arterial roads and would continue to be maintained by St. Louis County should the annexation occur.

²⁸ Bridges #266, #305, and #347 and Culverts C-3-431 and C-3-451 are all located on CRS (residential or subdivision streets) roads.

²⁹ The estimated cost includes design, property acquisition, and construction expenses.

The County Department of Transportation and Public Works is also responsible for snow removal on all County maintained roads which includes arterial, collector, and subdivision streets. The Department has a target of having streets cleared within 24 hours of the last snowfall. The City's Plan of Intent states that they have a 4 hour snow removal goal. It is important to note however, that the City is only responsible for snow removal of the residential streets. If annexation occurs, the County would still clear major roads including Weidman Road, Dietrich Road, Barrett Station Road, and Carman Road – important collectors that facilitate the movement of vehicles throughout this area of the County.

The proposed annexation area currently receives all of their planning and zoning, permitting, neighborhood preservation, and inspection services through the County. Almost all of these services are provided by the County to residents currently living in the City through a contract basis. Since 2016, the County has issued 3,694 permits of all types within the annexation area. Of those, 791 have required zoning approval. While the County would still issue permits to the residents and businesses in the annexation area, the City would be responsible for issuing zoning approvals that were previously issued by the County.

The City proposes to take over street lighting costs for lights in public right-of-way. In unincorporated County this cost is typically borne by the Homeowners Association or Subdivision Trustees. Multi-family developments and a number of single-family developments would not benefit from this service because their lights are on private streets, not in public rights-of-way.

Both the City's Plan of Intent and remarks made at the Public Hearing indicate that the City would consider taking over the maintenance of private streets in the annexation area based on the City's assessment criteria and process. However, that process is not detailed in the Plan of Intent and was not made clear at the Public Hearing. The County has concerns that the City is promising to use public money for the maintenance of private property as an incentive to residents in the annexation area that live on private streets. If the City does in fact take over the maintenance of these private streets without ensuring current residents on private streets in the annexation area pay the significant expense of bringing those streets to public standard, then it will be existing residents of the City who will be shouldering the majority of that cost.

V.B.iii St. Louis County Parks Department

If annexed, residents of the area would have access to the City's recreation facilities at reduced rates from what they would pay now. However, the City has not proposed the addition of parks and recreation facilities in the area. The annexation area is home to Love Park, an 84-acre park with several amenities including a playground, athletic fields, trails, and two reservable shelters. Love Park will remain a County park. Since the 2004 annexation proposal, the County has completed several improvements to Love Park including the replacement of the playground surface in 2021; new playground equipment in 2007 at the cost of \$104,831; lighting conversion to LED for the interior and exterior of restrooms and both shelters in 2019; and asphalt overlays on the roads and parking lots.

The County Parks Department also owns and maintains Queeny and the Greensfelder Recreation Complex, immediately north of the proposed annexation area. County Parks manages over 12,700 acres across 75 parks and trails. There are programs and activities scheduled year-round across the entire County parks system. County Parks also maintains three golf courses and six recreation complexes with amenities including pools, sport courts, and ice rinks. The entirety of the County park system will remain available to anyone who wishes to enjoy them.

The Plan of Intent repeatedly states that the City has interest in maintaining and investing in Love Park, but in order to do so the City would need ownership of the park. The County has no interest in selling a valuable part of the County parks system. Love Park will continue to be a County park if the annexation were to succeed.

V.B.iv St. Louis County Department of Public Health

The County Department of Public Health provides many services county-wide, including to the proposed annexation area and the City. Most people are familiar with the excellent work the County’s Department of Public Health has done over the past two years combatting the Covid-19 virus. There are several, often overlooked but important, services that the Department provides. The County Department of Public Health currently provides vector control services – rat control and mosquito fogging – and animal control services to residents of the proposed annexation area and residents of the City. Those services will continue no matter what happens with the annexation proposal.

Another important service facilitated by the County Department of Public Health is waste collection. Both County and City contract with private companies to provide waste collection services. Table 17 provides a comparison of the waste collection costs for residents of the annexation area and for residents of the City.

Table 17: Comparison of Waste Collection Service Cost

	St. Louis County	Manchester
Monthly Cost	\$15.50	\$19.42
Subsidy	---	\$13.42
Cost to Resident	\$15.50	\$6.00

The annexation area is part of County Trash District 4; the service provider for Trash District 4 is Waste Connections³⁰. The current contract period is for the years 2022-2027. The monthly costs in year one (2022) is \$15.50 and in year 5 (2027) the monthly cost is \$17.45. This monthly cost includes once per week household waste, once per week recyclables, once per month bulky item pickup, and three seasonal yard-waste pickups. There is also a 10% senior discount available. Optional services include weekly yard-waste pickup service; yard-waste pickup can be subscribed to quarterly.

³⁰ The terms of the contract with Waste Connections for Trash District 4 can be found in Appendix G.

The Plan of Intent states that the waste collection cost for City residents is \$6 per month and asserts that residents of the annexation area will pay less for waste collection if annexation succeeds. The waste collection cost for City residents is only \$6 per month because the City subsidizes the majority of the waste collection cost; the true cost of waste collection in the City is \$19.42. There is no guarantee that future City Councils in Manchester will continue to authorize the subsidy of waste collection. Furthermore, the subsidy is funded through the taxes paid by City residents. There is no true cost savings to the resident, and this is especially true of residents in the annexation area who will experience an increase in taxes if annexed. The assertion in the Plan of Intent that the waste collection service provided through the City’s contract is less expensive obfuscates the true cost.

The City states in the Plan of Intent that a benefit to residents of the annexation area is that the City hosts regular electronic recycling events open to all County residents. The implication of this statement is that the City is providing this service. These electronic recycling events are funded by the County Department of Public Health, not by the City. These events are hosted throughout the County at various different dates throughout the year.

V.C. Services Not Affected

Both the proposed annexation area and the City are served by West County EMS Fire Protection District, which is an independent taxing jurisdiction that will not be affected by annexation. Thus, residential property owners will continue to pay the \$1.0560 per \$100 of assessed valuation and commercial property owners would continue to pay \$1.2240 per \$100 of assessed valuation for fire protection services.³¹ The rate for personal property for households and businesses was \$1.3200 per \$100 of assessed valuation.³²

The Missouri American Water Company and the Metropolitan St. Louis Sewer District will continue to provide water and sewer services respectively. The proposed annexation area will continue to be served by the Parkway School District and the St. Louis County Library system, an independent taxing jurisdiction that is not part of County government. All of the aforementioned services will not be affected by annexation.

