821408

I35E

FINAL ENVIRONMENTAL IMPACT STATEMENT

FROM TH 110 (DAKOTA COUNTY) TO I-94 NEAR DOWNTOWN ST. PAUL

Prepared by:
Metropolitan Council
U.S. Department of Transportation–
Federal Highway Administration
and Minnesota Department of Transportation

FHWA-MN-EIS-81-02-F
Federal Highway Administration
REGION 5

Interstate 35E
From
Trunk Highway 110 in
Dakota County, Minnesota
To
I-94 Near Downtown St. Paul, Ramsey County, Minnesota

FINAL ENVIRONMENTAL IMPACT STATEMENT

Submitted pursuant to:

42 USC 4332(2)(c)
49 USC 1653(f)
and
Minnesota Statute 116D.01 et. seq.

Submitted by:	Cooperating Agencies:
U.S. Department of Transportation Federal Highway Administration and The State of Minnesota Department of Transportation and Metropolitan Council	U.S. Army Corps of Engineers U.S. Coast Guard U.S. Department of the Interior U.S. Environmental Protection Agency U.S. Fish and Wildlife Service Upper Mississippi River Basin Commission Minnesota Department of Natural Resources Minnesota Pollution Control Agency

9/27/82	[signature]	[signature]
Date of Approval	For Metropolitan Council	Title
9/23/82	[signature]	Assistant Commissioner
Date of Approval	For MnDOT	Title
10/22/82	[signature]	Director, Office of Environmental Programs, FHWA Region 5
Date of Approval	For FHWA	Title

The following persons may be contacted for additional information concerning this document:

FHWA	MnDOT	Metropolitan Council
Mr. James St. John Federal Highway Admin. 490 Metro Square Bldg. St. Paul, MN 55101 (612) 725-5956	Mr. Del Gerdes Minnesota Department of Transportation John Ireland Blvd. St. Paul, MN 55155 (612) 296-6750	Mr. Ghaleb Abdul-Rahman I-35E Project Manager Metropolitan Council 300 Metro Square Bldg. St. Paul, MN 55101 (612) 291-6336

ABSTRACT: This environmental impact statement describes and evaluates the preferred alternative within the Pleasant Avenue corridor for a proposed link between I-35E south of the Minneapolis/St. Paul area to I-94 and I-35E immediately north of Downtown St. Paul, Minnesota.

I-35E FEIS

TABLE OF CONTENTS

		Page
Signature Page		i
Table of Contents		iii
List of Figures		v
List of Tables		vii
I.	Summary	1
	A. Purpose of the Final Environmental Impact Statement	1
	B. Preferred Alternative	1
	C. Supplemental Information	9
	D. Commitments and Assurances	11
	E. 4(f) Statement	13
	F. Proposed I-35E Schedule	13
II.	Preferred Alternative	19
	A. Background	19
	B. Alternatives Considered	21
	C. Selection of the Preferred Alternative	21
	1. Summary of the Public Hearing Testimony and Written Statements	25
	2. Opinions of Dakota County and City of St. Paul	26
	3. Truck Route Evaluation	27
	4. Metropolitan Council Recommendations	28
	5. Description of the Preferred Alternative by the Commissioner of MnDOT	29
	6. Final Approvals by the Metropolitan Council	30
III.	Supplemental or Updated Technical Information	31
	A. Costs	31
	B. Social Environment	31
	C. Air Quality	32
	D. Noise	48
	E. Transportation	62
	F. Social Impacts	79
	G. Historic Properties	84

TABLE OF CONTENTS (Continued)

		Page
IV.	Commitments and Assurances	93
	A. Noise Abatement	93
	B. Parkway Landscaping	97
	C. Inclusion of Bike/Pedestrian Facility	102
	D. Mitigation for Effects on Historic Properties	102
	E. Vibrations During Construction	102
	F. Parkway Convertibility	102
	G. Modifications to the Common Section	105
	H. Assistance for Property Displacement and Relocation	106
V.	4(f) Statement	109
	Introduction	109
	Purpose of Statement	109
	James J. Hill Property	109
	German Bethlehem Presbyterian Church	123
VI.	Response to DEIS Comments/Coordination with Cooperating Agencies	125
Appendix A -	Forecasted Design Year Noise Contours	275
Appendix B -	Memorandum of Agreement and Supporting Documentation for the Section 106/4(f) Processes	293

LIST OF FIGURES

		Page
1.	Preferred Alternative	3
2.	Proposed Common Section	7
3.	Alternatives Considered in the DEIS	23
4.	Location of High Risk Populations	37
5.	Noise Impact Analysis Areas	53
6.	Alternative Truck Routes and Noise Modeling Locations	59
7.	Representative Two-way Traffic Volumes for the Design Year	63
8.	Metropolitan Transportation Subregions	65
9.	General Origin and Destination Modeling through St. Clair - Grand/Ramsey Link	67
10.	General Destination Modeling through Lexington Bridge Link	69
11.	Truck Routes	73
12.	Right-of-Way and Relocation Impacts	81
13.	Location of Historic Properties	87
14.	Proposed Noise Abatement	95
15.	Generalized Parkway Cross Sections	99
16.	Proposed Bicycle/Pedestrian Corridor	103
17.	James J. Hill Mansion	111
18.	Hill Property Foundation/Retaining Wall	111
19-0.	Basic Alignment in Vicinity of James J. Hill Property	115
19-1.	Design Option 1	115
19-2.	Design Option 2	117
19-3.	Design Option 3	117
19-4.	Design Option 4	119
19-5.	Design Option 5 - Selected Design Option	119
20.	German Bethlehem Presbyterian Church	124
Appendix A - Forecasted Design Year Noise Contours		275
A-1	West Seventh to Randolph - Freeway Alternative	277
A-2	West Seventh to Randolph - Parkway Alternative	279
A-3	Randolph to St. Clair - Freeway Alternative	281
A-4	Randolph to St. Clair - Parkway Alternative	283
A-5	St. Clair to Grand/Ramsey - Freeway Alternative	285
A-6	St. Clair to Grand/Ramsey - Parkway Alternative	287
A-7	Grand/Ramsey to Common Section - Freeway Alternative	289
A-8	Grand/Ramsey to Common Section - Parkway Alternative	291

LIST OF TABLES

		Page
1.	Enumeration of Total Population and High-Risk Groups within the Primary Impact Area	32
2.	Hospitals and Nursing Homes within the Primary Impact Area	33
3.	St. Paul Public and Private School Enrollments in the Primary Impact Area	34
4.	Licensed Day Care Centers in the Primary Impact Area	35
5.	CO Emission Factors for Autos and Vans (Year 1990)	42
6.	Generalized Noise Impacts upon Selected Pleasant Avenue Noise Sensitive Receptors without Mitigation	49
7.	Noise Measurement Schedule and Results	51
8.	Noise Impacts on the Preferred Alternative	55
9.	Noise Impacts at Specific Sites on the Preferred Alternative	56
10.	Off-Corridor Noise Level Predictions for I-35E (Year 2000)	58
11.	Comparison of Accident Rates for Alternative Truck Routes	76
12.	Proposed Noise Abatement Measures	94

Summary

I. SUMMARY

A. PURPOSE OF THE FINAL ENVIRONMENTAL IMPACT STATEMENT

This Final Environmental Impact Statement (FEIS) has been prepared according to paragraph 1503.4 of the Council on Environmental Quality regulations for FEIS preparation.

The purposes of this FEIS for Interstate 35E are to: 1) document the selection of the preferred alternative, 2) provide updated and supplemental information to the Draft Environmental Impact Statement (DEIS), 3) provide responses to public hearing and DEIS comments, 4) list commitments to mitigation measures, and 5) document the conclusions of the Section 4(f) process of the 1966 Department of Transportation Act. This summary capsulizes the major issues covered in the FEIS; for more detailed information, refer to the body of the FEIS and the DEIS.

B. PREFERRED ALTERNATIVE

The I-35E project has a long and controversial history. In 1972, the project was stopped on environmental grounds. The Minnesota Legislature placed a moratorium on further freeway construction in the Pleasant Avenue corridor in 1975. In 1978, the Minnesota Legislature directed the Metropolitan Council to prepare an in-depth EIS on the Pleasant Avenue corridor and on feasible alternatives. The Draft Environmental Impact Statement was completed in June of 1981. A location and design public hearing was held in September of 1981.

After carefully following the EIS process, the Commissioner of the Minnesota Department of Transportation has selected Alternative C, a direct connection parkway, as the preferred alternative (see the Commissioner's correspondence of December 16, 1981, on page 14). This decision was based upon a desire to achieve a solution providing a region-serving transportation facility balanced with measures to minimize neighborhood impacts. In reaching this decision, the Commissioner noted the positions and evaluations of all agencies. He especially considered the rationale of the Metropolitan Council relative to the availability of adequate alternate truck routes, and the Council's overall preference with regard to the further design and implementation of Alternative C in the Pleasant Avenue corridor. He also noted the recommendation of the St. Paul City Council for a similar alternative, a direct connection parkway with the inclusion of an east central business district bypass, improvements to Shepard Road, no immediate connection to Short Line Road, and other parkway features.

Although the Commissioner promised support for the city in its efforts to obtain appropriate solutions and pursue funding sources for both the bypass and improvements to Shepard Road, he did not decide that

these were necessary for the purposes and functions of 35E.[1] He did agree with both the city and the Metropolitan Council that the Short Line not be physically connected to the Pleasant Avenue parkway until there is resolution of various issues unrelated to 35E.

Parkway Characteristics

The specific features and improvements that are part of the preferred alternative include the following:

1. Access will be fully controlled with interchanges rather than at-grade intersections (see to Figure 1). The preferred alternative will provide seven interchanges in addition to the eventual Short Line connection. Full interchanges will be constructed at West Seventh Street and Randolph Avenue. However, a driver will not be able to enter downtown nor exit from downtown to and from the north at Kellogg Boulevard, Shepard Road, or the intersection of Grand and Ramsey Avenues. Conversely, a driver will not be able to exit from the south, or enter to the south at either the Victoria Street or St. Clair Avenue interchanges. The Fifth/Sixth Street connectors will be provided to maintain access between downtown St. Paul and I-94 to the west.

   The basic design will consist of four through-traffic lanes from West Seventh Street to I-94 in the St. Paul Capitol area. An exception will occur between West Seventh Street and the Short Line connection area. Here the crossing movements of vehicles will have to occur over a short distance, and there will be a critical safety need to provide adequate signing opportunities. Therefore, one auxiliary lane will be added in each direction within this corridor segment.

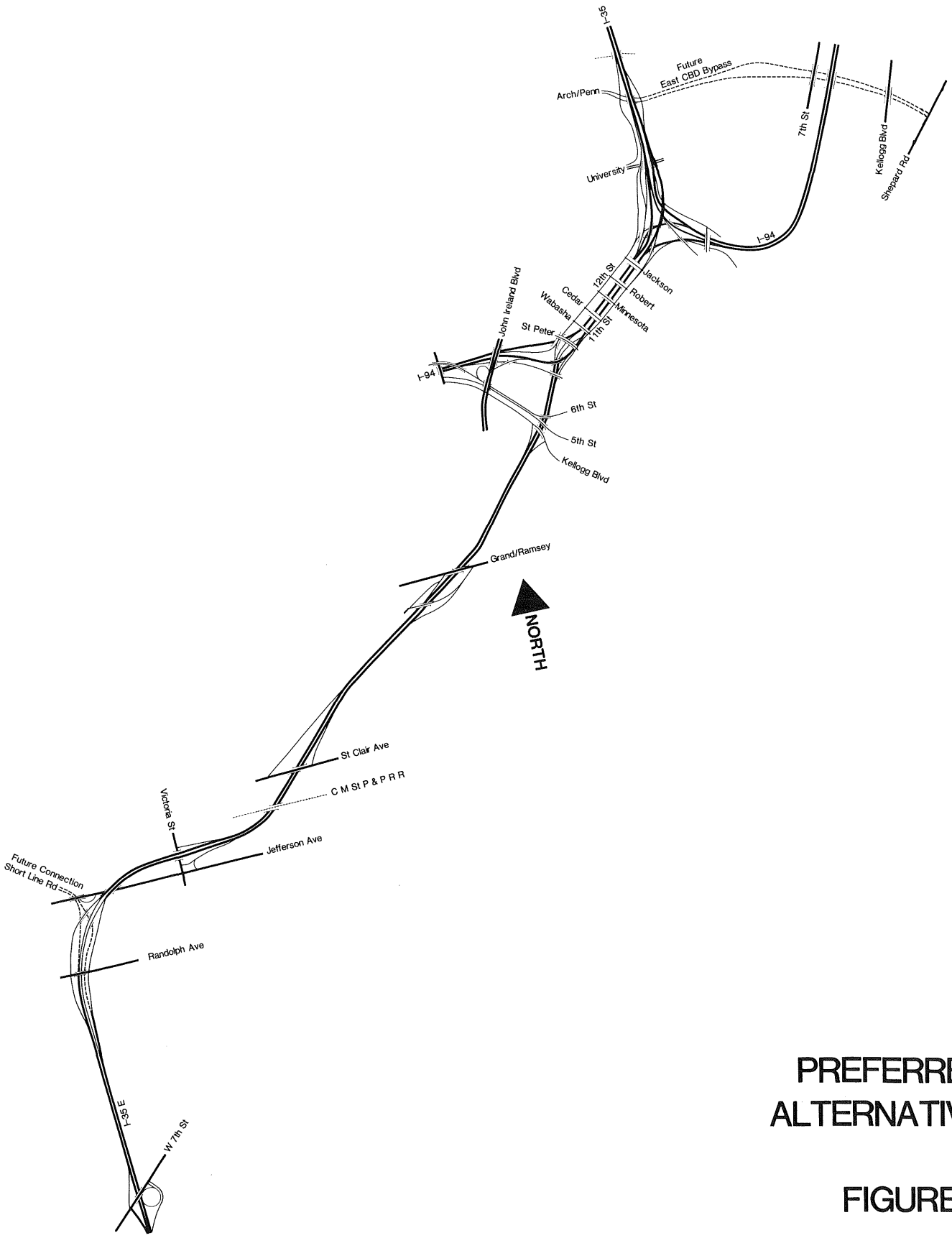
2. Design speed of the parkway will be 50 mph. The posted speed limit will be 45 mph, not 55 mph.

3. Landscaping will be used to create a parkway-like perception for viewers to and from the road. A landscaped median will be provided from north of West Seventh Street near Bayard Avenue to near the interchange with Grand/Ramsey. Canopy trees will be heavily used from the Short Line to Grand/Ramsey. Shrubs and ground cover will be used from Bayard Avenue to the Short Line.

4. A safe pedestrian/bike corridor has long been identified as a need in this area and is included in the I-35E parkway design. It is intended to serve several St. Paul neighborhoods and provide access to the central business district, the Civic Center, state offices, medical offices and hospitals, and several schools and parks.

---

[1]The Commissioner did, however, require that the impacts of the bypass continue to be disclosed through the FEIS process.



PREFERRED ALTERNATIVE

FIGURE 1

135E

A safe pedestrian/bike corridor will utilize I-35E right-of-way wherever possible and follow planned frontage roads when necessary. A short segment will utilize local streets.

5. Pedestrian crossings (at Bayard Avenue, Duke and Walnut Streets) are proposed to connect land uses on opposite sides of the parkway, thereby reducing any perceived barrier effects.

6. The Pleasant Avenue parkway will be designed to forecasted design year[2] volumes consistent with a prohibition of commercial vehicles licensed by the State of Minnesota for a gross weight in excess of 9,000 pounds. (This is the definition of "trucks" which is consistent with City of St. Paul parkway limitations.) Excluded from the prohibition will be the following common vehicle types:

   - autos
   - buses (MTC, school, intercity and others)
   - MnDOT authorized maintenance vehicles
   - emergency vehicles
   - commercial vehicles (9,000 pounds and under)
   - vans (delivery, vanpools, private, etc.)
   - motorcycles
   - pickups
   - recreational vehicles

   The proposed design will provide an assurance that a direct connection parkway will not be converted to full freeway status. It would be difficult and expensive to provide additional noise abatement and increased pavement thickness to accommodate the truck volumes that would utilize a freeway. The design of the preferred alternative will not anticipate, or provide for, conversion to normal freeway usage.

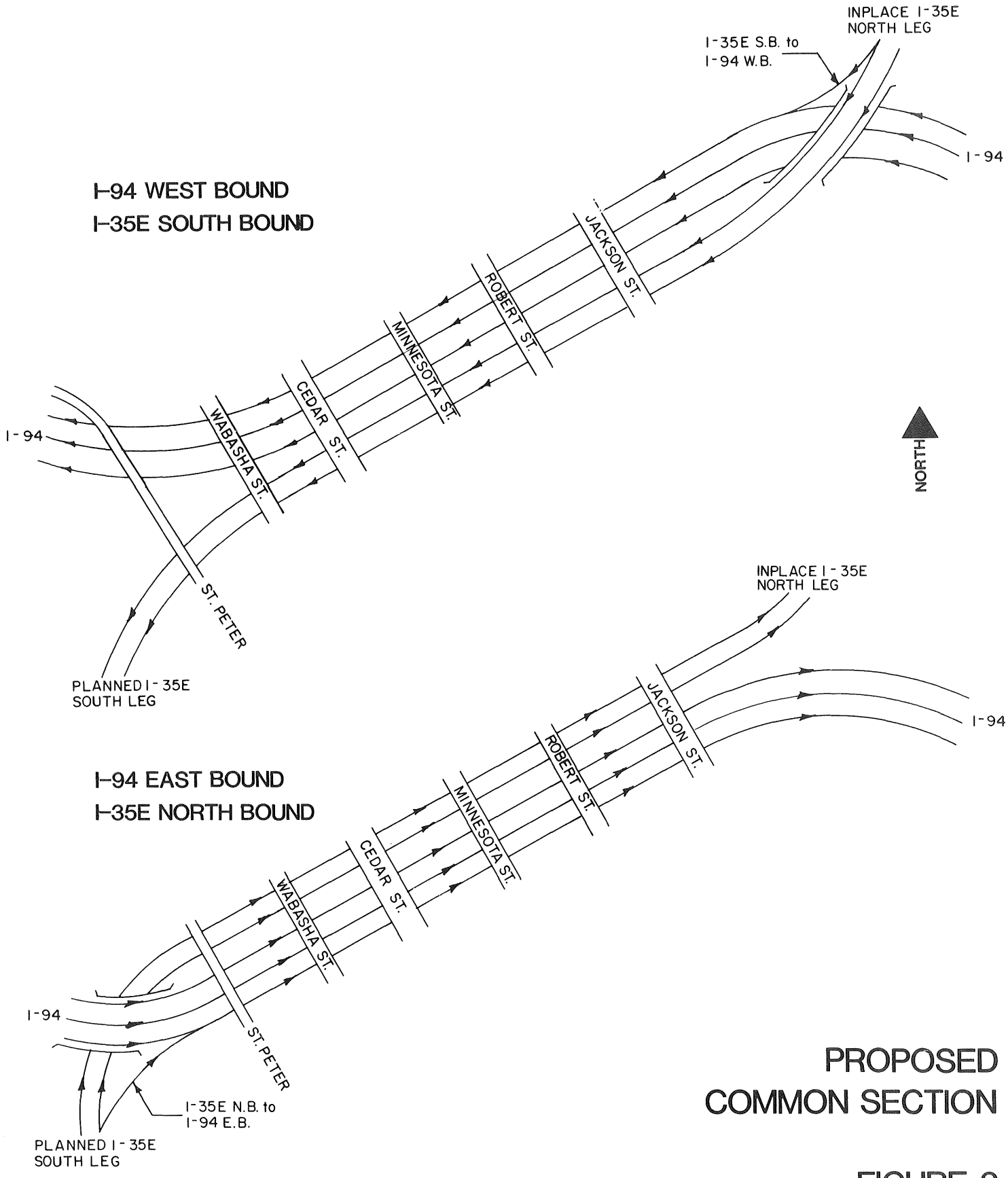
Common Section Improvements

The I-35E project includes improvements to the 1700-foot freeway section between St. Peter and Jackson Streets. This section is referred to as the "common section" because traffic from both I-94 and I-35E share a common corridor.

The proposed improvements in the area of the common section are described here and shown on Figure 2. One-lane ramps in two locations will be constructed to connect southbound I-35E directly to I-94 westbound and to connect northbound I-35E directly to I-94

---

[2] Although much of the analysis for I-35E was based on year 2000 traffic forecasts, the term "design year" here refers to twenty years from completion of the roadway, which for this project is currently anticipated to be the year 2006. This definition of design year will be used throughout the text. In cases where year 2000 data is used, it will be specifically labeled as such.



PROPOSED COMMON SECTION

FIGURE 2

Notes:

Includes I-94 Remodeling

Each Line Represents One Lane

Connection to 11th Street and 12th Street Frontage Roads Not Shown

eastbound. These ramps will be placed at the north and south ends of the planned ten-lane freeway cross section. The arterial street bridges now crossing the common section will be reconstructed to allow room for these ramps and the two added lanes.

The new ramp for the northbound 35E trips to eastbound I-94 eliminates the need to weave (cross through lanes) between the two interstates. Eastbound I-94 movements to northbound I-35E would shift left one lane in the common section. Similarly, westbound I-94 movements intending to go south on I-35E would shift left one lane in the common section. Neither of these movements would encounter crossing movements (weaving) from the other roadway.

The additional lane in each direction is planned in conjunction with the I-94 remodeling project. When completed, there will be two continuous through lanes in each direction on I-35E and three continuous through lanes on I-94. (No complex weaving for I-94 to I-35E and I-35E to I-94 movements will be necessary as explained above.) Capacity is expected to be adequate and the proposed design can safely accommodate the anticipated volumes.

The ramp connecting I-35E northbound directly to I-94 eastbound will require changes at the terminus of the 11th Street off-ramp at St. Peter Street, as well as reconstruction of 11th Street from St. Peter to just east of Wabasha Street. (For purposes of simplification, this frontage road work is not shown on Figure 2.)

The addition of an auxiliary lane on southbound I-35E, north of the common section, from the Cayuga Street bridge to the one-lane ramp to I-94 westbound is required for traffic signing and distribution purposes. This will require modifications to the exit ramps to Arch-Pennsylvania and University Avenue. The on-ramp at University Avenue will then connect directly into the one-lane ramp to I-94 westbound.

Ramp metering will be considered as part of the common section improvements.

C. SUPPLEMENTAL INFORMATION

The following summarizes updated information and additions to material contained within the Draft Environmental Impact Statement (DEIS), based on comment generated during the DEIS review process.

1. The current cost estimate for completing the preferred alternative is approximately $53,000,000.

2. The primary impact area contains a significant proportion of individuals who have been determined to be sensitive to air pollution. The primary carbon monoxide standards have been set to protect human health.

CO Standards	One-Hour	Eight-Hour
Minnesota	30 ppm	9 ppm
Federal	35 ppm	9 ppm

The highest values anticipated for the proposed action are 12.4 ppm for one-hour and 5.3 ppm for eight-hour. The analysis indicates that sensitive populations will not experience violations of the established health standards.

3. Analysis of the air quality implications of high-occupancy vehicle use and vanpooling reveals only a small reduction in air pollution emissions.

4. Air flow patterns caused by the presence of the bluff in the vicinity of the United Hospitals complex are reflected in a worst case air quality scenario and substantiates the conservative nature of the air quality methodology used. Predicted air pollution levels for the preferred alternative are well below federal and state standards.

5. An analysis of sulfur emissions under the preferred alternative indicates that I-35E will not significantly affect deterioration of the building materials of historic sites.

6. Noise levels for the preferred alternative will be within Federal Highway Administration (FHWA) design guidelines both inside and outside of hospital facilities, schools, parks, and historic sites along the corridor.

7. The method of noise sampling in the I-35E noise analysis was more elaborate than normal and is considered adequate.

8. Without the planned noise abatement, over 100 residential sites could have been subjected to a significant noise impact.

9. The number of trucks diverted to alternate routings with parkway designation is generally not great enough to cause more than a 1 to 2 dBA increase over noise levels occurring with freeway designation, at the same receptors on alternate routes. Either freeway or parkway selection would cause an increase of 3 to 4 dBA over present levels at receptors along Sibley and Jackson Streets. Future implementation of an east CBD bypass would improve the noise environment of Sibley and Jackson Streets.

10. Bluff topography will have negligible influences on noise levels south of the roadway.

11. Additional traffic studies indicate a need for I-35E to serve a regional function.

12. Under the preferred alternative, safety and movement on alternate truck routes will be improved as compared to the no-

build alternative because of reduced automobile traffic on arterials. Interstate truck trips on other freeway routes will experience convenience comparable to a freeway alternative. Regional and city movements have reasonable alternate routes.

13. A total of up to five moderately valued single-family dwellings and one medium-sized commercial/office building housing small offices will likely be taken for construction of the preferred alternative.

14. It is not possible to quantitatively predict to precision likely residential property value changes due to the I-35E parkway. Land values are established by the real estate market through the complex interaction of many variables. There may be some negative effects for certain abutting properties due to noise and aesthetic intrusion. There is also likely to be some positive influence due to improved regional accessibility which will tend to, at least partially, offset negative effects. There are currently no studies available which address the relationship of property values specifically to a parkway design. The reduced noise levels and improved appearance are expected to lessen negative influences as compared to a normal freeway design.

15. The How Residence will experience adverse aesthetic impacts that will be mitigated by parkway amenities.

D. COMMITMENTS AND ASSURANCES

The following commitments and assurances have been included in the preferred alternative concept.

1. Noise Abatement

   a. Depressed roadway construction in the Grand/Ramsey area

   b. Truck prohibition (commercial vehicles over 9,000 pounds of licensed gross weight)

   c. Reduced speed limit (45 mph)

   d. Noise barriers (approximately 14,000 lineal feet)

2. Parkway Concept

   a. Slower design speed and slower posted speed limit than on a typical interstate

   b. Greater variety and intensity of plant materials than on a typical interstate

   c. Parkway median of variable width containing major plantings and consistent landscape treatment for back-slopes and sideslopes

   d. Mainline parkway maintenance to be the responsibility of MnDOT

e. Architectural treatment for retaining walls

f. Special lighting fixtures

g. Use of canopy trees in areas where median is wide enough as well as where adequate space exists along the corridor

h. Consideration of special measures such as terracing, planting boxes and other techniques to visually soften the hard surface impact of the roadway

i. Consideration of landscape easements outside of the right-of-way

j. Inclusion of a bike/pedestrian corridor on I-35E right-of-way wherever possible, following planned frontage roads when necessary; a short segment will utilize local streets

k. Pedestrian overpasses at Bayard Avenue, Duke and Walnut Streets are proposed

3. Mitigation for Historic Property Impacts

For a description of mitigation commitments related to historic properties, refer to the Memorandum of Agreement, Appendix B of the FEIS. (See also the Commissioner of Transportation's correspondence of September 2, 1982, on page 16.)

4. Vibration During Construction Blasting

a. Specification of maximum amount of charge to be detonated at any one time

b. Prescheduling of blasting to avoid sensitive hospital activities to the extent possible

c. Advance notification of blasting schedule to hospitals, and general neighborhood notification

5. Special Parkway Assurances

a. Design noise barriers to reflect the forecasted design year traffic volumes including absence of commercial vehicles greater than 9,000 pounds licensed gross weight

b. Design pavement thickness to reflect the forecasted design year traffic volumes, including absence of commercial vehicles greater than 9,000 pounds licensed gross weight

6. Common Section Improvements (Refer to earlier description of the Preferred Alternative)

7. A Connection Between Fifth and Sixth Streets and I-94

8. Relocation Assistance

   a. Availability of replacement "in-kind" for residential properties taken with reimbursement to follow the Uniform Relocation Act

   b. Relocation counseling and financial assistance

E. 4(f) STATEMENT

Adoption of an alternative design option eliminates 4(f) involvement at the James J. Hill property and the German Presbyterian Church. There is no other 4(f) involvement in the corridor.

F. PROPOSED I-35E SCHEDULE

Metropolitan Council Approval of FEIS	December 1982
Minnesota Environmental Quality Board Approval of FEIS	December 1982
Roadway Design Approvals	Late 1982/Early 1983
Right-of-Way Acquisition	1983
First Stages of Construction	1983 or 1984
Roadway Open to Traffic (West Seventh to I-94)[3]	1986 or 1987

[3]Certain segments may open at an earlier date depending upon funding availability and detailed staging plans.

Minnesota
Department of Transportation
Transportation Building
St. Paul, Minnesota 55155

Office of Commissioner

(612) 296-3000

December 16, 1981

Mr. Charles Weaver, Chairman
Metropolitan Council
300 Metro Square Building
St. Paul, Minnesota 55101

Dear Mr. Weaver:

I have reviewed the Metropolitan Council report and accompanying memorandum which include your specific recommendations for I-35E in St. Paul. I am pleased that you did make a definitive choice in view of your important role on regional issues such as 35E. I have considered and support your recommendations and ask that you proceed with preparation of the Final Environmental Impact Statement with the directly connected parkway as the preferred alternate.

More specifically the preferred alternate includes:

- A parkway in the Pleasant Avenue Corridor from West 7th Street to downtown St. Paul with a direct connection to I-94.

- A roadway with four through-lanes and auxiliary lanes for off and on ramp weaving movements where needed.

- A prohibition of trucks on the facility.

- A connection to the Shortline. The connection should be included in the design and construction, but not physically linked until City resolution of the various Shortline issues occurs.

I have taken the time to follow the process carefully, I have reached this decision after reviewing the Draft Environmental Impact Statement, public hearing testimony, and many other written and verbal position statements. I have had a number of meetings with my staff to be briefed on the issues as they emerged. The St. Paul City Council and the Metropolitan Council positions and rationale have been given important weighting in my decision.

This is one of the most complex, controversial, and difficult issues I have had to face as Commissioner. It is quite clear that no complete concenses has emerged -- no one acceptable answer that satisfies conflicting desires of the most directly affected neighorhoods and the somewhat less visible user groups both from within and outside St. Paul. In my view, it is understandable that these differences have existed and have been debated openly - people can and do differ because of varying perceptions of what is best from their unique perspectives. What is perhaps most important, however, is that the stalemate end.

Your regional policy perspective is, in my view, appropriate for a transportation investment of the magnitude anticipated for I-35E. Your recommendations appear to balance the regional need for an improved travel corridor to and through St. Paul with measures that will significantly lessen neighborhood impacts. I realize this is not a popular position given pro-freeway and pro-indirect connection parkway preferences voiced.

I fully recognize that further legislative action will be necessary for any of the project alternatives to be implemented. I think that the general legislative intent was that the Metropolitan Council, with Mn/DOT and the City of St. Paul assitance, go through the environmental impact statement process, which includes analyzing many alternatives, hearing much testimony via hearings and meetings, and make a decision using information from that process. I do not think legislative intent was to constrain the process to select any particular alternate. Therefore, I am optimistic that appropriate legislative changes will be made.

I also recognize that related Shepard Road, East Central Business District (ECBD) Bypass and Shortline issues are not fully resolved. I continue to support the City of St. Paul in its efforts to obtain appropriate solutions and pursue funding sources. I recognize the desirability of the ECBD bypass in reducing truck movements through downtown and in lessening truck traffic on other regional routes, but also believe existing and planned routes will suffice for the near future until funding can be found for these other projects.

In accordance with the contract, please proceed immediately with preparation of the Final Environmental Impact Statement (FEIS). I trust that the substantive comments of the many groups and individuals who spent a great deal of time in developing questions and positions will be formally addressed in this document. Hopefully the long and divisive time of indecision will be one major step closer to ending.

Sincerely,

Richard P. Braun
Commissioner

Minnesota
Department of Transportation
Transportation Building
St. Paul, Minnesota 55155

Office of Commissioner

(612) 296-3000

September 2, 1982

Mr. Charles Weaver
Metropolitan Council
300 Metro Square Building
St. Paul, Minnesota 55101

In reply refer to: 319
I-35E in St. Paul

Dear Mr. Weaver;

My letter dated December 16, 1981 regarding I-35E in St. Paul gave Mn/DOT's preferred alternate (essentially Alternate C -- a directly connected parkway) and asked that the Final Environmental Impact Statement be completed using that alternate.

As you know, we are at a point in the I-35E project development process where a decision is necessary on which design refinement near the north end of the project is to be used for the completion of the Final Environmental Impact Statement and historical documentation. The purpose of this letter is to inform you of my choice of Layout 3D, Study 4.

This design refinement both avoids the James J. Hill Estate lower foundation wall, as preferred by the Minnesota Historical Society, and provides for the long-planned half-diamond to and from the south at relocated Kellogg Boulevard, as preferred by the City of St. Paul. It also avoids use of land at the Selby Hill Streetcar Tunnel approach and better ties to the city ring road system by connecting to 6th/Concordia Avenue near the Vo-Tech institute. Nearby developed and developable properties will have adequate access. A frontage road between Walnut and Chestnut Streets is planned for serving the United Hospitals complex and the other properties nearby. It therefore supports historic preservation goals and also meets community circulation and land use goals both in the project area and downtown. At the same time, it will allow I-35E parkway traffic to be properly served without adding to the overall project cost.

I think credit for resolution should go to the entire project management team for investigating many potential alternatives and their effects. I am aware that, at times, it seemed like no resolution acceptable to all major parties would be found. Finally, a creative solution has emerged which, in my view, does achieve the most important goals. The cooperation of the Minnesota Historical Society has been very helpful. United Hospitals input has also been important.

This alternative design refinement should be used in the Final Environmental Impact Statement and appropriate historical issue documentation as well. I will be communicating my decision to the State Historical Preservation Officer which will in turn initiate his determination of effect findings for this alternative. I believe it represents another important step in bringing the I-35E Parkway closer to implementation.

Sincerely,

Richard P. Braun
Commissioner

cc: PMT Members

Preferred Alternative

II. PREFERRED ALTERNATIVE

A. BACKGROUND

The need for a roadway to serve the southwest portion of St. Paul was first recognized in the 1920s, when the city identified Pleasant Avenue as a major roadway in the Plan for St. Paul.

Origin-destination studies conducted by the City of St. Paul and the Minnesota Highway Department in 1946 and 1950 confirmed the need for a major roadway facility capable of carrying traffic generated by development in southwest St. Paul and in northern Dakota County.

A 1954 study, Highway Transportation in Minnesota, published for the Minnesota Highway Study Commission, identified the Pleasant Avenue corridor as a major St. Paul thoroughfare. In 1954 the St. Paul City Council identified critical areas where highway right-of-way was required. The Council directed that building permits be withheld in those areas. Portions of the Pleasant Avenue corridor were included.

I-35E along the Pleasant Avenue alignment was first proposed in the September 1955 report General Location of National System of Interstate Highways. Approvals were received from the St. Paul City Council and the Bureau of Public Roads (predecessor of the Federal Highway Administration) for I-35E in this location in 1957. The Minnesota Highway Department held a public hearing on the proposed location of the interstate system in St. Paul, and no objections were raised to the proposed location of I-35E.

Detail design studies for the portion of I-35E from West Seventh Street to Duke Street were authorized in 1961, and for the portion from Duke Street to I-94 in 1962. Most of the right-of-way for the project was acquired before 1967. I-35E construction commenced in 1964 with the letting of contracts for storm sewers, grading, paving, construction of bridges and their roadway approaches.

The Metropolitan Council approved I-35E in the Pleasant Avenue corridor in 1969, and the State Planning Agency approved the project in 1970.

Right-of-way acquisition in the Pleasant Avenue corridor for the St. Paul link of I-35E is from 90% to 95% complete. Work in the categories of clearing, grubbing, excavation, earth moving, construction, drainage tunnels, structures, and bridge construction is virtually completed from West Seventh Street to Duke Street. Grading work is complete from West Seventh Street to St. Clair Avenue, three-quarters of the total length. Slope stability structures in the vicinity of St. Clair Avenue are in place. There has been essentially no construction on I-35E in St. Paul since August 1972. Investment to date is equivalent to $54,250,000 in 1980 dollars.

Construction of I-35E was stopped by a joint lawsuit involving the City of St. Paul and four neighborhood groups in 1972. A Stipulation for Settlement, dated August 21, 1972, required: 1) the preparation of an Environmental Impact Statement for the segment of 35E from West Seventh Street to the junction of I-94 and I-35E, and 2) the holding of a location and design public hearing.

A preliminary impact report was prepared by Walter Butler Engineering Company[1] and public hearings were held in 1975. The City of St. Paul passed a resolution in support of the completion of a roadway in the Pleasant Avenue corridor with restrictions regarding facility connections and truck access.

The Minnesota Legislature placed a moratorium on further freeway construction in the Pleasant Avenue corridor in response to citizen opposition in 1975.

In 1977, the St. Paul City Council reaffirmed their 1975 resolution and further resolved that an EIS immediately commence to resolve the several outstanding issues regarding the St. Paul link of I-35E. The City Council also resolved that the St. Paul link be removed from the National System of Interstate and Defense Highways.

In 1978, the Minnesota Legislature directed the Metropolitan Council to prepare an in-depth EIS on the Pleasant Avenue corridor and feasible alternatives (M.S. 1978, Section 161.124). Phase I of the study, which identified the parameters of the study and feasible alternatives for I-35E, commenced in 1978 and was completed in 1979. The Phase I Report fulfilled the State Action Plan requirements for the Project Development Report and the Preliminary Location Report. In it, eight alternatives in the Pleasant Avenue corridor, one in the Shepard Road corridor, and a no-build alternative were identified for further study in the Draft Environmental Impact Statement. These options were the only ones considered reasonable based upon an evaluation of eight "first-level" criteria. This evaluation is described in the document Interstate 35E, Phase I Report.

In March of 1979, Phase II of the study, preparation of the DEIS, was initiated. A total of nineteen special studies were prepared addressing a variety of environmental and socioeconomic impacts to be analyzed and synthesized into the DEIS. During August and September of 1979, public meetings were held with each of the following groups to identify issues and concerns to be addressed in the EIS: the Lexington-Hamline, Groveland-Macalester, Summit Hill, and Downtown District Councils of St. Paul; Mendota Heights City Council; Eagan City Council; and Ramsey and Dakota County Board of Commissioners. Out of the concerns raised in these meetings, three additional alternatives in the Pleasant Avenue corridor (Alternatives A', J, and K) were developed. These were introduced at meetings in December of 1979 and February of 1980.

---

[1]Walter Butler Engineering Co., Inc., and Tucay M. Aydinalp, Consulting Engineers, I-35E Report, St. Paul, Minnesota, March 1975.

A second round of public meetings was held in December of 1980 through January of 1981 to summarize the conclusions of the special studies and record public input. Presentations were given before the Lexington-Hamline Community Council, Southwest Area District Council and Summit Avenue Hill Association; Operation '85, the Dakota and Ramsey County Board of Commissioners; and the Transportation Subcommittee and Transportation Advisory Board of the Metropolitan Council.

The DEIS was published on June 22, 1981. After allowing for review of the document by government agencies, private interest groups, and individual citizens, a location and design hearing on the DEIS was held on September 9, 1981. The hearing record was held open for comment until September 30th at which time Phase III of the study, preparation of the FEIS, commenced. Phase III of the study process included consideration of public hearing testimony, response to comments on the DEIS, selection of the preferred alternative by the Commissioner of the Minnesota Department of Transportation (see pages 14 to 17 of this EIS), and completion of coordination with cooperating agencies. Publication of the FEIS concludes Phase III.

FHWA must prepare a concise public Record of Decision (ROD) no sooner than 30 days after EPA publishes a notice that the FEIS has been filed and made available to the public. Phase IV includes other preliminary work and approvals needed so that design and construction can commence.

