

TPW Item No. 17
Environmental Impact Statement Draft Purpose and Need Statement: MnDOT Highway 252/I-94
Motion by Ellison

Ellison moves to amend the City's comments related to the Environmental Impact Statement Draft Purpose and Need Stated for Highway 252/I-94 to read as follows:

Comments on the Draft Purpose and Need Statement:

- The City of Minneapolis supports the need for safety improvements along Highway 252.
- The statements reflected in the Draft Purpose & Need Statement, Logical Termini memo, and Project Objectives memo are comprehensive and set the stage for a holistic review of potential project components. They are the result of months of coordinated work with partner agencies and reflect the discussions that have been held.
- On page 3-47 of the Purpose & Need Statement, table 3.22 indicates that the south leg of Dowling Avenue at the East Ramp has a pedestrian LOS of A. While this may be true using the metrics of the Multimodal Level of Service tool, the City does not believe that this segment is adequate to meet pedestrian needs. A notation should be added to reflect this condition.
- Content contained in the Evaluation Criteria memo is appropriate and meaningful. However the City would like to see more information added to section 2.1.1 (page 2-3) describing in detail how the Equity and Health Assessment (EHA) process will be used to inform the alternatives developed and advanced for this corridor. The federal EIS process is well-known and has routine activities for projects of this size. The EHA is not required in an EIS and therefore its influence on the alternatives to be developed is unknown and should be explained more thoroughly. The current language states that the "EHA process will be incorporated into the evaluation of alternatives when applicable and timing of the EHA activities align with the evaluation process/steps...The joint leading partners will determine when and how the EHA is prudent for the NEPA EIS process." This leaves open the possibility for the results of the EHA to be disregarded as irrelevant by the EIS process. In its place, the City recommends that the EHA results be identified as an Evaluation Criteria in the same vein as the others described in tables 2.1, 2.2, and 2.3, and/or as described in section 2.2.6 (page 2-26) for Social, Economic, and Environmental Considerations.
- Improved transit service is critically important to the mobility and health of the City and its residents. Merging a highway improvement project with a transit project is a cost-effective strategy to ensure that the long-term vision for this corridor meets City goals. Minneapolis requests MnDOT to add "Transit Mobility Improvements" as a Primary Need. Including transit as a Primary Need will not guarantee, but will facilitate, a simultaneous and successful outcome. The City's Transportation Action Plan includes strategies and actions to pursue new transit projects of high impact and expand multimodal access to transit.

Comments on the 252/I-94 Corridor and Related Work:

- The City of Minneapolis will continue to advocate for improvements along the corridor as the project develops. Potential improvements to be evaluated as part of the EIS process include:
 - Implementation of transit advantages;
 - Direct connection to downtown for transit users;
 - Transit improvements to serve the area;
 - A new bicycle and pedestrian bridge over I-94 near 34th Ave N;
 - Multimodal improvements at the Dowling Avenue bridge;

In addition, the City is eager to continue coordination on related corridors impacted by the potential changes along the main highway corridor.

- Minneapolis has set a goal, through the Transportation Action Plan, the Climate Action Plan, and reinforced in the *Minneapolis 2040* comprehensive plan, to reduce vehicle miles traveled (VMT) by 1.8% per year. It is our intention that projects impacting Minneapolis should be implemented in a way to help us meet that goal.
- Minneapolis encourages MnDOT and project partners to look at vehicle safety metrics that do not prioritize free-flowing traffic. High-speed designs may reduce property damage crashes but create more severe crashes.
- Minneapolis would also like to reiterate its opposition to any additional lanes on I-94. Bus Rapid Transit (BRT) should be implemented on this corridor by converting an existing general purpose lane to a High-Occupancy Vehicle (HOV) or High-Occupancy Toll (HOT) lane.
- The City of Minneapolis is committed to partnering with MnDOT on the Highway 252/I-94 EIS and project development, as evidenced by its participation on the Technical Advisory Committee and associated subcommittees. The City looks forward to further coordination and support through the alternatives analysis and project development, concluding in 2024.