V.D Impact on County Service Provision

The County currently is able to reasonably access the large unincorporated area that is proposed to be broken up by the annexation. The County provides quality and efficient local services to the existing unincorporated area and the annexation area benefits from being part of a large, contiguous unincorporated community.

It is important to note that the County’s provision of services to the two unincorporated areas to the north and south of the annexation area and the three unincorporated pockets to the east of the

³¹ 2021 St. Louis County Rate Book.

³² 2021 St. Louis County Rate Book.

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annexation area would be greatly affected by the proposed annexation. The proposed annexation would disrupt County service provision in the unincorporated area by incorporating the middle one-third of a large unincorporated area that is completely surrounded by municipalities. The annexation would remove 61% of the population and 41% of the land area that the County currently shares between Town and Country, Des Peres, and Kirkwood on the east and Ballwin, Manchester, and Valley Park on the west. The two largest unincorporated areas created by this annexation would be separated by a distance of approximately 2.85 miles (shortest driving distance) and would require passing through municipalities between the two areas. This fragmentation of the County service area would mean a significant loss of the economies of scale, including a diminished police presence and a corresponding decrease in police response time due to reduce staff for the area and the physical distance between the remaining unincorporated areas.

VI. Summary of Issues

VI.A Compactness and Boundary Issues

Although the proposed annexation is geographically reasonable for the City, it creates very awkward boundaries for the County and surrounding residents. In addition, the remaining County service area would be noncontiguous leading to difficulties and inefficiencies in service delivery.

This annexation would take roughly the middle third of an unincorporated area that extends from the northern end of Queeny Park on the north to the Meramec River between Kirkwood and Valley Park on the south. The proposed annexation would create 5 separate unincorporated areas, three of which would be legally classified as unincorporated pockets, that are completely surrounded by municipalities, isolated from one another and the rest of unincorporated County.

VI.B Impact on Annexation Area Residents, Property Owners, and Businesses

Annexation by the City would have a negative financial impact on the residents, property owners, and businesses in the annexation area that is obfuscated in the Plan of Intent. The true costs to residents and property owner are not clearly presented in the Plan of Intent. The increased costs to businesses are absent altogether. The City’s attempt to entice support of the proposed annexation among the affected unincorporated residents includes a promised property tax rebate, the legality of which is disputed, creates confusion around the true property tax rate, and will present difficult administrative challenges to City staff.

By proposing this annexation, the City is seeking to supplant the County as the local government service provider for those residents and businesses in the annexation area. The City will need to extract additional property taxes at a rate that is 75% higher for residents, 67% higher for businesses, and 63% higher for personal property to provide the same services the County currently provides. Table 18 illustrates the increase in taxes by the local government jurisdiction to fund local government services.

Table 18: Percent Increase of Property Taxes for Local Government Services

Taxing Jurisdiction	Residential	Commercial	Personal Property
St. Louis County	0.4180	0.4670	0.5230
Manchester	0.3150	0.3150	0.3300
Total	0.7330	0.7820	0.8530
Percent Increase	75%	67%	63%

Local sales taxes would increase from one percent (1%) to two and one quarter percent (2.25%) with the addition of the City’s local option sales tax, capital improvements sales tax, and park and stormwater sales tax. All shoppers in the annexation area will see an increase in sales tax paid. The biggest impact for annexation area residents and businesses will be felt when they purchase automobiles, recreational vehicles, watercraft, and the like. With the average new car price in

excess of \$45,000, residents of the annexation area will pay hundreds to thousands more in sales tax on these purchases.

Commercial property owners will be subject to the additional property tax levied by the City. Businesses will also be subject to a merchant license fee based on annual gross receipts. This is a cost that businesses do not currently budget for as there is no merchant license fee in the County outside of the nominal \$5 flat rate. Given the City's, like many other surrounding municipalities, reliance on sales tax, this annexation may do more to address the City's financial standing than to benefit residents of the annexation area.

Some residents, as evidenced at the Public Hearing, seem to have expectations regarding City takeover of private streets. Comments made at Public Hearing implying the City would adopt private streets, carte blanche, appear to be in contradiction of statements in the Plan of Intent and City policy. Most streets in multi-family developments and some streets in single-family developments are private and would not be taken over by the City without being brought to City standard. If the residents on these streets are to pay for the improvement of the street to City standard, it would likely be a shock to them, both in the cost and the seeming discordance between what was promised to them by City officials and reality. If the City were to adopt these streets without requiring they be brought to City standard, the existing residents of the City would be left shouldering the lion's share of that cost.

VI.C Impact on St. Louis County

The total annual revenue loss that the County could experience as a result of the proposed annexation is estimated to be \$2,838,379. The County would be left with five smaller, more difficult to serve unincorporated areas that could not be reached from another without passing through municipalities. The County would lose economies of scale and would not be able to make corresponding reductions to serve the area in proportion to the loss of revenue.

The cumulative effect of large annexations such as the one proposed is to reduce County revenue and fragment service provision, eroding the County's economies of scale. Meanwhile, the cost of County assistance to municipalities such as the provision of specialized police services and the maintenance of major arterial and collector roads would be shifted onto an increasingly smaller unincorporated tax base. This is a reason that the State legislature created the Boundary Commission; to ensure that annexation proposals would be fair and balanced for all parties – the City, County, and surrounding residents.

VI.D Impact on Remaining Unincorporated Area Adjacent to Annexation Area

This proposed annexation would clearly not be beneficial to the residents of the five unincorporated orphans that would remain to the north, south, and east of the annexation. The City argues that there will be no impact on the County's service delivery to these remaining unincorporated areas because the County would still have access to all of the roads that they currently have access to. However, these areas would be more difficult for the County to serve because they will be physically separated from the rest of unincorporated County and they will

suffer slower response times for services. Their likelihood for future annexations to neighboring municipalities would be reduced by the fact that the City would have already annexed the most productive commercial properties along Manchester Road, leaving no way for a municipality to offset the increased cost of providing services to these largely residential areas. They would share with the other unincorporated communities throughout the County the problem of how to finance services to the County's more fragmented service area with a reduced tax base.

