

December 4, 2020 - Sent by email

Margaret Anderson Kelliher, Commissioner
Minnesota Department of Transportation

Wendell Meyer, Division Administrator
Federal Highway Administration

Subject: Environmental Review for the "Rethinking I-94" Project

Dear Commissioner Kelliher and Division Administrator Meyer:

We are writing about the environmental review process now underway regarding Interstate 94 between Trunk Highway 55 in Minneapolis and Marion Street in Saint Paul. Many of us are members of the Community Leaders group for the project. At MnDOT's August 25, 2020, meeting of Community Leaders, we were encouraged by this text in the PowerPoint: "public involvement in defining the purpose and need" and "engage communities early and continuously." In light of these objectives, we are writing this letter to communicate our preliminary recommendations about the purpose and need statement for a future I-94 project.

Historical and ongoing impacts to communities

The tremendous harm that was done to communities by the construction of I-94 through Minneapolis and Saint Paul - the loss of homes, businesses, and community cohesion - is well documented. Today, over 60 years after construction, the effects are ongoing. The highway, while clearly serving the needs of drivers, inflicts a daily toll on the lives of the people living nearby. Interestingly, a high percentage of the trips within the corridor are short, local trips. The highway is:

- **A barrier that continues to divide our communities.** Historically people could easily travel north and south within the corridor on a great number of residential and collector streets. The construction of I-94 dramatically reduced the number of crossings. Today I-94 is dangerous and difficult to cross and remains a physical and psychological barrier for adjacent communities.
- **A generator of unhealthy air.** While the metro region has relatively good air quality and is in attainment with federal Clean Air Standards, communities along the I-94 corridor experience higher levels of air pollution from traffic. The EPA states that "pollution exposures related to roadway traffic include higher rates of asthma onset and aggravation, cardiovascular disease, impaired lung development in children, pre-term and low-birthweight infants, childhood leukemia, and premature death."¹
- **Loud.** The sound of roadway traffic (from tires, engines, brakes) is nearly constant for people living, working, and going to school near the highway. This noise is disruptive to conversation and to sleep. According to information on the website of the US Department of Transportation,

¹ US Environmental Protection Agency, Near Roadway Air Pollution and Health: Frequently Asked Questions
<https://www.epa.gov/air-research/near-roadway-air-pollution-and-health-frequent-questions>

traffic noise at normal urban levels can ... lead to stress and sleep disturbances, both of which can lead to a higher risk for type 2 diabetes.”²

- **Missing advantages for transit.** I-94 was built for general purpose traffic with no specific transit facilities. The few transit advantages that did exist were eliminated in 2007, when a key section of the shoulder lane used by buses was converted to a general-purpose lane.

Our vision for the I-94 Statement of Purpose and Need

Planning for this interstate highway corridor in the heart of the Twin Cities region should set a new standard for urban transportation projects. The community, not vehicles, should be the highest priority. We call for a greener, quieter, healthier corridor for the people who use it and live, work, and play nearby. Below are our recommendations for the project’s “purpose and need” statement toward that new vision.

- We oppose the use of the word “mobility.” The word is too vague and often means moving more vehicles faster. The University of Minnesota’s Center for Transportation Studies and many regional governments have shifted to using the term “access” rather than mobility. We support this project statement: **“Increase access by transit, carpooling, bicycling, and walking as a percentage of all trips.”** This statement is consistent with Minnesota law³, and acknowledges the importance of transit and carpooling in the I-94 corridor as well as the importance of travel across the corridor by non-motorized means.
- Rather than using the general term “safety,” substitute this language from state law: **“minimize fatalities and injuries for transportation users.”** The latter prioritizes addressing more serious injury crashes as compared to “fender-benders,” which are more likely to occur during peak-hour congestion. This language is also consistent with state law.⁴
- Include **reducing vehicle miles traveled (VMT)** as a project purpose. Reducing driving is essential to meeting state and municipal goals for reduced greenhouse gas emissions.⁵ Minnesota law calls for an 80% reduction in GHG emissions by 2050 from 2005 levels. (Reduced VMT allows for consideration of a variety of strategies to reduce transportation impacts on the climate, noise levels, and air quality in the corridor.)
- **Reconnect communities** through new infrastructure to make crossing the corridor seamless, by reducing the presence and impact of the trench, and by making travel adjacent to it more accessible, convenient, and inviting. New infrastructure should contribute to regenerative, equitable economic development in communities where construction of the highway caused great harm and loss of community wealth. These communities should be consulted to co-create the vision for this corridor.

² US Department of Transportation, information on proximity to major roads.

<https://www.transportation.gov/mission/health/proximity-major-roadways>

³ State goals for transportation in Minnesota Statute Chapter 174.02, subdivision 2. <https://www.revisor.mn.gov/statutes/cite/174.02>

⁴ Ibid.

⁵ Minneapolis Climate Action Plan goal is a 30% reduction by 2025 (from 2006 level).

<http://www2.minneapolismn.gov/www/groups/public/@citycoordinator/documents/webcontent/wcms1p-113598.pdf>

Saint Paul Climate Action and Resilience Plan (2019) calls for a 50% reduction in GHG emission by 2030 (from 2015 levels).

<https://www.stpaul.gov/sites/default/files/Media%20Root/Mayor%27s%20Office/Saint%20Paul%20Climate%20Action%20%26%20Resilience%20Plan.pdf>

State of Minnesota’s Next Generation Energy Act <https://www.pca.state.mn.us/air/state-and-regional-initiatives>

Thank you for your consideration. We look forward to hearing from you about these recommendations.

Sincerely,

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