B. ALTERNATIVES CONSIDERED

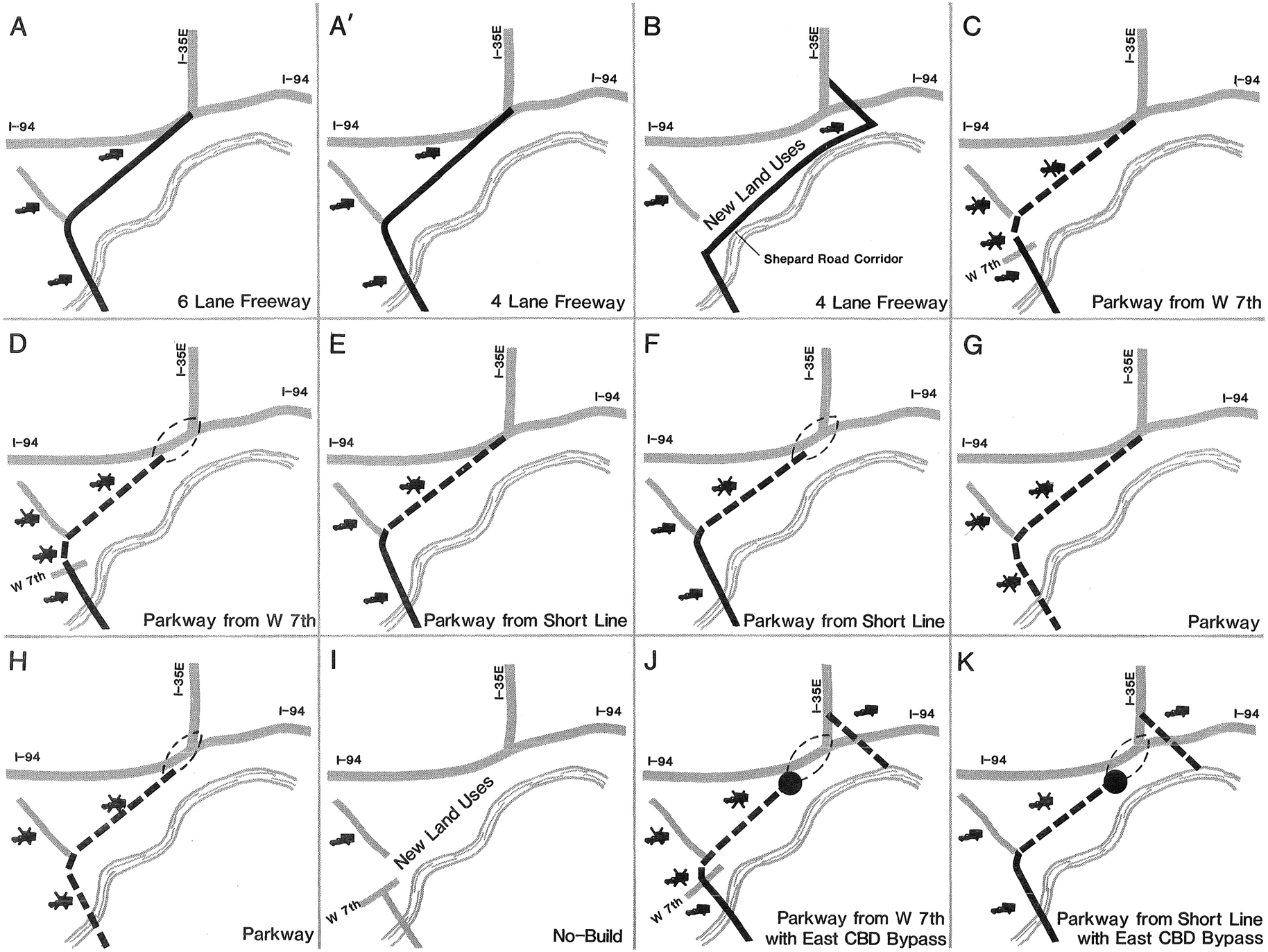
A total of twelve alternatives were considered in the Draft EIS. These are depicted on Figure 3. Of these, eleven "build" alternatives were developed within the Shepard Road and Pleasant Avenue corridors. Only a six-lane freeway alternative was studied for Shepard Road (Alternative B). Both freeways and parkways were studied within the Pleasant Avenue corridor. The freeway alternatives (A and A') had six and four lanes, respectively. The six parkway alternatives (C, D, E, F, G, H), each with four lanes, began at the Short Line, West Seventh Street or I-494, and had either a direct or indirect connection to I-94. Two more alternatives were indirectly connected parkways that began at either West Seventh Street (J) or the Short Line Road (K), and included a bypass east of downtown St. Paul. The "no-build" option was the twelfth alternative (I). Alternative C has been chosen as the preferred alternative as discussed below.

C. SELECTION OF THE PREFERRED ALTERNATIVE

Selection of the preferred alternative reflects participation in a lengthy process of environmental analysis and public review. Selection was based on review of the I-35E Draft EIS, public hearing testimony, and other written and verbal position statements. Of particular importance in decision-making were the positions and rationale of the Dakota County Board and Dakota County communities, St. Paul City Council and the Metropolitan Council.

FIGURE 3

ALTERNATIVES CONSIDERED IN THE DEIS



Existing Freeway

Existing Arterial

Proposed Freeway

Proposed Parkway

Trucks Allowed

No Trucks

Direct Connection

Indirect Connection

At-Grade Intersection

I35E

Summary of Public Hearing Testimony and Written Statements

A public hearing was held on the I-35E DEIS on September 9, 1981, at the Highland Park Junior High School in St. Paul. Among those attending were local government officials from Dakota County and its communities, Ramsey County and St. Paul; staff and officials of local, regional, state and federal government agencies; representatives of private groups and organizations; and individual citizens from St. Paul and Dakota County.

In general, there were three different factions represented at the public hearing and in written correspondence. These included support for a freeway alternative in the Pleasant Avenue corridor, a Pleasant Avenue parkway with direct connection to I-94, and a Pleasant Avenue parkway with an indirect connection to I-94. The Shepard Road freeway was not specifically favored by any one group and was directly opposed by the U.S. Environmental Protection Agency (EPA), Department of the Interior (DOI), and the Minnesota Department of Natural Resources (DNR) due to its potentially severe impacts on river morphology, soils, water quality, wetlands, and aesthetics.

Primary proponents of a Pleasant Avenue freeway alternative included northern Dakota County City Councils and Chambers of Commerce, Dakota County legislators, and private organizations such as the Urban Council on Mobility, the Minnesota Transport Services Association, St. Paul Association of Commercial Clubs, Rauenhorst Corporation and Burlington Northern. These groups cited issues such as safety, energy savings, improved goods movement, availability of funding, and regional development interests in support of their opinion.

The parkway with an indirect connection was preferred by community councils in St. Paul located near the Pleasant Avenue corridor, St. Paul legislators located near the corridor, interest groups such as RIP 35E and the Wilder Park Association, Operation '85, and a Ramsey County commissioner. This alternative was favored as a compromise to a freeway alternative as it was thought to reduce noise and aesthetic impacts along the corridor and to not require amendment to legislation which allowed only an indirectly connected parkway to be built. (M.S. 1980 161.12 and 161.1245 were since amended by the 1982 State Legislature.)

In support of a parkway with a direct connection to I-94 were the St. Paul Planning Commission and City Council, the Transportation Advisory Board of the Metropolitan Council, the State Automobile Association, legislators from the west side of St. Paul, the West Side Citizens Organization, Grand Avenue Businessmen, the Downtown Community Council, and the St. Paul Association of Building Owners and Managers. These groups favored a parkway for similar reasons as stated above, and because it is consistent with city development goals and policies. The direct connection was supported as a means of providing continuity in the regional transportation system and to minimize traffic on downtown streets.

Opinions of Dakota County and the City of St. Paul

On August 18, 1981, the Dakota County Board passed a resolution in support of freeway Alternatives A and A'. Seven Dakota County communities subsequently passed variations of the same resolution (see pages 170 to 181). Reasons cited within the resolution in support of this decision included provision of an adequate level of service for trucks and other vehicles, eligibility for Interstate funding, and reduction of traffic congestion on other major transportation routes.

The City of St. Paul, after an extensive Planning Commission review process, a public meeting on July 20, 1981, and a public hearing on August 10, 1981, passed a resolution in favor of a modified Alternative J. The resolution passed on September 3, 1981, called for a Pleasant Avenue parkway with a direct connection to I-94, and an east CBD bypass (see pages 182 to 183). This modification of Alternative J made it essentially the same as Alternative C with the inclusion of an east central business district bypass and the following additional features:

A. Prohibition of trucks

B. Forty-five mile an hour speed limit

C. A raised, landscaped median and roadsides

D. Architecturally treated lighting

E. Continuous pedestrian and bicycle paths to be located, where feasible, within the existing right-of-way

F. Appropriately located and designed pedestrian crossings and noise mitigation measures

G. Grade-separated interchanges at Shepard Road, West Seventh, Randolph, Victoria, St. Clair, Grand/Ramsey, Kellogg and a grade-separated crossing at Fifth/Sixth Street crossing, and the design of these intersections should be reviewed by the affected communities

H. Direct connection from the parkway to I-94 east and I-35E north

I. Major modifications to the common section of I-94/I-35E to provide lane continuity and to eliminate weaving

J. Widening of the Jackson ramp from 11th Street to I-35E north

K. Improvement of Shepard Road to standardize lane widths, and provide shoulders, protected left turns, and an upgraded intersection with Chestnut, and the design of this intersection should be reviewed by the affected community

L. Continuation of the truck prohibition on the Short Line and no connection of I-35E to the Short Line until further study has been completed and a satisfactory resolution of traffic problems at the north end has been determined by the City Council

Listed in the resolution among the reasons for choosing this alternative were an overall positive impact on the economic, social and environmental quality of the city, consistency with the goals and policies of the city's comprehensive plan, improved access to the St. Paul CBD, enhancement of CBD economic development potential, reduction of traffic on neighborhood arterials, reduced noise impacts, and more positive visual and aesthetic integration with adjacent residential areas (than a freeway alternative).

Truck Route Evaluation

Updated and supplementary analysis to establish the reasonableness of alternate truck routes for the selected parkway was performed. (The details of this analysis are described in Section III.E., page 62, of this FEIS.) This was a major analysis in view of the substantial comments received on the Draft EIS and from the public hearing record.

By definition, trucks which would be prohibited from using an I-35E parkway include all commercial vehicles greater than 9,000 pounds licensed gross weight. Therefore, permitted vehicles on the parkway would include autos, buses, MnDOT-authorized maintenance vehicles, emergency vehicles, commercial vehicles (licensed for 9,000 pounds and under), vans, motorcycles, pick-up trucks, and recreational vehicles.

Interstate, regional and local truck movements were identified, and data was collected on potential alternate routes to evaluate safety, distances, travel times, speeds, and potential noise impacts. The evaluation concluded that the preferred alternative provides reasonable alternate service for trucks based upon the following factors:

1. Safety of movement for trucks is expected to be better under the preferred alternative than with the no-build because auto volumes on many of the routes involved would be diverted to the I-35E parkway.

2. Typical interstate truck movements have comparable high speed, safe, and convenient routings through the area and to downtown St. Paul with the parkway compared to a freeway.

3. Typical regional truck movements with a parkway have alternative routings which are somewhat longer in distance and travel time than with the freeway. However, the differences are not judged to be of a magnitude to cause any significant problems.

4. Typical city truck movements from the Lexington Avenue Bridge to downtown via Shepard Road on alternate routes like West Seventh Street (TH 5) and Montreal-Snelling (TH 51), are very similar in distance, but considerably longer in expected travel times than with a freeway due to lower speeds on the arterial type routes. Truck movement on Shepard Road to downtown St. Paul is very similar to a hypothetical Pleasant Avenue freeway allowing trucks.

5. Speeds on alternative truck routings show that there is not significant lengthy congestion on these routes.

6. The preferred alternate truck movements will be better than for the "no-build" since auto traffic volumes will be considerably reduced on the routes trucks utilize.

7. The number of trucks diverted to alternate routings due to the parkway designation is generally not great enough to cause more than a 1 to 2 dBA increase over noise levels occurring with freeway designation, at the same receptors. (This change is not normally perceptible.) Either freeway or parkway selection without an east CBD bypass will cause an increase of 3 to 4 dBA over present noise levels at receptors along Sibley and Jackson streets. With a bypass, noise levels at these receptors would be reduced by 2 dBA from present levels.

8. Safety of movement of trucks will be similar under the preferred alternative on alternate routings involving freeways (and in some cases better) as anticipated for a freeway in the Pleasant Avenue corridor. Interstate and longer trip regional routings would tend to use other freeway routes. Arterial routings using TH 5 (West Seventh Street) and TH 51 (Snelling Avenue) would travel on routes with considerably higher accident rates. A Shepard Road routing involves travel on a route with an accident rate a little higher than that for urban expressways.

Metropolitan Council Recommendations

On December 3, 1981, the Metropolitan Council recommended that the Commissioner select Alternative C as the preferred alternative. The recommendation included that a hook-up to the Short Line be designed as part of the facility but not constructed until such time as needed improvements on the Short Line are completed. In addition, it was suggested that an east CBD bypass be included in the year 2000 transportation plan for St. Paul and that the city and the Commissioner of MnDOT jointly pursue funding sources for implementation of the bypass.

In order to reach this recommendation, I-35E alternatives were analyzed in terms of consistency with regional development policies. The following summarizes the Metropolitan Council's rationale for choosing Alternative C as the preferred alternative.

1. The no-build alternative was considered inconsistent with the goals of the Metropolitan Development Framework and several transportation policies.

2. It was determined that I-35E is to serve regional travel and, therefore, a regional arterial designation was consistent with the requirements of the functional classification criteria and characteristics of the Metropolitan Transportation Policy Plan. Both a freeway and parkway would meet this criteria.

3. The Shepard Road corridor was determined to be inconsistent with St. Paul's Mississippi River Corridor Critical Area Plan and would have the greatest impact on the regional recreation open space system and the Mississippi Great River Road program.

4. Although a freeway in the Pleasant Avenue corridor was consistent with policies related to accessibility to metropolitan centers and goods movement, it was found to be inconsistent with a number of other transportation policies concerning multiple use of right-of-way, consistency with state and federal environmental standards, provision of a trail corridor and compatibility with trail activity, the compatibility of the scale and perspective of the facility with its surrounding area, architectural and aesthetic compatibility of the facility, and safe bicycle access.

5. Although restriction of trucks on a regional arterial is inconsistent with policy concerning goods movement, a parkway in the Pleasant Avenue corridor from West Seventh Street was found to be most consistent with all other transportation policies. It was found that trucks could be routed to Shepard Road and the Jackson-Sibley connection to conform with goods movement policy, and an east CBD bypass would further support this policy by meeting longer range truck demand.

6. A direct connection was found to be consistent with policies related to safety and maintenance of the facility, limiting traffic through neighborhoods, compatibility with adjacent land use, accessibility to metropolitan centers and safe accessibility to metropolitan centers by bicycles, whereas an indirect connection was not.

7. A connection with the Short Line was considered consistent with the Development Framework chapter of the Metropolitan Development Guide.

Description of the Preferred Alternative by the Commissioner of MnDOT

After careful consideration of all available input, the Commissioner of the Minnesota Department of Transportation in a statement issued on December 16, 1981, selected a preferred alternative to be studied in further detail. (This statement can be found on page 14 of the EIS.) He also requested that the Metropolitan Council proceed with preparation of the Final EIS.

The preferred alternative is Alternative C. As defined by the Commissioner of Transportation, this alternative consists of:

- A parkway in the Pleasant Avenue corridor from West Seventh Street to downtown St. Paul with a direct connection to I-94. Parkway designation calls for a legal speed limit of 45 mph and provides for extensive landscaping within the facility right-of-way.

- A roadway with four through-lanes and auxiliary lanes for off- and on-ramp weaving movements where needed.

- A prohibition of trucks on the facility. "Trucks" as defined here refers to commercial vehicles over 9,000 pounds. Buses, high occupancy vehicles and other MnDOT authorized vehicles, however, will be permitted to use the facility.

- A connection to the Short Line Road. The connection should be included in the design and construction of the parkway, but not physically linked until the City of St. Paul reaches a resolution on various Short Line issues.

The Commissioner offered to support the City of St. Paul in its efforts to eventually implement an East Central Business District Bypass and appropriate improvements to Shepard Road. These were desirable future plan elements for which funding was not available. They were not thought to be necessary for the completion of the I-35E project per se.

Final Approvals by the Metropolitan Council

According to state law (Minn. Stats. 473.167), the Metropolitan Council must approve or disapprove of the Commissioner's selection. The Council will also review the Final EIS for adequacy in compliance with National Environmental Policy Act (NEPA) regulations.

Supplemental Data

III. SUPPLEMENTAL OR UPDATED TECHNICAL INFORMATION

This section of the FEIS makes corrections to material contained in the DEIS and includes material not contained in the initial impact statement. These corrections and additions are based upon comments received during the DEIS review period and upon further study conducted since completion of that document.

A. COSTS

The estimated cost of the preferred alternative has been updated to reflect 1982 dollars. This estimate includes acquisition of right-of-way, noise abatement as currently proposed, landscaping, a pedestrian/bicycle facility, and pedestrian crossings. The current estimate is approximately $53,000,000 which includes $38,500,000 for construction of the Pleasant Avenue corridor and $14,500,000 for improvements to the common section.

B. SOCIAL ENVIRONMENT

High Risk Segments of the Population

(This section has been added in response to Minnesota Department of Health comments concerning sensitive populations.)

High risk populations are groups of individuals who because of physical, genetic, or psychological characteristics are more likely to be affected by pollutant levels to which other members of the population can adapt. These populations have specifically been identified as children 0 to 2 years old, day care center enrollees, elementary school children, hospital patients, residents of long-term nursing care facilities, people over 65 years of age, and people with incomes below poverty level.[1] High-risk populations located in the primary impact area are enumerated on Tables 1 through 4 with the geographic location of identified facilities displayed on Figure 4.

Because the primary impact area encompasses a portion of St. Paul which is high in density, including the city's central business district, a large proportion of high-risk individuals are found in this area. Eight of eleven hospitals located in St. Paul are found in the primary impact area, and account for 80 percent of licensed hospital beds in the city. Long-term care beds licensed in the primary impact area represent 60 percent of the city's total. In 1975, 15.3 percent of the population in the primary impact area was 65 years or older as compared with 13.6

---

[1] Source: Wadden, R.A. et al. Transportation Emissions and Environmental Health: an Evaluating Planning Methodology. University of Illinois School of Public Health. June 1975.

TABLE 1
ENUMERATION OF TOTAL POPULATION AND HIGH-RISK GROUPS WITHIN THE PRIMARY IMPACT AREA

Total Population	108,432
Children 0 to 4 years old*	7,048
Day Care Center Enrollees	643
Hospital Beds	1,815
Long-Term Care Beds	1,821
People Aged 65 and Older	16,590
Elementary School Enrollees	9,007
Families with Incomes Below Poverty Level	2,395

Source: Barton-Aschman Associates, Inc., December 1981.

*Available data did not allow a breakdown of children 0 to 2 years of age to be analyzed.

percent for the city as a whole. Additionally, 9.1 percent of families living in the primary impact area had incomes below poverty level according to 1970 census data as compared to 6.4 percent for St. Paul overall. The population of children four years of age and younger[2] and those attending elementary schools in the primary impact area appears to be proportionate with that for the city as a whole.

C. AIR QUALITY

Relationship of the Project Area to the State Implementation Plan

(This section is presented as additional information.)

This project is in an air quality nonattainment area for which the State Implementation Plan (SIP) is required to contain transportation control measures. The transportation planning process was reviewed by the Federal Highway Administration on November 12, 1981, and the transportation plan was determined to conform to the SIP which was approved by EPA on June 16, 1980. The Transportation Improvement Plan (TIP) was determined to conform to the SIP on January 18, 1982. This project was included in the transportation plan and the TIP, both conforming to the SIP. Therefore, pursuant to 23 CFR 770, this project conforms to the SIP.

[2]Available data did not allow a breakdown of children 0 to 2 years of age to be analyzed.

TABLE 2
HOSPITALS AND NURSING HOMES WITHIN THE PRIMARY IMPACT AREA

Facility	Number of Licensed Beds	% Occupancy
Hospitals		
1. Bethesda	298*	67.4
2. Children's	116	61.4
3. Gillette Children's	60	40.0
4. Midway	337/285**	82.4
5. St. John's	354	71.1
6. St. Joseph's	538/500	79.3
7. St. Paul Ramsey	455	79.0
8. United	695/556	81.4
9. St. Paul Public Health Center	NA	NA
Nursing Homes		
1. Amy Johnson Residence	25 BCH***	
2. Bethel Care Center	149 NH	
3. Bethesda Lutheran Infirmary	138 NH	
4. Dayton Board and Care Home	26	
5. Harmony Nursing Home	150 NH	
6. Highland Chateau, Inc.	111 NH	
7. Hoikka House, Inc.	117 BCH	
8. The Holy Family Residence	153 NH	
9. Midway Manor, Inc.	186 NH	
10. Mounds Park Rest Home, Inc.	37 BCH	
11. Pine View Residence	22 BCH	
12. Pleasant Hill Care Center	90 NH	
13. Quinlan Care Home	26 BCH	
14. Regency Manor, Inc.	145 NH	
15. St. John's Hospital	18 NH	
16. St. Paul's Church Home	95 NH	
17. St. Paul Home for the Aged	147 NH	
18. Summit Manor Health Care Center	120 NH	

Sources: Metropolitan Council/Health Board, Health Board Report of Hospital Utilization Rates for December 1979 and Staff Verification Report, Metropolitan Council, St. Paul, Minnesota.

Metropolitan Council, Consumer's Guide to Long-Term Care, 2nd Edition, Metropolitan Council, St. Paul, Minnesota, Publication No. 19-79-007, March 1979.

*For the year ending December 31, 1979.
**Updated as of September 1981 Minnesota Health Department Licensing Data.
***"NH" refers to "nursing home" beds, "BCH" means "boarding care home" beds. (Some residents of licensed board and care homes are not considered at high risk to air and noise pollution.)

TABLE 3
ST. PAUL PUBLIC AND PRIVATE SCHOOL ENROLLMENTS IN THE PIA

			Total Students
Public Elementary Schools			
1.	Adams		316
2.	Daytons Bluff		675
3.	East Consolidated		674
4.	Franklin		392
5.	Highland Park		230
6.	Hill		456
7.	Jefferson		196
8.	Maxfield		414
9.	Randolph Heights		399
10.	Webster Magnet		1,015
		Total	4,767
Special Public Elementary Schools			
11.	Open School		186
12.	Bridge View		99
13.	Hartzell		74
14.	Behavioral Learning Center		38
		Total	397
Private Elementary Schools			
15.	Children's House Montessori		42
16.	Immaculate Heart		237
17.	McIntyre School		679
18.	Temple Baptist		96
19.	St. Francis de Sales		251
20.	St. James		148
21.	St. Luke		522
22.	St. Patrick		230
23.	Urban Catholic Community		176
24.	SPA-Summit Lower		197
25.	Holy Spirit		424
26.	Christ's Household of Faith		115
		Total	3,117

Sources: St. Paul Public Schools, Elementary and Public School Enrollments, September 28, 1979.

St. Paul Public Schools, "Non-Public School Enrollment," December 1979.

TABLE 4
LICENSED DAY CARE CENTERS IN THE PRIMARY IMPACT AREA

		Licensed	Enrollment
1.	Camphor Head Start	35	28
2.	*Central High School Day Care Center	15	12
3.	*Children's Program St. Paul YWCA	37	47
4.	Creative Day Care	30	32
5.	*Dayton's Bluff Day Care	24	26
6.	Downtown Day Care Center	77	35
7.	Hallie Q. Brown Child Care Center	69	55
8.	Head Start Child Development Center	105	84
9.	*Juvenile Horizons Development Day Care	14	20
10.	McIntyre's Center for Gifted Children	30	28
11.	*Midway Montessori School	45	40
12.	Mount Airy Head Start	15	30
13.	New Morning Children's Christian Learning Center	20	21
14.	St. Mark's Head Start	32	30
15.	*St. Paul's Childhood Center	70	70
16.	Summit Hill Child Care Center	14	10
17.	Sunshine Child Care Center	83	65
18.	*William Mitchell College of Law Child Care Center	21	10

*Programs which include children two years and younger.

FIGURE 4

LOCATION OF HIGH-RISK POPULATIONS

KEY

- ● DAY CARE FACILITIES
- ■ ELEMENTARY SCHOOLS
- ✱ HOSPITALS
- ▲ NURSING HOMES

0 2000 4000 8000 Feet

I35E

Adequacy of National Air Quality Standards in Relation to High Risk Segments of the Population

(This section was added in response to concern raised by the Minnesota Department of Health and RIP-35E over sensitive populations.)

Objectives/Conclusions of Air Quality Analysis

The I-35E Draft EIS presented evaluations of project related air quality impacts based upon standard methodologies approved by the appropriate regulatory agencies, as described in the DEIS. The results of the analyses were evaluated relative to impact threshold criteria and standards promulgated by MPCA and the U.S. EPA. Criteria and standards were developed pursuant to enabling legislation aimed at the protection of the general public with an adequate margin of safety. The DEIS conclusions were that the proposed action will not cause violations of the air quality standards or criteria.

Basis of Standards Promulgation

With respect to air quality standards, a basic criteria document for carbon monoxide was issued in 1970 by the (Former) U.S. Department of Health, Education and Welfare.[3] That document was drafted pursuant to the 1967 Amendments to the Clean Air Act that required that the Administrator:

> ". . . from time to time, but as soon as practicable, develop and issue to the States such criteria of air quality as in his judgment may be requisite for the protection of the public health and welfare . . . Such criteria shall . . . reflect the latest scientific knowledge useful in indicating the kind and extent of all identifiable effects on health and welfare which may be expected from the presence of an air pollution agent."[4]

The intent of the Air Quality Criteria for Carbon Monoxide document, issued in 1970, was to serve as the basis for the national ambient air quality standards. These would be air quality standards which protected the entire population from air pollution agents. The 1970 document clearly states this intention.

> Since air quality criteria must, unless otherwise specified, consider all of the population rather than just major segments of it, studies must consider especially the impact of air pollution on the "most sensitive" responders. The population group most

---

[3] Air Quality Criteria for Carbon Monoxide: U.S. Department of Health, Education and Welfare, Public Health Service. 1970.

[4] Air Quality Act of 1967, PL 90-148

> susceptible to the adverse effects of atmospheric CO can be predicted on a physiological basis to include those persons most sensitive to a decrease in oxygen supply: 1) people with severe anemia due to the already limited supply of oxygen-carrying hemoglobin; 2) those with cardiovascular disease and the resultant impairment of circulation, 3) those with abnormal metabolic states such as thryotoxicosis or fever, which result in increased oxygen demands; 4) those with chronic pulmonary disease; and 5) the developing fetus, which may be unusually sensitive to insufficient oxygen.[5]

The 1977 amendments to the Clean Air Act reiterate this commitment to the protection of the public health. The act states that standards shall be promulgated to do so.

> National primary ambient air quality standards, prescribed, under section (a) shall be ambient air quality standards the attainment and maintenance of which in the judgment of the Administrator, based on such criteria and allowing an adequate margin of safety, are requisite to protect the public health.[6]

In October of 1979, the U.S. Environmental Protection Agency issued a document titled Air Quality Criteria for Carbon Monoxide. This report was issued pursuant to Section 109 of the Clean Air Act, as amended, and was designed to evaluate the scientific information which will form the basis for the National Ambient Air Quality Standard (NAAQS) for CO. The document addressed the following major questions:

1. At what level of CO exposure do adverse health effects occur?
2. What are the major health effects from exposure to CO?
3. What are the special groups at risk to CO exposure?
5. Are there additive effects from CO exposure in combination with other pollutants and drugs, or at high altitudes?
6. Do present monitoring methods adequately reflect human exposure to CO?
7. What are the global effects of increased emissions of CO to the atmosphere?

In Section 11.8 of the Air Quality Criteria for Carbon Monoxide, 1979, studies and research regarding CO effects on special risk groups were evaluated in an attempt to deduce the extent of the impacts of CO exposure. The following special populations at risk were identified:

---

[5]Op Cit, pgs. 9-8, 9-9.

[6]The Clean Air Act as Amended. August 1977. Sec. 109 (a) (1) (B) (b) (1) p. 16. 95th Congress.

the fetus; subjects with cardiovascular damage; individuals under the influence of various drugs; persons exposed to high altitudes; and certain occupational groups (firefighters and traffic policemen) who are typically exposed to higher CO levels than normal. From the reviews of the literature pertaining to CO effects, the following conclusions were made:

> Fetuses, persons with cardiovascular or central nervous system defects, sickle cell anemics, young children, older persons, persons living at high altitudes, and those taking drugs comprise groups at special risk to CO exposure. The current literature offers little information regarding the high risk groups; however, it is apparent that exposure for eight hours to CO concentrations as low as 15-18 ppm may be detrimental to the health of persons suffering cardiac impairment.[7]

The current national and Minnesota ambient air quality standard for eight-hour maximum CO exposure is 9 ppm. The highest anticipated corridor concentration for the proposed alternative is 5.3 ppm (year 2000) for the eight-hour period. The anticipated CO exposure is well below the national and the Minnesota health standards.

Air Quality Impacts of High Occupancy Vehicle and Car/Van Pool Lanes

(This section addresses a concern raised in the U.S. EPA correspondence of September 1, 1981.)

The DEIS evaluated the effects of the high occupancy vehicle (HOV) usage, including car/van pooling arrangements, as a possible energy conservation measure. In order to quantitatively estimate the extent of potential beneficial energy and air quality impacts associated with the diversion of auto travel to car/van pool travel, detailed trip generation information would be required. Such information includes average occupancy factors, and vehicle miles of travel (VMT) for both vans and cars, before and after the car/van pool system became operational.

The DEIS indicates that car/van pooling would produce a net savings in VMT of only 0.5 percent resulting in a very small energy savings. Motor vehicle air emissions are approximately proportional to energy consumption (assuming both automobiles and vans are equipped with internal combustion engines and similar gasoline/diesel fuel mixes for each fleet). Therefore, the very small savings in energy consumption will result in only a small reduction in emissions.

---

[7] Air Quality Criteria for Carbon Monoxide. U.S. Environmental Protection Agency. October 1979. Washington, D.C. pgs. 1-1 and 1-2.

Furthermore, the actual net percentage reduction in CO emissions achieved by diversion to car/van pooling is likely to be less than even the small savings in VMT, inasmuch as vans (on the average) produce more air pollution per mile traveled than autos.

For example, all other factors being equal (proportion of hot/cold starts, maintenance schedules, average travel speeds), carbon monoxide emissions based upon the MOBILE 2 model, U.S. EPA, are about 34 percent greater for vans (see Table 5). Thus, the net reduction in CO is unlikely to amount to more than a few tenths of a percent rendering the measure of questionable value (from an air quality perspective), given the minimal air quality impacts of I-35E forecast for 1990 and beyond.

TABLE 5
CO EMISSION FACTORS FOR AUTOS AND VANS (YEAR 1990)*

		Emission Factors (grams per vehicle-mile)		
Speed (MPH)	Vehicle (TYPE)	100% Cold Start	100% Hot Start	National Average**
5	Auto	127	24	40
	Van	175	32	53
15	Auto	50	9	16
	Van	69	12	21
25	Auto	35	7	11
	Van	48	9	14
35	Auto	24	4	7
	Van	32	6	10
45	Auto	20	4	6
	Van	28	5	8

*From MOBILE 2, U.S. EPA, for Autos (LDV) and Vans (LDT 1)

**Based on an approximate weighting of 21 percent cold, 27 percent hot transient and 52 percent hot stable operation (EPA, Vol. 9, 1978).

Influence of Local Topography on Air Quality Analysis

(This section was added in response to the issue of local terrain raised by John Diehl representing R.I.P. 35E in a correspondence of September 1, 1981.)

A report prepared by Professor Harold J. Paulus (University of Minnesota) in 1975[8] addressed the issue of the influence of terrain on potential I-35E air quality impacts at St. Lukes (United/Children's) Hospital. This study concluded, based on comparisons between meteorological (wind speed and direction) modeling at St. Lukes Hospital and at Station KSTP, that local air flow patterns were significantly affected by the presence of the bluff. The technical findings of the Paulus study that relate to topographical influences are not inconsistent with the air quality analysis or conclusions and, in some instances, actually substantiate the overall conservatism of the approach used.

1. Bluff influences on microscale wind patterns. Based on data from the two wind sensors, the Paulus study concluded that regional scale winds from the northwest quadrant usually approached St. Lukes Hospital from the southwest. In fact, wind directional patterns at urban CO "hot spots" often differ from regional patterns (as measured at an airport or other regionally representative site) because of man-made (e.g., street canyon) or natural topographical influences. However, such differences, while germane for a situation where the annual average concentrations would be of interest, are irrelevant in a modeling study which attempts to simulate the credible worst case scenario for CO (highest one-hour or eight-hour CO concentration likely to occur in the analysis year) by preselecting the local wind direction (and wind speed) that produces this scenario. This "worst case" local wind pattern need occur only once to result in the predicted CO concentration (that is, the concentration appearing in the Air Quality Study, Appendix C of the DEIS); however, if the predicted worst case CO is below the applicable standard, it may occur many times without altering the basic conclusion of the CO study -- namely, that the I-35E project will not induce violations of the CO standards. Thus, the frequency of occurrence of the worst case local wind directions will have no bearing on this conclusion.

   On the other hand, it is of interest to note the statement on page 9 of the Paulus report: "Variable readings usually indicate a very low wind speed (2-4 mph) and the chart will show an erratic wind direction behavior...". Although wind speed data did not appear in the Paulus report, this observation is essentially consistent with the use of 1.0 m/sec. (2.2 mph) as a worst case wind speed in the Air Quality Study (and as recommended by EPA as a lower limit for use in gaussian type diffusion models, such as HIWAY). Furthermore, the "erratic wind direction behavior" observed appears to lend credence to the use of the 0.7 "persistence

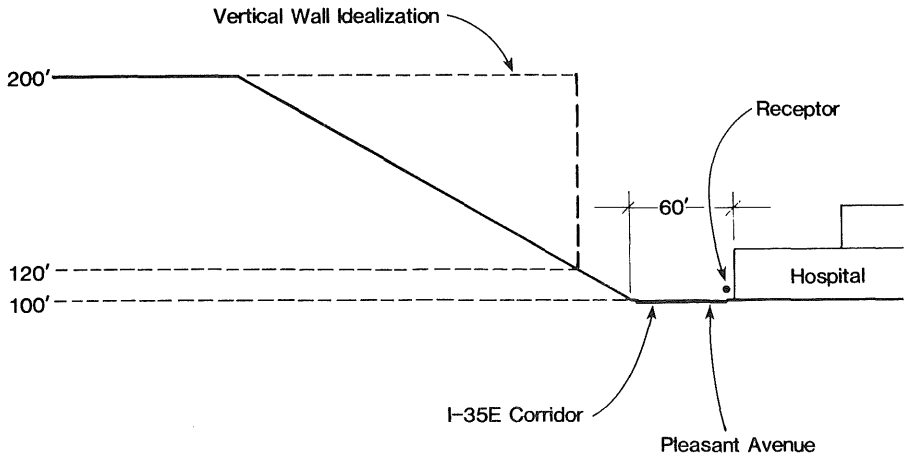
---

[8]Paulus, Professor Harold J. "Influence on Air Quality of the Proposed Highway 35E in the Vicinity of St. Lukes Hospital." April 28, 1975.

factor" as a conservative approach in the derivation of the eight-hour CO predictions.[9]

2. Credibility of Modeling in Hospital Area. This applicability of the HIWAY model to the area below the bluff has been questioned. While such concerns are relevant to the findings of the Air Quality Study, careful examination of the natural and urban topography in the subregion of interest, as well as consideration of the relative influence of the various topographical elements on air flow and pollutant transport behavior, provide convincing evidence that the HIWAY model can be expected to yield reasonable results despite the apparent terrain effects.

Inspection of the topography along that corridor segment where bluff influences appear to be most severe (approximately between the proposed Kellogg Boulevard and Grand-Ramsey interchanges, including the United Hospitals complex) reveals a typical cross section shown in the following diagram.



UNITED HOSPITALS COMPLEX
CORRIDOR CROSS SECTION

The effective height of the bluff (vertical distance above Pleasant Avenue of the abrupt portion of the ridge) is on the order of 100 to 120 feet, with an average grade of about 25 percent. The identifiable base of the bluff, in fact, is 100 feet or more (horizontally) from the critical receptors on the south side of Pleasant Avenue, including the hospitals. It is therefore evident that, once a credible worst case wind speed/direction is adopted,

---

[9]This factor is an EPA recommended reduction factor, applied to modeling for a single wind direction to account for the fact that this "worst case" wind direction is unlikely to persist over an eight-hour period. (EPA Volume 9 (Revised) Guidelines 1978.)

- o urban roughness elements (buildings, plantings, etc.); and

- o thermomechanically-induced turbulence from the vehicle stream (on proposed I-35E and/or local streets)

will play dominant roles in influencing local pollutant transport, with the gross topography associated with the bluff having a relatively minor effect. Both urban roughness and vehicular turbulence are implicitly incorporated in the modeling.

To further illustrate the insignificance of the bluff on pollutant transport, one may replace the bluff by a vertical wall 100 feet high and located at approximately the midpoint of the actual bluff (60 feet north of the receptor). Applying the criteria of the EPA Indirect Source Guidelines - Appendix C (EPA 1978)[10] the streamline separating the air flow (free flow) at the top of the 100 feet barrier from the vortex flow (formed in the reentrant corner between the wall and the ground by the wall-induced turbulence) penetrates a depth S into the cross section, where S is given by

$$S = 7\sqrt{\frac{D}{U}}$$

where D is the (horizontal) distance from the wall to the point where the separation streamline touches the ground (in meters), and U is the worst case wind speed (1 m/sec.). According to the Volume 9 criteria, a necessary condition for both the receptor and the traffic source to be within the so-called "vortex zone" (that is, affected by recirculation of emitted CO) is that

1. the angle between the ambient wind direction and the roadway source (assumed to be parallel to the barrier) exceeds 30^{o}; and

2. $S < H$, where H is the barrier height.

Substituting in the appropriate values (D = 64m[11], U = 1 m/sec., H = 30 m), S = 56m H = 30 m. Thus, even for this extreme idealization of the bluff (replacing by a vertical wall at the base), topography-induced vortex flow would be ruled out by the conservative procedures of Volume 9, which then recommends that the standard gaussian model (HIWAY) be used when the vortex criteria are not satisfied. Again, it is emphasized that the wall idealization is introduced here merely to illustrate how severe the changes in gross terrain must be in order to invalidate

---

[10] Based on the APRAC-1A street canyon model.

[11] Approximate distance from St. Luke's Hospital (point closest to Pleasant Avenue) to nearest 120 feet contour line.

the use of a gaussian line source model as a reasonably conservative approach to predicting worst case CO. Realistically, the 25 percent grade of the bluff is probably too gradual to induce any significant turbulence or vortex flow compared to the pronounced influences of urban roughness and the vehicle stream.

Air Quality Impacts on Historic Properties

(This section has been added in response to concern over deterioration of historic properties raised by R.I.P. 35E in a correspondence of September 1, 1981.)

In considering the impact of air pollution on historic properties, the primary issue is the potential for direct and indirect (deterioration) impact on certain building materials (e.g., limestone, marble, sandstone, etc.) of sulfur containing constituents of vehicle exhaust gases. Of particular concern is the total sulfate ($SO_4^=$) produced by roadway exhausts, which are primarily attributable to

- o $SO_4^=$ emissions from cars equipped with catalytic converters
- o SO_2 solubilized on wet surfaces
- o $SO_4^=$ transformed from vehicular SO_2 emissions under meteorological stagnation conditions such that emissions remain in the vicinity of the roadway

To put this impact into proper perspective, it is necessary to estimate the existing impacts due to sources other than those associated with I-35E. The delivery of these impacts normally occurs by three mechanisms:

- o Wet deposition on sensitive surfaces of dissolved SO_2 and $SO_4^=$ (typically as NH_4HSO_4 in urban areas)
- o Dry deposition of sulfates on surfaces with solubilization during precipitation events or when the humidity is very high
- o Dry deposition of SO_2 on wet surfaces

The wet deposition component may be estimated using data from the National Atmospheric Deposition Project Network (NADP), whose samples are analyzed by the Illinois State Water Survey's Laboratory, and the Atmospheric Pollutants Loading Study, sponsored by EPA's regional office in Chicago.

The impact of $SO_4^=$ dry deposition is more difficult to estimate since it depends on knowledge of the particulate $SO_4^=$ fraction, whether surfaces are vertical or horizontal, hygroscopicity of deposited particules, the effect of rapid washoff during heavy precipitation events, and other factors.

The magnitude of the dry deposition of SO_2 on wet surfaces may be estimated as above from knowledge of the ambient SO_2 levels and the solubility behavior of SO_2 using computer simulation modeling.

An indication of the relative impact may be obtained by considering the I-35E increment in near field (roadside) sulfate concentrations relative to urban background sulfate. Although either quantity is difficult to estimate precisely (especially background sulfates after 1990), limited data are available for:

1. Catalyst equipped vehicular sulfate concentrations from source monitoring performed during the General Motors (GM) Sulfate Dispersion Experiment[12] (Cadle et al, 1977); and

2. Urban background sulfate concentrations from monitoring at selected Minnesota Pollution Control Agency (MPCA) sampling locations within the Twin Cities

Source Monitoring. In the GM Sulfate Dispersion Experiment (Cadle et al, 1977), 352 catalyst equipped automobiles were driven along a 10 km test tract (at the GM proving ground in Milford, Michigan) to simulate a (six-lane) freeway situation with a traffic volume of 5462 vph. Sulfate sampling was performed under a variety of wind velocity and atmospheric stability conditions, and at twenty locations, ranging from the median strip to 100 meters downwind. The study report, which provides summary results of 30-minute samples taken at the various probe locations, indicates that, as expected, highest sulfate concentrations occurred either at the median strip or roadside location and that the average of these maximums was about 8 micrograms per cubic meter (ug/m^3), exclusive of background.

In the vicinity of the Cass Gilbert Church structure (the historical structure of interest which is closest to the proposed I-35E roadway), average daily traffic is projected to be about 50,000 vpd in 1990. This is about 37 percent of the freeway traffic volume simulated in the GM Sulfate Experiment. Assuming that the sulfate emissions from the vehicles in the GM tests are representative of the Twin Cities fleet in 1990 and thereafter, vehicular (I-35E) induced sulfate concentrations should be of the order of 3 ug/m^3 adjacent to the roadway (i.e., at the Cass Gilbert Church) and less at distances further downwind (i.e., of the order of 1 to 2 ug/m^3 of less).

MPCA Urban Background Monitoring. The MPCA has been monitoring sulfates at six Twin Cities locations over the past several years, four of which are in St. Paul. All of the St. Paul sites are in the vicinity of relatively high levels of general traffic; however, none is adjacent to a freeway. For 1978, the latest year for which a full year's data were recorded, the arithmetic $SO_4^=$ means ranged from 5.5 ug/m^3 to 7.1 ug/m^3 in St. Paul, with respective standard deviations of 2.6 ug/m^3 and 3.4 ug/m^3, respectively (Seltz 1982). (The annual SO_2 secondary standard is 60 ug/m^3.) Therefore, if it is assumed that these concentrations are representative of current and future urban background levels in the proposed I-35E corridor, roadside I-35E

---

[12] Test procedures and results of this experiment were audited by the U.S. EPA.

induced concentration increments based on extrapolating the GM Sulfate Experiment results would, at worst, amount to about half the background and would be comparable to the standard deviations obtained from the MPCA measurements.