VI.E Impact on Annexing Municipality

The City would see an increase in revenue by annexing this area; approximately \$4.8 million in the first full year after annexation by County estimates. The annexation would allow them to spread the expense of future bond issues over a larger population. The City would have a significant new commercial and industrial area from which to draw revenues and shore up their sales tax stream as the economy increasingly turns towards ecommerce and flexible work routines.

VII. Recommendation of St. Louis County

The County strongly opposes this proposed annexation. The proposed annexation is not in the best interests of the area to be annexed nor is it in the best interest of the adjacent unincorporated areas and the County as a whole for the following reasons:

- Residents, businesses, and property owners in the affected area will experience significant and unnecessary tax and fee increases.
- The annexation would result in the fragmentation of an unincorporated area that is now efficiently and effectively served by the County.
- Residents of adjoining unincorporated areas north, south, and east of the annexation area would be particularly disadvantaged by the fragmentation of the County's service area; it would be more difficult for the County to maintain prompt service to those areas.
- The City would reap an unreasonable estimated annual windfall of at least \$4,000,000 to \$5,000,000 if this annexation were approved. That amount represents the revenue that will be generated within the annexation area from the City's additional taxes and fees.
- The County would experience an estimated annual revenue loss of \$2,838,379 as a result of this annexation. This would erode the ability of taxpayers to benefit from the economies of scale the County is able to bring to bear in providing efficient and effective regular and specialized local and countywide services to its residents.

Fundamentally, the question before the Boundary Commission is whether or not the proposed annexation is balanced and beneficial for all parties. The County finds that it does not benefit the residents in the annexation area, the residents in the immediately surrounding unincorporated areas to remain after annexation, or the other approximately 305,000 residents of unincorporated County that will see increasing difficulties in service provision from their local government that results from the continued incorporation of the County.

The County believes that the requested annexation is unbalanced, providing benefits to the annexing municipality at the expense of the residents, property owners, and businesses of the annexation area, the adjoining unincorporated area, and the rest of the residents of the County, both those living in municipalities and those living in unincorporated County. Thus, St. Louis County recommends the Boundary Commission disapprove this proposal.

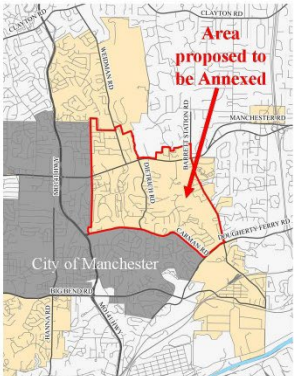
Appendix A – St. Louis County Department of Planning Public Outreach

The Department of Planning highly values public input and ensuring that all stakeholders are aware of governmental circumstances that affect their home, work, and enjoyment in St. Louis County. Subsequent to the Boundary Commission’s Public Hearing on June 29, 2022, the Department of Planning prepared a video presentation describing the process and potential impacts of annexation, with the intention of reaching the residents and business owners in the proposed annexation area who may be unaware of the pending proposal. To ensure residents were fully informed, the presentation also included links to the Plan of Intent and the Boundary Commission’s recording of the Public Hearing.

Front:

Saint Louis COUNTY PLANNING 41 S. Central, 5th Fl.
Clayton, MO 63105

The City of Manchester is attempting to annex your property.



Current Resident
or Property Owner

ADDRESS
CITY, STATE
ZIP

Back:


The City of Manchester wants to annex your property.

The St. Louis County Boundary Commission is considering an annexation proposal by the City of Manchester. The 1,466 acre annexation area is home to 6,549 residents, 2,865 housing units, Love Park, and Pierremont and Carman Trails Elementary Schools.

St. Louis County Planning Department wants to make sure your voice is heard! Scan the QR Code or visit the link below to hear Acting Director of Planning Jacob W. Trimble, AICP describe the process, actions taken so far, and the impact the annexation could have on you.

CALL TO ACTION:

1. Watch the informative presentation at <https://tinyurl.com/STLCO-BC2201>
2. Contact the Boundary Commission to provide comments and concerns by **7/19/22**.



For additional information please contact the Department of Planning at (314) 615-2520, (314) 615-5467 (TTY - for the hearing impaired), or Planning@stlouiscountymo.gov.

Appendix B – Letter from County Executive to Boundary Commission



OFFICE OF THE COUNTY EXECUTIVE

SAINT LOUIS COUNTY
41 SOUTH CENTRAL AVENUE
SAINT LOUIS, MISSOURI 63105

SAMPAGE
COUNTY EXECUTIVE

July 14, 2022

(314) 615-7016

Steve Wegert
Chairman, St. Louis County Boundary Commission
225 South Meramec Avenue Suite 821T
Clayton, Missouri 63105

Dear Chairman Wegert:

More than anything, residents want to feel safe in their communities. Businesses want to open and expand in a community where public safety is a priority.

That's why St. Louis County is the choice of more than 1 million residents and more than 30,000 businesses.

Having one of the best trained, best equipped Police Departments is a long-standing priority of St. Louis County, resulting in a department with three international accreditations, including for its training academy and dispatch services.

Our residents and businesses have come to expect a responsive, professional department, and those trained to protect and serve are doing exactly that.

Homicides investigated by St. Louis County Police are down 15 percent, aggravated assaults with firearms are down 13 percent, and overall crimes against persons is down more than 6 percent, compared to a year ago.

When some of our residents are at risk of losing quality county services, it's important that we pause and remind everyone just what St. Louis County government provides.

If the unincorporated area is annexed by the city of Manchester, those living there would no longer have the St. Louis County Police Department for law enforcement.

The average response time to a call in the proposed annexed area is one minute and 45 seconds.

Residents and businesses there would lose the long, extensive relationship they have with the West County Precinct Neighborhood Policing Unit.

That includes working with the 29 neighborhood watch groups and the walk-and-talk program, where officers walk one subdivision per week to meet with residents.

The County Police Department also provides a resource officer for the Parkway School District.

St. Louis County spends about \$166 million a year on policing, representing 48 percent of the general fund budget.

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This allows our Police Department to offer highly specialized services that smaller communities cannot match.

