



CITY OF SAINT PAUL
Melvin W. Carter, Mayor

1500 City Hall Annex
25 W. Fourth Street
Saint Paul, MN 55102-1660

August 26, 2020

Nicole Peterson, PE, PMP
MnDOT Metro District
1500 County Road B2 W
Roseville, MN 55113

Dear Ms. Peterson:

As a Participating Agency in the Re-Thinking 94 project the City of Saint Paul was asked to provide concurrence with the project's Purpose and Need and Evaluation Criteria documents. While MnDOT and FHWA have since indicated that the City of Saint Paul and other Participating Agencies do not need to provide concurrence at this time, we believe it is appropriate to take this opportunity to share the City's concerns with the current status of the documents.

Our concern with the project's Purpose and Need and Evaluation Criteria documents is they are not consistent with and do not reflect the City's adopted policies and priorities. Ultimately these documents indicate a primary focus on the I-94 trench and at best a secondary focus on the deficiencies across the top of the trench. The primary focus of this project must be include improving the deficiencies related to the physical and psychological impact of the trench, improving connectivity across the trench, and the safe movement of people and goods across the trench.

It is simply not enough to acknowledge past harm. Rethinking I-94 must actively work to repair some of the damage done by the original construction of this stretch of Interstate. The City has asked that improved, safe, multimodal connections along (frontage roads) and across the trench be part of the primary project need as this is an existing deficiency that exists all along the corridor. The City has also asked for specific goals in the areas of reducing local air pollution and VMT. We do not see these issues, primary to the City's goals for the project, sufficiently or directly addressed in the documents.

As we continue to work to move this project forward, we share the following statements developed by staff which are intended to help guide the City's input on the project:



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- 1) Minimize the physical and psychological impact and footprint of I-94. In this context, psychological impact refers to how the built environment and the barrier created by I-94 feels to the user. In minimizing this impact, how can the corridor be made to feel safer, easier, and more comfortable to cross. In addition, what can be modified to make the two sides of the freeway feel more connected.
- 2) Improve multimodal connectivity across I-94. With this we note the quality of the connection is as important as the physical connection itself.
- 3) Support transit improvements within the corridor (relates back to our VMT reduction goals)
- 4) The I-94 corridor includes the adjacent frontage roads of Concordia and St. Anthony and all the intersecting roadways as these roadways are a part of the physical and psychological impact and footprint of I-94.
- 5) The project should not have negative economic impacts or do anything to further existing inequities within the adjacent communities. Furthermore, the project must actively work to repair some of the economic damage done by the original construction of the interstate if/when possible.
- 6) Project process and recommendations must consider the City's adopted policies and plans including the 2040 Comp Plan and the Climate Action Plan, both of which set goals of reducing VMT in Saint Paul 40% by 2040.

Also, we would like to reiterate the importance of allowing both the public and the Policy Advisory Group the opportunity to provide meaningful and timely input on the key project elements. We respectfully request that prior to any future requests to the City for approval or concurrence these groups be appropriately engaged.

We sincerely appreciate MNDOT's and FHWA's commitment to and continuing efforts with this project. The City of Saint Paul remains committed to working with MnDOT, FHWA, and all the other project partners to successfully implement the much needed improvements in the I-94 corridor. Please let us know if you have any questions or would like to further discuss our concerns.

Sincerely,



Sean Kershaw
Director of Public Works

CCs:

Anna Varney, FHWA
Michael Barnes, MnDOT
Sheila Kauppi, MnDOT