Based upon the above findings, the air quality impacts on historic properties are not anticipated to be significant.

D. NOISE

Noise Impacts in Sensitive Areas

(The following section was added in response to a request for further information by U.S. EPA Region V, the Minnesota Department of Health, and R.I.P. 35E.)

Table 6 represents a detailed listing of specific noise sensitive receptors for the Pleasant Avenue corridor, presenting the predicted year 2000 peak hour noise levels and the appropriate FHWA Design noise level values. Exterior and interior noise levels (as appropriate for the particular receptor) are presented for both the parkway and freeway alternatives.

It should be noted that the "worst case" noise levels are presented in Table 6; that is, noise levels were evaluated at points closest to the corridor centerline, without benefit of noise mitigation measures, and for peak hour traffic conditions. Actual noise levels will be lower at portions of these facilities more remote from the I-35 corridor, such as interior rooms, and rooms on the opposite (non-I-35E) side of structures. Also, it was conservatively assumed that ordinary, residential grade window sash (closed) was employed. FHWA data indicates that typical modern institutional grade construction yields noise reduction improvements of an additional 5 to 10 decibels over the conventional residential construction.

The results presented in Table 6 show that for hospitals, noise levels due to parkway noise would be within the FHWA design guidelines, both inside and outside the hospital. (To meet the interior guidelines, windows overlooking the corridor will need to be maintained in a normally closed condition. Windows are normally kept closed to maintain the desired climatic environment. Department of Health regulations require specified filtered air exchanges. Open windows would defeat the purpose of the ventilation system.) For the freeway alternative, exterior noise levels would exceed the guidelines at all the hospitals on the corridor and interior guidelines would be exceeded at one of the hospitals (United Hospitals Complex).

For schools, parks and historic sites adjacent to the Pleasant Avenue corridor, noise level results are similar to those presented for hospitals. That is, noise from the parkway is within the FHWA design guidelines at these receptors, for both interior and exterior spaces as appropriate. On the other hand, noise from the freeway generally would exceed both interior and exterior design noise level values.

TABLE 6
GENERALIZED NOISE IMPACTS UPON SELECTED PLEASANT AVENUE
NOISE SENSITIVE RECEPTORS WITHOUT MITIGATION

		Year 2000* Noise Levels (L_{10}, dBA)**		
			Predicted Noise Level Due to I-35E Traffic	
Receptor	Location	FHWA Design Noise Level	Parkway	Freeway
Pleasant Hill Nursing Home	Interior	55	44	51
	Exterior	70	64	71
United Hospitals Complex	Interior	55	49	56
	Exterior	NA***	69	76
St. Joseph's Hospital	Interior	55	47	54
	Exterior	NA	67	74
St. Paul Ramsey Hospital	Interior	55	45	52
	Exterior	NA	72	72
Adams School (Classroom)	Interior	55	42	49
Adams School (Playground)	Exterior	70	68	75
Linwood Park	Exterior	70	62	69
Kenwood Park	Exterior	70	63	70
Oakland Terrace Park	Exterior	70	69	76
Palace Playfield	Exterior	70	63	70
Crocus Hill Park	Exterior	70	68	75
St. Clair Playground	Exterior	70	64	71
Jefferson School (Classroom)	Interior	55	46	53
Jefferson School (Playground)	Exterior	70	68	75
Quinlan Care Home	Interior	55	44	51
(Nursing home; historic site)	Exterior	70	64	71
James J. Hill Mansion	Interior	55	45	52
(Historic site; offices)	Exterior	70	65	72
German Presbyterian Church	Interior	55	47	54
(Historic site)	Exterior	NA	67	74
How Residence	Interior	55	46	53
(Historic site; residence)	Exterior	70	66	73

* As the development process for this project has progressed, more detailed noise data for the preferred alternative has been generated. Refer to Tables 8 and 9 for updated design year noise level predictions at general and specific locations along the corridor.

** Evaluation based upon closest portion of receptor to I-35E traffic. For interior spaces, use of a minimum 20 decibel of noise reduction (corresponding to window closed condition) was employed. No other noise mitigation was employed. Local topography was not considered in this evaluation; however, the figures generated were considered appropriate for a comparison among alternatives.

*** NA denotes "Not Applicable" because there is no exterior land use to be impacted at these sites.

At other hours of the day and night, with lower traffic volumes, noise levels are expected to be lower. For these reasons, it is not meaningful or appropriate to attempt to estimate the numbers of people affected at specific noise levels.

Noise Analysis Methodology

(This section was added to clarify the methodology used in monitoring background noise for the noise impact analysis and responds to questions raised in correspondence from R.I.P. 35E.)

In predicting noise levels and assessing noise impacts, the following time-of-day (and other) conditions were employed (as per the Federal Aid Highway Program Manual, Transmittal 282, October 9, 1978, Vol. 7, Ch. 7, Sec. 3 item b).[13]

1) Automotive volume - the future volume (reduced for truck traffic) obtained from the lesser of the design hourly volume or the maximum volume which can be handled under traffic level of service C conditions. For automobiles, level of service C is considered to be the combination of speed and volume which creates the worst noise conditions. The average day for the design year may be used for those highway sections where the design hourly volume or the level of service C condition is not anticipated to occur on a regular basis during the design year.

2) Speed - the operating speed which corresponds with the design year traffic volume selected in paragraph 14b(1) and the truck traffic predicted from paragraph 14b(3). The operating speed must be consistent with the volume used.

3) Truck volume - the design hourly truck volume shall be used for those cases where either the design hourly volume or level of service C was used for the automobile volume. Where the average hourly volume for the highest three hours on an average day was used for automobile traffic comparable truck volumes should be used.

The type of automatic noise measurement instrumentation employed (Model 614 BBN Instrument Company) samples the noise environment at a rate of 7 samples per second. For a reasonably constant noise level environment, measurement durations of 15 minutes are entirely adequate. (This adequacy was verified on several occasions by recording the instrument output at other times, such as 10, 15, 30, and 60 minute intervals with typical differences of less than 2 dBA between measurement durations. Table 7 presents details of the noise measurement schedule.

---

[13]Since the preparation of this noise analysis, revised regulations concerning methodology have been adopted by the Federal Highway Administration which amend FHPM 7-7-3. The change does not affect the validity of the analysis or change conclusions, mitigation, or commitments for further evaluation during final design.

TABLE 7
NOISE MEASUREMENT SCHEDULE AND RESULTS

Location Description	Date (1979)	Time (Start)	Duration (Minutes)	L_{10}*	L_{50}
SE Corner Shepard & 35E	6/25	1824	15	68	60
Alaska & Otto	6/25	1936	60	56	49
	6/26	2357	60	49	45
Watson & Baldwin	6/25	2045	60	52	47
Griggs & Fairmont	6/25	1746	15	63	51
Summit & Griggs	6/25	2319	60	61	50
	6/26	1223	60	64	60
Jefferson & Victoria	6/26	0752	60	62	55
Linwood Park	6/25	1721	15	61	53
Ramsey & Summit	6/26	0503	60	51	45
	6/26	1114	60	60	55
Grand & Douglas	6/25	2201	60	54	51
	6/26	1009	60	59	53
Pleasant & Thompson	6/26	0903	60	60	55
Butternut & Sumac	6/25	1826	60	67	61
Emma	6/26	0854	15	64	56
Elm/Walnut (Irvine Park)	6/25	1716	60	57	54
	6/26	2239	60	65	55
Rivoli & Minnehaha	6/25	1559	60	56	50
Kellogg & Cedar	6/25	1618	15	68	63
Hamline & Selby	6/26	1058	15	67	61
Sidewalk above 9th and Smith	6/25	1552	15	64	60
Mt. Airy & L'Orient	10/29	1400	20	70	66
Genesse & L'Orient	10/29	1330	20	68	65
St. Paul-Ramsey Hosp.	10/29	1300	20	67	64

*L_{10} and L_{50} represent two different descriptions of noise levels; they respectively correspond to noise levels achieved 10 percent of the time and noise levels achieved 50 percent of the time. L_{10} levels are used in comparison to appropriate design noise levels documented elsewhere in this EIS.

Change in Applicability of Noise Standards

The 1981 Minnesota Legislature exempted interstate highways from state noise standards. The Federal Highway Administration noise standards are considered as proper criteria for noise impact assessment and proposed mitigation. State noise standards have been considered during the EIS process and will be considered through the project's development, construction and operation.

Noise Impacts Expected to Result from the Preferred Alternative

(This section is provided as an update to the noise impact section of the DEIS and reflects a more detailed study of noise impacts under the preferred alternative.)

This noise analysis identifies the anticipated traffic noise impacts from the preferred alternative. This analysis takes into consideration the selected highway design, peak hour traffic volume (design year), existing and future topography. Vehicle speed used was consistent with the projected peak hour volumes which will give the worst hourly traffic noise level.

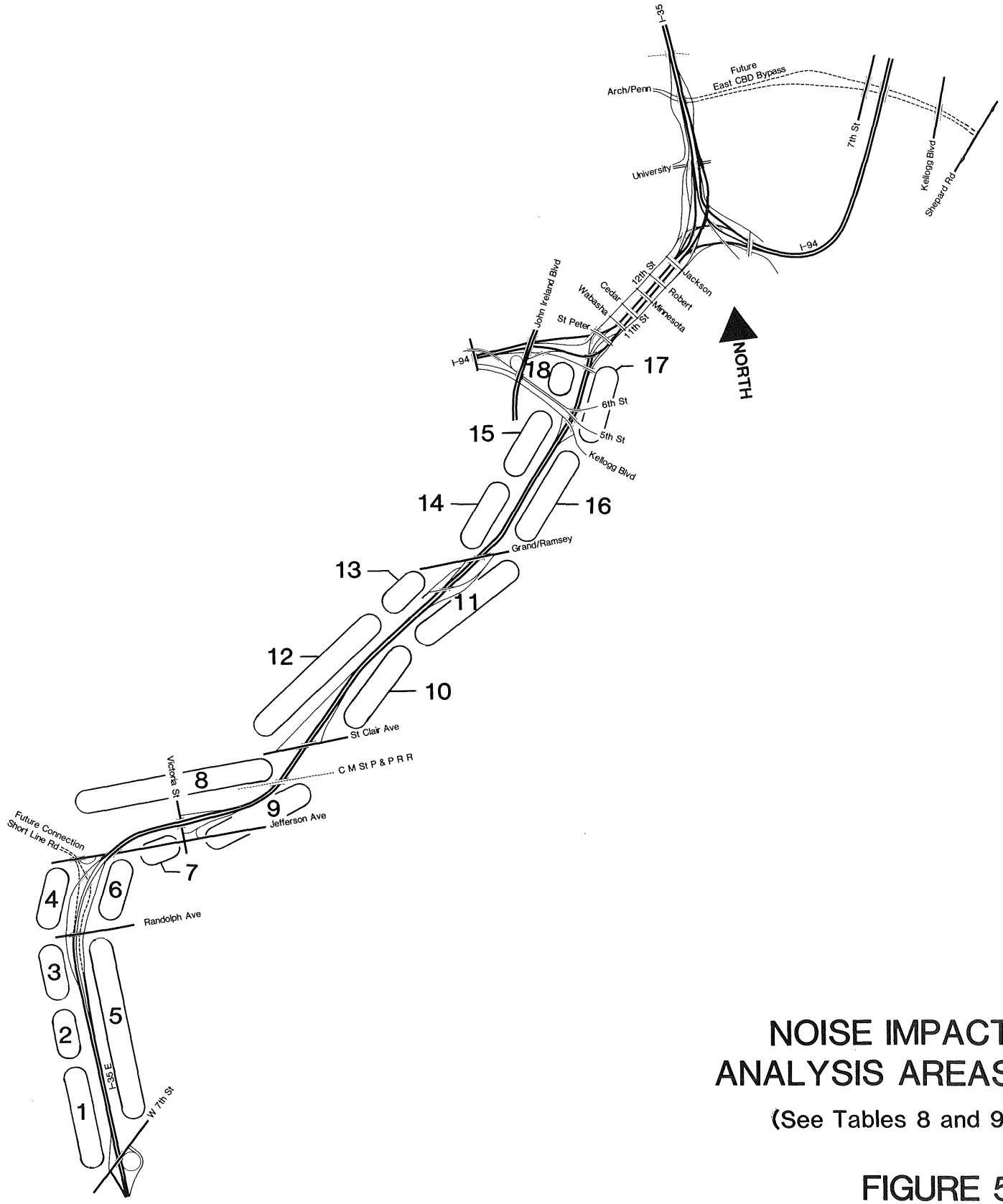
Noise impacts are determined according to FHWA design noise levels. By these criteria, impacts occur when the predicted traffic noise levels approach or exceed the noise abatement criteria (NAC) or when the predicted traffic noise levels substantially exceed the existing levels. The $L_{10}70$ dBA level is the NAC for residential land uses and is for exterior areas where frequent human use occurs and lowered noise levels would be of benefit. The interior criterion ($L_{10}55$ dBA) applies when no exterior uses would benefit from lowered levels or where they are located in a manner that prevents impacts.

The corridor was divided into 18 relatively homogenous areas which were determined by continuity/topography and noise levels. Figure 5 shows these areas. Noise levels for key first row receptors in each area were computed. Noise impacts for all first row sites (shielding by possible noise barriers not considered) are shown in Tables 8 and 9. Without noise abatement, over 100 residential sites could be subjected to a substantial noise impact (increase over 10 dBA) and eleven of those sites could have levels above the $L_{10}70$ dBA level. See Section IV, Impact Mitigation Measures.

Off-Corridor Noise Impacts

(This section was added partly in response to a request by U.S. EPA Region V that truck noise be analyzed under a parkway alternative for arterials which are expected to serve as future truck routes. It is also an important consideration in the Federal Highway Administrator's determination that there are adequate alternate truck routes available.)

Additional noise levels were predicted at five locations to assess the off-corridor impacts of trucks. The location and receptors were:



NOISE IMPACT ANALYSIS AREAS

(See Tables 8 and 9)

FIGURE 5

I35E

TABLE 8
NOISE IMPACTS ON THE PREFERRED ALTERNATIVE
(Shielding by topography considered but not noise barriers)

Area	1st Row Sites	L_{10} Noise Levels			Impact Analysis	
		Existing	Future(1) Avg.	Future(1) Max.	Average Impact	Sites Above L_{10}70 dBA
1	16	55	69	71	+14	2
2	11	60	62	62	+2	0
3	2	55	60	60	+5	0
4	3	55	61	62	+6	0
5	22	55	69	71	+14	8
6	6	50	61	64	+11	0
7	11	60	61	63(2)	+1	0
8	12	55	59	60	+4	0
9	7	55	68	70	+13	0
10	34	55	69	70	+14	0
11	16	55	66	68	+11	0
12	17	55	52	59	0	0
13	32	65	59	61(3)	0	0
*14-18	16	60-65	56	74	0	1
					Total	11

Notes:

(1) Peak hour noise level for design year from I-35E. Avg. denotes average noise level for all 1st row sites. Max. denotes the maximum level at the closest site(s).

(2) Traffic on Jefferson Avenue will likely create higher noise level.

(3) Traffic on Grand and Ramsey will likely create a higher noise level.

*See Table 9 for more specific data.

TABLE 9
NOISE IMPACTS AT SPECIFIC SITES ON THE PREFERRED ALTERNATIVE
(Shielding by Topography Considered But Not Noise Barriers)

Map Area	Receptor	Distance to Centerline 35E	Future L_{10} Level(1) Exterior	Interior	Applicable Standard
5	Adams Playground	200'-600'	60-66	-	70
	Adams School	600'	60(2)	50	55
8	Linwood Park	600'	63	-	70
9	Palace Playground	400'-800'	<60(3)	-	70
10	St. Clair Playground	350'-900'	<60(3)	-	70
11	Jefferson Playground	150'-400'	60-65	-	70
	Jefferson School	250'	62(2)	52	55
12	Kenwood Park	500'	<55	-	70
13	*How Residence	235'	57(3)	-	70
	*Gr. Presb. Church	200'	60(3)	-	75
14	Pleasant Hill Nursing	350'	55	-	70
	7 Residences	300'-400'	54-55	-	70
	Irvine Hill Condominiums	200'	59-64(4)	-	70
15	*J.J. Hill Mansion	325'	<50	-	70
16	United Hospital				
	- West Entrance	350'	61	-	70
	- West 2nd & 3rd Floor	170'-350'	66-69(5)	41-44	55
	- Circular Wing	135'	70(5)	45	55
	Hoikka House				
	- East court	200'	56-59	-	70
	- North 2nd Floor	150'	65(2)	55	55
17	CYC	300'	63(2)	53(3)	55
	*Quinlan Care Home	450'	60(2)	50(3)	55
	St. Joseph's Hospital				
	- Nurses' Home	250'	69(5)	44	55
	- West Wing - 5th Floor	250'	69(5)	44	55
	- Interior Courtyards	300'+	<55	-	70
18	Archdiocese Office	375'	66	-	75
	College Hill Condominiums				
	- East Side	120'	74(5)	49	55
	- South Side	200'	72(5)	47	55

* Denotes Historic Site
< Denotes less than

Notes:
(1) Peak hour noise level for design year.
(2) No exterior use at this location. Interior level obtained by reducing exterior level 10 dBA for open window condition.
(3) Adjacent street(s) will create higher traffic noise level.
(4) Noise level from main floor (low L_{10}) to top floor (high L_{10}) at patio decks.
(5) No exterior use at this location. Interior level obtained by reducing exterior level 25 dBA since windows are normally closed (masonry walls-single glazing value).

1. A house at Snelling and Iglehart (between Marshall and I-94)

2. A house at Snelling and Goodrich (between Grand and St. Clair)

3. Mears Park Apartments at Jackson and 6th (daytime only)

4. Mears Park on Sibley at 5th (nighttime only)

5. Proposed Warner Road Overlook Park at the junctions of Shepard Road, Warner Road and the proposed East CBD Bypass (daytime only)

These locations are shown in Figure 6.

Since these receptors are not on the interstate system, it was assumed that the State Noise Pollution Control Standards would apply. Only daytime standards were analyzed for the proposed Warner Road Overlook. Nighttime analysis for the Sibley/Jackson pair was limited to Sibley because it carries much higher truck volumes during the critical 6 to 7 AM hour. Jackson carries the highest PM peak traffic, so daytime analysis was conducted there. Both daytime and nighttime were modeled for Snelling receptors.

The predicted noise levels are shown in Table 10 and discussed below for each location.

Snelling/Iglehart:

Future noise levels are projected to increase moderately (7 to 9 dBA daytime, 6 dBA nighttime) over present conditions at this location. The greatest increases are projected for the no-build alternative (Alternative I). Because with this alternative there is no new facility drawing either autos or trucks, Snelling is affected the worst. Although there are significant changes in auto and truck volumes between alternatives, these differences are small when compared to the absolute volumes. Thus, they do not create substantial variation in predicted noise levels (3 dBA or less). Predicted levels for present conditions indicate a violation of state standards. The noise level increase cannot be mitigated by noise barriers due to the frequent curb breaks along the road and the close proximity of the receptors.

Snelling/Goodrich:

Present noise levels show a two decibel drop from Iglehart to Goodrich. This difference will be maintained in the future. Under any alternative, including the no-build, noise levels are projected to increase (6 to 9 dBA daytime and 4 to 6 dBA nighttime) over present conditions at Goodrich. The change in traffic and truck volumes is due to the Short Line Road and a high density of local truck destinations in the Snelling/I-94 area. The difference between alternatives is less than 3 dBA, with the freeway being the best, and the indirectly connected parkway (Alternative J) and the no-build being the worst. As is the case at Snelling/Iglehart, predicted present noise levels violate state standards for day and night. Mitigation is not feasible

TABLE 10
OFF-CORRIDOR NOISE LEVEL PREDICTIONS FOR I-35E (YEAR 2000)

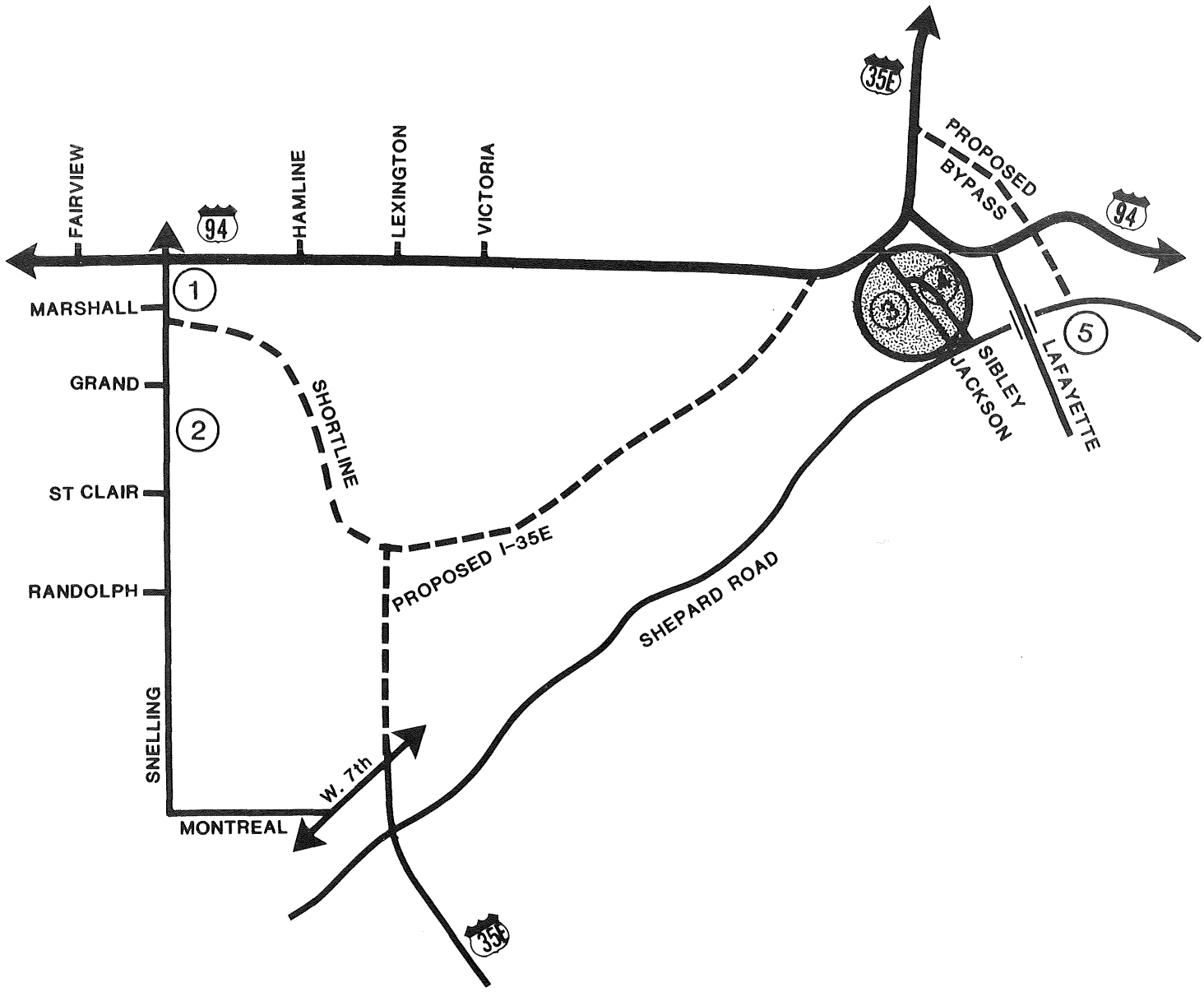
	1 Snelling/Iglehart		2 Snelling/Goodrich		3 Jackson/6th	4 Sibley/5th	5 Shepard/Warner
	PM Peak*	6-7 AM**	PM Peak*	6-7 AM**	PM Peak*	6-7 AM**	PM Peak*
Freeway (Alt. A) L_{10}	80	75	77	73	73	71	70
Parkway (Alt. C) L_{10}	81	75	78	75	74	71	71
Parkway (Indirect) w/Bypass (Alt. J) L_{10}	82	75	80	75	68	65	75
No-Build (Alt. I) (No trucks on Short Line) L_{10}	82	78	80	75	71	66	71
Present L_{10}	73	69	71	69	70	67	Not Applicable

*State Daytime L_{10} Standard = 65 dBA

**State Nighttime L_{10} Standard = 55 dBA

Federal Guideline = 70 dBA

Source: Barton-Aschman Associates, Inc.



1. HOUSE ON SNELLING AT IGLEHART
2. HOUSE ON SNELLING AT GOODRICH
3. MEARS APARTMENTS
4. MEARS PARK
5. PROPOSED WARNER ROAD OVERLOOK

DOWNTOWN ST. PAUL

ALTERNATIVE TRUCK ROUTES AND NOISE MODELING LOCATIONS

FIGURE 6

I35E

because of curb breaks, frequent intersections and tight right-of-way. However, allowing trucks to use the Short Line Road would decrease noise levels on this portion of Snelling by 2 dBA.

Since year 2000 truck and auto volumes south of St. Clair do not vary among alternatives (including the no-build), noise impacts due to I-35E are considered negligible. From St. Clair north to I-94, the land use is mostly commercial. A total of 28 homes and five apartment buildings can be found along this stretch. Noise levels at these receptors will increase significantly by the year 2000 regardless of the I-35E decision. The relative difference between noise levels for various alternatives in all cases is 3 dBA or less.

Jackson/6th - Sibley/5th:

Future auto volumes on Jackson and Sibley are expected to decrease by 40 to 45 percent by the year 2000 with the build alternatives and by 25 percent with the no-build. However, without the East CBD Bypass, truck volumes will increase substantially. This truck increase causes a rise of 5 to 6 decibels over present noise levels, but when combined with the auto volume decrease, the net noise level increase is 3 to 4 dBA. Bypass alternatives will decrease present noise levels by 2 dBA. The no-build alternative would be about the same as present, with more trucks but fewer cars. Minnesota noise standards are presently being violated and would continue to be exceeded under any alternative. Mears Park and the nearby Mears Park Apartments are the two sensitive receptors along the heavily used portion of Sibley/Jackson.

Shepard/Warner Roads:

Minnesota noise standards for parks would likely be exceeded at the proposed Warner Road Overlook Park regardless of the I-35E decision. It is probable that the freeway has the least impact because it attracts some east St. Paul traffic away from Warner Road. Constructing an interchange with the East CBD Bypass would create noise levels 5 dBA higher than the freeway alternative.

Bluff Reflection

(This paragraph was added to clarify the effect of local topography on noise levels as was questioned in several written statements by R.I.P. 35E.)

The bluff topography found in the United Hospitals area will have negligible influences on noise levels south of the roadway because of the following facts: 1) the "bluff" is actually a sloping area (not a vertical "cliff"), therefore, even if the bluff were perfectly reflecting, any sound from the roadway would be reflected toward the sky, and 2) the bluff area is actually an irregular surface covered with vegetation and road and rail cuts, therefore, any sound energy incident on the bluff will be influenced by scattering and absorption effects.

E. TRANSPORTATION

Future Travel Patterns

(This section was revised in response to concern raised by the Metropolitan Council as to whether I-35E is to serve a local or regional function.)

Figure 7 depicts design year (see footnote on page 4) traffic volumes on the preferred alternative, the East CBD Bypass and the Short Line Road. (In order to better understand the following discussion, the location of metropolitan transportation subregions is depicted on Figure 8.) Figure 9 shows the general origins and destinations for trips using I-35E between St. Clair and Grand/Ramsey interchanges. Twenty-seven percent of the trips using the facility originate from Subregion 3, via the Fort Snelling Bridge. Subregion 11 contributes 32 percent of the volume -- this portion using the Lexington (I-35E) Bridge. The remaining 41 percent came from St. Paul using the West Seventh Street, Randolph, Victoria and St. Clair interchanges.

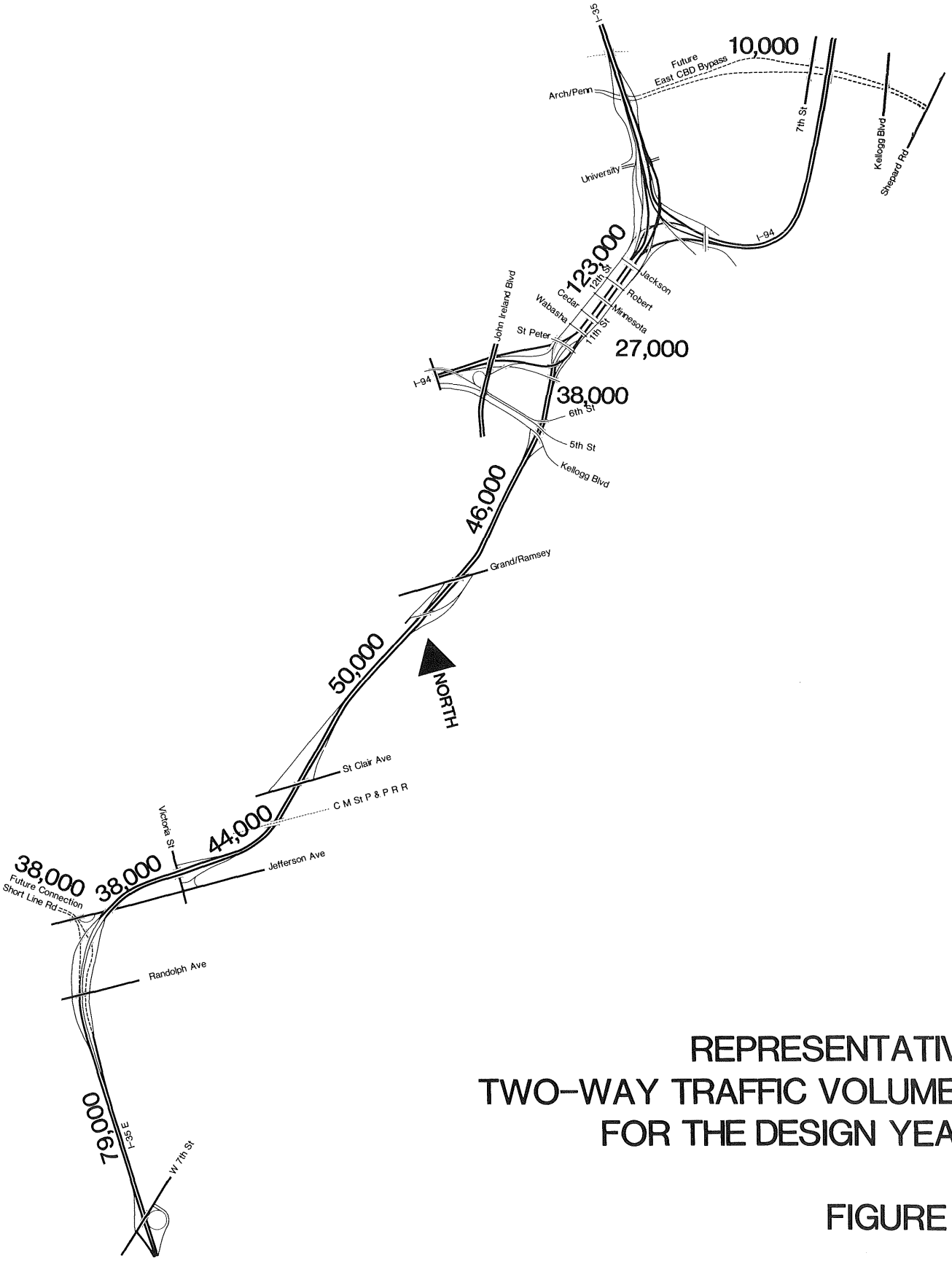
Destinations of trips using this portion of the Pleasant Avenue corridor include 47 percent continuing north on I-35E to destinations in Subregions 8 and 9. Travel east on I-94 constitutes 13 percent. Forty percent of the traffic is destined for the downtown area of St. Paul (including the Capitol complex).

Figure 10 shows the destinations of northbound trips which cross the Lexington Bridge. Most of these trips originate from Subregion 11. The figure shows that 41 percent of all northbound trips crossing the Lexington Bridge desire to travel to the Short Line and on to destinations in the Snelling/University Avenue area, I-94 westbound, TH 280, downtown Minneapolis, and in general Subregions 2 and 8. Sixteen percent of all trips continue north on I-35E past the St. Paul CBD and are destined for Subregions 8 and 9. Three percent of the trips continue east on I-94, east of the St. Paul CBD. Eleven percent are destined for the St. Paul CBD area (including the Capitol complex), and 20 percent are destined for other areas of St. Paul, using Shepard, West Seventh Street, and Randolph exits. Finally, 9 percent of the trips continue west on Shepard Road to the Highland area of St. Paul.

The preceding analysis shows that there is a need for a regional facility which would serve many trips between Subregions 3, 11, 8, 9, and to a less extent Subregions 2 and 10. In addition, regional trips to the downtown St. Paul area would also be served.

Alternative Truck Routes

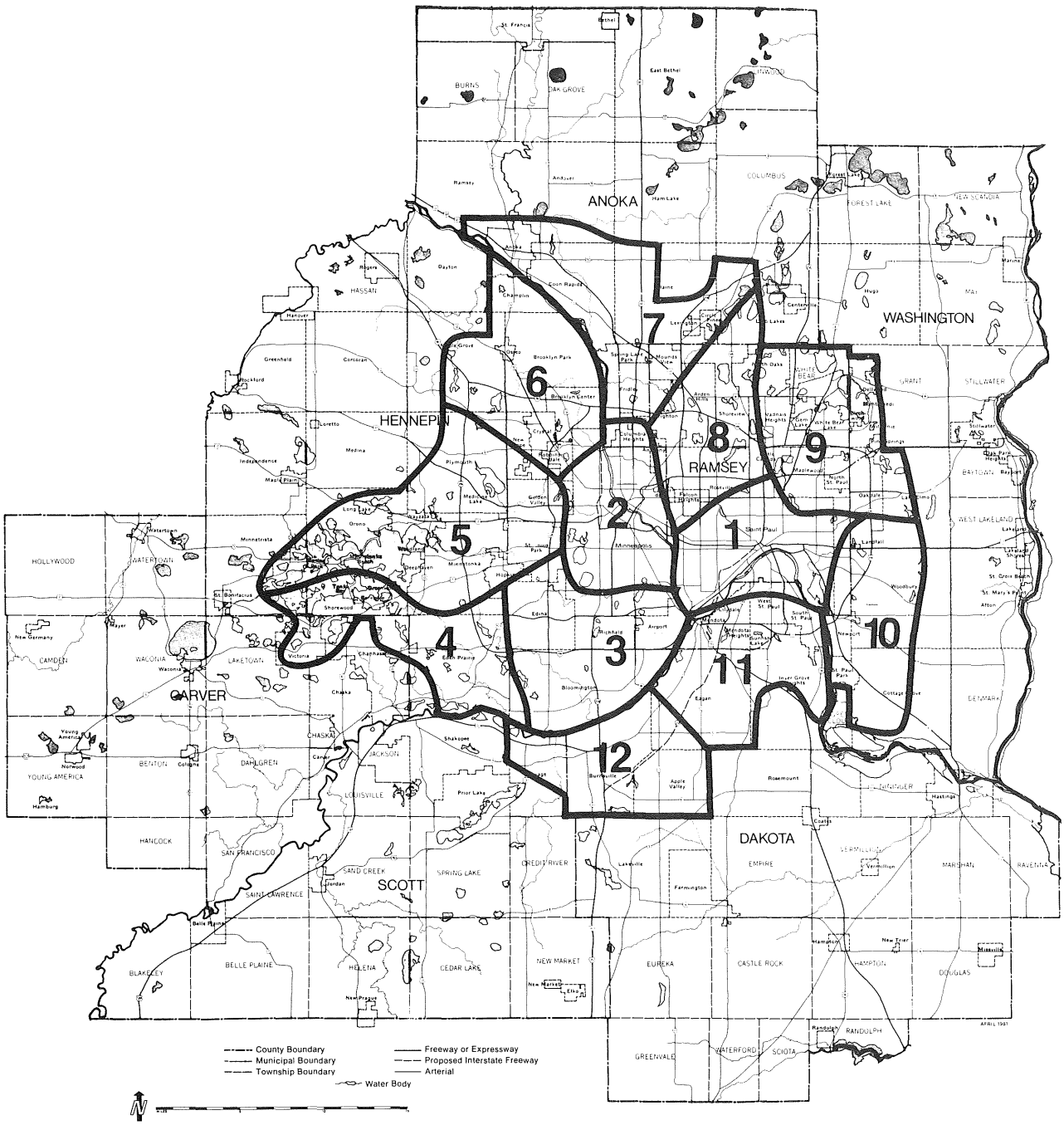
(Many reviewers of the DEIS expressed concern that adequate truck routes be provided in the event that a parkway alternative was selected. The following discussion was added to address the feasibility of alternate truck routes including such issues as travel time and safety.)



REPRESENTATIVE TWO-WAY TRAFFIC VOLUMES FOR THE DESIGN YEAR

FIGURE 7

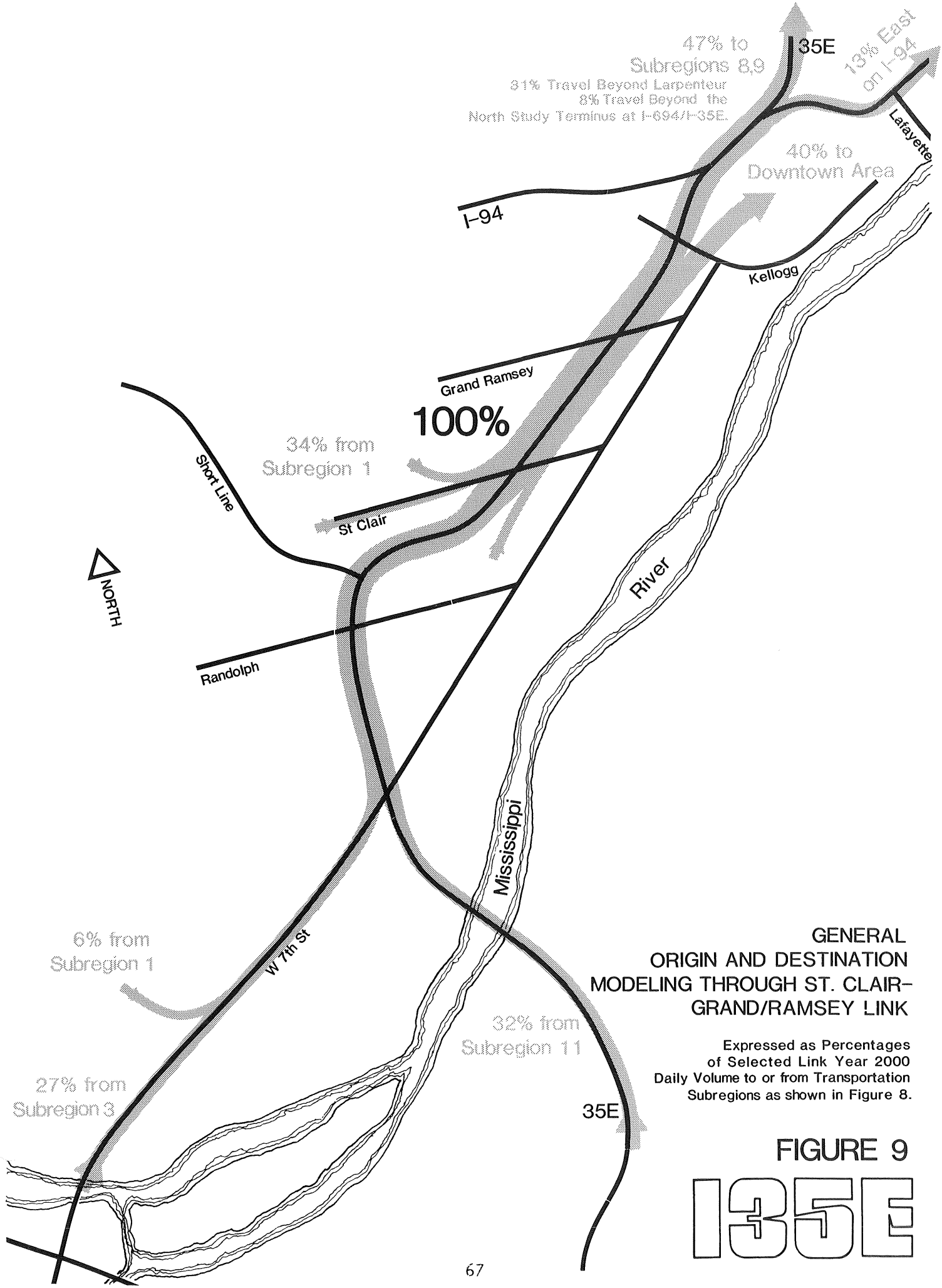
I35E



METROPOLITAN TRANSPORTATION SUBREGIONS

FIGURE 8

135E

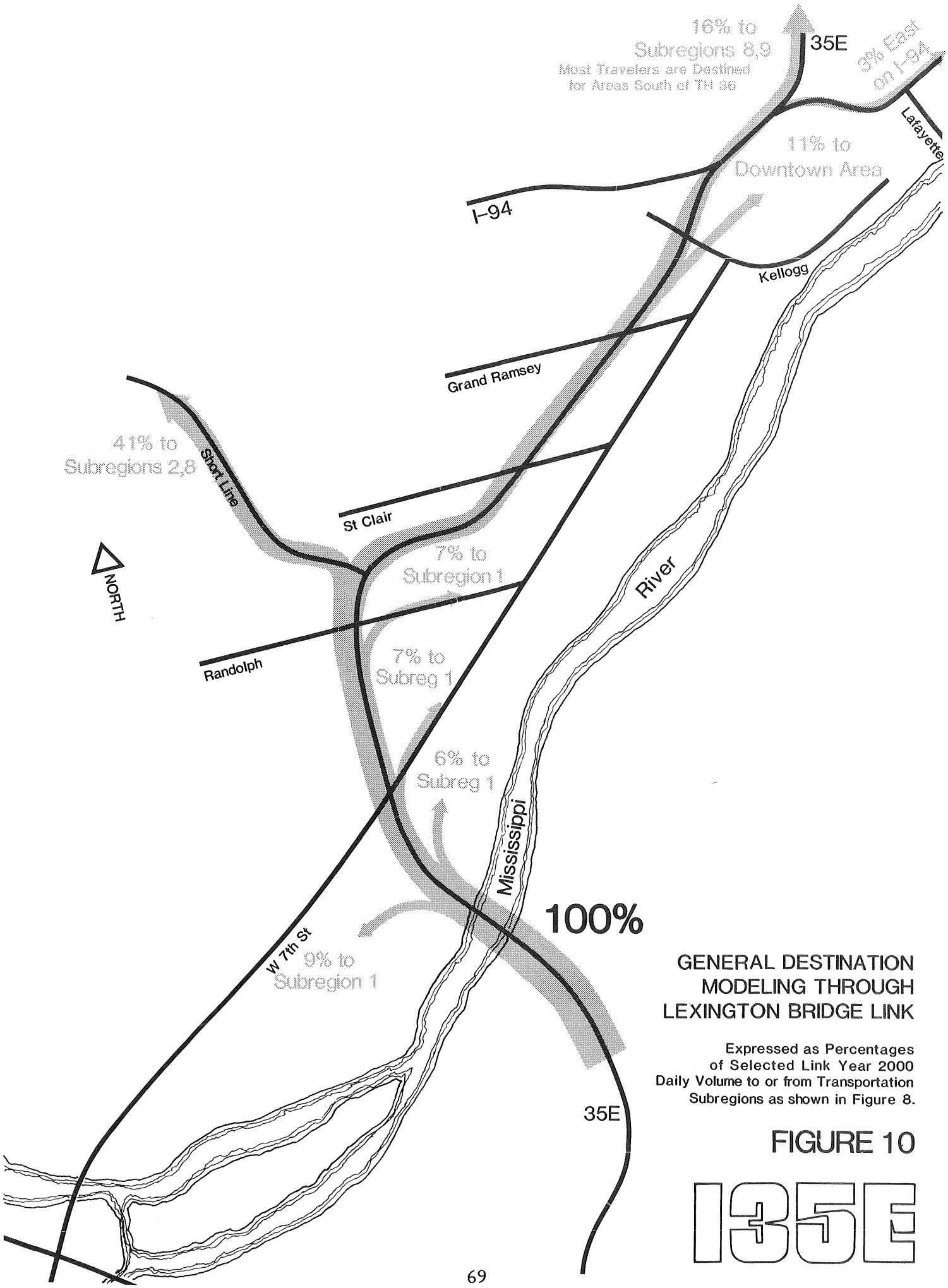


GENERAL
ORIGIN AND DESTINATION
MODELING THROUGH ST. CLAIR–
GRAND/RAMSEY LINK

Expressed as Percentages
of Selected Link Year 2000
Daily Volume to or from Transportation
Subregions as shown in Figure 8.