This includes the Bureau of Crimes Against Property, Bureau of Crimes Against Persons, Commercial Vehicle Unit, Highway Safety Unit, Metro Air Support Unit, Tactical Operations, and the K9 Unit.

The county continues its commitment to investing in public safety. Earlier this year, I signed into law a bill passed by the council to invest \$4 million to upgrade the police department's 20-year-old 911 dispatch system.

And the county is spending nearly \$38 million to build new police precincts in North County and Affton.

Last week, Gov. Parson signed the state budget. It includes \$23 million for a regional real-time crime surveillance center, an evidence storage facility, and firearm and canine training complex.

While public safety certainly includes law enforcement, keeping the public safe is much broader reaching. It includes keeping trash picked up and streets repaired.

In the unincorporated area that Manchester is eyeing, the county maintains more than 16 miles of roads. County Public Works and Transportation provides repairs and snow removal that residents have come to rely on.

For the city to provide the same level of services to those in the unincorporated area, that will mean more costs to those living there with no guarantee those new services will be as good as what they have now.

The proposed new boundaries will create islands of unincorporated St. Louis County, making it more challenging to provide police service.

To replace the services St. Louis County now offers, residents of Manchester will see an increase in taxes, but not necessarily an improvement in services. For St. Louis County, the annexation would result in about \$2.7 million a year in revenue loss, based on early projections.

I respectfully ask the Boundary Commission to reject this proposal so the residents in the unincorporated area can continue receiving the quality services from St. Louis County that they enjoy and expect.

Sincerely,



Sam Page

Appendix C – Letters from Departments to Boundary Commission

ST. LOUIS COUNTY POLICE DEPARTMENT

Colonel Kenneth L. Gregory
Chief of Police



(314) 615-4260
FAX (314) 615-7065

OFFICE OF THE CHIEF OF POLICE
7900 Forsyth Boulevard
St. Louis, Missouri 63105

July 18, 2022

Mr. Jacob Trimble
Acting Director of Planning
41 South Central Avenue
St. Louis, Missouri 63105

Dear Mr. Trimble:

Over the past several months, the spike in violent crime in some of America's largest cities has been well documented by the national media. Some cities experiencing a 10 percent increase in violent crime, some more. In St. Louis County however, we have seen decreases in the number of homicides and assaults involving firearms, down 15 and 13 percent respectively. In addition, aggravated assaults with other dangerous weapons are down 25 percent. Overall robberies down 18 percent.

One of the major spikes in nonviolent crime not only locally but nationally has to deal with larcenies. Many of them involving vehicles. Larcenies in St. Louis County are down 7 percent overall, and 20 percent in the West County Precinct alone.

The St. Louis County Police Department is comprised of over 1200 men and women whose tireless work helps to keep our communities safe.

We are a tri-arc accredited agency through CALEA, with accreditations in the areas of law enforcement, communications, and our training academy.



“Committed to Our Citizens Through Neighborhood Policing”



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Mr. Jacob Trimble
Page Two
July 18, 2022

Engaging with the citizens we are sworn to protect is the catalyst and future of policing, and I believe the St. Louis County Police Department is at the forefront of community policing. The efforts Captain Tanner and the men and women of the West County Precinct put forward daily show the level of commitment our department gives to the citizens of St. Louis County.

The West County Precinct has established 29 Neighborhood Watch groups in the proposed annexation area alone. Since April of this year, the West County Neighborhood Policing Office is attending up to three meeting per week to better engage the people we are sworn to protect. Captain Tanner has initiated three new programs in the annexation area and has furthered that throughout the entire precinct.

Walk and Talks, where police officers become involved in neighborhoods, to hear citizens' concerns and expectations from their police department.

The use of social media communication on platforms like Facebook and Nextdoor, where the department can immediately respond to questions regarding crime in specific neighborhoods.

And finally, special enforcement, focusing proactive, coordinated patrols to lower the crimes the west county area experiences the most, stolen vehicles and vehicle break ins.

The men and women of the St. Louis County Police Department take pride in the communities we serve, and due to the level of commitment we give to the citizens, St. Louis County is a safer place to live and work.

Sincerely,



COLONEL KENNETH L. GREGORY
Chief of Police

KG:dw
0722151

BC2201 – City of Manchester Annexation
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Sam Page
County Executive



Stephanie Leon Streeter, P.E.
Acting Director

Joseph W. Kulesa, P.E.
Acting Deputy Director

July 18, 2022

Steve Wegert, Chairman of the St. Louis County Boundary Commission
c/o Michelle Dougherty, Executive Director
225 South Meramec Avenue, Suite 821T
Clayton, Missouri 63105

RE: Manchester Annexation Opposition

Dear Mr. Wegert:

The St. Louis County Department of Transportation and Public Works is in opposition to the proposed annexation by the City of Manchester. Our department is committed to maximizing the impact of every taxpayer dollar and the equitable distribution of services to the residents of St. Louis County. To that end, the department employs a large team of dedicated and experienced civil servants committed to the needs of our residents.

When inclement winter weather descends on the region, we are ready! We don't simply deploy our maintenance staff to combat winter storms; we mobilize staff from nearly every department to ensure the safety of the public. Staff is ready 24 hours a day, 7 days a week to ensure our community keeps moving. We focus first on the roadways which are essential for regional connectivity, and then on to less traveled roads. This practiced and well tested method of snow removal maximizes public safety and minimizes delays for the traveling public.

The department is also planning for a bright future! We recognize that projects to rehabilitate our roads and bridges are necessary for the health of the region. Equally necessary are projects which create multimodal connectivity which will bring more opportunity and alternatives to our region's transportation network. As evidence, the department published an Action Plan for Walking and Biking and is actively programming projects recommended in the study.

Our construction program further supports our strategic priority to rebuild our aging infrastructure while enhancing mobility and connectivity throughout St. Louis County. Our experienced construction staff ensures taxpayer investment produces high-quality, long-lived improvements. These projects and programs include arterial road maintenance, collector road maintenance, subdivision street maintenance, bridge rehabilitation, traffic signal reconstruction, sidewalks, trails, bicycle facilities, transit improvements, and Americans with Disabilities Act (ADA) upgrades.