FIGURE 9

I35E



GENERAL DESTINATION
MODELING THROUGH
LEXINGTON BRIDGE LINK

Expressed as Percentages
of Selected Link Year 2000
Daily Volume to or from Transportation
Subregions as shown in Figure 8.

FIGURE 10

I35E

Background

The selected alternative prohibits trucks on the I-35E Pleasant Avenue corridor from West Seventh Street to I-94. This prohibition is within the statutory authority of the State Commissioner of Transportation. Commercial vehicles over 9,000 pounds licensed gross vehicle weight will not be allowed. Buses of various types (MTC, school, intercity, commuter vans) will be allowed. MnDOT authorized maintenance vehicles, commercial vehicles licensed for 9,000 pounds and less, most vans and pickups would also be allowed, as would recreational vehicles.

This section compares the safety, distances, travel times, and speeds on the most likely alternative routings to allowing trucks in the Pleasant Avenue corridor. Comparison to the "no-build" is also included because this answers the question--Do conditions get worse or better for trucks than at present? This information aids in determining reasonableness of these routings. The routings analyzed include typical interstate type movements which would be of most interest for through trips and for trips to St. Paul from out of state. This may be of most relevance from a national perspective. The interstate system was, in large part, designated to serve the long distance through movements and major cities of the nation.

Some regional movements are also analyzed. These kinds of trip movements would be of most interest to truckers with origins or destinations within the metropolitan area. From a metropolitan perspective, these might be considered most important. Movements within the city are also analyzed because of the local importance of these truck movements. St. Paul's downtown and the Midway area were chosen as city destinations for purposes of illustration. These interstate, regional, and city movements utilized routes shown on Figure 11.

Safety on Alternate Routes

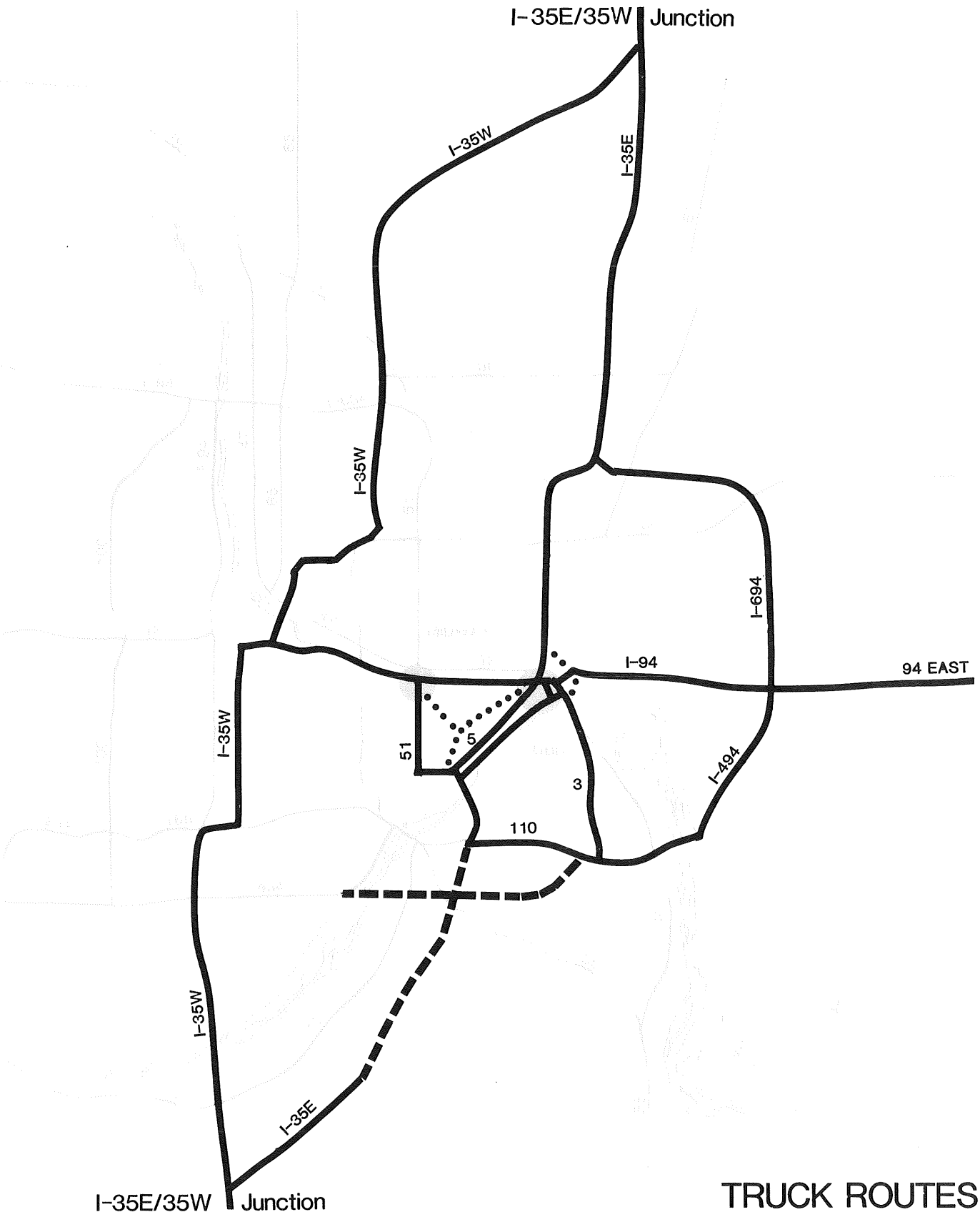
The purpose of looking at safety is to assess expected accident potentials of various routings as compared to a freeway allowing trucks in the Pleasant Avenue corridor and to the "no-build" alternative.

Urban freeway routes would typically be around 2.0 accidents per million vehicle miles. The I-35E rates north and south of the Pleasant Avenue corridor together average 2.6 accidents/million vehicle miles. A 2.0 acc./mvm to 2.6 acc./mvm range represents the expected rate for I-35E.[14] A national study concluded that there is no significant difference in accident rates of trucks and non-trucks and the total traffic stream.[15] Therefore, for comparative purposes, a comparison

---

[14] District 9 MnDOT, Traffic Studies Section.

[15] Report No. FHWA/RD-80/137, "The Effect of Truck Size and Weight on Accident Experience and Traffic Operations," Vol. 3, Accident Experience of Large Trucks, July 1981 iv.



TRUCK ROUTES ANALYZED

Routes in Place

Routes Planned

Additional Options Analyzed in this EIS

TRUCK ROUTES

FIGURE 11

135E

of overall rates for all vehicles on alternate routes with the I-35E rate range can be used. Another useful tool is to compare accident rates on the alternate routes to averages for similarly designed facilities elsewhere. Is the alternate routing better, worse, or similar to these facilities?

Table 11 was developed to allow such comparisons for many of the likely alternate routes.

The table basically shows that truck movements on other alternate routings utilizing urban freeways like I-35W, I-494, I-694, and TH 3 (Lafayette) will travel on facilities with similar or better safety records than would be anticipated for the Pleasant Avenue corridor. The same would be true for TH 110, an expressway. Arterial routings like TH 5 (West Seventh Street) and TH 51 (Montreal-Snelling) would be expected to have accident rates considerably higher than an urban freeway or other urban arterials of similar character. To a lesser degree, the same could be said for Shepard Road routings. The accident rate there is a little higher than that for urban expressways and considerably higher than the average urban freeway rate. Using projected ADT, expected additional truck volumes and anticipated higher accident rates (as compared to a freeway in the Pleasant Avenue corridor allowing trucks), about five to eight additional accidents per year could be anticipated -- a 6 to 9 percent increase in total Shepard Road accidents.

Truck routings for the "no-build" alternative would be expected to be the same as present routings which would also be the same as for the preferred alternative since trucks would not be allowed. The accident rates for the parkway build alternative would also therefore be the same as the "no-build" insofar as trucks are concerned. The main advantage trucks would have is that auto volumes would be reduced (to varying degrees) by diversions to the Pleasant Avenue parkway. This would relieve routes like Shepard Road, West Seventh Street (TH 5), and Montreal-Snelling (TH 51). (See Transportation sections of DEIS and Traffic Impact report.) This should contribute to safety and convenience for remaining users including truckers.

Distance and Travel Times

Other important criteria in assessing alternative routings include comparative distances and travel times. Increased distances and travel times mean higher operating costs. Some typical major movements noted earlier (interstate, regional, and city movements) were analyzed after measuring distances and travel times. Theoretical travel times were used for incomplete routes using expected volumes and levels of service to estimate speeds. Actual travel time runs were made on existing routes to get current operating data in both directions of travel during evening peak and off-peak hours. Actually, the majority of truck movements (about 90 percent) occur during off-peak hours. The PM peak hour was used because higher truck volumes (and total volumes) typically occur then.

TABLE 11
COMPARISON OF ACCIDENT RATES FOR ALTERNATIVE TRUCK ROUTES

Route	(Acc./mvm) Accident Rate	Similar Facility* Average	Pleasant Avenue	Comments
TH 5 (W. 7th St.) Montreal-Lafayette	11.5	6.2	2.0-2.6	Considerably higher rate on arterial compared to others and freeway.
TH 110 (TH 55 to I-494)	2.1	3.3	2.0-2.6	Comparable to freeway --lower rate than other similar facilities.
I-494 (I-94 to TH 12) "Beltline"	1.1	2.0	2.0-2.6	Better than Pleasant Avenue freeway or other freeways.
TH 3 (TH 110 to E. 7th St.)	1.9	2.0	2.0-2.6	Similar rates.
I-694 (I-94 to I-35E) "Beltline"	0.8	2.0	2.0-2.6	Better than Pleasant Avenue freeway or other freeways.
I-35E (TH 110 to W. 7th St.)	3.3	2.0	2.0-2.6	Somewhat higher--may be due to low volumes.
I-35E (Univ. Ave. to I-694)	1.8	2.0	2.0-2.6	Similar rates.
I-35E (I-694 to I-35W)	0.7	2.0	2.0-2.6	Low accident rates.
I-35W (I-35E to I-35E)	1.5	2.0	2.0-2.6	Lower accident rates.
TH 51 (W. 7th St. to Univ. Ave.)	8.3	6.2	2.0-2.6	Considerably higher rate compared to others and freeway.
Shepard Rd. (I-35E - Sibley St.)	4.0	3.3	2.0-2.6	Somewhat higher than urban freeway or expressways.

*District 9 MnDOT Average Trunk Highway Rates.

Interstate Movements

Typical interstate routings analyzed included a movement from the I-35E/I-35W junction on the north to the I-35E/I-35W junction on the south -- a distance of 39.2 miles via I-35E. Four alternate routings were analyzed and compared to an I-35E Pleasant Avenue routing for this long distance through movement. Two routings were found to be quite comparable to the I-35E routing as shown below.

Route(s)	Distance (Miles)	Travel Time (min./sec.) Peak Hr.	Off-Peak Hr.
I-35E	39.2	45:30	45:19
I-35W	41.8	47:53	47:56
I-35E, I-494, TH 3	42.4	49:00	48:53

Distances and travel times on alternate routings are within 8 percent of I-35E.

Another important interstate to interstate type movement is from I-35E (south leg) to I-94 (east leg). The main routing, if the Pleasant Avenue corridor allowed trucks, would be I-35E to I-94 east with the route change at downtown. The main alternate routing would be I-35E to I-494 (the "beltline") and then to I-94 east. Comparison data is shown below.

Route(s)	Distance (Miles)	Travel Time (min./sec.) Peak Hr.	Off-Peak Hr.
I-35E, I-94	26.1	30:38	30:29
I-35E, I-494, I-94	23.9	26:52	26:59

This data illustrates the likely preference of truckers for the "beltline routing" since it is expected to be shorter and faster.

Yet another interstate type movement is the movement from out of state, or outstate Minnesota, to St. Paul's downtown. (The interstate system was also planned to serve major cities and their major traffic generation points like downtowns.) The following data compares trips from the south I-35E/I-35W junction to downtown.

Route(s)	Distance (Miles)	Travel Time (min./sec.) Peak Hr.	Off-Peak Hr.
I-35E	18.6	21:34	21:29
I-35W, I-94	25.7	31:08	30:43
I-35E, Shepard Rd.	18.8	22:09	22:03

This data shows that a Shepard Road routing is quite comparable to an I-35E routing. The travel time difference would be less than one minute. The alternate movement via Minneapolis is not as competitive, but it does allow freeway travel which can be a distinct advantage to truckers.

Regional Movements

Movements from I-494 to I-694 in this corridor were also analyzed using I-35E and three alternates. The best alternative routing appears to be via planned I-494 and TH 3 as shown by the following comparison data.

Route(s)	Distance (Miles)	Travel Time (min./sec.) Peak Hr.	Off-Peak Hr.
I-35E	14.5	18:27	17:57
I-494, TH 3, I-35E	17.7	21:57	21:31

The alternate routing is about 3.2 miles further and about 3½ minutes longer. This is about 20 percent longer in distance and travel time.

Another regional type movement which was previously discussed is the movement from I-35W to downtown. It essentially goes from the edge of the metropolitan service area to a major center (St. Paul's downtown). Routing to the edge of the downtown area via Shepard Road is comparable to that via I-35E since Shepard Road allows fairly high speeds and has few stops.

A third regional type movement analyzed was the movement from the I-35E/I-35W junction to the Midway -- defined for this purpose as Snelling and Selby. Two alternative routings were compared to I-35E/Short Line.

Route(s)	Distance (Miles)	Travel Time (min./sec.) Peak Hr.	Off-Peak Hr.
I-35E/Short Line	18.8	22:26	22:15
Montreal-Snelling (TH 51)	18.9	27:04	27:09
I-35W/I-94	22.2	27:06	26:41

The TH 51 alternate, while similar in distance, is about 4½ minutes (20 percent) longer in travel time due to the slower speeds and traffic signals on Snelling Avenue. An I-35W/I-94 routing is also about 20 percent longer in travel time, but truckers can utilize freeway routes.

City Movements

Several typical movements were analyzed to illustrate travel from the edge of St. Paul near the Lexington Avenue (I-35E) bridge to the Midway and downtown -- two important destinations near the corridor which would utilize I-35E if trucks were allowed. The data is presented below.

Route(s)	Distance (Miles)	Travel Time (min./sec.) Peak Hr.	Off-Peak Hr.
I-35E/Short Line	3.5	4:50	4:51
Snelling/Montreal	3.6	9:28	9:45

This data illustrates that distance differences are not significant, but travel time more than doubles for this type of short trip. Travel times are about 4½ minutes longer.

Another movement compared was the movement from I-35E to downtown.

Route(s)	Distance (Miles)	Travel Time (min./sec.) Peak Hr.	Off-Peak Hr.
I-35E	3.6	4:58	4:58
W. 7th St.	3.2	--	7:07
Shepard Rd.	3.8	--	5:33

This city movement via Shepard Road is a little longer in travel time (about ½ minute), but similar in distance. Shepard Road is quite comparable in travel time, speed, and distance while West Seventh Street is considerably longer in travel time.

Speeds/Congestion

Speeds on alternative routes were also computed and compared to the I-35E Pleasant Avenue corridor. The main purpose of looking at this parameter is to determine whether the alternative routings are congested or not. In general, the peak hour and off-peak hour runs were quite similar in speed indicating no severe congestion of long length/duration. In some cases, peak hour speeds for trucks were even slightly faster than off-peak. (It is speculated that this occurred because congestion levels were not high and drivers during the peak hour generally want to get to their destinations quickly.)

Parkway Build vs. "No-Build" Alternatives

In general, the preferred parkway build alternative reduces auto volumes on alternative truck routings to varying degrees. The most likely truck routings for "closer in" trips (i.e., regional or city movements) are Snelling Avenue and Shepard Road. Both are expected to have considerable traffic relief with the parkway alternative selected and thus conditions for truckers should improve relative to what they would be under a true "no-build" condition.

Environmental Impacts

The noise implications of diverting trucks to alternate routes with a parkway are not significantly different than the impacts of a freeway (see the expanded information on noise, page 52).

F. SOCIAL IMPACTS

Right-of-Way and Relocation Impacts

(This information has been added to provide more detailed right-of-way requirements, and resulting relocation impacts; these are in some cases based upon refinements to layouts for the preferred Alternative C.)

The right-of-way needed for the preferred alternative is shown in Figure 12. Up to five houses may be taken in the Pleasant Avenue corridor. Four of these homes are located between West Seventh and Randolph. One additional home in this area has already been purchased but has not been removed. The fifth home which may be acquired is in the vicinity of St. Clair and 35E as shown in Figure 12.

This number is small because of the extensive work already done on this alignment prior to passage of the National Environmental Policy Act and the decision to write this EIS. These houses contain no minorities, and are not known to contain any handicapped or elderly. They are all owner-occupied single-family dwellings. Most of the properties are located in the southernmost third of the corridor. The housing stock is average to below average in quality. St. Paul's assessed valuation of the units ranges from $30,000 to $40,000. The fair market value of these homes ranges from $45,000 to $65,000. There is equivalent housing available within the same neighborhood. St. Paul has adequate fair housing laws to protect displacees.

Improvements to the common section will require the taking of one commercial/office building at 555 Wabasha Street. This acquisition is required with a direct connection parkway to permit construction of the ramp from northbound I-35E to eastbound I-94 and resultant changes to 11th Street (refer to the discussion of the improvements to the common section on page 105). This three-story masonry-brick office building houses seventeen organizations and businesses representing a total of 83 employees.

An engineering study was conducted to ascertain if a portion of the building could be saved and reconstructed. Because the building was constructed of brick and poured concrete, it was determined that the entire building will probably have to be taken and demolished.

Changes in Property Value

(This section replaces page 168 of the DEIS. It was revised in response to correspondence from John Diehl and R.I.P. 35E dated September 1, 1981.)

During highway construction, local residents, businesses, and industrial plants may suffer costs, lost trade, and inconvenience due to access limitations and detours.

The dust, noise, dirt, vibrations, and congestion created by machinery and trucks serving the construction areas may temporarily lower local environmental quality. Property values adjacent to construction sites can be temporarily depressed as a direct result of construction-related activities.[16]

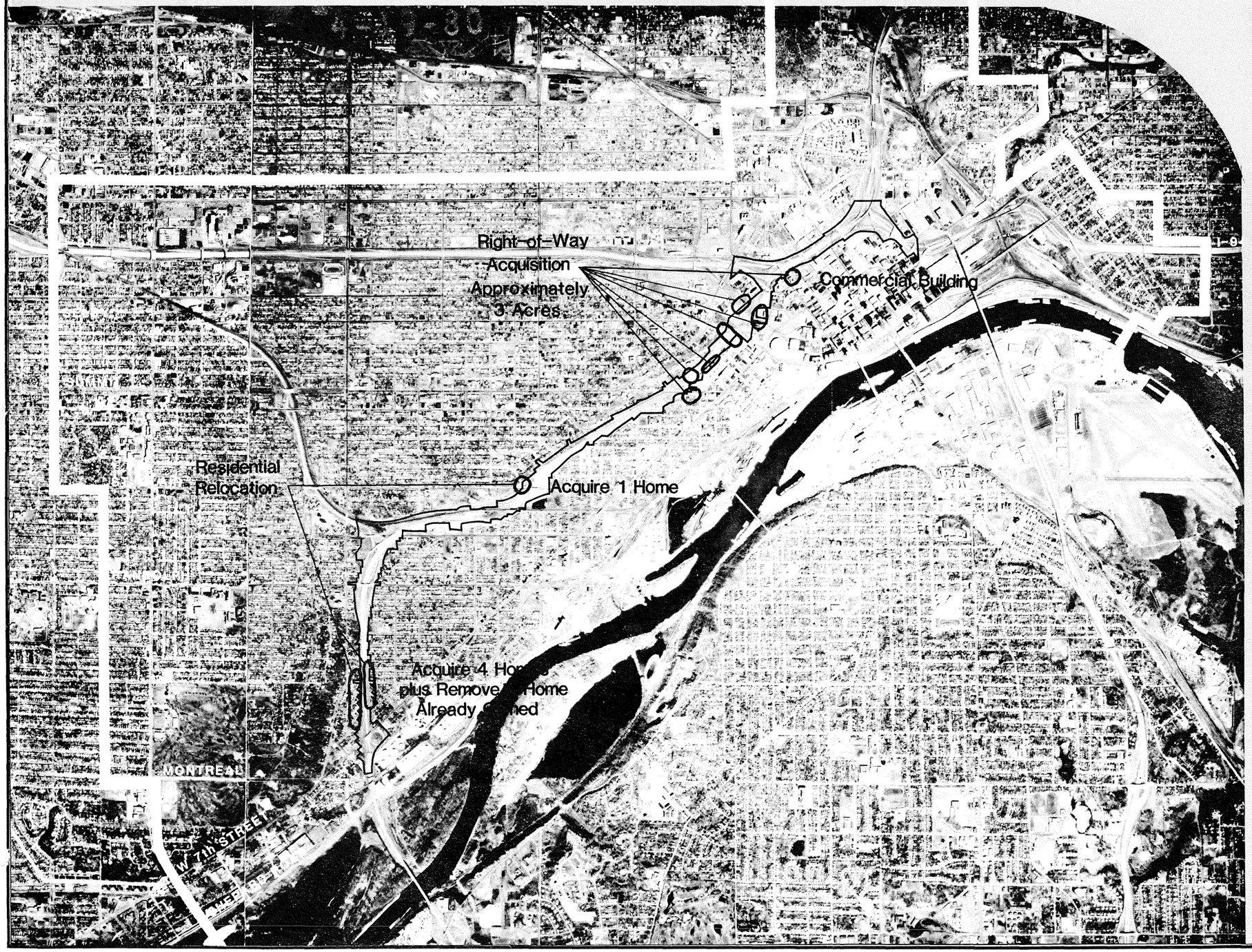
---

[16]See special study "Neighborhood Project Response, Social Impacts" - Appendix F.

FIGURE 12

RIGHT-OF-WAY AND RELOCATION IMPACTS

Pleasant Avenue Corridor Shows Right-of-Way Already Acquired



Location theorists, realtors, and land economists have long recognized that land values are established by the real estate market through the complex interaction of a broad range of variables, some of which serve to enhance the value of a given land parcel while others act as value detractors. Among the factors which can influence property values are the availability of land, accessibility, visibility (i.e., advertising exposure), aesthetic quality of adjacent properties, noise, air pollution, tax rates, zoning regulations, and topographic features. Other important variables include the general economic health of the community; the quality of structures on the lot; the availability and quality of community services and facilities; the availability and cost of credit; as well as certain qualitative phenomena that may be considered "accidents of history." In short, there are a multiplicity of factors which interact to determine the demand for, and price of land. The net effect of these variables will be largely dependent upon the specific combination of attributes or characteristics of the land parcel and its surroundings as well as the nature of the activity actually occupying the land or intending to utilize it.

For the lack of foundation in literature, it is neither possible nor appropriate to quantitatively evaluate the potential property value impacts of the various I-35E alternatives. However, studies on highway effects on adjacent land values reveal certain qualitative conclusions. In a 1974 study by Gamble and others entitled Adverse and Beneficial Effects of Highways on Residential Property Values, it was found that the net effect of construction of a highway in North Springfield, New Jersey, was to raise the value of all properties in its vicinity, but the increase in the value of abutting properties was less than the increase for non-abutting properties due to adverse environmental effects. Property value increases due to regional accessibility amounted to $5 million while highway induced property value losses were $300,000. A study was conducted by the North Star Research and Development Institute entitled The Economic Impact of Freeways on the Twin Cities Metropolitan Area for sub-segments along I-94 in Minneapolis and St. Paul and I-35W in Minneapolis and Richfield. It was found that there is little relationship between freeway proximity and sales values, with the exception of those streets directly adjacent to the freeway which, in certain cases, increased in value at a slower rate than those streets one or more blocks away. (The overall area effect of accessibility increases was not measured in this study.)

In light of these and other findings (e.g., Langley, 1976, 1981; Palmquist, 1980), it can be best concluded that a major roadway exerts mixed effects upon adjacent property. The value of residential property abutting the right-of-way is subject to the negative influences of noise and aesthetic intrusion. It is also subject to the positive influence of accessibility improvement. Relative to other properties in the vicinity, those located directly adjacent to the right-of-way may experience flatter rates of increase. It is anticipated that the provision of noise barriers and corridor landscaping will mitigate adverse impacts. In areas where improved access and mobility will be provided, property values will likely increase.

There are currently no studies available which address the relationship of property value to a "parkway design." The reduced noise levels

from truck prohibition are substantial; the improved appearance of the parkway is likely to be a benefit, as is the trail provision. Low noise barriers are planned in areas where any substantial noise increases are anticipated. Lower speed limits are also planned. For these reasons, there should be fewer impacts on adjacent neighborhoods than would ordinarily be the case with normal freeway construction.

G. HISTORIC PROPERTIES

The DEIS considered all historic properties within the project area which were potentially affected by implementation of I-35E. Sites were discussed in three separate sections of the document in relation to whether they were eligible for review under Section 106 of the National Historic Preservation Act and/or Section 4(f) of the 1966 Department of Transportation Act or neither. Sites impacted by the preferred alternative are similarly organized herein. Properties of local historic significance and those protected by Section 106 are addressed below. Properties presumed to be protected both by Section 4(f) and Section 106 are addressed in Section V to follow (see pages 109 to 124). Although two properties, the German Bethlehem Presbyterian Church (commonly known as the German Presbyterian Church) and the James J. Hill property, are discussed in the DEIS under the heading of 4(f) properties, it has now been concluded that no 4(f) encroachment at these properties will occur due to design revisions which allow the project to avoid 4(f) impacts.

Sites of Local Historic Interest

Sites of local historic interest which do not meet the criteria for Section 106 or 4(f) protection were identified in the DEIS, including the archaeological sites discussed below. Only one such historic site was identified in the Pleasant Avenue corridor, the St. Paul Masonic Temple. This structure was demolished following publication of the DEIS after its structural integrity was destroyed by a fire. No further historic values remain.

Archaeological Resources

In the right-of-way of the Pleasant Avenue corridor, potential archaeological remains of five sites were identified in the Archeological Survey of the I-35E Pleasant Avenue and Shepard Road Corridors.[17] These include a cooper's shop, the People's Church, the George Mitsch home, the Searle House and the Flandrau House. Evidence of these sites is suspected to have been destroyed during the original grading of Pleasant Avenue for I-35E. The above archaeological sites are considered not likely eligible for inclusion on the National Register by the State Historic Preservation Office, as there is currently not enough evidence available to designate them as such.

---

[17] Environmental Research and Technology, Inc. Archeological Survey of the I-35E Pleasant Avenue and Shepard Road Corridors. March 1981. Concord, Massachusetts.

As stipulated in the Memorandum of Agreement (Appendix B) signed by the Advisory Council on Historic Preservation, MnDOT, FHWA, and the State Historic Preservation Office, monitoring of construction activities will be conducted at the above archaeologically sensitive areas to allow for archaeological review if evidence of the buildings is unearthed.

Sites on or Eligible for Inclusion on the National Register

Introduction

Section 106 of the National Historic Preservation Act of 1966, as amended, and Executive Order 11593 "Protection and Enhancement of the Cultural Environment" requires that impacts of federally-assisted projects on sites of historical, archaeological, or cultural significance be considered. The Act also requires that federal agencies afford the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment on undertakings that affect such properties. The ACHP has established procedures for "Protection of Historic and Cultural Properties" (36 CFR, part 800). This section summarizes the information necessary for compliance with the Section 106 process and the procedures of the ACHP with regard to the potential impacts of the completion of Interstate 35E on historic properties. Commitments to mitigate adverse impacts (developed under 36 CFR, part 800.6C) are included below as stipulated in the Memorandum of Agreement (Appendix B) concurred in by the ACHP, State Historic Preservation Office (SHPO), FHWA and MnDOT.

Inventory of Historic Sites

An inventory of historic sites was conducted under the provisions of Section 106 and Executive Order 11593. The following is a description of properties eligible for inclusion or listed on the National Register which will be affected by the preferred alternative as identified in the Historic Sites Assessment Report[18] and concurred in by the State Historic Preservation Office, the Keeper of the National Register, and the Advisory Council on Historic Preservation. Sites eligible for inclusion on the National Register were determined as such by the Department of the Interior on October 9, 1981, pursuant to Chapter I Part 63.2 of the National Historic Preservation Act. (For the location of these properties, see Figure 13.)

Historic Hill District

The Historic Hill District is a relatively triangular area comprising approximately 75 blocks. It is topographically defined by a steep sloping rise in terrain on the south and east which levels to a plateau. This plateau extends westward to the Mississippi River. With the exception of the area immediately adjacent to the slope, development

---

[18] Williams/O'Brien. Historic Sites Assessment Report: Prepared for the I-35E Environmental Impact Statement. February 1981.

LOCATION OF HISTORIC PROPERTIES

FIGURE 13

135E

of streets and plats is in accordance with a grid plan. Historically, the development pattern also progresses westward from the slope with earliest development in the 1850s occurring in the northeast corner of the triangle and latest in the southwest corner. The transitions in this development have occurred gradually to create a homogenous environmental district with no hard-line intermediate subdistrict boundaries, and a relatively soft-line boundary to the north and west. The primary exception to this hard-line/soft-line boundary theory exists at only one place within the district, the Grand Avenue commercial spine.

The Historic Hill District in St. Paul is significant for the largest concentration of nineteenth and early twentieth century architectural styles in Minnesota, as employed by architects, designers, and builders to satisfy the demands of the upper and upper-middle social and economic classes in a testimony of affluence, expression, and fashion.

The history of the Historic Hill District is not just a history of isolated, individual events and personalities. Rather, it is a rich narrative encompassing the heritage of one of St. Paul's communities. Its people were closely involved with the economic and cultural development of the city and state, and some affected the course of history in the nation.

The Historic Hill during its hey-day from the 1880s to the Depression of the 1930s represented a community of hope and expectation, for it was considered the best residential community of St. Paul. It was also a community of diversity where the houses of the social and civic elite were flanked by areas of more modest housing. In these collective neighborhoods was the beginning of the physical development of St. Paul.

Selby Avenue Tunnel

The Selby Avenue Tunnel is 1500 feet in length and rises from the base of the Hill District heading west at a 7 percent grade under Selby Avenue. The approach walls of the east portal are 23 feet apart and vary in height, with a maximum of 15 feet. The walls are constructed of reinforced concrete with wrought ironwork along the top. The tunnel is no longer in use, although some machinery may still be in place. Except for a portion of the property transferred to MnDOT by a commissioner's order, the tunnel property remains a transportation easement for the City of St. Paul. The property held by MnDOT was transferred prior to its designation of historic significance.

The Selby Avenue Tunnel is located within the boundaries of the Historic Hill District. It was built in 1906 for transportation use as part of the early Minneapolis/St. Paul streetcar system.

James J. Hill Property

Refer to pages 109 to 123 for documentation on this property.

German Bethlehem Presbyterian Church

Refer to pages 123 to 124 for documentation on this property.

Armstrong House

The Armstrong House is a two and one-half story, red brick, double dwelling built in 1886. The home was built in the popular picturesque Victorian Era styles of Queen Anne and Richardsonian Romanesque, recognized by highly decorative surface treatment and irregular plan applied to a bold structural massing.

The Armstrong House is one of a few architecturally and historically significant residences located within the St. Paul central business district. It was built for the George Washington Armstrong family, a family active in the formative history of Minnesota. George Washington Armstrong was the last territorial and first State Treasurer in Minnesota. The home was designed by prominent architect E. P. Bassford who was the supervising architect of St. Paul U.S. government buildings.

How Residence

The How house design is a mixture of classical and Tudor style, as evidenced by the fully extended, two-story, columned front porch; tall, slender chimneys; extended one-half timber bays; and high-pitched dormer windows.

The dominant impression of the home is created by the polychromatic brick and stone detailing, rectangular plan, and large front porch.

Integral elements of the home's design are a detached two-stall garage and surrounding fencework. The garage is reminiscent of the Prairie style. The extensive wrought iron and stone fencing surrounding the property is in excellent physical condition.

The How residence was built in 1904 for Jared How, a then prominent attorney. How, a Harvard law school graduate, was a senior partner in the St. Paul law firm How, Butler and Mitchell. How also taught law at the University of Minnesota and was a regent of the university. He was recognized as one of the finest lawyers in Minnesota. His partners Pierce Butler and William D. Mitchell held positions of Justice of the U.S. Supreme Court and Solicitor General of the United States, respectively. Jared How moved to San Francisco, California, in 1913. The How residence was designed by architect Louis F. Lockwood. Lockwood was born in England, the son of Francis Day and Morthlock (Sturges) Lockwood. He was educated at Kings College in London and graduated from Cambridge in 1884. Lockwood moved to the U.S. in 1889 and worked in Seattle, Portland, and San Francisco before moving to St. Paul about 1892. He designed nearly 70 St. Paul buildings in a wide variety of styles, including 19 houses on Summit Avenue alone. His works include 341 and 711 Dayton, 568-574 Dayton, and 726, 786, 842, and 963 Summit.

Application of the Criteria of Adverse Effect

The criteria of adverse effect, Chapter 8 Part 800.3 of the regulations of the Advisory Council on Historic Preservation, were applied to each of the historic properties described above in the Preliminary Case Report on Historic Properties/Draft 4(f) Supplement. Adverse effects documented in the Preliminary Case Report included the physical taking of property for project use, noise and aesthetic impacts, as discussed below.

Historic Hill District

The Historic Hill District will experience aesthetic impacts from the roadway. Approximately 75 homes built along the bluffline on the southern boundary of the district will be adversely affected.

Street reconstruction within existing street right-of-way within the Historic Hill District will have no adverse impact on the district. MnDOT-owned land south of the James J. Hill wall and in the Historic Hill District will be used. However, these lands contain no improvements and have no historic value.

Selby Avenue Tunnel

Earlier roadway alignments indicated that under the worst case, the widening of Kellogg Boulevard, which is also a part of the City of St. Paul street plan, would use approximately 3,300 square feet of district property, requiring the removal of the first 90 feet of the Selby Avenue Tunnel approach walls. (This encroachment was to occur on MnDOT-owned or city-owned property.) However, further design study now indicates that the paved approach wall to the Selby Avenue Tunnel will be preserved intact, as will the tunnel itself.

Armstrong House

Access options at the Armstrong House will be somewhat reduced. Construction will not have any adverse effect upon this property, including from noise and aesthetics.

How Residence

The How Residence will experience aesthetic impacts.

Alternatives to Mitigate Adverse Effects

The following mitigation commitments are documented in the adopted Memorandum of Agreement (see Appendix B).

Historic Hill District

Mitigation for the adverse impact on the Historic Hill District will include:

a. Construction of design concept 5 (discussed on page 122 and currently identified by MnDOT as Layout 3D Study 4) which is intended to preserve intact the existing features of the former James J. Hill estate through construction of a retaining wall approximately 10 feet southeasterly of the existing exposed wall which is approximately 110 feet northwesterly of the existing centerline of Pleasant Avenue.

b. Exercise of special care during design and construction so as to avoid encroachment upon the steps and walkways of the German Bethlehem Presbyterian Church and the walled approach to the Selby Avenue Tunnel.

c. Construction of a pedestrian overpass at Walnut Street, connecting the pedestrian path adjacent to the Hill property to Walnut Street on the south side of the highway to maintain continuity between the Historic Hill District and the Irvine Park Historic District. The State Historic Preservation Officer will be consulted during design of the overpass to provide for compatibility with historic properties.

d. Application within the highway right-of-way of landscaping techniques appropriate for a parkway design to mitigate specific adverse aesthetic impacts on historic properties.

e. Monitoring of construction activities in the area between Grand Avenue/Ramsey Street and Kellogg Boulevard which were formerly occupied by a Cooper's shop, People's Church, Mitsch house, Searle house and Flandrau house to allow for archaeological review if evidence of those buildings are unearthed.

Selby Avenue Tunnel

Special care will be exercised during design and construction so as to avoid enroachment upon walled approach to the tunnel.

How Residence

Mitigation for the adverse impact on the How Residence will consist of the application of landscaping techniques appropriate for a parkway design within the highway right-of-way.

Commitments

IV. COMMITMENTS AND ASSURANCES

During Phase III (Final EIS), preliminary design work has continued on the preferred alternative in an effort to resolve specific impacts and issues. Design work has now been developed at a level sufficient to allow commitments regarding mitigating measures and further definition of the parkway concept, direct connection and improvements to the common section. All of these refinements and solutions have been reviewed and accepted by the various agencies involved in the process, including the Metropolitan Council, City of St. Paul, Minnesota Department of Transportation, Federal Highway Administration, and others. The resultant commitments and assurances regarding the project and mitigation of the project's impacts are integral to implementation of the preferred alternative.

A. NOISE ABATEMENT

Noise impacts of the preferred alternative without abatement were discussed in Section III. All residential areas adjacent to I-35E have been investigated for possible noise mitigation needs. FHWA funding for noise abatement is limited to feasible and reasonable measures where the overall benefits are determined to outweigh the overall adverse social, economic, and environmental effects. The approval of highway construction plans is contingent upon the incorporation of all reasonable and feasible noise abatement measures.

Four noise abatement measures are being implemented or proposed for this highway:

1. Depressed section in Grand-Ramsey area
2. Truck prohibition (commercial vehicles over 9,000 pounds licensed gross weight)
3. Reduced speed limit (45 mph)
4. Noise barriers

The first three measures (approved) have reduced the potential noise impacts an average of 7 dBA for first row receptors, eliminated the need for mitigation measures in some areas, and improved the reduction performance of the proposed noise barriers.

Noise barriers are proposed in six of the residential areas as shown on Figure 14. The noise levels attainable by the proposed noise barriers are shown in Table 12. Specific locations for construction of noise walls will be determined after input from area residents with city approval.