To turn our plans into reality, the department works tirelessly to obtain funding from all possible sources for all candidate projects to maximize our ability to provide a safe, flexible, efficient, and well-maintained transportation system. This includes the utilization of federal funding programs such as the Surface Transportation Program (STP), Congestion Mitigation and Air Quality Program (CMAQ),

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Steve Wegert, Chairman of the St. Louis County Boundary Commission
July 18, 2022
Page 2

Transportation Alternatives Program (TAP) and the Highway Bridge Program (HBP) whenever prudent. We will continue to be diligent in marketing our needs to leverage alternative funding.

The department strongly feels our ability to accomplish our mission will be diminished should the City of Manchester be allowed to proceed with their proposed annexation. The annexation will create discontinuous pockets of unincorporated St. Louis County which reduce the efficiency of our maintenance and snow removal operations. Additional regional segmentation will diminish our ability to plan for and construct a comprehensive and inclusive transportation network. Finally, the financial loss to County activities will be felt by less prosperous communities as we will have fewer resources with which to balance our programs.

Thank you for your consideration.

Sincerely,



Stephanie Leon Streeter, P.E.
Acting Director

SLS:JWK

cc: Jacob Trimble, AICP, Acting Director, Department of Planning

BC2201 – City of Manchester Annexation
St. Louis County Comments

Sam Page
County Executive



Dr. Faisal Khan
Acting Director

Kate Donaldson
Deputy Director

July 18, 2022

Steve Wegert
Chairman of the St. Louis County Boundary Commission
c/o Michelle Dougherty, Executive Director
225 South Meramec Avenue, Suite 821T
Clayton, Missouri 63105

Dear Mr. Wegert,

I am writing on behalf of the St. Louis County Department of Public Health to inform you about the potential impact of the plans by the City of Manchester to annex a part of unincorporated St. Louis County.

There are two programs within the Department of Public Health whose services will be impacted by this proposed annexation: The Trash Districts Program and The Vector Control Program.

The area being considered for annexation is part of St. Louis County Trash District 4. Annexation would remove approximately 2,855 households currently serviced under the trash district contract from the unincorporated St. Louis County. This will impact the operations of Republic Services, the current contracted trash hauler. The City of Manchester contracts with Waste Connections and would presumably want to bring the annexed households under their contract. They would need to coordinate that effort with the haulers concerned. Our primary concern is the potential increase in service fees for the households impacted. The current contract cycle does not allow for any special exemptions or choice for households served.

The Vector Control Program performs a critical disease prevention service by controlling the spread of mosquito populations. The program has a contract with the City of Manchester. Therefore, the sites that exist within the unincorporated section that the City of Manchester is looking to annex would simply transfer to the existing contracted list of Manchester routes and they would then be billed for those additional services. The financial impact is on the City of Manchester.

Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Faisal Khan".

Faisal Khan, MBBS, MPH
Acting Director

Cc: Jacob Trimble, Acting Director Planning, St. Louis County

BC2201 – City of Manchester Annexation
St. Louis County Comments

Dr. Sam Page
County Executive



Thomas M. Ott
Director of Parks & Recreation

July 13, 2022

Steve Wegert, Chairman of the St. Louis County Boundary Commission
c/o Michelle Dougherty, Executive Director
225 South Meramec Avenue, Suite 821T
Clayton, Missouri 63105

Dear Mr. Wegert:

The St. Louis County Park Department came into existence with the adoption of the St. Louis County Charter in 1950. Our first park was Creve Coeur Park, dedicated as a war memorial shortly after World War II. Over the next several decades the department kept adding parks from either private land donations or purchases of property through the use of bond issue funds.

Love Park came to St. Louis County as a donation from John and Mary Love. The Love family started acquiring and donating parcels in 1959 and finished by the mid 1960's. The park was dedicated in October, 1968. The park has two shelters, a playground, an athletic field, a cricket field and two restrooms. Love Park today is cherished by those who live nearby as a neighborhood park, but it also sees regular use from people outside of the neighborhood with its easy access off of Manchester Road. Love Park gets regular daytime use from the early morning walkers, playground users from the spring through fall, lunch time visitors to evening soccer or baseball practices or games. On the weekends the park shelters are rented out on a regular basis for family reunions, birthday parties and gatherings.

Today, the St. Louis County Park Department is 72 years old and has grown to 75 parks with 12,700 acres. Our regional park system offers 166 miles of trails for people to explore, six recreation complexes (Greensfelder Recreation Complex is next door in Queeny Park), six cultural sites, three golf courses, 65 athletic fields, 44 playgrounds, 78 picnic shelters and 400 plus recreational programs annually. As you can see we have a lot to offer the residents of St. Louis County. The Park Department is a very active part of our residents' lives with over 12 million visitors annually. For these reasons I would ask that you consider keeping our St. Louis County jurisdiction intact.

Please let me know if I can be of any further assistance.

Sincerely,

A handwritten signature in black ink that reads "Thomas Ott".

Thomas Ott
Director, St. Louis County Parks and Recreation Department

cc: Jacob Trimble, Acting Director, Planning

Saint Louis County Parks - Administration
41 S. Central Avenue, 5th Floor • Clayton, MO 63105 • PH 314-615-PARK • FAX 314-615-4696
<https://www.stlcountyparks.com>

BC2201 – City of Manchester Annexation
St. Louis County Comments

Sam Page
County Executive



Jacob W. Trimble, AICP
Acting Director of Planning

July 19, 2022

Steve Wegert, Chairman of the St. Louis County Boundary Commission
c/o Michelle Dougherty, Executive Director
225 South Meramec Avenue, Suite 821 T
Clayton, Missouri 63105

Dear Mr. Wegert:

The mission of the Department of Planning is to foster healthy communities by guiding development and reinvestment, developing long-range plans, promoting citizen engagement, and using data and information technology to guide public policy. The Department of Planning provides both countywide services as well as local services to the unincorporated areas of St. Louis County, which accounts for roughly one-third of the population, and one-third of the land area of the entire County. As such, the Planning Department covers the largest jurisdiction by land area and population of any local government planning agency in the St. Louis region.

The Department of Planning prides itself on providing professional and timely service to residents, business owners and developers, as well as elected and appointed officials. Full-time staff includes a director, two managers, a senior planner, four planners, two planning technicians, and an office supervisor. The Department has the capacity and professional experience to service all portions of Unincorporated St. Louis County. Additionally, the County is preparing to undergo an extensive update to the General Plan, which would look at the existing built environment of St. Louis County, assess our strengths and weaknesses, and recommend a buffet of policy and regulatory changes to better align our codes with our desired outcomes. The plan effort would focus its deep analysis on unincorporated County, but all portions of the County are intertwined. The Department expects to increase capacity for service provision even further after the Plan is adopted.

The Department proudly serves the more than 10,000 residents of the unincorporated area where the annexation is proposed. For the past 60 years, the Department of Planning has shepherded hundreds of requests for changes in zoning and special procedures through the Planning Commission process, and reviewed even more Site Development Plans for new businesses and redevelopments in the 3,571 acre community containing the proposed annexation area. The Department of Planning has also facilitated the development of dozens of residential subdivisions. This thriving community is a reflection of the County's ongoing relationships with residents, property owners, and developers, and of our shared aspirations.

Based on the above considerations, the Department of Planning is opposed to the annexation by the City of Manchester. Please let me know if I can be of any further assistance.

Regards,

A handwritten signature in black ink that reads "J. Trimble".

Jacob W. Trimble, AICP | Acting Director of Planning

Appendix D – Taxing Jurisdiction Percentage of Overall Tax Bill

Taxing Jurisdiction Percentage of Overall Tax Bill						
Taxing Jurisdiction	Residential		Commercial		Personal Property	
	Before Annexation	After Annexation	Before Annexation	After Annexation	Before Annexation	After Annexation
State of Missouri	0.42%	0.41%	0.35%	0.34%	0.37%	0.35%
St. Louis County	5.92%	5.66%	5.44%	5.25%	6.43%	6.18%
St. Louis Community College	3.95%	3.78%	3.25%	3.13%	3.43%	3.30%
Special School District	14.38%	13.77%	11.84%	11.42%	12.50%	12.01%
Metro. Zoological Park & Museum District	3.48%	3.33%	2.86%	2.76%	3.02%	2.90%
Dev. Disability – Productive Living Board	1.01%	0.96%	0.98%	0.94%	1.11%	1.06%
County Library	2.92%	2.79%	2.73%	2.63%	3.20%	3.07%
Parkway School District	51.51%	49.31%	57.08%	55.06%	52.42%	50.38%
MSD	1.47%	1.41%	1.21%	1.17%	1.28%	1.23%
Fire- West County EMS	14.95%	14.31%	14.26%	13.76%	16.24%	15.61%
Manchester	---	4.27%	---	3.54%	---	3.90%
	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

Appendix E – Streets in the Proposed Annexation Area

Street Name	Functional Class	From Street	To Street	Length(mi)	PCR	Last Improvement
Dietrich Road	Urban Collector - CRS2	Lochhaven Lane	Manchester Road	0.27	6	N/A
Dietrich Road	Urban Collector - CRS2	Carman Road	Lochhaven Lane	0.81	6	N/A
Barrett Station Road	Urban Collector - CRS2	EOM at City Limits of Town & Country	Manchester Road	0.21	4	2022 AR/CR-1818 Barret Parkway Area Improvements
Barrett Glen Court	Urban Local - CRS	Barrett Station Road	Thru Turnaround	0.09	7	2015 Crackseal County Forces
Cassandra Marie Drive	Urban Local - CRS	Barrett Station Road	Clarjon Drive	0.1	9	2017 Concrete Relacement w/ Crackseal
Clarjon Drive	Urban Local - CRS	Thru Turnaround	EOM at Terminus	0.32	9	2017 Concrete Relacement w/ Crackseal
Barrett Springs Drive	Urban Local - CRS	Barrett Station Road	Thru Turnaround	0.22	9	2015 Concrete Replacement w/ Crackseal
Barrett Springs Court	Urban Local - CRS	Barrett Springs Drive	Thru Turnaround	0.06	9	2015 Concrete Replacement w/ Crackseal
Hidden Meadow Lane	Urban Local - CRS	Barrett Station Road	Thru Turnaround	0.19	9	2016 Concrete Replacement w/ Crackseal
Hidden Meadow Lane	Urban Local - CRS	2500 Hidden Meadow Lane	2520 Hidden Meadow Lane	0.03	9	2016 Concrete Replacement w/ Crackseal

BC2201 – City of Manchester Annexation
St. Louis County Comments

Street Name	Functional Class	From Street	To Street	Length(mi)	PCR	Last Improvement
Barrett Place Court	Urban Local - CRS	Barrett Place Drive	Thru Turnaround	0.06	9	2016 Concrete Replacement w/ Crackseal
Barrett Place Drive	Urban Local - CRS	Barrett Station Road	Thru Turnaround	0.22	9	2016 Concrete Replacement w/ Crackseal
Mason Lane	Urban Local - CRS	Manchester Road	Thru Turnaround (Park Entrance)	0.45	7	N/A
Berringer Place	Urban Local - CRS	Carman Valley Drive	Thru Turanround	0.05	4	N/A
Carman Valley Drive	Urban Local - CRS	Dietrich Road	Thru Turnaround	0.11	6	N/A
Braeshire Drive	Urban Local - CRS	Manchester Road	Pinecrest Lane	0.29	6	2017 Crackseal
Braeshire Drive	Urban Local - CRS	Pinecrest Lane	Dunloe Road	0.52	6	2017 Crackseal
Dunloe Road	Urban Local - CRS	EOM at Terminus	EOM at Terminus	0.34	6	2017 Crackseal
Glandore Drive	Urban Local - CRS	Dunloe Road	Braeshire Drive	0.36	6	2017 Crackseal
Wicklow Road	Urban Local - CRS	Braeshire Drive	EOM at Terminus	0.09	6	2017 Crackseal
Carman Meadows Drive	Urban Local - CRS	Carman Road	Thru Turnaround	0.24	9	2019 Concrete Replacement w/ Crackseal
Carman Meadows Drive	Urban Local - CRS	655 Carman Meadows Drive	643 Carman Meadows Drive	0	9	2019 Concrete Replacement w/ Crackseal
Carman Ridge Court	Urban Local - CRS	Huntley Hieghts Drive	Thru Turnaround	0.17	6	N/A
Indian Hill Lane	Urban Local - CRS	Dietrich Road	EOM at Terminus	0.17	7	N/A
Indian Hill Court	Urban Local - CRS	Indian Hill Lane	Thru Turnaround	0.06	7	N/A
Dietrich Glen Drive	Urban Local - CRS	Dietrich Road	Thru Turnaround	0.27	7	N/A
Dietrich Glen Drive	Urban Local - CRS	1500 Dietrich Glen Drive	1512 Dietrich Glen Drive	0	7	N/A