TABLE 12
PROPOSED NOISE ABATEMENT MEASURES

Area	1st Row Sites	Existing	Future Avg.(1)	Future Max.(1)	Remaining Impact (2)	Average Barrier Attenuation (3)
1	16	55	61	62	+6	-8 dBA
5	22	55	62	64	+7	-7 dBA
6	6	50	52	55	+2	-9 dBA
9	7	55	59	61	+4	-9 dBA
10	34	55	58	64	+3	-11 dBA
11	16	55	58	60	+3	-7 dBA

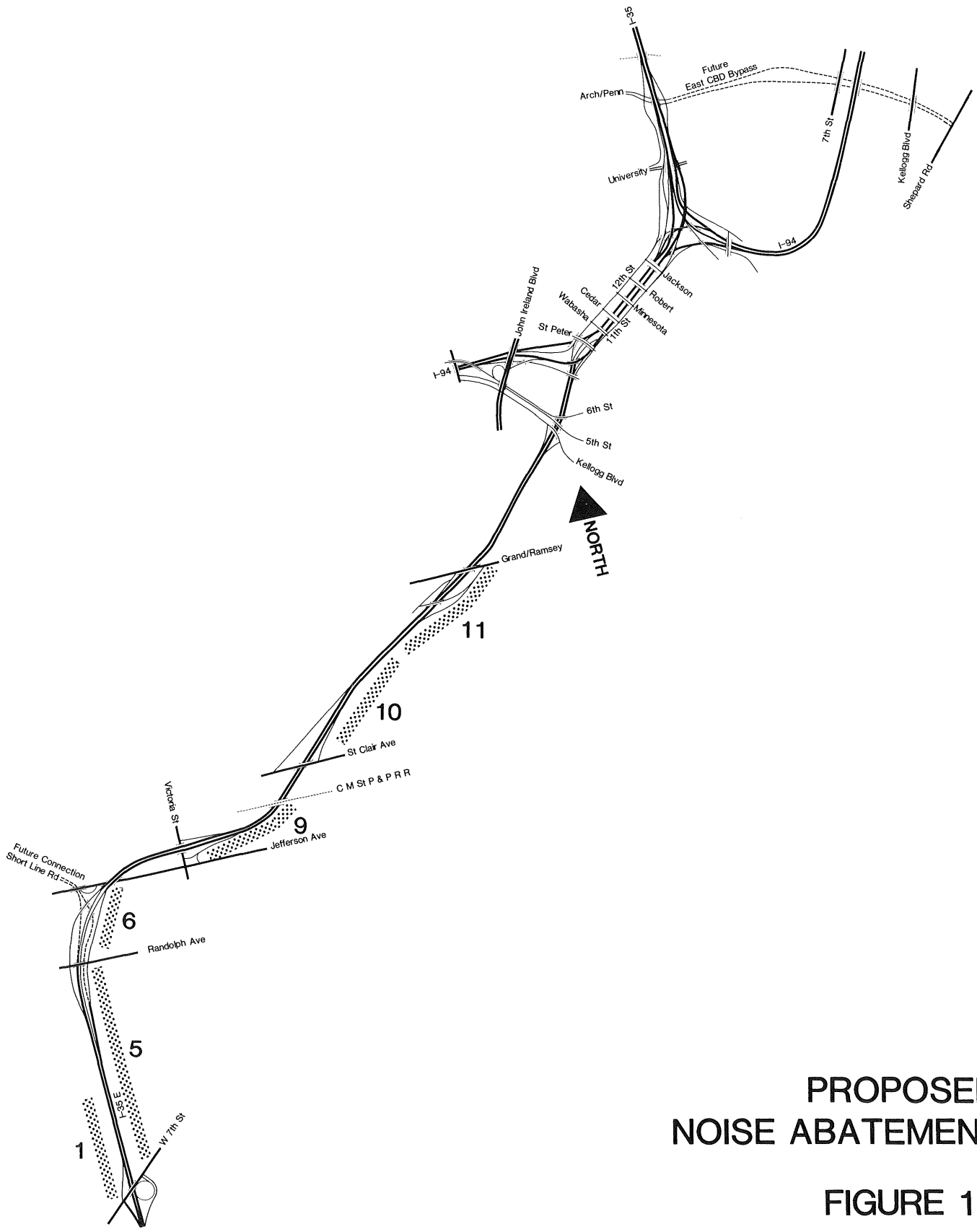
Notes: (1) Future peak hour L_{10} levels for the average receptor site and the worst site (max.) after abatement at all 1st row sites.
(2) Difference between existing level and average future level, with abatement.
(3) Based on average for all sites.

About 14,000 lineal feet of noise walls are proposed which attain an average of 8 dBA attenuation. The walls as viewed from the residential side will be approximately 5 to 7 feet in height. A wall design, 10 to 12 feet in height, was also analyzed and found to obtain only 2 dBA (average) more noise reduction. This design averages 10 dBA at close to double the cost. The 10- to 12-foot walls are considered uneconomical in relation to the benefit gained, and increase the potential for adverse social and aesthetic impacts.

Assuming acceptance of the proposed noise walls in the six areas noted in Table 12, the average first row receptor (all 18 areas) would have an L_{10} 57 dBA level (peak hour) which is substantially below FHWA criteria and near the existing levels. Receptor sites in second row and further back would have even lower levels. For noise levels in areas outside the proposed noise wall areas, see Section III.

A wood wall design is anticipated for this corridor to blend with the existing and future vegetation. The specific location and configuration of the walls in relation to receptor sites is being designed in conjunction with landscaping and trail designs. These design concepts will be reviewed by the affected residents at neighborhood meetings which will be coordinated by the City of St. Paul. MnDOT policy requires formal approval by the City of St. Paul of the proposed noise barriers. The views of the affected residents are actively sought to reach a decision on the final noise barrier plans.

A Final Noise Study Report will be submitted to the FHWA prior to project construction which will document the final noise abatement plans. No exceptions to the FHWA noise levels are needed on this project. Resident rejection of a noise barrier in any area does not require a formal exception request, since procedures no longer require exceptions where abatement is not considered reasonable or feasible.



PROPOSED NOISE ABATEMENT

FIGURE 14

I35E

B. PARKWAY LANDSCAPING

The primary objective of parkway landscaping is to mitigate aesthetic and visual impacts so that the roadway blends into the adjacent neighborhoods, moderating or lessening negative impacts while enhancing the positive character of the roadway. This section will discuss specific areas within the Pleasant Avenue corridor where negative visual impact is apparent and mitigation would relieve it. The measures chosen result from view type, impact intensity, surrounding land use and available space.

West Seventh to Short Line

From West Seventh Street to Short Line, moderate to heavy visual impacts will occur without mitigation. Neighborhoods impacted include those which abut the alignment and the Milton-Linwood bluff areas. Primary mitigation will be dense landscape planting along the right-of-way consisting of canopy trees, shrubbery and ground cover. In addition, shrubs and ground cover will be used in the median between Bayard Street and Short Line Road to moderate views of the corridor and screen oncoming traffic (see Figure 15). These plantings will reduce the visual effect of the traveled lanes and merging lanes and complement proposed noise walls. Noise wall location, material selection and surface treatment will be designed to minimize the visual impact on the neighborhood.

Short Line to Grand/Ramsey

Mitigation for the Short Line Road to the Grand-Ramsey area will be oriented towards the West Seventh and bluff neighborhoods. These areas are expected to receive moderate to heavy impacts. The West Seventh neighborhood will view the proposed noise wall and varying degrees of side slope, depending on specific location. Appropriate landscaping will be used to reduce intrusion of the slope and soften the appearance of the noise walls. The primary mitigation for bluff and vantage points will be the landscaped, wide, raised roadway median (Figure 15). Canopy trees, shrub massing and ground cover will effectively soften the perceived hard appearance of the roadway. Special lighting on the parkway will also have a more positive appearance than normal freeway lighting. Appropriate sensitivity will be exercised where regrading is necessary.

Earth retaining structures will be designed to complement the adjacent areas. In order to reduce the dominating appearance of the structure, techniques to be considered include stepped retaining walls, integration of planters into structures and use of textured finishes. Locations where grading occurs will utilize plant material compatible with the surroundings.

Grand/Ramsey to I-94

Between the Grand-Ramsey interchange and the I-94 connection, the parkway median will be replaced by a non-planted median because of the narrow right-of-way width available. Therefore, the mitigation of

this segment will be directed towards the retaining structures, bridges and other basic elements of the parkway (see Figure 15). Wall surfaces, bridge abutments and structure design will reflect visual cohesion, and materials, surface treatment and color will be designed to complement each other. Opportunities to provide heavy landscape plantings will be maximized. Plant terraces will be integrated into retaining structures where right-of-way dimensions allow. In addition, easements for landscape purposes outside the right-of-way will be considered. Plant materials selected will be of quality and dimension to maintain the vitality of the plantings.

Parkway Design Considerations

A well-landscaped, raised-median parkway is the single most effective measure to minimize visual intrusion of the I-35E roadway. Aesthetic impacts such as views of the road, views from the road, and physical integration will be mitigated by landscaping throughout the parkway. Successful implementation of the parkway design is contingent upon numerous design considerations. The following is a list of these considerations with an elaboration of each.

A. Driving Speed. The posted speed limit for the parkway will be 45 mph rather than the 55 mph driving speed of most interstate freeways. As a result of the slower driving speed, a better perception of the form, color, texture and dimension of the highway will result.

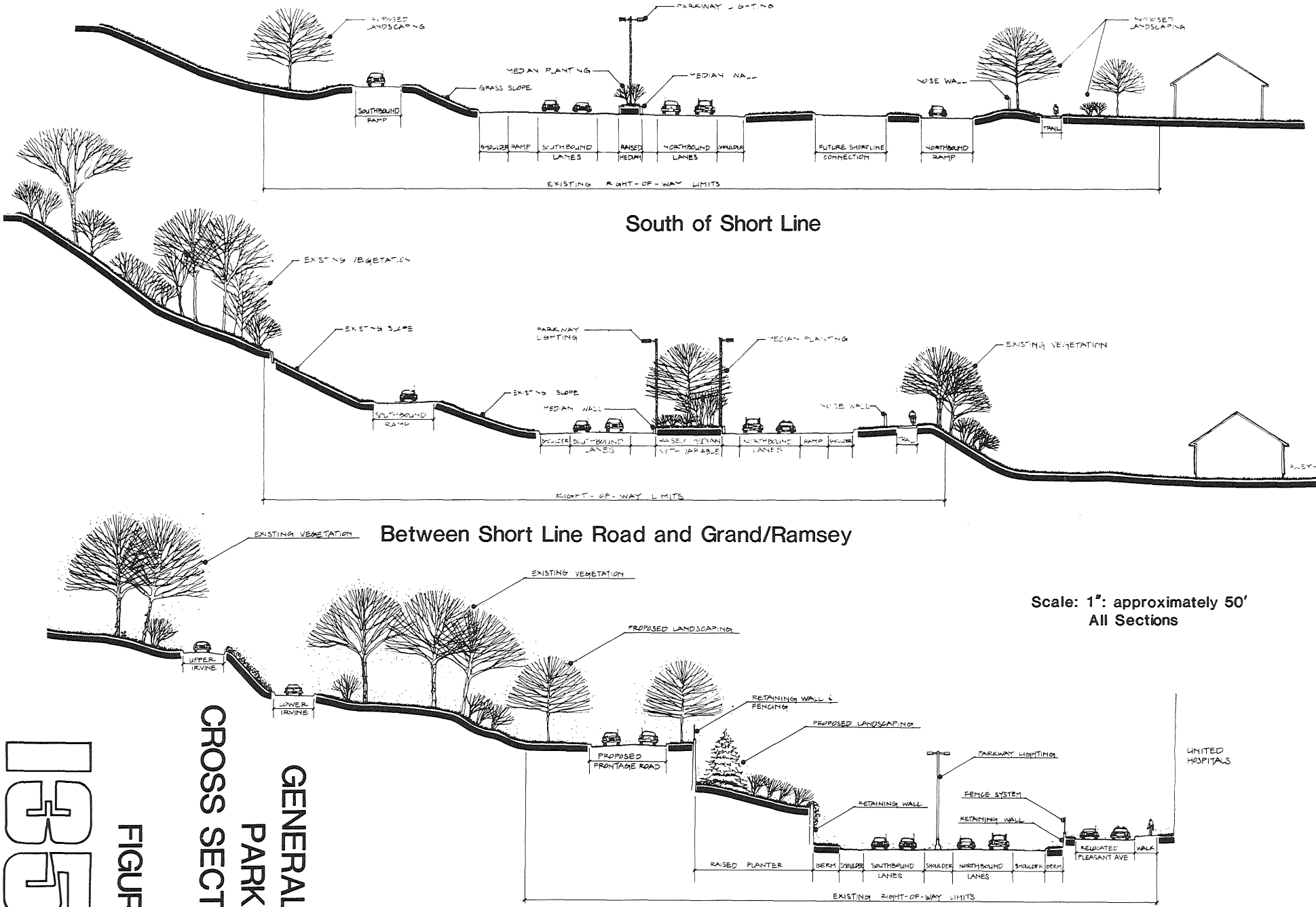
B. Plant Material Varieties. Parkway design characteristically promotes a greater use of plant materials than traditional freeway design. This will be reflected in plant density and proximity of plants to the roadway. Plant materials selected will be hardy, low maintenance varieties and preferably native to the region. Varieties displaying these characteristics have greater potential for survival and will insure that the mitigation remains viable. (See "Landscape Features" for additional comments.)

C. Design Consistency. The landscape design for the parkway will extend beyond the parkway median and onto the backslope/sideslope spaces and adjacent parcels. A comprehensive design will provide a corridor design which can respond to and mitigate specific visual intrusion.

D. Maintenance. Maintenance is an integral consideration for the vitality and continued effectiveness of any landscape plan. Median access is required to service lighting, utilities and intermittent plant care.

E. Structural/Retaining Features. A consistent architectural treatment will be applied to structural and retaining wall features throughout the corridor. Similar attention will be given to the noise walls.

F. Lighting. Sensitivity will be exercised in providing the required levels of illumination. Pole and luminaire color, shape, and dimensions will be selected so as to project an aesthetically pleasing appearance while mitigating visual impacts.



Scale: 1": approximately 50'
All Sections

GENERALIZED PARKWAY CROSS SECTIONS

FIGURE 15

G. Grading. Grading is important due to the constrained right-of-way, topographic relief and adjacent bluffline of the corridor. Cut and fill sections will have a "finished" appearance and complement existing grades.

Landscape Features

The purpose of the "Landscape Features" is to translate landscape mitigation principles into design concepts by investigating plant material, form and dimension.

It is important that the roadway blend into the surrounding environment by complementing natural edges and that it provide a pleasing view from adjacent residential neighborhoods. It is equally important that the driving experience be made visually appealing. Other design objectives which mitigate visual intrusion include plant massing to create major landscape statements, prevent monotony, promote interchange identity, and naturalize cut/fill slopes with surrounding topography.

The following landscape design criteria should be respected during implementation of visual mitigation.

1. Plant mass dimension must create a strong visual statement to provide effective mitigation.

2. Plant material species will provide diversity but also serve to unify the corridor.

3. Plant material will be hardy, fast growing and salt tolerant. Native species common to central Minnesota are preferred. These species commonly require low maintenance.

4. Planting will be consistent with the character of the area within which it is used. Planting along natural edges should remain informal. Planting which is adjacent to development can be designed in a more structured manner.

5. Small and full-size trees shall conform to clear zone restrictions unless traffic barriers are utilized. (Trees which have trunks which exceed four inches in diameter shall not be placed within the "clear zone.")

6. A Design Guide report will be prepared documenting the visual relationship of the various design elements of the parkway. By developing the design elements as a whole, it will be possible to provide a strong sense of visual unity and continuity throughout the corridor. The Design Guide will be available for community information and review and will guide the designer in preparing the construction plans.

The preceding criteria should serve as a framework for final landscape designs. The criteria aid in promoting functional and effective mitigating measures.

C. INCLUSION OF BIKE/PEDESTRIAN FACILITY

A bike/pedestrian plan has been developed by MnDOT with consultation and assistance from the City of St. Paul. This plan, including three pedestrian crossings at Bayard, Duke and Walnut, will be constructed if necessary city approvals are received. Further consideration will be given in detailed design for a connection in the Miller Hospital area. Neighborhood input will be sought during plan development and city approval. (See Figure 16 for the proposed general location of the bike/pedestrian corridor.)

D. MITIGATION FOR EFFECTS ON HISTORIC PROPERTIES

Refer to the Memorandum of Agreement in Appendix B for mitigation of historic impacts.

E. VIBRATIONS DURING CONSTRUCTION

Vibrational impacts were extensively studied as a direct result of scoping comments during Phase I. In particular, all hospitals near the corridor were evaluated as to possible impacts during surgery or microsurgery. Vibrations from operation of a parkway were found to be two orders of magnitude below the sensitivity thresholds of such activities and one order of magnitude below existing background vibrations. Operational effects of 35E are therefore not anticipated to be significant.

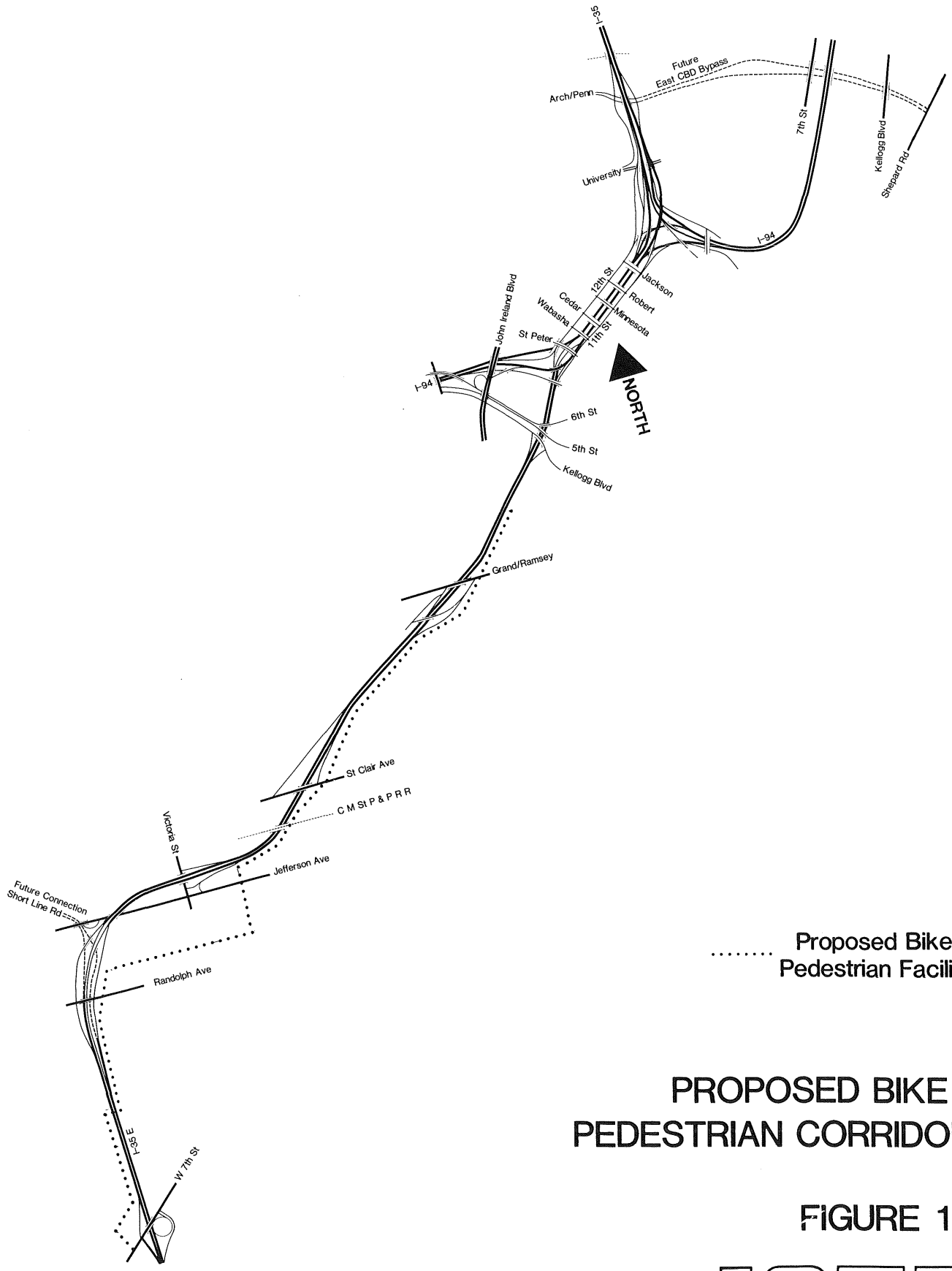
Mitigation will, however, be implemented, as recommended in the DEIS, whenever there is blasting of heavy rock during excavation of road grades. This specific commitment involves specifying the maximum amount of charge to be detonated at any one time at specific distances from the hospitals. MnDOT will require pre-scheduling of the blasts at times of least interference with sensitive hospital activities. The construction engineer will coordinate all blasting activities with the appropriate hospital authorities. Advance notification will be given to all neighbors.

F. PARKWAY CONVERTIBILITY

Various commentors have suggested that a direct connection parkway has the potential to be easily converted to full freeway operation at some time in the future.

A number of project features provide assurances that this outcome is a very remote possibility.

a. Pavement thickness is being designed to reflect the intended use of the highway. The exclusion of commercial vehicles rated greater than 9,000 pounds will allow the pavement to be somewhat thinner than with other metropolitan freeways. The exact thickness will be developed during the final design phase of the project.



..... Proposed Bike / Pedestrian Facility

PROPOSED BIKE / PEDESTRIAN CORRIDOR

FIGURE 16

135E

b. Noise barriers are not being designed for trucks. Noise walls along the parkway corridor will be lower in height than are typically constructed for freeways. Freeway noise walls are larger in order to mitigate noise from the trucks (the overall noise source is 8 feet above ground as compared to a ground level source for autos). Removal of the truck prohibition on the parkway would require major design changes to the walls and costly remedial construction.

G. MODIFICATIONS TO THE COMMON SECTION

The basic I-35E and I-94 designs were developed in the late 1950s and early 1960s. The early layouts had three lanes from I-94 eastbound joining with two lanes from I-35E northbound with a tight curve at each end of the common area. The right lane from I-35E was to merge into the left lane of I-94 for a total of four lanes in the "common section." This design required two through lanes to merge within the common section. In the westbound direction, two lanes from I-94 joined two lanes from I-35E southbound for a total of four lanes in the common section. Based on 1975 traffic volume forecasts and freeway operational knowledge then available, this design was thought to be adequate despite a rather short weaving distance of about 1,700 feet for the I-94 to I-35E and I-35E to I-94 crossing movements. (The use of 1975 design year volumes at the time was dictated by federal law.) The conflicts with lane balance and lane continuity principles were not yet understood or recognized. The "state of the art" was not that advanced--particularly as related to "driver expectancy." Drivers expect to be able to stay in a given lane if they want to proceed on the route they are on.

Two main considerations led to the design concept proposed. The first was that knowledge of freeway operations advanced to the point where the principles of lane continuity and balance indicated the desirability of having five lanes in the eastbound direction to avoid the unexpected merge problem for I-35E and I-94 drivers--even if forecast volumes would not strictly warrant five full through lanes. Two lanes would be used by I-35E traffic and the other three lanes by I-94 volumes. A second development involved revisions being advanced for I-94[1] in this area which would provide three through lanes for I-94 thus eliminating a number of very troublesome lane drops on a segment with one of the higher urban freeway accident rates in the state. With these revisions, and a direct connection, five lanes are necessary in the common section in the westbound direction as well to avoid five lane to four lane reduction and conflict with lane balance and continuity principles. Figure 2 (page 7) shows the proposed common section improvements.

The current proposal which is often referred to as the "common section improvements" includes the following:

---

[1]The I-94 remodeling project is separate from I-35E, but related by virtue of the common section.

Northbound I-35E (that portion which has yet to be constructed) -- A ramp is built which splits the traffic from northbound I-35E to enter I-94 eastbound on the right, while the I-35E northbound trips would enter on the left of existing I-94 and continue through on two continuous lanes. The ramp for the trips to eastbound I-94 merging as an acceleration lane on the right side of the roadway is a new proposal. It eliminates crossing movements (i.e., weaving). This new ramp requires modifications to the St. Peter Street Bridge and rebuilding of the Wabasha and Cedar Street bridges, as well as extensive retaining wall work.

Southbound I-35E -- To complement the northbound movement, similar work to southbound I-35E south of the "Cayuga" railroad bridge is necessary. This work would involve adding traffic lanes to I-35E to properly assign the traffic, modification to the exit ramp to Arch-Penn, and University Avenue. Traffic destined to westbound I-94 would exit from I-35E on a new ramp and merge directly into the right side of I-94 in the vicinity of Jackson Street. I-35E would enter the I-94 common section as it does today and remain on the left side and exit near Wabasha to southbound I-35E. The new ramp will require modification to the Jackson Street Bridge as well as to rebuilding the Robert Street and Minnesota Street bridges.

Eastbound I-94 movements to northbound I-35E would shift left one lane in the common section. Similarly, westbound I-94 movements intending to go south on I-35E would shift left one lane in the common section. Neither of these movements would encounter crossing movements (weaving) from the other roadway.

With these revisions, two continuous through lanes exist for I-35E and three continuous through lanes would exist for I-94 in each direction. No complex weaving for I-94 to I-35E and I-35E to I-94 movements will be necessary. Capacity is expected to be adequate to safely accommodate the anticipated traffic volumes.

The City of St. Paul requested improvements to the Jackson Street on-ramp to I-35E northbound. This was not specifically included in the preferred alternative for the project. The direct connection alternative is expected to provide some relief for the Jackson Street ramp. However, conditions on this ramp and other in-place sections of I-35E further north of downtown will be monitored. If improvements are eventually warranted, appropriate solutions will be pursued.

H. ASSISTANCE FOR PROPERTY DISPLACEMENT AND RELOCATION

Mitigation measures for right-of-way acquired includes payment for the properties needed, relocation counseling for people and businesses displaced, payment of moving costs and housing supplement payments for residential displacees. Relocation assistance for displacees will be provided by MnDOT District 9 Office of Right-of-Way. This service will be provided from the district office because it is not feasible to have a neighborhood office for five displaced families. The Federal Uniform Relocation Assistance and Real Property Acquisition Policies

Act of 1970 and Minnesota state law provide for a number of services and financial assistance to mitigate relocation problems. Dislocated residents will be given priority to purchase FHA and VA repossessed homes. They also have priority to occupy senior citizen housing and subsidized housing. For those displaced homeowers purchasing replacement homes, a housing supplement will ensure that they can buy an adequate home that meets the occupancy code for decent, safe and sanitary requirements. Those homeowners who have mortgages will receive an interest differential payment that will allow them to maintain their present payment schedule. Homeowners will also be reimbursed for closing costs incurred in the purchase of the replacement home. Both residential and business displacees will be paid for the cost of moving their personal property to their new location.

Adverse property value impacts resulting from construction activities will be mitigated by minimizing the total time of construction, suppression of dust and noise, and with aesthetic landscape treatment.

Several options were explored to mitigate the taking of the office building at 555 Wabasha. These options and their impacts are listed below.

1. Partial taking: This would leave approximately half of the building standing while allowing room for the realigned roadway. Because of the structural characteristics of the building and other factors, this option was eliminated.

2. Reroute traffic around the building: This option would require traffic exiting from I-35E to be routed south on St. Peter, east on 10th Street and then north again. These turning movements would severely restrict traffic and cause some delays.

3. Construct an elevated roadway over the freeway: This option would place a cantilevered roadway above the proposed I-35E to I-94 eastbound ramp between St. Peter and Wabasha. Such an alignment would curve the roadway and be very expensive compared to the cost of acquiring the building.

Based upon the above evaluations, it was decided that the only reasonable and prudent alternative was to acquire the building and demolish it.

Relocation of the businesses in the 555 Wabasha building within the City of St. Paul will be encouraged through the assistance of the city in locating adequate replacement sites. The building's owner and tenants will be compensated for time spent finding a new location and for the actual, reasonable expenses for moving there. Based on a review of available downtown office space, all 555 Wabasha tenants could remain in the area.

4(f) Statement

V. 4(f) STATEMENT

INTRODUCTION

Section 4(f) of the Department of Transportation Act of 1966 declares a national policy that special effort be made to preserve the natural beauty of the countryside, public park and recreation lands, wildlife and waterfowl refuges, and historic sites. Section 4(f) permits the Secretary of Transportation to approve a project requiring the use of such publicly-owned lands of national, state, or local significance or privately-owned lands of national historic significance only where it can be shown that:

1. There is no feasible and prudent alternative to the use of such land; and

2. Such project includes all possible planning to minimize harm to the Section 4(f) land resulting from such use.

PURPOSE OF STATEMENT

This section contains the information and supporting documentation required for an FHWA decision regarding the use of properties protected by Section 4(f) for the proposed completion of Interstate Highway 35E in the City of St. Paul. In this instance, design modifications developed by the Minnesota Department of Transportation have eliminated the need to use land at any of the properties previously identified as 4(f) properties during the environmental review process. This section considers impacts to the James J. Hill property and the German Presbyterian Church, and provides documentation of the development of alternatives to avoid applicability of Section 4(f) to these properties, therefore eliminating the need for preparation of a Final 4(f) Statement and final 4(f) determination.

JAMES J. HILL PROPERTY

Description

Construction of the James J. Hill home was begun in 1888 and completed three years later at an approximate cost of $522,864.38 for the house, $931,275.01 total. The four-story, 45-room mansion was built in red sandstone by Peabody and Stearns of Boston (see Figure 17). Mark Fitzpatrick of St. Paul was the supervising architect.

For James J. Hill, Peabody and Stearns designed a big house with 36,000 feet of living space, including 13 bathrooms, 22 fireplaces, a billiard room, and a sky-lit two-story art gallery which housed, among other things, 22 Corots. John Kirchmayer, a Bavarian wood carver working for the design firm of Irving and Casson of Boston, spent nearly a year at work on the first floor paneling and the furniture.

The Hill house is Richardsonian in its use of heavy, rock-faced masonry and in the heavy Syrian arches of the port-cochere. Facing the gardens and the bluff to the south are cloisters of porches with heavy Romanesque columns. The two pavilions which flank the great porte-cochere are balanced, solid, commanding, unequivocal. Also of note are the numerous dormers and towering chimneys.

Many of the details of its lavishly finished interior remain unchanged today. The ornate reception hall retains much of its opulence. When in ownership by the Archdiocese of St. Paul, the two-story art gallery was converted to a library and the tremendous dining room was altered for use as a chapel. However, these rooms are currently being restored to reflect their historic use. Glass doors have been added to many rooms in use as office space. The nursery on the top floor and service areas in the basement remain largely unchanged.

The portion of the Hill estate that would have incurred direct impacts under the original design concept included the foundation and basement walls of what was once a gardener's residence, the basement of which is thought to have housed an innovative electrical power generating and storage plant and engine room. This structure also incorporated a large retaining wall that helped stabilize the slope on which the Hill estate is located. The walls, in existence today, are 32 feet in height from the top of the wall to the bottom of the footing, with a width of ten feet six inches at the base (see Figure 18). What were once Hill's greenhouse, mushroom cave, grape arbors and perhaps an artesian well would have also incurred direct effects under the original Pleasant Avenue design. The SHPO has determined that the value of this structure and archaeological components is in preservation in place rather than salvage. Under FHWA regulations (23 CFR Part 771.135), taking archaeologically significant resources having value in place would have constituted a Section 4(f) involvement.

Use

The Minnesota Historical Society (MHS) currently uses portions of the Hill mansion for office space. MHS offices occupy sections of the second and third floors of the mansion. The first floor is presently open to the public for public visitation. The basement and part of the second floor are being restored and will soon be open for interpretation as well. The MHS would eventually like to develop the lower portion of the property which includes the impacted retaining wall for interpretive use. However, no restoration plans have been developed nor has there been a commitment of funds for this purpose.

Access

The entrance to the James J. Hill estate, located at the northwest side of the property, is accessible by vehicle via Summit Avenue. Pedestrian access is provided off of Summit Avenue or from the southeast via a pathway and steps along Walnut Street.

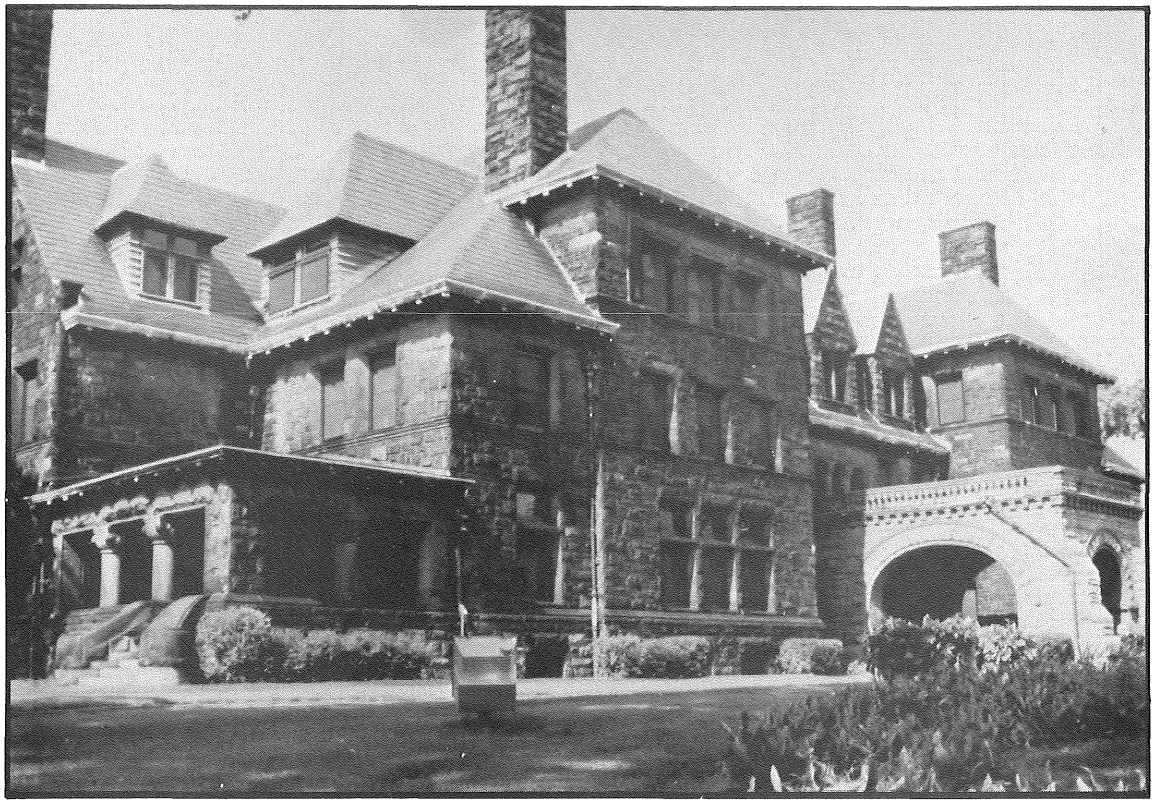


Figure 17 James J. Hill Mansion

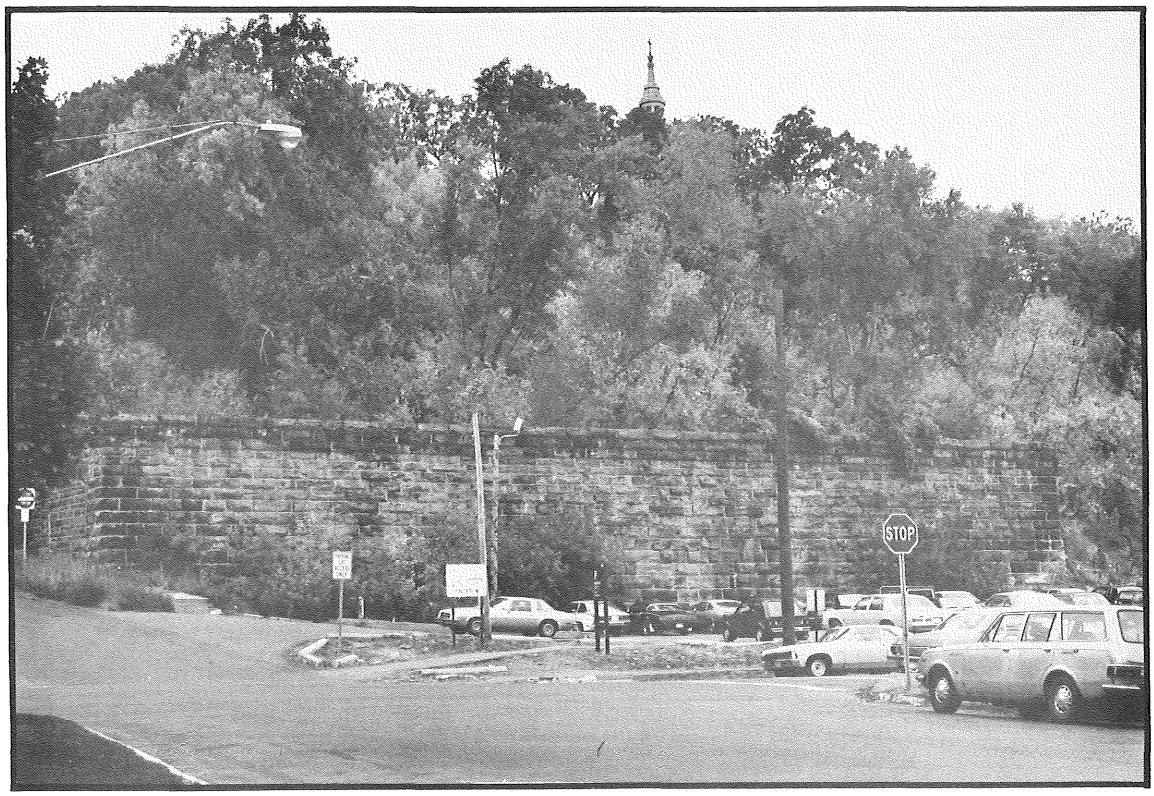


Figure 18 Hill Property Foundation/Retaining Wall

Ownership

After James J. Hill's death, his daughters presented the mansion to the Archdiocese of St. Paul in 1925. The Minnesota Department of Transportation completed purchasing lots 9, 10 and 11 of the Hill property from the Archdiocese of St. Paul in 1968 and currently holds the title to these lots. The Minnesota Historical Society purchased the remainder of the Hill estate from the Archdiocese in 1978 and is the present owner of that portion of the James J. Hill property.

Relationship to Similarly Used Lands

The James J. Hill mansion stands out among other residential structures of its period both in stature and historical significance. It is the largest residential structure to be built on Summit Avenue. Listed on the National Register of Historic Places and designated a National Landmark, the property is historically significant in relation to its original owner James J. Hill.

James J. Hill was one of the great railroad builders in the American West and one of the leading financiers of the nineteenth century. His mansion was the showplace of St. Paul until his death in 1916.

Hill was born in 1838 in Ontario, Canada, of Scotch-Irish parents, and began work in a country store at age fourteen. In 1856, he went to St. Paul and early became interested in transportation. By 1878, he was able to purchase the St. Paul and Pacific Railroad along the Red River to Fort Garry (now Winnipeg). Under Hill's leadership, the company became the St. Paul, Minneapolis and Manitoba Railway. Efficient management soon produced an entire network of Hill-controlled railroads throughout the Northwest. In 1890, all these lines were merged into the Great Northern Railway Company, which completed lines to the Pacific by 1893. At the same time, he acquired the Northern Pacific and the Chicago, Burlington, and Quincy soon after. An attempt to absorb these holdings into the Northern Securities Company was defeated by the newly enacted Sherman Anti-Trust Law in 1904.

The Great Northern Railroad did not receive the land subsidies or other government aid used for construction by most other railroads, yet the Great Northern unlike many other lines weathered all the financial panics and crashes of the period. Conservatively financed and soundly managed, the Hill lines achieved a reputation for integrity uncommon in that era. Hill's efforts did much to bring the Northwest into the mainstream of Amercian commerce. The Hill estate exemplifies the successful enterprise of James J. Hill.

Location and Amount of Taking

Original roadway design indicated that construction of I-35E would use property at the base of the James Hill estate requiring the removal of the previously described lower foundation wall and portions of a former gardener's house, greenhouse and garden (see Figure 19-0). The land to be used was contained within the right-of-way limits previously

acquired by MnDOT by 1968. However, adoption of an alternative design in the vicinity of the Hill property will no longer require removal of the wall structure. (This alternative is discussed in greater detail under "Alternatives to the Use of 4(f) Properties.") The existing wall along Walnut Street and the existing wall across lots 9, 10, and 11 approximately 110 feet northwesterly of and parallel to the existing centerline of Pleasant Avenue will be preserved in their existing condition and location with no construction to extend behind the faces of those walls. The excavation for roadway construction will be contained by a retaining wall to be built approximately 10 feet southeasterly of the existing wall parallel to Pleasant Avenue.

Other Physical Effects on the Property

Aesthetic impacts of the view of the roadway will be experienced at this site. In addition, pedestrian access via the Walnut Street walkway would be severed; however, a pedestrian overpass has been proposed as a mitigation measure.