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Street Name	Functional Class	From Street	To Street	Length(mi)	PCR	Last Improvement
Dietrich Oaks Drive	Urban Local - CRS	Dietrich Road	Thru Turnaround	0.55	7	N/A
Dietrich Oaks Drive	Urban Local - CRS	1405 Dietrich Oaks Drive	1401 Dietrich Oaks Drive	0	7	N/A
Dougherty Terrace	Urban Local - CRS	Dougherty Estates Drive	Thru Turnaround	0.56	6	2018 Crackseal
Dougherty Oaks Court	Urban Local - CRS	Carman Road	Thru Turnaround	0.19	9	2018 Concrete Replacement w/ Crackseal
Dougherty Estates Drive	Urban Local - CRS	Carman Road	Dougherty Terrace Drive	0.42	7	2018 Crackseal
Rushholm Court	Urban Local - CRS	Waterford Ridge Drive	Thru Turnaround	0.06	6	2018 Crackseal
Waterford View Court	Urban Local - CRS	Dougherty Terrace Drive	Thru Turnaround	0.12	6	2018 Crackseal
Waterford Ridge Drive	Urban Local - CRS	Dougherty Estates Drive	Dougherty Terrace Drive	0.37	6	2018 Crackseal
Waterford Ridge Court	Urban Local - CRS	Waterford Ridge Drive	Thru Turnaround	0.14	6	2018 Crackseal
Winegard Drive	Urban Local - CRS	Dougherty Estates Drive	Dougherty Terrace Drive	0.14	6	N/A
Iron Warrior Drive	Urban Local - CRS	Crestbury Drive	EOM at City Limits of Manchester	0.04	2	N/A
Wissmann Drive	Urban Local - CRS	Weidman Road	Blairshire Drive	0.4	4	N/A
Crestbury Drive	Urban Local - CRS	386 Crestbury Drive	384 Crestbury Drive	0.01	4	N/A
Iron Warrior Drive	Urban Local - CRS	384 Crestbury Drive	1226 Iron Warrior Drive	0.01	2	N/A

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Street Name	Functional Class	From Street	To Street	Length(mi)	PCR	Last Improvement
Blairshire Drive	Urban Local - CRS	Crestbury Drive	Thru Turnaround	0.18	5	N/A
Birchwood Cove Court	Urban Local - CRS	Redwood Forest Drive	Thru Turnaround	0.07	8	2017 Crackseal
Maple Leaf Court	Urban Local - CRS	Redwood Forest Drive	Thru Turnaround	0.08	7	2017 Crackseal
Redwood Forest Drive	Urban Local - CRS	Dietrich Road	Weidman Road	0.62	6	2017 Crackseal
Redwood Forest Court	Urban Local - CRS	Redwood Forest Drive	Thru Turnaround	0.2	6	2017 Crackseal
Johnson Place Drive	Urban Local - CRS	Barrett Station Road	Clarjon Drive	0.15	9	2017 concrete Replacement w/ crackseal
Lochhaven Lane	Urban Local - CRS	Dietrich Road	Thru Turnaround	0.34	6	N/A
Loehr Estates Court	Urban Local - CRS	Loehr Estates Drive	Thru Turnaround	0.1	6	N/A
Loehr Estates Drive	Urban Local - CRS	623 Loehr Estates Drive	611 Loehr Estates Drive	0	7	N/A
Loehr Estates Drive	Urban Local - CRS	Carman Road	EOM at Terminus	0.14	6	N/A
Havenhurst Road	Urban Local - CRS	Weidman Road	Wyncrest Drive	0.2	7	N/A
Thornlea Court	Urban Local - CRS	Havenhurst Road	Thru Turnaround	0.06	7	N/A
Wickstead Road	Urban Local - CRS	Weidman Road	Thru Turnaround	0.16	5	N/A
Wyncrest Drive	Urban Local - CRS	Miremont Drive	410 Wyncrest Drive	0.09	5	N/A
Mason Oaks Lane	Urban Local - CRS	Mason Road	Thru Turnaround	0.21	9	2016 Concrete Replacement w/ Crackseal
Mason Meadows Court	Urban Local - CRS	Mason Road	Thru Turnaround	0.16	9	2016 Concrete Replacement w/ Crackseal

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Street Name	Functional Class	From Street	To Street	Length(mi)	PCR	Last Improvement
Sovereign Court	Urban Local - CRS	Thru Turnaround	Thru Turnaround	0.31	7	N/A
Wyncrest Drive	Urban Local - CRS	Weidman Road	Sovereign Court	0.14	7	N/A
Consort Drive	Urban Local - CRS	Manchester Road	Wyncrest Drive	0.2	8	N/A
Carman Valley Drive	Urban Local - CRS	Dietrich Road	Thru Turnaround	0.67	6	N/A
Cool Dell Court	Urban Local - CRS	Carman Valley Drive	Thru Turnaround	0.26	6	N/A
Huntley Heights Drive	Urban Local - CRS	Carman Road	Thru Turnaround	0.68	5	N/A
Valley Point Lane	Urban Local - CRS	Carman Valley Drive	Thru Turnaround	0.11	7	N/A
Woodside View Lane	Urban Local - CRS	Huntley Heights Drive	Thru Turnaround	0.08	8	N/A
Warmington Court	Urban Local - CRS	Huntley Heights Drive	Thru Turnaround	0.25	5	N/A
Crofton Circle Court	Urban Local - CRS	Carman Valley Drive	Thru Turnaround	0.13	7	N/A
Carman Forest Lane	Urban Local - CRS	Carman Valley Drive	Thru Turnaround	0.14	7	N/A
Amberwood Lane	Urban Local - CRS	Carman Valley Drive	Thru Turnaround	0.18	7	N/A
Forestview Ridge Lane	Urban Local - CRS	Huntley Heights Drive	Thru Turnaround	0.1	7	N/A
Wood Fern Drive	Urban Local - CRS	Carman Road	Thru Turnaround	0.24	9	2018 Concrete Replacement w/ Crackseal
Wood Fern Drive	Urban Local - CRS	636 Wood Fern Drive	620 Wood Fern Drive	0	9	2018 Concrete Replacement w/ Crackseal