Alternatives to the Use of the James J. Hill Property

Of the twelve alternatives analyzed in the Draft EIS, the Shepard Road freeway and the no-build alternative would have avoided impacts to this historic property. The Shepard Road alternative, however, would have impacted a greater number of historically and archaeologically significant resources, requiring the use of seven sites eligible for inclusion or listed on the National Register and adversely affecting seven other significant sites. The no-build alternative was eliminated during the selection process because it was inconsistent with metropolitan development goals and policies. Of the Pleasant Avenue alternatives studied in the DEIS, the parkway alternatives have been recognized as having a less severe impact on historic properties than the freeway alternative. Selection of a parkway by the Commissioner of Transportation as the preferred alternative minimizes adverse effects to the James J. Hill property.

Because of a special concern for preservation of the Hill property expressed by the Minnesota State Historic Preservation Office and other cooperating agencies, an analysis of feasible design alternatives in the vicinity of the Hill site was undertaken by the Minnesota Department of Transportation. The following five options to the original design (shown in Figures 19-1 through 19-5) were considered.

1. A modified alignment with a loop ramp at the Kellogg Boulevard interchange (see Figure 19-1).

2. Shifting the interchange at Kellogg Boulevard to Fifth/Sixth streets (see Figure 19-2).

3. Elimination of the interchange at Kellogg Boulevard, reducing the number of downtown interchanges to two (see Figure 19-3).

4. Maintaining the original design with a loop on-ramp at Kellogg Boulevard to limit encroachment into the Hill property (see Figure 19-4).

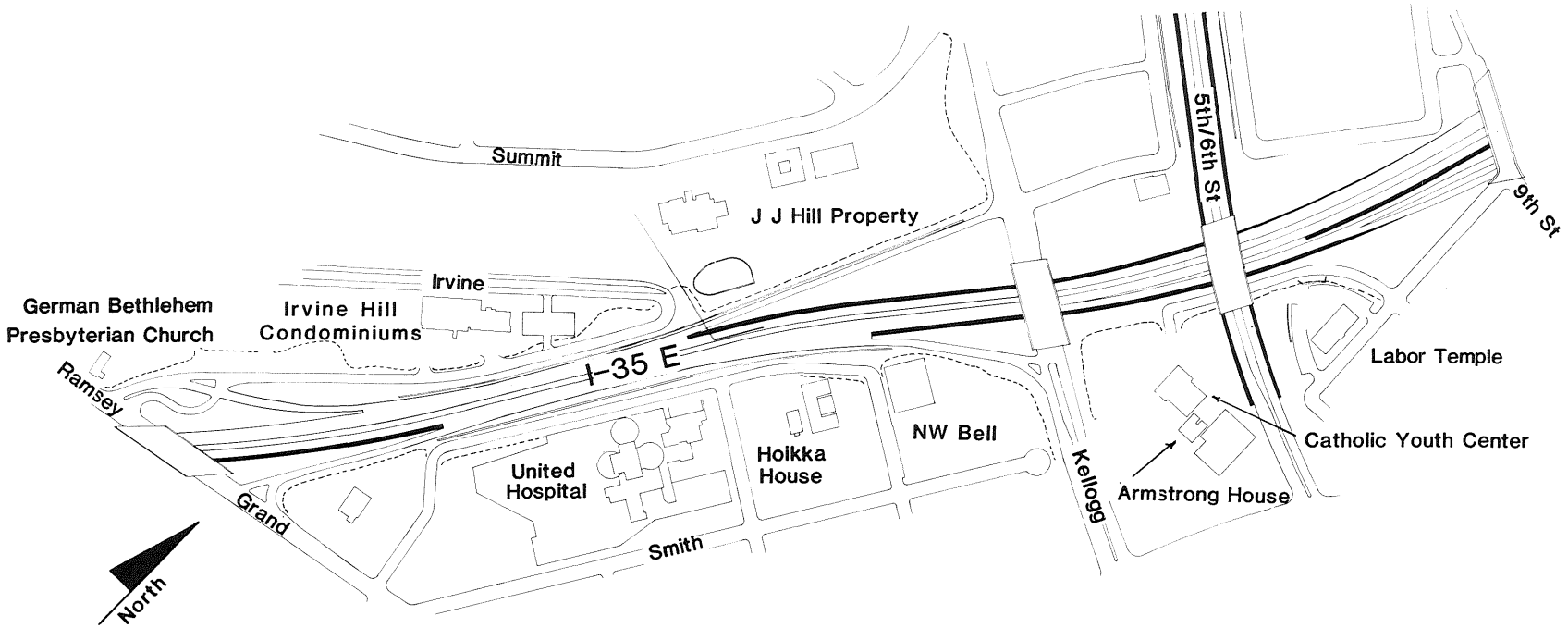


FIGURE 19-0
Basic Alignment

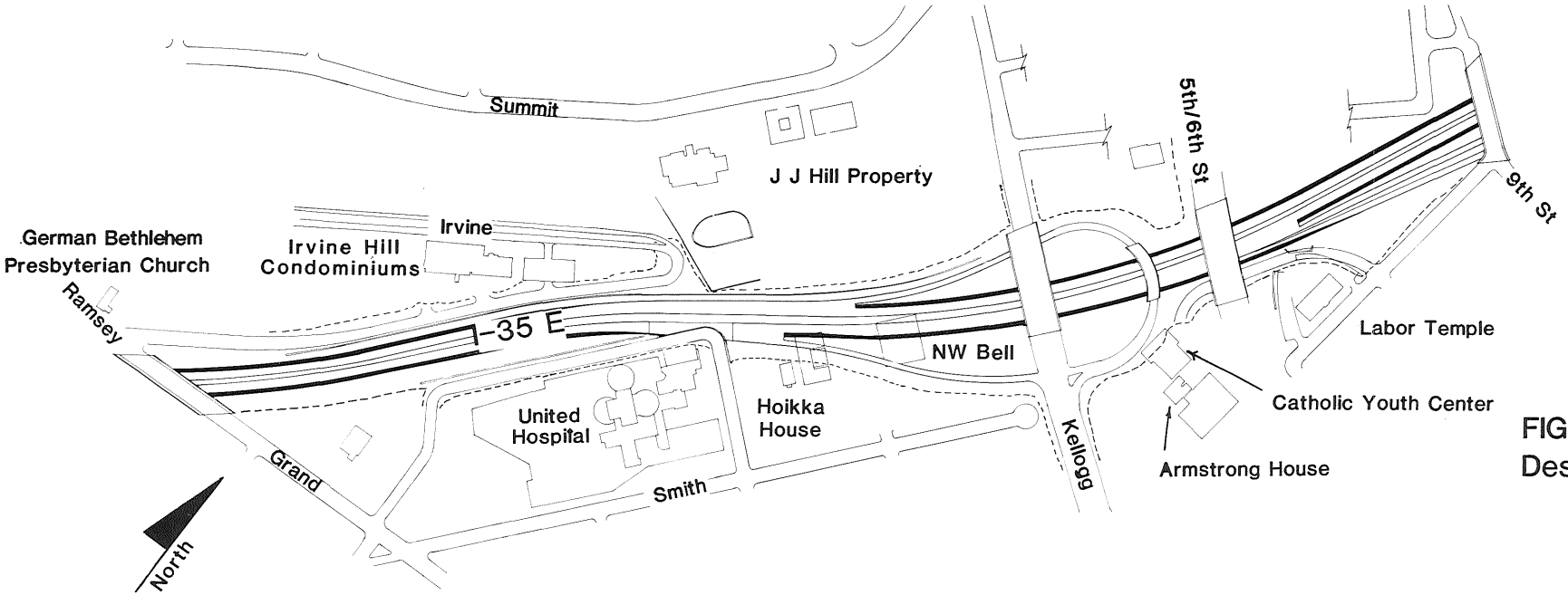


FIGURE 19-1
Design Option 1

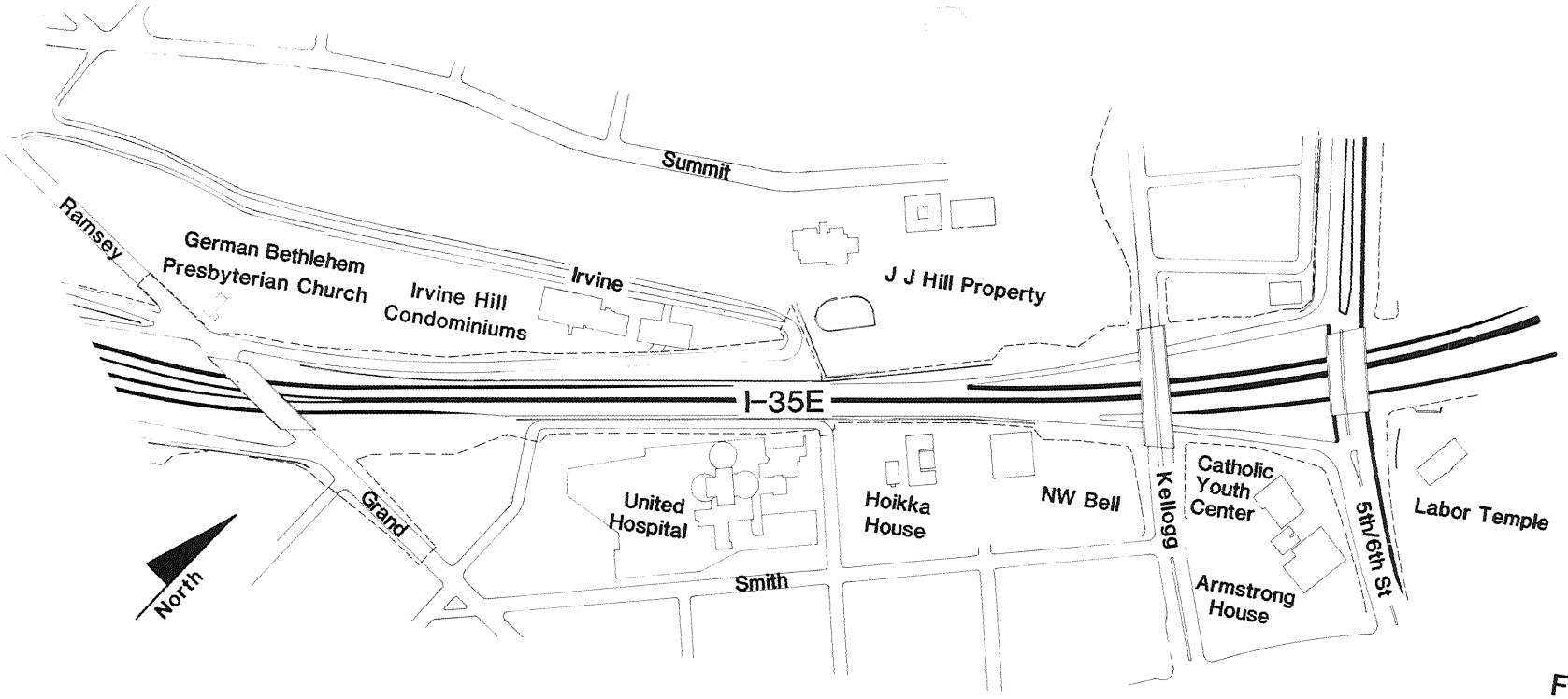


FIGURE 19-2
Design Option 2

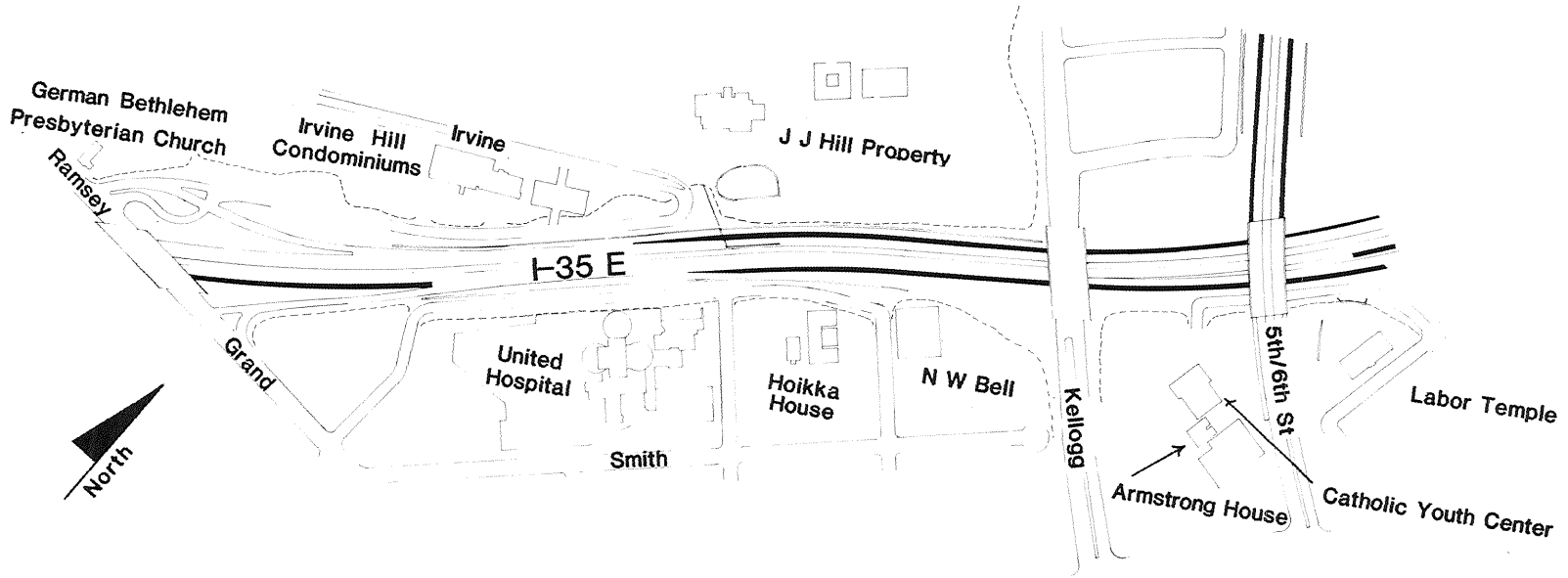


FIGURE 19-3
Design Option 3

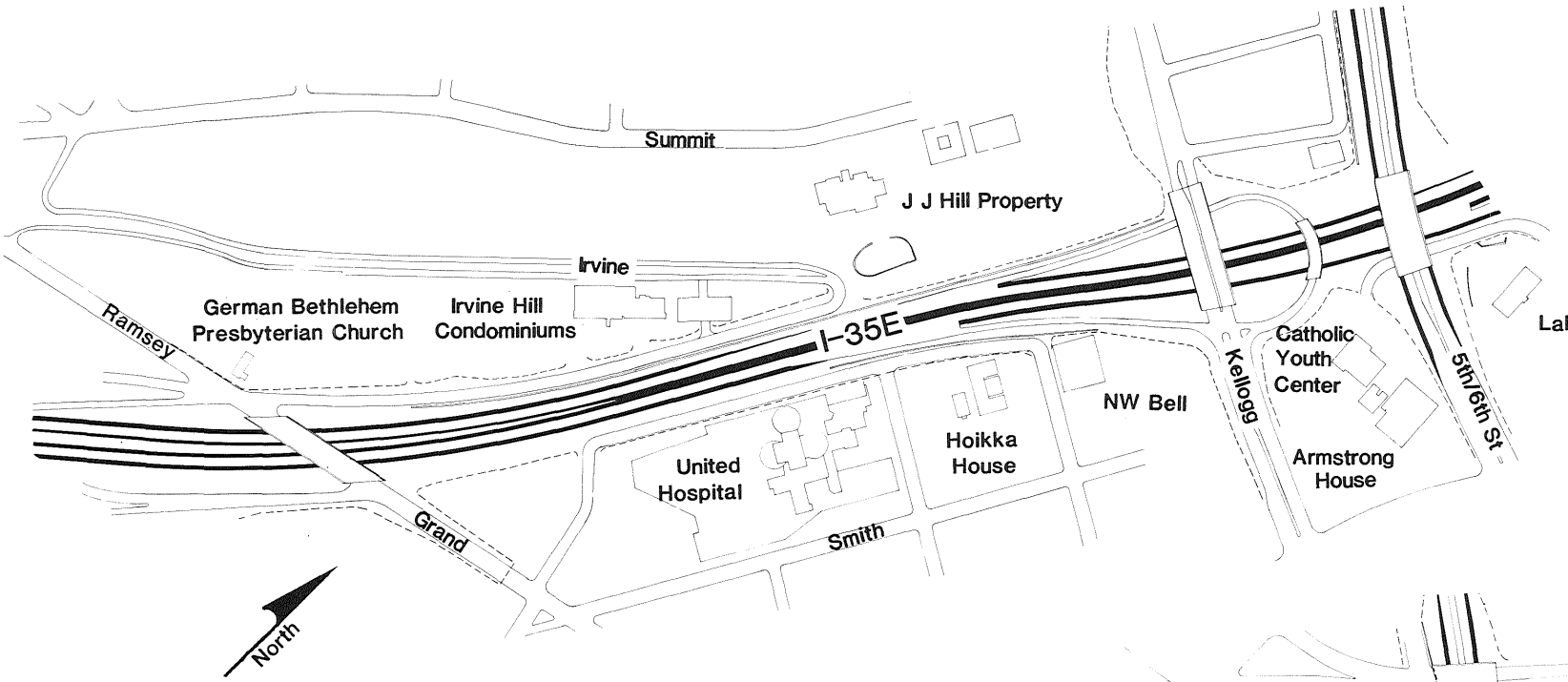


FIGURE 19-4
Design Option 4

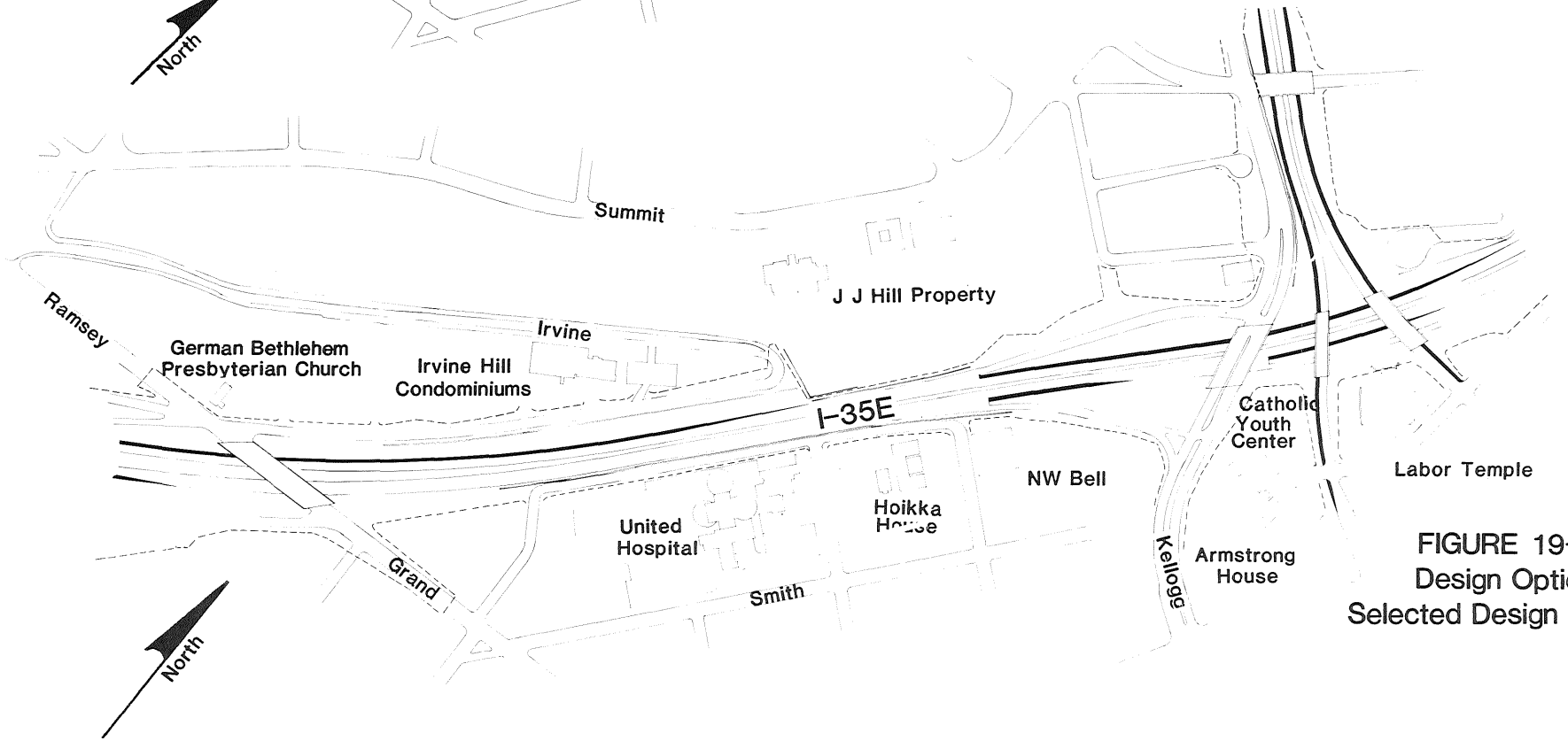


FIGURE 19-5
Design Option 5
Selected Design Option

5. Shifting the location of Kellogg Boulevard to the east (Figure 19-5).

Each of these design options are presented in greater detail below.

Design Option 1

This design concept was analyzed in the "Preliminary Case Report on Historic Properties/Draft 4(f) Supplement." Development of this modification was limited by severe topographical features, a need for frontage road continuity in the area, and the need for an interchange at Kellogg Boulevard. The modification was achieved by allowing the original alignment to be skewed while providing clearance between the Hill retaining wall and the service area of the United Hospital complex. The modified four-lane roadway with narrow median features a loop eastbound on-ramp at Kellogg Boulevard in place of a standard ramp design, and includes a bridged structure at the Walnut Street/Pleasant Avenue intersection. A frontage road on the north side of the corridor provides access to the Irvine-Hill condominiums and other land uses along Irvine Avenue. The design also calls for construction of a frontage road from West Ninth Street to the Fifth/Sixth Street connector in order to maintain access to redevelopment parcels in between Pleasant Avenue and West Seventh Street.

Although the modified alignment described above is technically feasible, it is not considered desirable by the City of St. Paul or the administration of the United Children's Hospital as it causes adverse impacts to existing land use in the area, including encroachment upon four buildings; it conflicts with development and redevelopment plans of the City of St. Paul as well as the master plan for the United Hospitals complex; and in itself causes much visual intrusion in the area. In addition, this concept results in increased cost of $6,500,000 to $7,500,000 for right-of-way acquisition and construction, and causes additional and unique relocation impacts.

Design Option 2

Design Option 2 involves shifting the interchange at Kellogg Boulevard northeast to Fifth/Sixth streets. This would avoid encroachment upon the wall and is supported as a reasonable alternative by the SHPO. However, the City of St. Paul does not support this option because it interferes with access to existing and major new downtown development areas, in particular, the Rice Park Area which is eligible for inclusion as a national historic district; it causes adverse impacts to downtown traffic circulation and conflicts with existing parking as well as planned commuter parking locations; and it negatively affects downtown transit service. (See City of St. Paul correspondence of August 6, 1982, on page 314 for further detail.)

Design Option 3

Option 3 eliminates the interchange at Kellogg Boulevard without any replacement. This alternative is not favored by the City of St. Paul for similar reasons stated under design 2 above. The city feels that

deletion of the interchange would compromise improved access to the downtown and associated economic benefits. In addition, the city has based much of traffic and parking programming on the assumption that a Kellogg Boulevard interchange would ultimately be constructed. (Refer to City of St. Paul correspondence of August 6, 1982.)

Design Option 4

Design Option 4 involves the construction of a loop on-ramp to southbound I-35E in place of a standard ramp. This design does not avoid taking the foundation/retaining wall. However, it limits the amount of encroachment into the property. Encroachment would be reduced by approximately 20 to 30 feet.

Design Option 5

Option 5 involves the shifting the alignment of Kellogg Boulevard east of its present location while maintaining an interchange with I-35E at Kellogg. This design concept is supported by the City of St. Paul and the SHPO as it avoids removing the lower remaining wall and does not conflict with city redevelopment plans, existing land use, United Hospital expansion plans nor downtown traffic circulation.

This design option includes the Fifth/Sixth Street connector to I-94. The connector is supported by the City of St. Paul as an important element of the overall downtown circulation plan as it provides a major access between I-94 to the west and downtown St. Paul.

Conclusion

After extensive consultation afforded under Section 106, which included a field inspection and meeting at the James J. Hill house on August 26, 1982, between FHWA, MnDOT, SHPO, the Advisory Council on Historic Preservation, and the City of St. Paul, the Commissioner of Transportation has chosen design option 5 to be adopted as part of the preferred alternative. (See the September 2, 1982, correspondence from the Commissioner of Transportation on page 16 and the Memorandum of Agreement in Appendix B.)

Measures to Minimize Harm

Mitigation for the adverse impact on the James J. Hill property will include:

1. Construction of the above design concept 5 (currently identified by MnDOT as Layout 3D Study 4), which is intended to preserve intact the existing features of the former James J. Hill estate through construction of a retaining wall approximately 10 feet southeasterly of the existing exposed wall which is approximately 110 feet northwesterly of the existing centerline of Pleasant Avenue.

2. Conveyance to the Minnesota Historical Society of the portions not required for highway right-of-way of lots 9, 10, and 11 of

Block 70, Dayton and Irvine's Addition (formerly a part of the James J. Hill property), following completion of construction of I-35E and in accordance with applicable state and federal laws and policies.

3. Construction of a pedestrian overpass at Walnut Street, connecting the pedestrian path adjacent to the Hill property to Walnut Street on the south side of the highway to maintain continuity between the Historic Hill District and the Irvine Park Historic District. The State Historic Preservation Officer will be consulted during design of the overpass to provide for compatibility with historic properties.

4. Application within the highway right-of-way of landscaping techniques appropriate for a parkway design to mitigate specific adverse aesthetic impacts at the Hill property.

(Refer to the Memorandum of Agreement in Appendix B.)

GERMAN BETHLEHEM PRESBYTERIAN CHURCH

Description

This small limestone and wood church building is located at the foot of Ramsey Hill and is constructed such that the rear portion of the building is set into the sloping hillside (see Figure 20). It was designed in 1890 by Cass Gilbert in the flavor of a medieval Swiss mountain parish church. The dominant design feature is the buttressed square corner entry tower with its extremely thin spire. Immediately adjacent to the tower is a steep bargeboarded gable with leaded windows. The entry porch is graced by a stylized hammer-beam. A sweeping stone staircase leads to the street. The church has recently undergone renovation and is in an excellent state of preservation. It is presently used as an office building.

A congregation of German-speaking emigrants established the church. The original congregation disbanded in 1916. Since then, the building has been used for a variety of institutional purposes and is currently used as office space. The building is noted as one of Cass Gilbert's favorite designs. This property is an individually certified historical building (Tax Reform Act of 1976) within the Historic Hill District.

Location and Amount of Taking

Original roadway alignments indicated that approximately 170 square feet of property at the German Presbyterian Church would be required for a construction easement at this site. However, adoption of design option 5 (MnDOT Layout 3D Study 4) described above eliminates use of this property. There will be no construction beyond the existing sidewalks along Ramsey Street and Pleasant Avenue. Thus, Section 4(f) applicability is avoided.

Other Physical Effects on the Property

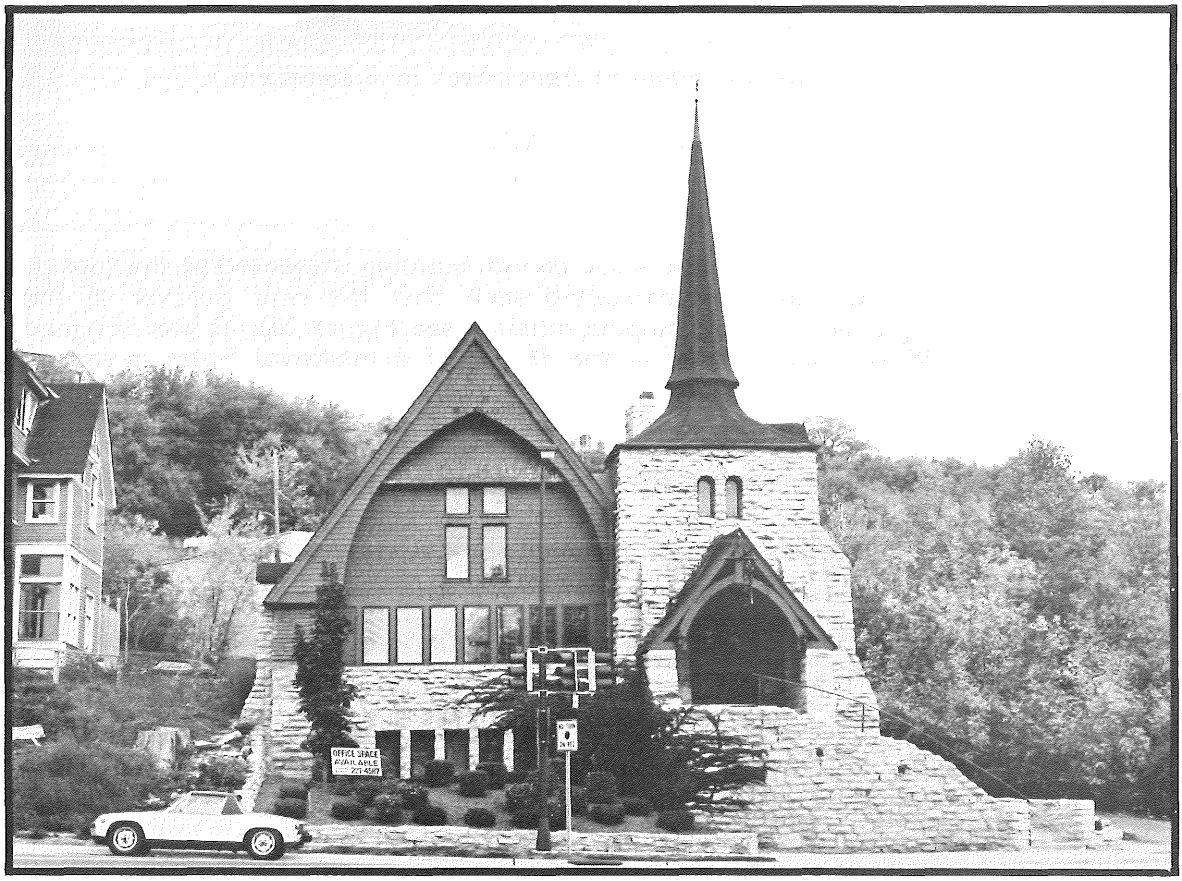
The church property will experience visual impacts.

Alternatives to the Use of 4(f) Property

The adoption of design option 5 (MnDOT Layout 3D Study 4) eliminates encroachment at this property. Section 4(f) applicability is avoided.

Alternatives to Mitigate Adverse Impacts

Application within the highway right-of-way of landscaping techniques appropriate for a parkway design will be employed to mitigate specific adverse aesthetic impacts to the church property. (Refer to the Memorandum of Agreement in Appendix B.)



Comment / Response

VI. RESPONSES TO DEIS COMMENTS/ COORDINATION WITH COOPERATING AGENCIES

The following letters were received in response to requests for comments on the Draft Environmental Impact Statement. Letters received are included in the following order.

		Page
I.	FEDERAL AGENCIES	127
A.	U.S. Environmental Protection Agency (9/1/81)	127
B.	U.S. Environmental Protection Agency (6/5/81)	133
C.	U.S. Environmental Protection Agency (7/28/82)	137
D.	General Counsel of the U.S. Dept. of Commerce (8/20/81)	139
E.	U.S. Dept. of Transportation (9/15/81)	140
F.	U.S. Dept. of Transportation (5/13/82)	140
G.	U.S. Dept. of the Interior (9/3/81)	141
H.	U.S. Dept. of the Interior, Fish & Wildlife Service (9/8/80)	144
I.	U.S. Dept. of the Interior, Fish & Wildlife Service (7/27/82)	145
J.	U.S. Dept. of the Army, Corps of Engineers (9/24/81)	146
K.	Advisory Council on Historic Preservation (7/13/81)	147
L.	U.S. Coast Guard (7/6/81)	148
M.	Federal Energy Regulatory Commission (6/29/81)	149
N.	Federal Aviation Administration (7/6/81)	150
II.	MINNESOTA STATE AGENCIES	151
A.	Minnesota Pollution Control Agency (9/30/81)	151
B.	Minnesota Pollution Control Agency (7/1/82)	152
C.	Minnesota Dept. of Health (9/9/81)	153
D.	Minnesota Historical Society (10/6/81)	154
E.	Minnesota Dept. of Natural Resources (6/3/81)	155
F.	Minnesota Dept. of Natural Resources (9/15/81)	156
G.	Minnesota Dept. of Natural Resources (7/16/82)	157
H.	Minnesota Energy Agency (7/7/81)	159
III.	REGIONAL AND LOCAL GOVERNMENT	161
A.	Metropolitan Council of the Twin Cities (12/8/81)	161
B.	Metropolitan Transit Commission (8/20/81)	166
C.	Metropolitan Waste Control Commission (7/7/81)	168
D.	Ramsey County Board (9/9/81)	169
E.	Dakota County Board of Commissioners (8/24/81)	170
F.	City of West St. Paul (8/24/81)	172
G.	City of Eagan (8/19/81)	173
H.	City of Mendota Heights (8/18/81)	175
I.	City of Apple Valley (8/13/81)	176
J.	City of Burnsville (8/25/81)	177
K.	City of South St. Paul (9/8/81)	179
L.	City of Inver Grove Heights (9/9/81)	180
M.	City of St. Paul (9/3/81)	182

		Page
IV.	ORGANIZATIONS AND GROUPS	185
A.	Downtown Community Development Council (8/31/81)	185
B.	Grand Avenue Business Association (8/20/81)	186
C.	Rice District Merchants & Professional Men's Ass'n. (9/15/81)	187
D.	Rice Area Citizens, Inc. (9/15/81)	188
E.	The Association of Commercial Clubs, Inc. (9/12/81)	189
F.	Minnesota Transport Services Association (9/28/81)	190
G.	Minnesota State Automobile Association (9/4/81)	192
H.	Urban Council on Mobility (9/30/81)	193
I.	Wilder Park Association (7/6/81)	195
J.	Residents in Protest over 35E (9/1/81)	202
K.	Residents in Protest over 35E (9/30/81)	225
L.	Northern Sound (9/30/81)	232
M.	Lexington Hamline Community Council (9/30/81)	234
N.	Summit Hill Association (9/25/81)	236
O.	American Postal Workers Union (9/23/81)	239
P.	Citizens League (9/25/81)	241
V.	INDIVIDUALS AND BUSINESSES	245
A.	State Senator Donald M. Moe and State Representative Fred C. Norton (9/30/81)	245
B.	Burlington Northern Railroad (9/10/81)	249
C.	Republic Airlines (7/6/81)	250
D.	Rauenhorst Corporation (9/25/81)	257
E.	Thomond R. O'Brien (9/1/81)	258
F.	Thomond R. O'Brien (9/30/81)	259
G.	Shepard Park (9/9/81)	272
H.	Phil and Carol Gersmehl (9/17/81)	273

Federal Agencies

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF

1 SEP 1981

Mr. Ghaleb Abdul-Rahman
Project Manager
Metropolitan Council of the
Twin Cities Area
300 Metro Square Building
St. Paul, Minnesota 55101

RE: NEPA-DE-FHW-F40168
(81082)

Dear Mr. Abdul-Rahman:

We have completed our review of the Draft Environmental Impact Statement (EIS) for I-35E from T.H. 110 to I-94 near Downtown St. Paul, Dakota and Ramsey Counties, Minnesota. This Draft EIS was published in the Federal Register on July 10, 1981. Our views and comments on the proposed action have been requested by your agency and the Federal Highway Administration. We had commented previously, June 5, 1981, on the scoping documents which were prepared for this project. Major concerns expressed in our comments on the scoping documents focused on the potential air and noise impact areas. The comments on the scoping documents should be used to supplement the attached comments on the Draft EIS.

Twelve alternatives within two corridors were evaluated in the EIS. These alternatives vary from a six lane freeway to a four lane parkway and finally the no-build alternative. The major concerns which we have on the project are associated with the floodplain impacts, water quality impacts and mitigation of adverse noise levels.

Based upon our review of the Draft EIS, we believe there are adverse environmental impacts associated with each of the alternatives discussed in this Draft EIS. The most significant and adverse impacts are associated with Alternative B. The impacts upon wetlands, floodplains, water quality and relocations associated with Alternative B outweigh those of the other alternatives. Since there appears to be alternatives to avoid the impacts associated with Alternative B, we have rated it as EU (Environmentally Unsatisfactory) and the other alternatives as ER (Environmental Reservations) because of the potential for significant increased noise levels. We have rated the EIS as Category 2, additional information necessary to more clearly assess the impacts or to clarify statements or information provided in the EIS. Detailed comments on this proposal are attached. The date and classification of our comments will be published in the Federal Register in accordance with our responsibility to inform the public of our views on other agencies' projects.

We appreciate the opportunity to review this Draft EIS. When the Final EIS is prepared, please forward three copies to us for our review. Since we have indicated major concerns with the implementation of this proposal, we would welcome the opportunity to participate in coordination efforts before the Final EIS is prepared. If you have any questions in regard to our comments, please contact Mr. Bill Franz, at 312/886-6687.

Sincerely yours,

Ronald L. Mustard

Ronald L. Mustard, Director
Office of Environmental Review

Attachments

Environmental Protection Agency's Comments on the Draft Environmental Impact Statement for I-35E from TH 110 to I-94 near Downtown St. Paul, Dakota and Ramsey Counties Minnesota

Floodplain and Water Quality Impacts

The only alternative which has any significant impacts upon the floodplain areas is the Shephard Road corridor (Alternative B). The EIS has adequately assessed the impacts associated with construction in the Shephard Road corridor and has indicated there may be significant adverse associated with the construction in this corridor.

Alternative B would longitudinally encroach on effective flow areas of the 100-year floodplain from the I-35E bridge at river mile 843.2 to just east of the Lafayette Bridge at river mile 838.5. Approximately 370 acres of floodplain would be encroached by Alternative B. The relocation of railroad tracks would also result in the loss of 2.5 acres of river channel. In addition to the direct loss of floodplain lands and the associated increase in river velocity and level, there are the indirect impacts which will result in water quality degradation due to construction on the steep slopes and increased soil erosion. Studies have been made to determine the stability of the slopes. Based upon these studies, it has been determined that I-35E could be constructed in the Shephard Road corridor, provided special construction and monitoring techniques are carried out. However, there is still a risk of slope failure and water quality degradation. The fish resource of the area will also be adversely affected by construction in the Shepard Road corridor.

Alternative B also impacts the greatest amount of wetlands and natural areas. This corridor contains approximately 110 acres of bottomland hardwood forest, classified as type 1 wetland. The use of Alternative B would result in the loss of 8.1 acres of these bottomland hardwood forest. While this is not a significant portion of wetland (7.4%), the acreage becomes more valuable when considering that the wetlands are located in an urbanized area. Additional impacts to adjacent wetlands, including several small type 4 inland deep freshwater marshes, will also result due to the removal of vegetative barriers and possible soil erosion on the bluff. This area provides a unique area for wildlife habitat, conservation and recreation in an urban environment. Furthermore, it would appear Alternative B violates both the Executive Order on the Protection of Wetlands and the Executive Order on Floodplain Management. These Executive Orders require Federal agencies to take action which minimizes the destruction, loss, or degradation of these areas. The filling of the wetland areas will require Army Corps of Engineers' 404 permits. The 404(B)(1) Guidelines specify in Section 230.10(a) that no discharge shall be permitted, if there is a practicable alternative to the proposed discharge of fill material. Based upon information provided in this Draft EIS, we believe there are reasonable alternatives available which are environmentally preferable to Alternative B.

Construction of Alternative B, J or K would also require dewatering activities because of the high water table. This dewatering action may require the use of a settling basin to reduce the amount of suspended solids in the water prior to discharge into the Mississippi River. The EIS should indicate the discharge location, whether or not the discharge is regulated by the Minnesota Pollution Control Agency and the limits placed upon this discharge. A.

Under several of the alternatives, truck traffic will be permitted to use the roadway. With trucks using the roadway, there is the potential for spills of hazardous or toxic wastes. The possibility of designing highway drainage not only to remove water from the road surface, but also to contain spills of such materials to prevent their entry into the Mississippi River should be investigated. Clean-up of some spills may require the disposal of the spilled material and any contaminated soils in a hazardous waste landfill. The disposal of any of these materials should be coordinated with the Minnesota Pollution Control Agency and our Environmental Emergency Section. B.

Noise Impacts

Because of the intense development in the project corridor, the potential for adverse noise impacts is significant. Because of this potential for significant adverse impact an assessment of the noise impacts has been provided in the EIS, pages 125 - 130 and Appendix B. Included in this assessment is a map of the sites where ambient noise levels were monitored, and a description of the type of land use or activity at these sites. The noise monitoring sites are distributed throughout the project area, in order to provide a general assessment of the existing noise and future noise levels. Future noise levels were predicted using the Federal Highway Administration's Highway Traffic Noise Prediction Model and indicates the noise levels which would result from the implementation of the different alternatives. The EIS has indicated, in Table 15, the total number of front row structures or activity centers which would experience exceedences of either the Federal Highway Administration's noise criteria or the Minnesota Pollution Control Agency's noise standards.

A. Alternative B was not examined as the Shepard Road corridor is economically infeasible and environmentally unsatisfactory.

Alternatives J and K are not recommended at this time. However, layouts and profiles of Alternatives J, K were examined to determine where dewatering would be necessary.

Dewatering would be necessary where roadway subcuts occur below the water table. The profile elevation of the bypass from Stations 100 to 108 ranges from 1.0 feet to 5.5 feet above the normal water surface elevation of the Mississippi. Any roadway subcuts between these stations (100 to 108) would likely require dewatering. Discharge would be to the Mississippi River.

An examination of bridge plans for Kellogg Street show that cast in place (C.I.P.) concrete pylons would be used to support the footings. The C.I.P. concrete pylons would probably be used to support the footings of the following proposed bridges: relocated Warner Road, relocated railroad tracks, and Fourth Street. The C.I.P. pylons do not require dewatering. Therefore, at this time, dewatering is not expected for bridge construction.

Dewatering to the Mississippi River would be regulated by the MPCA. The MPCA would review the plans for dewatering and determine if they are adequate. If the plans are determined adequate, no permit would be necessary. The MPCA reserves the right to require a permit if plans are inadequate.

Any work performed on the Trout Brook Sewer System would require a Sewer Extension Permit.

If necessary, it is the responsibility of the contractor to obtain a dewatering permit. It is the responsibility of the City of St. Paul to obtain a Sewer Extension Permit. MnDOT, however, would work out an agreement with the City of St. Paul.

B. The preferred alternative includes a prohibition of trucks on the Pleasant Avenue parkway. With no trucks using the roadway, there is only a remote chance of a spill of a significant amount of hazardous or toxic material. Consequently, there is no change to the present truck network due to this proposed action (refer to Table 8, page 99, and spill control discussion on pp 104-105 of the DEIS). Eventual construction of the east CBD bypass would represent a change since the intersection of Randolph and Shepard Road would experience greater truck usage. This intersection is the most likely spill location and overlies St. Peter sandstone with only a thin soil cover.

This EIS needs to be improved in a number of areas before it can be considered adequate with respect to its noise analysis. Our concerns center on whether or not noise levels have been predicted for all front row structures and activity centers along the highway corridors, or only for those structures and activities centers where ambient noise monitoring was conducted. Table 15 indicates the number of front row structures to be impacted, while Appendix B indicates the number of structures or activity at each monitoring site, but it is difficult to ascertain if either figure represents the total number of structures or activities centers which are adjacent to and will be impacted by the highway corridors. Furthermore, the EIS has not indicated whether or not any structures or activity centers beyond the front row would be adversely affected by future noise levels. The impacts on specific noise sensitive sites, such as hospitals, schools, and parks is also not discussed sufficiently. C. D. E.

A spill control plan would be needed for this area and would be prepared prior to construction of the bypass as an independent project. Coordination on disposal does occur in the event of any spill per existing procedures developed with MPCA.

C. The Preliminary Noise Analysis Report (PNAR) shows 31 areas of relatively homogeneous land use which were judged, by virtue of noise sensitive land use type and proximity to proposed roadway corridors, to represent all the receptors adjacent to the proposed corridor alternatives. These areas are indicated in Figure 3 of the PNAR. Appropriate distances from receptors within these areas were used for noise predictions. Noise measurements were conducted at a limited set of 20 points within a subset of these areas, as indicated in Appendix B of the DEIS by the locations for which measured noise level values are presented. The noise measurement schedule was reviewed by and approved by representatives of the FHWA, Metropolitan Council and MnDOT. (See also pages **50 to 51** of this EIS for further information on noise measurements.)

D. Additional structures and activity centers beyond the front row of structures will be exposed to reduced noise levels; a row of one or two story buildings, relatively closely spaced (30% open gap ratio) would produce an average barrier attenuation effect of approximately 3 to 5 dBA. Table 13 of the PNAR presents an approximate comparison of affected receptors with just the first row receptors.

E. See pages **48 to 50** of this EIS for a discussion of noise impacts on specific noise sensitive sites.

Our comments on the scoping document recommended that noise contours be over laid on aerial photographs of the project area. The use of aerial photographs could provide most of the information we are requesting. The aerial photographs would indicate the edge of the right-of-way for each of the alternatives, as well as the 65, 70, 75 etc. dBA, noise contours. F.

We also note from our review of the EIS that there are many health care facilities within the project area. Locations of these health care facilities is provided in Figure 15, page 63. The Final EIS should indicate whether these health care facilities would be affected by increased noise levels with would result from the implementation of any of the alternatives. G.

Regardless of which alternative is selected, there will be some adverse noise impacts. The EIS indicates that mitigation measures can make a significant difference in the number of persons adversely affected by noise. Mitigation measures were discussed in general terms without recommending one form of mitigation over another. The type of mitigation which will be provided should be more specific as alternatives are eliminated. This would provide a better indication of how significant the noise impacts will be, and if additional measures should be taken to further reduce the number of persons impacted. H.

It appears the parkway alternatives (C, D, G and H) can mitigate the nighttime noise levels both on the corridor and off the corridor through the prohibition of truck traffic. However, the prohibition of truck traffic on the parkway and Short Line Road will force this traffic to use other routes. Noise levels along the routes most likely to be used should be assessed and the impacts upon structures adjacent to these routes evaluated. I.

The Final EIS should also provide information on the routes to be used by construction vehicles during the construction phase of the project. Routing of equipment through residential neighborhoods can have a significant impact upon them and that impact should be assessed. J.

F. Noise contours for the Pleasant Avenue corridor parkway and freeway alternatives are presented on pages 275 to 291 of the FEIS. As noted on the contour sheets, the contours are for free field conditions and do not include the effects of road cuts or of barriers, etc.

G. As indicated in the text on page 50, interior noise levels (L_{10} peak hour) at hospitals along the Pleasant Avenue corridor for the selected (parkway) alternative range from 45 to 49 dBA. These values are well within the FHWA design noise level value of 55 dBA. As noted at health care facilities, the indicated noise levels will be lower at other times of the day, when traffic values decrease. For the freeway alternative, interior noise levels at some of the health care facilities are shown to exceed the FHWA design values (based upon the assumptions noted in the text.)

H. For a discussion of noise mitigation measures, see pages 93 to 95 of the Commitment section of this FEIS.

I. An analysis of off-corridor noise has been included on pages 52 through 61 of the Final EIS.

J. Construction equipment will not be allowed (City of St. Paul traffic regulations) on non-designated truck routes. Also, the Pleasant Avenue corridor has been graded over much of its length. This will permit routing of construction traffic onto the corridor itself. City ordinances and state procedures will be followed to minimize short-term construction noise impacts.

Air Quality

The completion of I-35E should not cause any violations of the National Ambient Air Quality Standards. The EIS indicated the use of car/van pool lanes was considered for the freeway alternatives for energy benefits. The affects upon air quality should also be addressed. Under the parkway alternatives, there will be several at-grade intersections. The EIS should indicate whether the traffic signals will be synchronized or electronically controlled to encourage smooth traffic flow and improved air quality. K. L.

The common section of I-94 and I-35E will have congestion problems at several of the entrance ramps. To determine the significance of this congestion and aid in the evaluation of different ramp design configurations and locations, a "hot-spot" analysis should be performed. This analysis is not being requested to show compliance with National Ambient Air Quality Standards, but to be used as an additional tool in the selection and design of an alternative. An additional area where the "hot-spot" analysis could be used, is the intersection of Snelling between Iglehart and Marshall Avenues, near the Milwaukee Road Railroad Bridge. Should this analysis indicate adverse air quality impacts, the need for two left turn slots would be confirmed. M.

During construction, wind blown dust may create localized problems, particularly, at sensitive receptors. The Final EIS should specify the dust control measures which will be required. Because of the sensitivity of some of the receptors and the fact that construction will take place in an urban area, stricter requirements may be necessary than those outlined in the Minnesota Department of Transportation specifications. Consideration should be given to limiting or discontinuing construction during periods of high winds. Monitoring at the sensitive receptors to determine if construction activities are adversely affecting these receptors should also be considered. N.

K. Refer to pages 41 to 42 in the text.

L. The preferred alternative does not include at-grade intersections as with the indirect connection alternatives. To further address this question in the context of the indirect connection only, it is necessary to consider congestion related air quality issues in the context of the original purpose of the indirect connection alternative. This alternative was introduced to reduce traffic on the I-35E parkway by providing a degree of disincentive for traffic attempting to access the proposed parkway from I-94 (north of the common section), or vice versa. Therefore, some degree of congestion (and, hence, higher CO concentrations than would occur with the direct connection alternative) will be experienced at these at-grade intersections. However, as a separate project, the City of St. Paul with federal aid urban and special transportation system management funds plans to install a computerized traffic control signal system for approximately 107 intersections in downtown St. Paul, including the 11th and 12th Steet intersections adjacent to the I-35E/I-94 common section. This work will be done in stages starting in 1982 and should be completed in 1984. However, to meet the objective of minimizing (within the framework of the indirect connection alternative) the air quality (CO) impact at local receptors adjacent to these intersections, signal synchronization was incorporated in the traffic and air quality analyses.

M. The air quality analysis is currently sufficient to select an alternative. A design-level analysis will be conducted as a part of MnDOT's application for an Indirect Source Permit from the Minnesota Pollution Control Agency. However, detailed design is beyond the purview of the EIS process.

Modifications to the Short Line Road or Snelling Avenue are not part of the I-35E project. The preferred alternative provides for eventual hook-up of the Short Line to I-35E but there is to be no physical connection until further study by the City of St. Paul which would include air quality and traffic noise studies.

N. Each contractor will be required to submit a dust control plan addressing the requirements of APC-6 for approval by the MnDOT project engineer prior to the beginning of the contracted construction activities. The control plan will be consistent with the applicable MnDOT contract specifications, the contract's special provisions, and MPCA regulations. See also response C to the EPA Region V letter of June 5, 1981, to follow.

Additional Comments

The section on transportation and traffic indicated that the need for I-35E could be eliminated if additional traffic lanes were added to all existing arterials. The Final EIS should indicate how feasible this alternative is and the relative impacts which would be associated with such an alternative. Both Alternatives J and K include as part of their design an indirect connection with I-94. The Final EIS should evaluate whether or not a direct connection could be used, thus reducing impacts upon the local street system. O.

A bicycle path is not being specifically planned as part of this proposal. However, since the corridor will provide a direct route between the residential area to the south and southwest of St. Paul and the downtown area, the potential for bicycle commuting will be enhanced. The possibility of incorporating a bicycle route as part of this proposal should be evaluated in the Final EIS. P.

O. The alternative of adding traffic lanes to existing arterials was not judged to be a reasonable alternative by the lead agencies nor the various communities who have continuously provided input during the scoping process. Perhaps the most significant reason is that many homes and businesses front on the various arterials making major upgrading very costly and disruptive. However, the direct connection parkway was studied in the EIS as a means of reducing local impacts. This option has been selected as a part of the preferred alternative (see pages 14 to 15).

P. A bicycle/pedestrian facility is being carefully studied as a part of the design process. Specific cross sections have been reviewed to determine the best possible location and design of the facility. The bikeway/pedway will be accommodated along I-35E right-of-way wherever possible and follow planned frontage roads or local streets where necessary. Plans are being coordinated with the City of St. Paul and the Metropolitan Council.

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF

5 JUN 1981

Mr. Ghaleb Abdul-Rahman
I-35E Project Manager
Metropolitan Council
300 Metro Square Building
St. Paul, Minnesota 55101

RE: CA-FHW-F40168-MN

Dear Mr. Abdul-Rahman:

On April 16, 1981, you requested us to review and comment on the scoping documents for I-35E in St. Paul, Minnesota. This proposed highway segment is approximately five miles in length and is known as the "St. Paul I-35E Link." As part of the scoping process, the Metro Council in cooperation with the Minnesota Department of Transportation and the Federal Highway Administration has prepared 15 scoping documents. These scoping documents are each devoted to a separate issue which will be affected by the project. We have reviewed each of these documents and are impressed with the thoroughness and detail of analysis of each report.

We will continue to use these reports and the Draft Environmental Impact Statement to formulate our opinion on which alterantive we believe to be the most environmentally acceptable. The difference between the environmental impacts of the many alternatives is not great and no one alternative stands out as environmentally preferable. The attached comments indicate specific instances where we believe additional information should be developed. Further analysis of impacts will result in identifying that alternative which satisfies the objectives of the project and minimizes adverse impacts. If you or your staff or members of the Minnesota Department of Transportation or the Federal Highway Administration has any questions in regard to our comments, please contact Bill Franz at 312/886-6687.

Sincerely yours,

Barbara Taylor Backley

Barbara Taylor Backley, Chief
Environmental Impact Review Staff
Office of Environmental Review

Attachments

EPA Region V's Comments on the Scoping Document for
I-35E, St. Paul, Minnesota

Air Quality Report

The completion of I-35E in St. Paul is part of the Transportation System Management Plan (TSM). The Draft Environmental Impact Statement should indicate the reduction in hydrocarbon emissions attributable to I-35E in the TSM. The Environmental Impact Statement should also indicate whether or not the TSM specified a completion date and whether or not the this proposal will be completed by the time air quality standards are to be attained. It should also be explained what, if any, additional mitigative or corrective measures are available to the Metro Council to attain the desired hydrocarbon concentrations if the "no-build" alternative is selected.

A.

B.

It was noted in the air quality report that hydrocarbons and nitrogen oxides are precursors to the formation of oxidants. While this is the case, the emission of hydrocarbons and nitrogen oxides from this highway segment may not affect the oxidant levels in St. Paul. Due to the time required for the chemical reaction to take place, the formation of oxidants may occur several miles downwind from the proposed project.

While Total Suspended Particulates (TSP) is not normally associated with mobile sources, the control of this pollutant within the project limits should not be neglected. The air quality assessment indicated that at the monitoring sites where TSP levels increased over previous years (at 10th and Minnesota), major construction and renovation occured, (and at University Avenue) or the area was subject to substantial truck traffic. This highlights two areas of concern for TSP control within the project limits. The first concern is for control of fugitive dust during construction. The Environmental Impact Statement should indicate the measures which will be implemented to assure fugitive dust does not become a problem. Measures to control fugitive dust such as limiting the area cleared, watering, immediate replanting or sodding, use of straw or netting etc. The second area of concern may not be as obvious. This has to do with the resuspension of dust and particulate matter by automobiles and trucks. With the introduction of trucks on to Short Line Road and I-35E, particulate levels may increase. Possible solutions to this problem are frequent street sweeping maintenance operations and/or the limiting of vehicle speeds. The Environmental Impact Statement should provide some discussion of this problem albeit minor. Consideration may want to be given to locating a Hivol sampler in the project area to determine if TSP levels increase.

C.

(This letter was not received in time for inclusion in the DEIS and therefore is addressed here.)

A. Because the TSM air quality projections were made for the year 1982 only (Metropolitan Council 1980), whereas the Air Quality Control Plan (AQCP) analyses were based on the assumption of a 1985 completion date for I-35E in St. Paul, the AQCP did not evaluate hydrocarbon (HC) reductions achievable by the project. However, a reduction of 33,000 vehicle miles traveled was estimated for 1987 attributable to the completion date (Metropolitan Council 1980), which is equivalent to a HC reduction on the order of about one-half of one percent of total HC emissions within the primary and secondary I-35E study area.

B. The completion of I-35E in St. Paul is not a TSM air quality measure. Further, the metropolitan area is currently unclassified regarding ozone, for which hydrocarbons are the main concern. Very few violations of the ozone standard in the metropolitan area were recorded in 1980 and none in 1979 or 1981. Current TSM measures are assumed in the no-build alternative and should adequately maintain the desired level of air quality under the no-build alternative.

C. See response N to the EPA September 1, 1981, letter, page 131. It is anticipated that the wetting of bare ground, prompt replanting or sodding, and use of cover materials such as straw or netting will be effective in minimizing dust generation during project construction.

Clearly, the extent of the I-35E construction impact on suspended particulates will depend upon actual precautions taken during the construction phase. If existing construction regulations are enforced, the impact will be minimized. However, for particular problem areas or "hot spots," additional primary control measures that can be taken include:

- o street sweeping along haul routes would reduce the extent of resuspended particulate matter;
- o restriction of vehicle flow on unpaved surfaces;
- o watering frequently during periods of high winds and construction activity;
- o minimizing the period during which the cleared and regraded lands are exposed; and
- o minimizing the period when spoils are stored in the immediate vicinity of the construction site.

During the operational phase, no violation of Ambient Air Quality Standards, including Total Suspended Particulates (TSP), are predicted for the proposed I-35E parkway. Operational strategies will be developed as needed if TSP violations are suspected.

To further mitigate construction impacts, consideration should be given to establishing a designated route for construction vehicles. The establishment of a route could help minimize congestion at critical intersections where carbon monoxide "hot-spots" may result. This designation of a construction vehicle route could also aid in the planning of street maintenance in the area. Street cleaning and sweeping along the construction vehicle route could help reduce localized fugitive dust problems. The routes may also serve to reduce noise nuisance problems. Truck traffic is restricted from the parkway alternatives (C-H), resulting in trucks being required to take alternate routes. It is not clear from the microscale analysis nor from Tables 15-20 whether this change in traffic distribution was taken into account. This should be clarified in the Draft Environmental Impact Statement. D.

The parkway alternatives (C-H) will have 6 "at-grade" intersections. These intersections will result in congestion that would not occur with a freeway design. It should be determined whether or not localized "hot-spots" will occur, and what measures could be implemented to relieve this problem. If "hot-spots" result, consideration of including the analysis of these intersections in the Draft Environmental Impact Statement should be made. E.

Noise Report

When viewed separately, the noise report lacks several pieces of information i.e., land use plan, traffic mix, vehicle speeds, and sensitive receptors. This information was included in other scoping documents. The Environmental Impact Statement should as a minimum, cross reference necessary pieces of information and it would be preferred that this information be included in the noise analysis. F.

Noise levels and numbers of affected receptors are provided in tabular form for many areas along the alternative routes. For persons unfamiliar with the projected area, it is difficult to correlate the noise levels with the land use for the area. To alleviate this problem, we suggest that the Environmental Impact Statement include noise contours overlaid on aerial photographs. These contours would show the noise impacts expected for a given site or many sites. G.

Our Agency suggests the use of day - night equivalent noise levels L(dn) over the provided L(10) and L(50) descriptors. However, we can accept the L(10) and L(50) metrics on the basis of their use in the State of Minnesota's "unique" noise regulations. The inclusion of L(dn) values should also be considered since they are better suited to describing impact. H.

We found the noise analysis to be general in many respects. There was insufficient information on the number of persons affected at specific noise levels and the effects these noise levels will have. The effects upon sensitive receptors, schools, hospitals, libraries, parks etc., was not addressed adequately. The location of these sensitive receptors should be provided along with projected noise levels and resulting impacts. I.

D. Haul routes for trucks will be designated by MnDOT and approved by the City of St. Paul or local jurisdiction. Neighborhood impacts are a determining factor in haul route selection. It should also be noted that approximately 75 percent of the required grading on the Pleasant Avenue corridor has been completed.

E. At-grade intersections most affected by Alternatives C-H include those along 11th and 12th Streets between St. Peter and Jackson. Under no circumstances will there be an at-grade intersection at 6th Street for Alternatives A-H. The most heavily used at-grade intersection at 11th and Jackson was used for the CO analysis. The no-build, Alternative C, and Alternative D were tested with the following results.

	1-Hour CO (ppm)	
	1990[a]	2000[b]
Alternative C	11.6	12.4
Alternative D	14.3	15.8
No-Build	11.6	12.4

	8-Hour CO (ppm)	
	1990[c]	2000[d]
Alternative C	4.9	5.3
Alternative D	6.3	6.9
No-Build	4.9	5.3

[a] Includes background CO: 8.8 ppm
[b] Includes background CO: 9.3 ppm
[c] Includes background CO: 3.4 ppm
[d] Includes background CO: 3.7 ppm

These values are all below both state and federal standards and, as this is a worst-case situation, the analysis provides assurance that no at-grade intersection will exceed CO standards for any alternative.

F. Additional cross references have been included in the EIS noise discussion. However, it would be impractical to repeat data contained in other scoping documents.

G. This suggestion has been adopted as noted in response to comment F of Ronald L. Mustard's letter of September 1. 1981. (EPA Region V) (See pages 275 to 291 of the text.)

H. The FHWA requires use of either Leq or L_{10} and MPCA requires use of L_{10} and L_{50}. To comply with agency requirements and to reduce the number of metrics, L_{10} and L_{50} were used in this study. This approach was concurred with by representatives of the FHWA, Metropolitan Council, MPCA and MnDOT.

I. Please refer to pages 48 to 50 of this EIS.

A statement on page 7 of the noise report implies that an increase in the ambient noise level of up to 9 dBA would be acceptable. In assessing the severity of noise impacts, it should be noted that published data (e.g., "Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety", USEPA 550/9-74-004) indicates incremental impact is a non-linear function of the absolute noise levels. In other words, one could expect a different degree of impact if noise levels went from 40 dBA to 50 dBA compared to changes of 70 dBA to 80 dBA. J.

The construction noise discussion should be expanded. In particular, quantitative information should be provided which shows the degree of impact to the surrounding population. The Environmental Impact Statement should also give information on the duration of construction, if any night operations are expected, and the routes which hauling trucks will be taking to and from the project site. K.

The section on noise mitigation was well prepared. Once an alternative is selected, we would like to work with your agency to establish specific details of any noise mitigation plans. L.

Vibration Report

The vibration report for this project is excellent. It describes vibration phenomena, documents its sources of information, documents vibration sensitive sites, predicts believable levels, applies reasonable standards, explains the consequences of the expected levels, and proposes mitigation measures where needed.

Groundwater

The impact of chlorides from road salts is expected to have the greatest potential for degrading groundwater supplies. Because of groundwater gradients and because there are not municipal or private wells in the vicinity of the highway, no impact to human health is expected. Excess chlorides will enter the groundwater and end-up in the Mississippi River. However, if the rate of de-icing salts application is minimized, chlorides reaching the river will be rapidly diluted to safe levels within a very small mixing zone. Its impacts should be undetectable.

Water Quality

Pleasant Avenue corridor alternatives will have the least impact on water quality. The differences in impact are very slight, but Pleasant Avenue corridor alternatives are, nonetheless, better.

Pleasant Avenue corridor alternatives offer a greater opportunity for confining spills of hazardous materials, than the Sheppard Road corridor alternatives. The Environmental Impact Statement should identify provisions available for isolating segments of the highway drainage system to reduce the effects of spills. Additionally, if the Pleasant Avenue corridor parkway alternatives is selected, trucks will be prohibited and forced to use Sheppard Road. Ths increases the risk of hazardous materials spilling into the Mississippi River and measures to control spills along Sheppard Road should be presented in the Environmental Impact Statement. M.

Floodplains

Sheppard Road corridor alternatives encroach upon effective flow areas of the Mississippi River floodway. It is predicted that this alternative may increase the surface elevation of the 100-year flood by 0.3 to 0.6 feet. As a result, property damages will increase, but the magnitude of this increase can not be predicted. River velocities will also increase by up to 1.0 feet per second. Although no evaluation of this is offered in the report. Based upon our experience, this is a significant increase. Significant bottom scour could occur around bridge supports. This scouring would also increase downstream sediment deposition. The increased scouring could have an adverse effect upon water quality and wetland areas downstream. The Environmental Impact Statement should thoroughly assess the impacts associated with the increase in the Mississippi River's velocity. N.

J. Human perception of the extent of change in noise level is indeed a non-linear function of noise level. However, the observations contained in the text of the PNAR are based upon traffic noise levels in the general range of 60 ± 10 dBA.

K. Please refer to the response to comment J of the September 1, 1981, correspondence from EPA Region V on page 130.

L. The responsible agencies appreciate the comment. Further information on specific mitigation has been included on pages 93 to 95.

M. Truck use of Shepard Road is essentially the same with a direct connection parkway and the no-build. Therefore, it is difficult to document any increased spill risk attributable to I-35E.

N. Although not included in the Water Quality or River Morphology special studies, the EIS does provide a floodplain evaluation as required by Executive Order 11988. Impacts to the natural and beneficial values of floodplains are covered in this section. However, Alternative B is no longer under consideration at this time.

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

28 JUL 1982

Mr. Ghaleb Abdul-Rahman
Project Manager
Metropolitan Council of the
Twin Cities Area
300 Metro Square Building
St. Paul, Minnesota 55101

RE: NEPA-PD-FHW-F40168-MN
(82073)

Dear Mr. Abdul-Rahman:

Thank you for your letter of June 3, 1982, which provided us with a copy of the Metro-Council's preliminary responses to our comments on the Draft Environmental Impact Statement (EIS) for I-35E in St. Paul, Minnesota and the technical scoping documents for the project. Overall, we are satisfied with the responses to our comments and find the majority of our concerns have been adequately addressed. However, we still have several questions which need to be considered regarding the water quality, increased noise levels and mitigation of these impacts. Our detailed comments are attached.

The text of our original letter of September 1, 1981, has been included as part of the materials sent to us along with your proposed responses to our concerns. Each of our comments has been given an alphabetical notation which corresponds to your responses. In this letter, we have used the same notations for easy reference.

We appreciate your providing us the opportunity to review the proposed responses to our Draft EIS comments. If you have any questions regarding our attached comments, please contact Mr. Bill Franz, at 312/886-6687.

Sincerely yours,

Barbara Taylor Backley

Barbara Taylor Backley, Chief
Environmental Review Branch
Planning and Management Division

Attachment

One of our comments on the draft EIS indicated that neighborhoods could be subject to adverse noise impacts due to the routing of construction vehicles on local streets. Response J indicated that construction equipment would not be allowed on non-designated truck routes. The final EIS should indicate which streets are truck routes and the likely route of construction vehicles in the Pleasant Avenue Corridor. A.

A. Designation of haul routes is more detail than is normally available at the FEIS stage of a project. It appears that suitable haul routes are available and haul routes will be approved by the City of St. Paul prior to use.

We noted in our comments on the draft EIS that under the parkway alternatives, there would be several at-grade intersections. The potential for adverse air quality impacts due to congestion and queing at these intersections lead us to request that the traffic signals be synchronized to permit smoother traffic flows. While Response L indicated that signal synchronization has been incorporated into the traffic and air quality analyses it is still not clear to us whether or not it will be included as part of the project. B.

B. See revised comment L on page 131.

We suggested that a "hot-spot" air quality analyses be done, to aide in the selection of an intersection design and in determining whether two left turn lanes would be desirable at the intersection of Snelling between Iglehart and Marshall Avenues. As indicated in our comments, we did want the "hot-spot" analyses to be done to determine compliance with the National Ambient Air Quality Standards, but to be used a a tool in selecting the intersection design which would have the least adverse impact upon air quality. Response M indicated this type of analysis was not done since detailed design is beyond the purview of the EIS. Therefore, we recommend that prior to making the final decision regarding intersection configuration, a "hot-spot" analysis be performed to aid in the minimizing air quality impacts. We also request that we be kept informed regarding the design and air quality impacts of these intersections. C.

C. A connection of I-35E to the Short Line and the improvements to Snelling Avenue that may become necessary are not part of this project. The City of St. Paul will be preparing the necessary documentation when that project is developed. No immediate connection to the Short Line is planned as part of the I-35E project.

Fugitive dust from the project will be controlled by developing plans consistent with the Minnesota Department of Transportation contract specifications as discussed in Response N. We suggest that consideration be given to the use of a road carpet to reduce fugitive dust emissions. A "road carpet" holds respirable fine particulates and prevents their reintroduction into the air. The uses and benefits of a road carpet are discussed in the publication "Assessment of Road Carpet for Control of Fugitive Emissions from Unpaved Roads" EPA 600/7-79-115. D.

D. Use of a road carpet to control fugitive dust will be considered if standard dust control methods are not effective.

In our comments on the draft EIS, we suggested that a bicycle path be incorporated as part of the project. Response P indicated the incorporation of a bicycle path must be consistent with the plan of the City of St. Paul and the Metropolitan Council. The final EIS should indicate if the path is consistent with local plans and what progress is being made regarding the bicycle path. E.

E. A bicycle path is being proposed as part of the project. Plans for the path will be submitted to the City of St. Paul for approval and will be reviewed by the communities at neighborhood meetings.

Environmental Protection Agency Region V's Post-Draft Environmenal Impact Statement Coordination on I-35E, St. Paul, Minnesota

Our comments on the draft environmental impact statement (EIS) recommended that consideration be given to designing the highway drainage system to contain potential spills of hazardous or toxic wastes. Response B indicated that a spill control plan would be prepared for the intersection of Shephard Road and Randolph Street because of the geology of the area. Specific information on what measures will be included in the spill control plan should be provided in the final EIS. In addition, information should be included regarding engineering design measures which could be incorporated into the highway's storm sewer system to prevent spilled chemicals, oils, hazardous or toxic wastes, etc. from being discharged into the Mississippi River. The final EIS should indicate whether a detention basin or other holding pond could be incorporated into the storm sewer system to capture and hold any spilled materials. F.

F. Response B indicates that a spill control plan for the Shepard Road/ Randolph intersection will be needed when the East CBD Bypass project is constructed. A spill control plan will be developed as part of that project's development and will include state-of-the-art measures.

We note that your proposed response to Comment F on noise impacts, was to include noise contour maps for both the freeway and parkway alternatives. These contour maps indicate that noise levels may not be attenuated by the first row of structures, and that the parkway alternatives have less of an adverse impact upon noise levels than the freeway alternative. We also note that the noise contour maps for the parkway alternatives include the 65 dBA contour while freeway alternative contours do not. Each set of contour maps should provide similar information to provide the reviewers a comparison of the area affected and the number of sensitive receptors within each contour. G.

G. The preferred alternative is the parkway design. We therefore do not plan to include more detail on the dismissed freeway alternative. The revised noise discussion gives a more detailed discussion of noise impacts (see page 52).

The noise impacts associated with the project, pose the most significant adverse effects. We believe the majority of these impacts can be mitigated through the construction of noise barriers. Noise mitigation measures are discussed in Response H which indicates that mitigation recommendations (noise barriers) are being prepared by the Minnesota Department of Transportation. If possible, mitigation measures which will be implemented should be included in the final EIS to permit a complete assessment of the degree of noise impacts. The final EIS should provide information on the degree of attenuation which will be achieved and the number of receptors which will benefit from the construction of the noise barriers. We also suggest that the noise barriers be included on the noise contour maps along with the 75, 70 and 65 dBA contours with the barriers in place. It would be difficult for us to drop our reservations about the significance of noise impacts from the project without some indication about the effectiveness and feasibility of noise mitigation. H.

H. Proposed noise mitigation (noise barriers) with discussion of effectiveness and number of receptors is included in the impact mitigation section of this Final EIS (see page 93). This information provides more detail than the inclusion of noise contours.

GENERAL COUNSEL OF THE
UNITED STATES DEPARTMENT OF COMMERCE
Washington, D.C. 20230

AUG 2 ⌄ 1981

Mr. Ghaleb Abdul-Rahman
I-35E Project Manager
Metropolitan Council
300 Metro Square Building
St. Paul, Minnesota 55101

Dear Mr. Abdul-Rahman:

This is in reference to your draft environmental impact statement entitled, "Interstate 35E from Trunk Highway 110 in Dakota County, Minnesota to I-94 Near Downtown St. Paul, Ramsey County, Minnesota." The enclosed comment from the National Oceanic and Atmospheric Administration is forwarded for your consideration.

Thank you for giving us an opportunity to provide this comment, which we hope will be of assistance to you. We would appreciate receiving four copies of the final environmental impact statement.

Sincerely,

Robert T. Miki
Director of Regulatory Policy

Enclosure Memo from: Kenneth D. Hadeen
Environmental Data and Information Service
National Oceanic and Atmospheric
Administration

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
ENVIRONMENTAL DATA AND INFORMATION SERVICE
Washington, D.C. 20235

Center for Environmental Assessment Services

July 31, 1981 OA/D242:MR

TO: PP/EC - Joyce Wood

FROM: OA/D2x1 - Kenneth D. Hadeen

SUBJECT: DEIS 8106.28 - Interstate 35E from Trunk Highway 110 in Dakota County, Minnesota to I-94 Near Downtown St. Paul, Ramsey County, Minnesota

General Comments: None.

Specific Comments: Pg. 43, para. 6: The DEIS states that the river valley of concern has topography which encourages mixing of air and improved dispersion of airborne pollutants. Normally, valley locations act as a trap for airborne pollutants, especially at night, when temperature inversions are frequent. The DEIS should expand on this statement to help substantiate the claim. A.

(RF: D. LeComte, D242)

A. The agency comment is valid. Valley locations at times do trap airborne pollutants. The Pleasant Avenue corridor is located in a wider portion of the geological valley formation where trapping is less intense but temperature inversions do occur. The carbon monoxide monitoring along with the EPA modelling procedures are able to address these valley locations.

Memorandum

U.S. Department of Transportation
Office of the Secretary of Transportation

Subject: Minnesota Draft EIS/Section 4(f) Statement, I-35E from TH 110 to I-94, FHWA-MN-EIS-81-2-D

Date: SEP 15 1982

From: Martin Convisser, Director, Office of Environment and Safety

Reply to Attn of:

To: Ali F. Sevin, Chief, Environmental Programs Division

We have completed our review of the draft EIS/section 4(f) statement for I-35E and offer the following comments.

Section 4(f)

The draft EIS does not recognize as a section 4(f) acquisition the taking of land from the James J. Hill house historic property. This is due to disputes about boundary descriptions for the 1961 National Historic Landmark designation. MNDOT has deemed section 4(f) designation unnecessary since only the mansion itself can be clearly shown as an historic landmark, not the property upon which it stands. A.

The final EIS should provide additional detail about the historic site boundaries, reflecting consultation with the State Historic Preservation Officer and the Department of the Interior. It appears from the map on page 219 that the area which would be affected by the highway contains facilities which are an integral part of the development of the site. The final EIS should include consideration of alternatives to avoid or reduce the taking from this property. One possible solution might be a southeastern shift of the alignment away from the Hill house property. B.

Alternatives

The parkway, rather than freeway, alternatives would decrease the need for noise mitigation on the project by eliminating truck traffic through residential areas. The reduced noise levels of the parkway alternatives would be very helpful in alleviating community opposition to the highway. C.

Aesthetics

The draft EIS includes discussion of landscape mitigation concepts for the various alternatives. The final EIS should include such mitigation where possible. Citizen concerns regarding project aesthetics contributed to the court action which halted the project over a decade ago. They also remain a citizen priority presently. D.

Memorandum

U.S. Department of Transportation
Office of the Secretary of Transportation

Subject: Draft Section 4(f) Involvement, Interstate Route 35E, Dakota County, Minnesota, FHWA-MN-EIS-81-02-D

Date: MAY 13 1982

From: Eugene L. Lehr, Chief, Environmental Division

Reply to Attn of: MSchwendeman, P-37, X-64492

To: Ali F. Sevin, Chief, Environmental Programs Division, FHWA/HEV-11

We have reviewed the subject EIS and have no comments to offer.

A. After receiving a determination from the SHPO that the historic value of the land to be used for I-35E is "in-place" rather than "salvage," it was decided that a supplemental draft 4(f) statement be prepared. The Hill house historic property was therefore acknowledged as a 4(f) property.

B. The Final EIS provides additional detail on the Hill house historic property. This information includes consultation with the SHPO, Department of the Interior, and Advisory Council on Historic Preservation. Alternatives which avoid or reduce the taking from the subject property are presented on pages 114 to 122. The design option chosen by the Commissioner of Transportation on September 2, 1982, avoids taking of 4(f) property at this site (see page 16).

C. As shown in the noise impact section of this FEIS (pages 52 to 56), and on Figures A-1 to A-8 (pages 275 to 291), there is a significant difference in the noise impact of the freeway versus the parkway due to the exclusion of trucks with the latter preferred alternative. Additional reduction in impact will be accomplished through the incorporation of noise abatement features as mitigation.

D. Landscape mitigation concepts have been included in the FEIS (refer to pages 97 to 101). The FEIS mitigation recognizes that the aesthetics of the parkway are, and have been, a citizen priority. An aesthetic design guide is being developed to aid further design refinement.

United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

ER 81/1292

SEP 3 1981

Mr. William R. Lake
Division Administrator
Federal Highway Administration
490 Metro Square Building
St. Paul, Minnesota 55101

Dear Mr. Lake:

This is in response to the request for the Department of the Interior's comments on the draft environmental/Section 4(f) statement for I-35E (from TH-110 to I-94), Dakota and Ramsey Counties, Minnesota.

SECTION 4(f) COMMENTS

General

The environmental/Section 4(f) statement separates the treatment of significant historic sites into two sections. Section V, Sites Eligible for Section 106 Review, covers sites located in the acquired right-of-way while Section VI, Preliminary 4(f) Document, covers sites not acquired. In our opinion, Section 4(f) also applies to all of the sites identified in Section V because construction has not yet begun and the agency is still capable of making decisions which will affect these properties. Therefore, for purposes of fulfilling consultation requirements under Section 4(f), our comments treat Section V, Sites Eligible for Section 106 Review, also as Section 4(f) protected properties. We also urge that the affected historic sites of local interest (pages 211-213) be treated as Section 4(f) properties as allowed by 23 CFR 771.135(d). A. B.

In addition, we recommend that an archeological survey of the two primary corridors be undertaken before an alternative is chosen. Urban areas may be heavily impacted and still preserve cultural remains. The survey should be developed in consultation with the State Historic Preservation Officer. Also, the Federal Highway Administration should request formal "determinations of eligibility" for any sites designated in the environmental statement as potentially eligible to the National Register. C. D.

Section V and the marginal comments on p. 273 discuss the James J. Hill property, which now houses some of the offices of the Minnesota Historical Society. We cannot agree with the narrow interpretation as to why Section 4(f) is not applicable to this National Historic Landmark (1961). Worth recognizing is that prior to establishment of the procedures and requirements relative to the listings on the National Register of Historic Places, "properties" which were given National Historic Landmark status were identified simply by the primary structure on the area. While there was no boundary description for the landmarks, it was axiomatic that the designation encompassed the entire property (all appurtenances and grounds) which was tied to the historicity of the identified structure. In short, the site, tract, parcel, property, estate, call it what you will, was part and parcel of the landmark designation of the James J. Hill House at 240 Summit Avenue. Accordingly, on the basis of these facts, related to our National Historic Landmarks Program, we believe Section 4(f) is indeed applicable to the "James J. Hill House." E.

In addition to the foregoing, we think it is relevant to call to your attention that Congress amended Title I of the National Historic Preservation Act of 1966 in Section 206 of the National Historic Preservation Act Amendments of 1980 (P.L. 96-515). Section 110(f) of Title I now states:

> "Prior to the approval of any Federal undertaking which may directly and adversely affect any National Historic Landmark, the head of the responsible Federal agency shall, to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to such landmark . . . ."

Based on information in the statement and on discussions with staff of the State Historic Preservation Officer, it appears that additional planning and actions should be given careful consideration to minimize harm to the total property of the James J. Hill House National Historic Landmark.

A. Section V of the Draft EIS addresses properties protected by Section 106 of the National Historic Preservation Act (NHPA) as amended, but for various reasons are not protected by Section 4(f) of the DOT Act. Section VI addresses properties protected by Section 4(f) of the DOT Act, many of which are also protected by Section 106 of the NHPA. In any case, Part 800 Advisory Council Procedures have been followed to their appropriate conclusion for all properties protected by NHPA. Similarly, FHWA has completed the Section 4(f) process as appropriate for all properties it determined to be protected by that statute (see 23 CFR Part 771.135(b)). See pages 109-124 of the FEIS.

B. Sites of local historic interest were not considered under Section 106 or 4(f) procedures as preliminary analysis, and coordination with the State Historic Preservation Office (SHPO) indicated that they did not meet National Register eligibility criteria and were not physically taken by any of the I-35E alternatives.

C. An archaeological survey of both corridors was performed by Environmental Research and Technology, Inc. prior to completion of the DEIS.

D. A formal determination of eligibility for historic properties potentially affected by I-35E was obtained from the Department of the Interior on October 9, 1981. Those properties which have been found to be eligible are listed in a correspondence from DOI found in the Preliminary Case Report on Historic Properties/Draft 4(f) Supplement.

E. During preparation of the DEIS, FHWA determined under 23 CFR 771.135(b) that the MnDOT lands acquired for highway purposes from the former Hill property were not subject to Section 4(f) protection considering 23 CFR 771.135(g). However, subsequent to the printing of the DEIS, the SHPO concluded that the value of the archaeological resources found on these lands is in preservation in place as opposed to salvage thus warranting 4(f) consideration. Accordingly, a Draft 4(f) Supplement, which addresses the Hill property, was completed in February 1982. The conclusions of the 4(f) process are included in the text of the FEIS on pages 109 to 124.

Specific

We concur that there are no feasible and prudent alternatives to the selection of any parkway alternate, provided additional consideration is given to shifting the proposed alignment, to the greatest extent possible, away from the James J. Hill mansion and grounds, a property listed in the National Register of Historic Places and a registered National Historic Landmark. Under the proposed alignment, the distinctive sandstone retaining wall and building foundation at the rear of the property would be removed. Adverse effects to the physical integrity, cultural quality, and interpretive potential of the site would result. This would be most unfortunate as we understand that by shifting the alignment only several feet to the southeast, the wall might be saved. The Federal Highway Administration should include such an alignment shift as part of their measures to minimize harm to the James J. Hill property. F.

Because of numerous adverse impacts to significant historic properties, and to parkland, the Department of the Interior would object to Section 4(f) approval of alternate B. G.