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Street Name	Functional Class	From Street	To Street	Length(mi)	PCR	Last Improvement
Fieldhurst Drive	Urban Local - CRS	Crestbury Drive	Wyncrest Drive	0.16	3	N/A
Foxview Terrace	Urban Local - CRS	Crestbury Drive	Wyncrest Drive	0.17	4	N/A
Crestbury Drive	Urban Local - CRS	Iron Warrior Drive	Foxview Drive	0.19	4	N/A
Scottfield Terrace	Urban Local - CRS	Foxview Terrace	Miremont Drive	0.15	4	N/A
Rivoli Drive	Urban Local - CRS	EOM at City Limits of Manchester	Scottfield Terrace	0.14	4	N/A
Twinview Terrace	Urban Local - CRS	Wyncrest Drive	Wissmann Drive	0.09	3	N/A
Wyncrest Drive	Urban Local - CRS	410 Wyncrest Drive	Weidman Road	0.38	4	N/A
Wyncrest Drive	Urban Local - CRS	1312 Wyncrest Drive	Thru Turnaround	0	5	N/A
Miremont Drive	Urban Local - CRS	EOM at City Limits of Manchester	Wyncrest Drive	0.19	3	N/A
Total				16.39		

Appendix F – County Maintained Traffic Signals, Bridges, & Culverts in
 the Annexation Area

Traffic Signals	Signal ID #	Type	Location Road	Road
	572	School Beacon	Carman Road	NA
	573	School Beacon	Carman Road	NA
	622	School Beacon	Weidman Road	NA
	623	School Beacon	Weidman Road	NA
	718	School Beacon	Weidman Road	NA
	719	School Beacon	Weidman Road	NA
	SC37	Fiber Splice Cabinet	Weidman Road	Manchester Road
	261	Intersection Signal	Barrett Station Road	Barrett Station Drive
	442	Intersection Signal	Barrett Station Road	Barrett Station Drive North
	454	Intersection Signal	Barrett Station Road	Dougherty Ferry Road
	462	Intersection Signal	Carman Road	Dougherty Ferry Road
	391	Intersection Signal	Weidman Road	Carman Road
	547	Intersection Signal	Weidman Road	Wyncrest Drive
Bridges	Bridge #	Route	Road Classification	
	338	Weidman Road	ARS	
	201	Weidman Road	ARS	
	305	Mason Lane	CRS	
	339	Dietrich Road	CRS2	
	363	Barrett Station Road	ARS	
	266	Wyncrest Drive	CRS	
	347	Braeshire Drive	CRS	
Culverts	Culvert Name	Road	Road Classification	
	C-3-422	Dietrich Road	CRS2	
	C-3-425	Weidman Road	ARS	
	C-3-431	Huntley Heights Drive	CRS	
	C-3-451	Mason Lane	CRS	
	C-3-53	Carman Road	ARS	
	C-3-54	Carman Road	ARS	
	C-3-55	Carman Road	ARS	
	C-3-56	Carman Road	ARS	
ARS (Arterial Road System)				
CRS2 (Collector Road System)				
CRS (Local/Subdivision System)				

Appendix G – Trash District 4 Waste Collection Contract – 2022-2027

District 4 Waste Collection Services Contract period 2022-2027
Waste Connections Price List customer service phone #
 Minimum Service Level per dwelling (once per week household waste, once per week
 recyclables, once a month bulky collection, three seasonal yard-waste pickups)
 10% senior (65+ head of household) discount is available; contact hauler

	Monthly Firm Fixed Price	Quarterly Firm Fixed Price	Annual Firm Fixed Price
Year One	\$ 15.50	\$ 46.50	\$ 186.00
Year Two	\$ 15.97	\$ 47.91	\$ 191.64
Year Three	\$ 16.44	\$ 49.32	\$ 197.28
Year Four	\$ 16.94	\$ 50.82	\$ 203.28
Year Five	\$ 17.45	\$ 52.35	\$ 209.40

All prices are firm and fixed. There will be no additional fuel or administrative charges added

Optional Services:

Weekly Yard-waste Pickup Service per
 Service per dwelling

Note: Yard-waste pickup must be subscribed to by the quarter

	Monthly Firm Fixed Price	Quarterly Firm Fixed Price	Annual Firm Fixed Price
Year One	\$ 11.00	\$ 33.00	\$ 132.00
Year Two	\$ 11.33	\$ 33.99	\$ 135.96
Year Three	\$ 11.67	\$ 35.01	\$ 140.04
Year Four	\$ 12.02	\$ 36.06	\$ 144.24
Year Five	\$ 12.38	\$ 37.14	\$ 148.56

	Firm Fixed Price Year 1	Firm Fixed Price Year 2	Firm Fixed Price Year 3	Firm Fixed Price Year 4	Firm Fixed Price Year 5
1 add'l waste pickup per week; add'l cost per month; subscription by quarter	\$ 30.00	\$ 31.00	\$ 32.00	\$ 33.00	\$ 34.00
In excess of min services, bulky waste per pickup	\$ 20.00	\$ 21.00	\$ 22.00	\$ 23.00	\$ 24.00
Over household waste volume (exceed cart volume) per pickup	\$ 20.00	\$ 21.00	\$ 22.00	\$ 23.00	\$ 24.00
Over yard-waste volume (>300 gal.) per pickup	\$ 20.00	\$ 21.00	\$ 22.00	\$ 23.00	\$ 24.00
Major appliance collection per pickup	\$ 35.00	\$ 36.00	\$ 37.00	\$ 38.00	\$ 39.00
Christmas tree collection per pickup (for non-subscribers of yard waste)	\$ 15.00	\$ 16.00	\$ 17.00	\$ 18.00	\$ 19.00
Minor renovation/emergency debris per pickup	\$ 250.00	\$ 275.00	\$ 280.00	\$ 290.00	\$ 300.00