Even though we concur with any of the parkway alternates (given consideration of the alignment shift mentioned previously) we recommend that either C, D, G, H, or J be selected. Under these alternates trucks would be prohibited from using the parkway thus avoiding the adverse sounds, sights, and smells associated with truck traffic along the corridor and at Crosby Farm Regional Park.

In general, the proposed mitigation measures presented in the draft environmental/Section 4(f) statement appear adequate. In addition, if avoiding the James J. Hill Mansion with an alignment shift is not possible, consideration should be given to appropriate mitigation such as facing the new abutment with the existing sandstone wall. Also the potential for permanent noise and visual barriers along I-35-E at the Quinlan Care House should be explored. Safe pedestrian and vehicular access to the site should also be provided. H.

Based on information provided in the environmental/Section 4(f) statement, it appears that the utmost care will be taken by the responsible agencies to provide a transportation facility which is as unobtrusive to the environment as possible. We were very pleased to learn that bike/hike trails have been included in the parkway alternates. As expressed on page 139, "Trail development within the parkway design would provide the opportunity to integrate the roadway with adjacent land use both functionally and aesthetically." We also encourage the liberal use of evergreen plantings along the parkway to provide year-round buffers to historic properties potentially affected by the project. Lighting fixtures and other roadway appurtenances in the vicinity of historic sites should be of a design and placement which does not diminish or compromise the cultural integrity of the setting.

SECTION 6(f) COMMENTS

As stated in the environmental statement, alternate B would require the use of approximately 3 acres from Crosby Farm Regional Park which was partially financed from funds made available under the Land and Water Conservation Fund Act. Section 6(f) of the Act requires that the Secretary of the Interior approve such conversion of use, and that approval can be given only if the converted lands are replaced by lands "of equal fair market value and of reasonably equivalent usefulness and location." As noted above in our Section 4(f) comments, it appears that there are feasible and prudent alternatives to the use of Crosby Farm Regional Park lands, hence, this Department objects to the selection of Alternate B. I.

ENVIRONMENTAL STATEMENT COMMENTS

Except as noted elsewhere in our comments, the draft environmental statement adequately addresses concerns of this Department.

FISH AND WILDLIFE COORDINATION ACT COMMENTS

The draft statement shows that some of the project alternatives may require Section 10 and/or 404 permits from the Corps of Engineers. From the information presented, impacts to fish and wildlife resources due to placement of fill or alterations of structures within the ordinary high water mark appear to be minimal. Specific conclusions cannot be drawn until the final alignment has been chosen. Accordingly, the comments in this draft statement do not preclude separate evaluation and comment by the Fish and Wildlife Service when it reviews any permit application. In review of the application, the Fish and Wildlife Service may concur, with or without stipulation, or object to the proposed work depending on the detailed information available. Based on current data and knowledge of the area,

F. An analysis of alternatives to save the wall at the James J. Hill property has been included in the 4(f) section of this document. An alignment which avoids the wall has been chosen by the Commissioner of Transportation (see pages 16 to 17).

G. Alternative B has not been selected.

H. Appropriate mitigation has been developed through completion of the 36 CFR Part 800 process and is documented in Appendix B on pages 297 to 298.

I. Alternative B has not been selected.

the Fish and Wildlife Service advises that its tentative position will probably be to concur to permits with possible stipulations. Once the final alignment is chosen and site specific information is available for the Section 404 or Section 10 permit involvement, the Fish and Wildlife Service would be pleased to cooperate about tentative resolution of all factors related to the needed permits so that this information may be included in the final environmental statement.

SUMMARY COMMENTS

With consideration of and provision for the above-mentioned alignment shift and mitigation measures related to the National Historic Landmark property, the Department of the Interior would not object to the Section 4(f) approval of any of the parkway alternates. We do, however, object at this time to the Section 4(f) approval of alternate B.

As Interior has a continuing interest in this project, we would be willing to cooperate on a technical assistance basis. The responsibility for technical assistance on cultural and park and recreational resources is assigned to the Chief, Ann Arbor Office, National Park Service, Federal Building, Ann Arbor, MI 48107 (phone: FTS 378-2394). For technical assistance regarding fish and wildlife resources, please consult the Area Manager, Fish and Wildlife Service, Twin Cities Area Office, 530 Federal Building & U.S. Custom House, 316 N. Robert Street, St. Paul, MN 55101 (phone: FTS 725-7641).

Sincerely,

Bruce Blanchard, Director
Environmental Project Review

cc: Mr. Richard P. Braun, Director
Minnesota Dept. of Transportation
Transportation Building
John Ireland Boulevard
St. Paul, MN 55155

Metropolitan Council
300 Metro Square Building
St. Paul, MN 55101

State Historic Preservation Officer
Minnesota Historical Society
690 Cedar Street
St. Paul, MN 55101

United States Department of the Interior
FISH AND WILDLIFE SERVICE
IN REPLY REFER TO:
St Paul Field Office, Ecological Services
538 Federal Building and U.S. Court House
316 North Robert Street
St. Paul, Minnesota 55101

8 SEP 1980

Mr. Daniel J. Lutenegger
Barton-Aschman Assoc., Inc.
1610 South Sixth St.
Minneapolis, Minnesota 55454

Dear Mr. Lutenegger:

This provides our preliminary comments regarding the proposed reconstruction of the Route 35E off-ramp at Shepard Road, and the expansion of Shepard Road from 35E east to the "High Bridge" area.

The wetland maps are basically accurate and well done, although we suggest that the area immediately east of 35E and south of Shepard Road be re-examined to include a floodplain forest category of wetland. A.

The construction limits estimated for the off-ramp and the project's westernmost section along Shepard Road would not result in major wetland encroachment, although floodplain encroachment along much of the project could be of major proportions.

The floodplain and wetlands areas south of Shepard Road provide high value habitat for a wide array of wildlife species. The more visable of these include deer, furbearers and other game and non-game small mammals, and diverse communities of migratory and non-migratory birds. The wildlife species present in the area are important in themselves, although their value is enhanced by the excellent recreational opportunities they offer. We hope that along with efforts to minimize disturbance to this area, that construction does not exclude recreational access to the area.

You may wish to coordinate planning for the relocated Shepard Road near Randolph Avenue with the Great River Road Program Coordinator in the Minnesota Department of Transportation. I believe that a scenic overlook is planned in this area and it appears from your preliminary route location that there could be some conflict in proposed uses.

You should also be aware that legislation is being proposed that could affect plans for a reconstructed Shepard Road. The legislation would establish a study of the Minnesota, Mississippi and St. Croix River Corridors in the Metropolitan Area, and could eventually result in a management plan for the River Corridors. The Corridors may include lands adjacent to the Rivers' banks, thereby potentially affecting your planning effort. Metropolitan Council's Staff can provide you with details regarding the proposed legislation.

If you have any questions regarding this letter or our further involvement, please contact Mr. Kenneth Carr of my staff.

Sincerely,

Richard F. Berry
Field Office Supervisor

cc: Darrell Weakly, Barr Engineering

A. The bottomland hardwood forest cover type was considered wetland (Type 1). Refer to page 112 of the Draft EIS.

United States Department of the Interior

FISH AND WILDLIFE SERVICE

IN REPLY REFER TO:

St. Paul Field Office, Ecological Services
570 Nalpak Building
333 Sibley Street
St. Paul, Minnesota 55101

July 27, 1982

Mr. Ghaleb Abdul-Rahman
Metropolitan Council
300 Metro Square Building
St. Paul, Minnesota 55101

Dear Mr. Abdul-Rahman:

Thank you for the preview of the FEIS for the I-35E Project in St. Paul (TH 110 to I-94).

Elimination of Shepard Road alternatives should reduce possible impacts of the project to fish and wildlife resources. We do not anticipate major fish and wildlife concerns for the final project.

Sincerely,

Richard F. Berry

Richard F. Berry
Field Office Supervisor

cc: FHWA, St. Paul

DEPARTMENT OF THE ARMY
ST PAUL DISTRICT CORPS OF ENGINEERS
1135 U S POST OFFICE & CUSTOM HOUSE
ST PAUL MINNESOTA 55101

REPLY TO
ATTENTION OF:

NCSED-ER

24 September 1981

Mr. Ghaleb Abdul-Rahman
I-35E Project Manager
Metropolitan Council
300 Metro Square Building
St. Paul, Minnesota 55101

Dear Mr. Abdul-Rahman:

We have received your 22 June 1981 request to comment on the draft environmental statement for I-35E in St. Paul. My staff has reviewed this draft, and our comments are inclosed.

Thank you for this opportunity to review the draft. We look forward to receipt of the final environmental statement (extra copies would facilitate our review) and to continued close coordination with you.

Sincerely,

PETER A. FISCHER
Chief, Engineering Division

1 Incl
As stated

ST. PAUL DISTRICT, CORPS OF ENGINEERS, COMMENTS
ON DRAFT ENVIRONMENTAL IMPACT STATEMENT (EIS)
I-35E, ST. PAUL

1. The St. Paul and Chaska flood control projects could be affected by the proposed I-35E project. A.

2. If alternative B, J, or K is selected (refer to Figure 19 and "Impacts and Mitigation Due to Increased Flood Elevations", page 91), further coordination with the Corps of Engineers will be necessary to insure that any floodplain impacts are fully considered. Data provided by Barr Engineering indicate that the effect of the I-35E corridor (alternative B) with the floodway is +0.9 foot. No data have been developed at this time for alternatives J and K because only minor modifications are proposed in the floodplain. B.

3. Page 93, sentence: "However, raising the height of the flood barrier 0.1 foot may be desirable to maintain existing freeboard." This is probably not practical or economically feasible. We suggest that this sentence be deleted. C.

4. Other than the comments above, the response to our comments on the preliminary draft and the text of the subject draft EIS are satisfactory.

A. Alternative B would affect the St. Paul flood control project, more so than the Chaska project. As suggested in comment B, modifications in the floodplain due to J and K would be minor and the effects minimal.

B. Alternative B has not been selected. The east CBD bypass is not a part of the preferred alternative. However, it is a desirable part of the future transportation plan. Further coordination with the Army Corps of Engineers will take place in the event that plans for the bypass are more fully developed.

C. Due to the format of the EIS, page 93 will not appear in the FEIS. However, this comment has been recognized.

Advisory Council On Historic Preservation

1522 K Street, NW
Washington, DC 20005

July 13, 1981

Mr. Ghaleb Abdul-Rahman
I-35E Project Manager
Metropolitan Council
300 Metro Square Building
St. Paul, MN 55101

Dear Mr. Abdul-Rahman:

Thank you for affording the Council an opportunity to review your draft environmental impact statement (DEIS) for Interstate 35E near downtown St. Paul, Minnesota, circulated for comment pursuant to Section 102(2)(c) of the National Environmental Policy Act. After review of that document we offer the following observations:

1. The DEIS mentions historic, architectural, and archeological properties that appear to meet the criteria for listing in the National Register of Historic Places. The Federal Highway Administration (FHWA) must obtain a determination of eligibility from the Secretary of the Interior for those properties that will be affected by the project prior to the Council issuing its comments. Discussions with the Secretary should address clarification of the boundaries of the James J. Hill House, a property listed on the National Register, but lacking definite boundaries. A. B.

2. In the DEIS, the Section 106 and Section 4(f) discussion of cultural resources are dealt with in separate sections to avoid duplication. FHWA should therefore submit the 4(f) discussion to the Council prior to requesting Council comments on the project. This would enable the Council to conduct a more thorough review of all alternatives and their effects. C.

3. One of the Special Studies prepared as background material for this project was an archeological survey. The Council would like a copy of that survey for review as soon as possible. This will facilitate our review of the project when FHWA requests the Council's comments. D.

As you state in the DEIS, compliance with Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470(f), as amended, 90 Stat 1320) and the Council's regulations "Protection of Historic and Cultural Properties (36 CFR Part 800) are independent requirements of the law that must be fulfilled for this project. We look forward to working with you in the near future on the I-35E project. If you should have any questions or require assistance in this matter, please call Sharon S. Conway at 202-254-3495.

Sincerely,

Jordan E. Tannenbaum
Chief, Eastern Division
of Project Review

A. See response D, page 141, to the Department of the Interior letter of September 3, 1981.

B. A more detailed discussion of the James J. Hill property was included in the I-35E Preliminary Case Report on Historic Properties/Draft 4(f) Supplement which was submitted to the Advisory Council in April 1982.

C. The Advisory Council has received the Draft 4(f) Statement which was printed in the DEIS as well as the Draft 4(f) Supplement on the James J. Hill property incorporated in the Preliminary Case Report on Historic Properties of January 1982.

D. This request has been answered. A copy of the I-35E "Archaeological Survey" prepared by Environmental Research and Technology, Inc. was forwarded to the Advisory Council in May of 1982.

DEPARTMENT OF TRANSPORTATION
UNITED STATES COAST GUARD

MAILING ADDRESS
COMMANDER(obr)
SECOND COAST GUARD DISTRICT
1430 OLIVE STREET
ST. LOUIS, MO 63103

Tel. 314-425-4607
FTS 279-4607

16591.1/843.2 UMR
6 July 1981

Mr. Ghaleb Abdul-Rahman
Metropolitan Council
300 Metro Square Building
Seventh & Roberts Streets
St. Paul, MN 55101

Re: I-35E Project, St. Paul, Minnesota; Draft Environmental Impact Statement

Dear Mr. Abdul-Rahman:

Thank you for your letter of 22 June 1981 forwarding us a copy of the Draft Environmental Impact Statement for the proposed I-35E Project.

We have completed our review of this document and determined that the comments made in our previous letter, dated 4 June 1981 and included in this document on page 278, have not changed.

Thank you for this opportunity to comment on this document. Should you have questions, please contact Mr. John Accornero of this office.

Sincerely,

S. W. THOROUGHMAN
Chief, Bridge Branch
Second Coast Guard District
By direction of the District Commander

FEDERAL ENERGY REGULATORY COMMISSION
CHICAGO REGIONAL OFFICE
230 SOUTH DEARBORN STREET, ROOM 3130
CHICAGO, ILLINOIS 60604

In reply refer to:
OEPR-CH-HRA

June 29, 1981

Mr. Abdul-Rahman Ghaleb
Metropolitan Council
300 Metro Square Building
Seventh & Roberts Streets
St. Paul, Minnesota 55101

Dear Mr. Ghaleb:

This is in response to your recent request inviting our review and comments on the Draft Environmental Impact Statement, FHWA-MN-EIS-81-02-D, for Interstate 35 E from T.H. 110 in Dakota County, MN to I-94 near Downtown St. Paul, Ramsey County, MN.

Comments of this office are made in accordance with the National Environmental Policy Act of 1969 and the August 1, 1973 Guidelines of the Council on Environmental Quality. Our review of the Draft Environmental Impact Statement is to determine the effect on matters concerning the Federal Energy Regulatory Commission's responsibilities. Such responsibilities stem from the Federal Power Act and the Natural Gas Act and relate to the licensing of non-Federal hydroelectric projects and associated transmission lines; participation in planning and development of Federal hydroelectric projects; certification for construction and operation of natural gas pipeline facilities, defined to include both interstate pipeline and terminal facilities; and the permission and approval required for the abandonment of natural gas pipeline facilities.

Because the above-noted proposed development would not pose a major obstacle to the construction or operation of such facilities and because the Draft does not indicate that existing natural gas or hydroelectric developments would be adversely affected, we have no specific comments.

These comments are of this office and therefore do not necessarily represent the views of the Federal Energy Regulatory Commission.

Thank you for the opportunity to comment on this Draft Environmental Impact Statement.

Sincerely,

Lawrence F. Coffill

Lawrence F. Coffill, P.E.
Regional Engineer

DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

Airports District Office
6301 - 34th Avenue, South
Minneapolis, Minnesota 55450

July 6, 1981

Mr. Ghaleb Abdul-Rahman
I-35E Project Manager
Metropolitan Council
300 Metro Square Building
St. Paul, Minnesota 55101

FHWA-MN-EIS-81-02-D; Draft Environmental Impact Statement for Interstate 35E from T.H. 110 in Dakota County, MN to I-94 Near Downtown St. Paul, Ramsey County, MN; Minnesota Project I-IG-35E-4(19)110; State Project 6280-220

Dear Mr. Abdul-Rahman:

We have reviewed the subject draft Environmental Impact Statement and have no comment to make upon it. We wish to thank you for the opportunity to review the document and we do not wish to receive the final EIS.

Sincerely,

Donald R. Stockdale
State Program Officer

Minnesota State Agencies

Minnesota Pollution Control Agency

September 30, 1981

Mr. Ghaleb Abdul-Rahman
I-35E Project Manager
Metropolitan Council
300 Metro Square Building
St. Paul, Minnesota 55101

Dear Mr. Abdul-Rahman:

The Minnesota Pollution Control Agency has reviewed the draft environmental impact statement (EIS) on the St. Paul link of I-35.

In general, the Agency staff feels the analysis of the air, water and noise impacts are complete and well done. This Agency naturally favors the alternatives with the least impacts on ambient air quality, water quality and noise.

Alternatives A, A^1, C, D, E, F, G, and H would probably have the least impacts on water quality, provided adequate erosion control measures are taken during construction. Much of the earth work has been done on the Pleasant Avenue corridor, reducing the erosion potential for the remaining construction activities. These eight alternatives also provide some room for any special spill control measures or runoff controls that may be installed.

Alternative B, on the other hand, would encroach on the Mississippi River, further restricting the river, adding considerable sediment loadings during construction, and providing little room for spills or runoff control measures. The Minnesota Department of Transportation (MnDOT) should outline a specific spill control plan for this segment of I-35, including management procedures and special design alternatives. This plan should be included in the final EIS. A.

Alternatives C and G provide the least impacts on air quality and noise. An Indirect Source Permit will be needed for this project. Alternatives C, G and H would probably have CO and lead levels below the standards; however, alternative H has indirect CO impacts approaching the CO standard near the Central Business District. B.

Alternatives C, G and H provide the lowest nighttime noise impact with abatement. Alternative A, on the other hand, is least desirable due to higher noise levels than alternatives C and G, even with abatement. For the assessment of noise impacts contained in the draft EIS to be valid, noise abatement walls would be necessary. The Minnesota Department of Transportation (MnDOT) should make a commitment to these in the final EIS. In addition, soundproofing by MnDOT of the hospitals would be necessary to meet nighttime standards and daytime standards which are equally important to patient care. MnDOT should soundproof hospitals to ensure that state standards are met. C.

Finally, MnDOT should outline a fugitive dust control plan which will be used to comply with Minnesota Rule APC 6: Preventing Particulate Matter From Becoming Airborne. D.

Thank you for the opportunity to comment on the draft EIS.

Sincerely,

Louis J. Breimhurst
Executive Director

Phone 296-7301
1935 West County Road B2, Roseville, Minnesota 55113
Regional Offices: Duluth, Brainerd, Detroit Lakes, Marshall, Rochester
An Equal Opportunity Employer

A. The preferred alternative includes a prohibition of trucks. Therefore, the likelihood of a spill will be remote. Standard maintenance procedures will govern in the unlikely event of a spill.

B. An indirect source permit will be applied for as required by MPCA prior to construction of the roadway.

C. Proposed preliminary noise barrier locations for the parkway are shown on page 95 (Figure 14). Locations actually constructed will be determined according to FHWA and MnDOT procedures. Community input will be obtained prior to final decisions. The St. Paul City Council will have a primary role in these decisions. MPCA standards, while no longer specifically applicable to interstate highways, have been considered during the EIS process.

D. Refer to page 131, response N to the EPA Region V letter of September 1, 1981, and response C to the EPA letter of June 5, 1981.

Minnesota Pollution Control Agency

July 1, 1982

Mr. Ghaleb Abdul-Rahman
Metropolitan Council
300 Metro Square Building
St. Paul, Minnesota 55101

Dear Mr. Abdul-Rahman:

Thank you for the opportunity to review the preliminary responses to the concerns raised with the draft environmental impact statement for the St. Paul I-35E project. Our concerns with air and water quality appear to have been adequately addressed. We do, however, have some comments with respect to noise. A.

From a noise standpoint, the chosen Parkway alternative, which includes a ban on trucks in the Pleasant Avenue corridor, is better than the freeway alternative. Although only federal, not state, noise standards are required by law to be met along interstate freeways, the Minnesota Pollution Control Agency (MPCA) recommends that an effort be made, wherever possible, to meet state daytime and nighttime noise standards at sensitive receptors.

Although the table included with the preliminary comments entitled, "Noise Impacts Upon Selected Pleasant Avenue Noise Sensitive Receptors" identifies no violations of the Federal Highway Administration design noise levels for the year 2000 with the Parkway alternative, several violations of the state noise standards are predicted to occur at medical facilities, parks, schools, and historic sites along this route without mitigation. It is important to note that state noise standards were designed to provide adequate protection for persons within buildings, taking into account the 20 decibel decrease in noise levels with a closed window condition.

Phone 296-7301
1935 West County Road B2, Roseville, Minnesota 55113-2785
Regional Offices • Duluth Brainerd Detroit Lakes Marshall Rochester
Equal Opportunity Employer

The MPCA is particularly concerned about nighttime noise levels at affected hospitals and nursing homes. The Noise Impacts table, without indication of daytime or nighttime, shows exterior noise levels (L_{10}'s) of 64-69 dBA would occur without mitigation at these receptors. The MPCA recommends that nighttime noise levels with proposed mitigation measures be included in that table in the final environmental impact statement. If these noise levels do, in fact, exceed the state standards, additional mitigation such as noise barriers or soundproofing of the hospitals or nursing homes should be provided, where possible. The map of the proposed noise barriers included with the comments does not indicate that a noise barrier will be located next to the United Hospitals. The feasibility and need for a noise barrier at this site should be explored. Also, Childrens Hospital, not the United Hospitals, was listed as a receptor in the Noise Impacts table. It is not clear whether this is the old Childrens Hospital or the closest portion of the receptor to the I-35E traffic corridor which is United Hospitals.

Thank you again for the opportunity to comment. If you have any questions, please call Deborah Pile (296-7216) of my staff.

Sincerely,

Louis J. Breimhurst
Executive Director

LJB:es

A. As your letter notes, only federal, not state, noise standards are applicable along interstate highways, as a result of 1981 State Legislation. Therefore, the Federal Highway Administration noise standards were used as the main evaluation criteria for impact determination and proposed mitigation. State noise standards have also been considered, but have not been specifically used as evaluation criteria.

A detailed analysis of the noise impacts for hospitals and nursing homes has been made as suggested. (The United Hospitals complex is meant to include new Children's Hospital.) Table 9, page 56, shows that all hospitals and nursing homes within the study area will have noise levels within the applicable federal standard and areas with normal exterior use would meet the state daytime standard.

Although a detailed assessment of nighttime noise levels has not been made, the nighttime standard may be exceeded at some receptors. The stringent nature of the nighttime standards makes mitigation by normal cost-effective methods (noise barriers) impractical. Other abatement measures, such as soundproofing, present numerous special technical, financial, and administrative problems.

Citizens and agencies have expressed concern about the potential for noise impacts from proposed I-35E. MnDOT shares that concern and is proposing mitigation measures to minimize noise to the extent reasonable and practical. Noise mitigation as proposed is discussed in Section IV-A, page 93.

MnDOT is continuing to evaluate the noise impact of I-35E as details are resolved. If additional abatement proves practical, it will be included. MnDOT will continue to coordinate with the MPCA as the project develops.

minnesota department of health
717 s.e. delaware st. minneapolis 55440
612 296 5221

September 9, 1981

Mr. Ghaleb Abdul-Rahman
Metropolitan Council
300 Metro Square Building
Seventh & Robert Streets
St. Paul, Minnesota 55101

Dear Mr. Abdul-Rahman:

As indicated in our June, 1978 letter to you, the Minnesota Department of Health's main concern regarding the I-35E project is air quality impacts. After reviewing the Draft Environmental Impact Statement(EIS) and the special studies for air quality, noise, and social impacts, the Health Department has prepared the following comments.

When the effects of a proposed project are assessed in an EIS, these effects are usually compared to the existing standards for regulated pollutants. If the environmental effects of the project do not violate a standard, the general conclusion is that the project will have little or no impact on the environment. On page 121 of the Draft EIS it is stated that "...no violations of national or Minnesota CO standards will occur at any of the direct or indirect receptors in either 1990 or 2000 under any of the twelve alternatives considered." This statement leaves the reader with the impression that the projected CO increases that will result from the completion of I-35E will have little or no effect on the environment. This is not necessarily true.

According to Edward Calabrese in his book Pollutants and High-Risk Groups(1978), the Clean Air Act requires that primary air standards have sufficient safety margins to protect the public's health. "(T)he Clean Air Act actually assumes that there exists a "no-effects" level for every pollutant and for each adverse health effect. However, individuals do exist who are more susceptible to the effects of environmental pollutants because of a variety of inherent biological factors acting either singly or in combination, and these individuals, termed high-risk segments of the population, are the first to experience morbidity or mortality from various levels of environmental pollutants." Calabrese also states that "...high-risk segments of the population were not specifically considered in the standard-setting process because there was not sufficient information about them to provide any quantitative assessment of risk and because it was assumed that they composed only a small percentage of the population." He also explains that the assumption that high-risk individuals are only a small percentage of the population is false.

In an article by Wadden et al("Transportation Emissions and Environmental Health: An Evaluatory Planning Methodology", Environment and Planning A, 8:3-21), a methodology was developed to rank alternative highway routes according to the number of hypersensitive people that would be affected by each alternative. The segments of the population that were identified as being hypersensitive to pollutants from transportation networks included children 0-2 years old, people in day-care centers, hospitals,and long-term health care facilities, people over 65, and people below the poverty level.

Since the air quality and noise sections of the Draft EIS did not address the issue of high-risk or hypersensitive segments of the population, the Minnesota Department of Health does not believe that these sections are adequate. The Final EIS should contain a general discussion of high-risk groups and the effects that air pollutants and noise may have upon these people. The special study on social impacts did contain some information about the size of health care facilities in the primary impact area(number of beds, occupancy rates). All information about the size of the health care facilities should be combined with the discussion of high-risk groups and included in the Final EIS. Since very few people read the special studies, it is not adequate to simply reference the material already in the social impacts report. An example of the type of information the Health Department believes should be in the Final EIS can be found in the Sherco 3 Final Environmental Supplement prepared by the Minnesota Pollution Control Agency in May, 1981. Chapter 12 describes the human health impacts of the project and pages 12-59 through 12-67 should be helpful in preparing the information requested by our Department.

Finally, the location of the air intakes for the hospitals, nursing homes, and schools that are adjacent to the 12 alternatives should be discussed in the Final EIS. We realize that the newer facilities attempted to locate the air intakes away from the proposed locations of the interstate, but this may not be true for the older facilities.

If you have any questions about the Health Department's comments, contact me at 296-5219.

Sincerely,

Laura A. Oatman

Laura A. Oatman
Public Health Engineer
Section of Health Risk Assessment

A. The I-35E Pleasant Avenue corridor is adjacent to a number of institutions with residents representing some of the identified special risk groups. (The Sherco 3 FEIS supplement has been used as a model to provide additional data and discussion for specific sensitive receptors, and can be found on pages 31 to 37 of the FEIS.) Of particular importance are the presence of hospitals and nursing homes in the general area. However, a review of the Air Quality Criteria Documents (1970 and 1979) and national and Minnesota standards indicates that there have not been any studies to date which have yielded sufficient data of adequate quality to suggest that the current national ambient air quality standard for CO (which was the basis for evaluating the air quality impacts of I-35E) does not provide an adequate protection for all populations at risk. For further discussion of this issue as related to air pollution, see pages 39 to 41.

A.

B. No quantifiable relationships have been identified between various types and levels of noise and health effects on various subgroups of people within the general population.

B.

B. It was found that there will be no violation of state or federal standards within any of these facilities. An explanation of the adequacy of federal air quality standards in protecting high-risk populations can be found on pages 39 to 41.

MINNESOTA HISTORICAL SOCIETY
FOUNDED IN 1849
690 Cedar Street, St. Paul, Minnesota 55101 • (612) 296-612

6 October 1981

Ghaleb Abdul-Rahman
I-35 Project Manager
Metropolitan Council
300 Metro Square Building
St. Paul, MN 55101

Dear Mr. Abdul-Rahman:

RE: Draft I-35E
MHS Referral File Number: I 205

The intent of this letter is to elaborate on our opinion regarding the impact of the proposed I-35 E on the James J. Hill estate. In June, 1981 we submitted comments emphasizing the potential direct impact that the Pleasant Avenue alternative would have on the massive retaining wall and archaeological features that are associated with this National Landmark, which is also a pivotal structure within the Historic Hill National Register District.

On September 9, 1981 representatives from the State Historic Preservation Office met with representatives from the Minnesota and Washington offices of the Federal Highway Administration and with a representative from Barton-Aschmann to discuss the potential direct impact on the structures and archaeological remains that are located on the James J. Hill property. During the meeting we stated that the entire area, including the lower walls, was in essence archaeological in nature, consisting of material above and below ground, and we recommended that they be preserved in place.

We should also note that the Minnesota Historical Society will soon open the James J. Hill House to the public and will interpret various aspects of the house and Hill's life. Part of this program will involve interpreting the lower levels of the house focusing on the then innovative energy systems used in running the estate. The threatened lower wall and associated features were integral elements of these early systems. Consequently, demolition of these structures would totally foreclose any future possibility of in-place interpretation of this unique and integral aspect of the house and James J. Hill's genius. Moreover, it would leave us with the embarassing problem of explaining why in 1981 this element of a National Historic Landmark was demolished for freeway construction.

The need to interpret this aspect of one of Minnesota's major historic sites underscores the value of preserving the archaeological features in place. Mere research and recovery of data contained in these features does not mitigate any adverse effect. Because extensive study or salvage is not an adequate substitute for preservation the decision to destroy these elements deserves close attention.

To reiterate, the value and useful interpretive potential lies not in data recovery, but in preservation that maintains the integrity of the entire site.

Sincerely,

for Russell W. Fridley
State Historic Preservation Officer

RWF/sl

cc: Clem P. Kachelmyer
604 Transportation Bldg.
Department of Transportation

Susan Blachmann
Barton-Aschman Associates, INc.
10 Cedar Square West/Cedar Riverside
1610 South Sixth Street
Minneapolis, MN 55454

A. As a result of this opinion, a 4(f) statement on the James J. Hill property has been prepared, the results of which are documented in the 4(f) Statement which is being circulated as part of the FEIS (see pages 109 to 123). A design option which avoids the taking of 4(f) property at this site has been chosen by the Commissioner of Transportation.

STATE OF MINNESOTA
DEPARTMENT OF NATURAL RESOURCES
CENTENNIAL OFFICE BUILDING · ST. PAUL, MINNESOTA · 55155

June 3, 1981

Mr. Ghaleb Abdul-Rahman
I-35E Project Manager
Metropolitan Council
300 Metro Square Building
St. Paul, MN 55101

RE: I-35E Special Study Reports on:
River Morphology and Flood Hazard
Hydrogeology
Hydrology/Hydraulics
Wetlands, Fish and Wildlife

Dear Mr. Abdul-Rahman:

The Department of Natural Resources has reviewed the above referenced I-35E Special Study Reports and has the following comments to offer for your consideration.

River Morphology and Flood Hazard

Generally this report is very good. We only wish to emphasize the following point:

The I-35E alignment must be made consistent with the City of St. Paul Flood Plain Regulations and the official district zoning maps. Therefore, where filling in the floodplain is necessary, it must be done outside the floodway district as identified in the City's floodplain zoning maps. Any fill which causes stage increases in the 100-year flood could require a floodway district map amendment, consistent with criteria established by the City and by DNR. The lowest road surface elevation should be above the flood elevation and this information should be included in the report. A.

Hydrogeology

Generally it would appear that there will be no groundwater problems as a result of any of the alternatives. This report, however, contains some deficiencies which should be corrected, as follows:

a. Page 22, second paragraph--The document states "however, it is not known whether these argillaceous beds are continuous throughout the primary impact study area." Then it mentions "...a four-foot shale layer accuring 34 feet above the base of the St. Peter. This shale layer acts as a groundwater barrier, hydraulically separating the two aquifers." These two statements are inconsistent. B.

b. Page 23, second paragraph--It is difficult to understand how a water table can exist continuously over a bluff. Regarding "perched conditions," we doubt if a perched water table would be found here. C.

c. Page 24 (Figure 12)--This map contradicts Figure 2 of Plate 6, Map I-1157, of the U.S.G.S. (1979) edited by Norvitch and Walton. Map I-1157 indicates the water table is in the surficial deposits up to the bluff, then in the bedrock once across the bluff. Figure 12 in the document cites unpublished M.G.S. data, while Map I-1157 is a published map and should be used as the source. D.

d. Page 24, third paragraph--The document states that "The lowlands and Crosby Lake, which are located in the lower river terrace, area surface expressions of the groundwater in the area." This contradicts the statement on page 31 which reads "Because Crosby Lake does not receive any groundwater flowing from the corridors, it should have no groundwater related hydrologic impacts." E.

e. Page 28 (Figure 13)--A comparison of Figure 13 to Figure 3, Plate 6 of M.G.S. Map I-1157 revels no 800 foot contour on the latter. Figure 3 cites a 1972 map, which is out of date. The references in the document do cite Map I-1157, and it should be used as the data source. F.

Hydrology and Hydraulics

We have no comments to offer on this report.

A. Floodplain impacts are associated with Alternative B, the Shepard Road freeway, and Alternatives J and K which include provisions for an East CBD Bypass on Shepard Road. Alternative B is no longer under consideration as a project alternative. Alternatives J and K were also not selected. However, if the East CBD Bypass is constructed in the future, design of the roadway above flood elevation is an issue that could be resolved during the permit process.

B. The relationship between the aquifers is clarified in the Draft EIS. Refer to Figure 10, page 45, and the fourth paragraph on page 85. Dr. Yardley of the University of Minnesota has suggested that the argillaceous beds may be locally continuous but are mostly lenses and appear at various elevations in the lower one-third of the St. Peter formation.

C. A large area northwest of the Pleasant Avenue corridor is blanketed with permeable sands and gravels. However, there is very little sign of springs along the bluff slope. Uphill borings have indicated that the sand and gravel deposits become saturated with depth. This would suggest that groundwater is perched on top of the relatively impermeable Decorah formation.

D. Map I-1157 is based on few data points. No data points are found within the study area except for the extreme northwest portion. The only known borings indicating water levels in the drift are recorded in M.G.S. files. This unpublished information is superior to the published map.

E. The potential impact to Crosby Lake has been clarified in the Draft EIS. Refer to Figure 12, page 49, and the second paragraph on page 85.

F. The DNR is correct in stating that the Norvitch reference is older. This is an erroneous reference cited on the figure, and was not the reference used.

Figure 13 of the Hydrogeology Special Study Report was based upon well log information from M.G.S. Map I-1157 only shows two data points in the entire study area, those being in the northeast portion in downtown St. Paul. Furthermore, in the text for Figure 13 (and also Figure 2 of the Hydrogeology Special Study Report), the authors acknowledge that "the configuration of the potentiometric surface shown on the map is approximate; it is estimated to be accurate to within 20 feet in the uplands and 10 feet in the river valleys." Because actual data were found in the M.G.S. files, M.G.S. was considered to be a better source. Accordingly, Figure 13 was developed from those data.

Wetlands, Fish and Wildlife

Our review of this report reinforces DNR's previous position that the most logical alternative for the I-35E project is the Pleasant Avenue corridor.

In reference to page 65 (fourth paragraph) we would argue that the Mississippi River corridor is unique in the Metropolitan area. The river and valley is a major migrational corridor for both fish and wildlife. Many species including walleye, sauger, catfish, northern pike, waterfowl, shorebirds, song birds, deer, pheasant, and small mammals, etc., are found here. Many are year around residents. If this corridor is to be maintained or improved for future generations to enjoy then major construction and development must be eliminated or minimized and mitigated. G.

If the Shepherd Road Corridor is utilized for freeway construction then fish and wildlife habitat and populations will be adversely impacted and would not be replaceable. Wildlife cannot be displaced into other areas already occupied by various species without reduction in numbers. Habitat has only a certain carrying capacity and newcomers will eventually die or disappear. The Shepherd Road Alternative will increase noise, air, and water pollution in addition to wildlife road kills.

We understand that Appendix I to the River Morphology and Flood Hazard Study outlines many impacts to the Mississippi River Floodplain. While we have seen copies of portions of this appendix, we would appreciate receiving a copy of the entire document.

If you have any questions regarding these comments, please call Ken Wald of our Environmental Review Section at 296-4794. Thank you for the opportunity to comment.

Yours truly,

Joseph N. Alexander
Commissioner

cc: Ron Harnack
Earl Huber

G. We concur. This statement on page 65 of the special study was changed in the Draft EIS. Refer to page 112, paragraphs 5 and 6.

STATE OF
MINNESOTA
DEPARTMENT OF NATURAL RESOURCES
CENTENNIAL OFFICE BUILDING · ST. PAUL, MINNESOTA · 55155

September 15, 1981

Mr. Ghaleb Abdul-Rahman
I-35E Project Manager
Metropolitan Council
300 Metro Square Building
7th and Robert Streets
St. Paul, Minnesota 55101

RE: Draft EIS for I-35E, St. Paul

Dear Mr. Abdul-Rahman:

The Department of Natural Resources has reviewed the Draft Environmental Impact Statement for I-35E in St. Paul and offers the following comments for your consideration.

We expressed a number of concerns in our letter of June 3, 1981 commenting on some of the I-35E Special Study Reports. This letter was not printed or responded to in the DEIS. The DEIS is somewhat general in regard to some of the issues we raised in that letter, and therefore we feel these concerns have not been adequately responded to. These matters should be addressed in the Final EIS.

It is clear from the information presented in the DEIS, as well as our knowledge of the corridors involved, that the Shepard Road alternative (Alt. B) would have the greatest impact on natural resources.

The Mississippi River is a major scenic and recreational resource in the Twin Cities, and is one of the last remaining resources of significance to fish and wildlife in the Metropolitan area. Construction of the Shepard Road alternative, with its major encroachment into the floodplain and into the river channel itself would create major aesthetic, hydrologic and fish and wildlife impacts. We concur with the comments of the U.S. Fish and Wildlife Service in its letter of September 7, 1981 on the effects of Alternative B on river hydrology, the floodplain, bottomland forests and wetlands in the project area.

For any of the alternatives other than "B," we believe we can address any concerns we may have through the DNR Protected Waters permit process. If you have any questions regarding these comments, please feel free to give me a call.

Sincerely,

Thomas W. Balcom

Thomas W. Balcom
Environmental Review Coordinator

TWB:KW:mp
cc: Ron Harnack, Earl Huber, Karen Loechler, Kent Lokkesmoe

AN EQUAL OPPORTUNITY EMPLOYER

A. The June 3, 1981, letter was not received in time to be included in the DEIS. See pages 155 to 156 for the letter and responses which are now included in the FEIS.

STATE OF
MINNESOTA
DEPARTMENT OF NATURAL RESOURCES
CENTENNIAL OFFICE BUILDING · ST. PAUL, MINNESOTA · 55155

DNR INFORMATION
(612) 296-6157

July 16, 1982

Mr. Ghaleb Abdul-Rahman
I-35E Project Manager
Metropolitan Council
300 Metro Square Building
St. Paul, Minnesota 55101

RE: Preliminary Draft of the FEIS for I-35E Project, St. Paul, Minnesota from T.H. 110 in Mendota Heights to I-94 in St. Paul

Dear Mr. Abdul-Rahman:

The Department of Natural Resources has reviewed the above-referenced draft and finds the responses to our June 3, 1981 letter adequate except for items D. and F. A further explanation of inconsistencies between data sources and why Map I-1157 was not used as the data source for the hydrogeological impact evaluation seems to be in order.

If you have any questions regarding this comment, please call Gil Gabanski of our Division of Waters, Groundwater Section at 296-0431. Thank you for the opportunity to comment.

Sincerely,

Thomas W. Balcom

Thomas W. Balcom
Environmental Review Coordinator

TB:pje
2840D

cc: Gil Gabanski
Ken Wald

AN EQUAL OPPORTUNITY EMPLOYER

A. Responses to comments D and F have been revised (see pages 155 to 156).

minnesota energy agency
980 amencan center building • 150 east kellogg boulevard • st. paul, minnesota 55101 • (612) 296-5120

July 7, 1981

Mr. Ghaleb Abdul-Rahman
Metropolitan Council
300 Metro Square Building
St. Paul, MN 55101

Dear Mr. Abdul-Rahman:

The Minnesota Energy Agency has reviewed the Environmental Impact Reports prepared for the Interstate 35E project in St. Paul. We greatly appreciate the fact that the Metropolitan Council has chosen to prepare a separate Energy Impact Report as part of the Environmental Impact Statement (EIS) process. We have a number of questions concerning the Energy Impact and the Central Business District Economic Viability and Development Impact Report. In addition, we have prepared suggestions that you may review if there is any further examination of the 35E corridor.

A. First, are all energy impacts being calculated by the computer model using data that assume that northern Dakota county population and demand for transportation to St. Paul will be at the same level for both "build" and "no-build" alternatives? It would appear that the energy impact analysis for the "no-build" alternative could be based on circular reasoning if population levels and demand for transportation to St. Paul are assumed to be the same as for the other alternatives. Under the "no-build" alternative, it is not clear whether residential development in northern Dakota county would occur to the extent that it might under "build" alternatives. It is also unclear under the "no-build" alternative whether the population in northern Dakota county would be attracted toward commuting to downtown Minneapolis rather than St. Paul. Given the possibility of less residential development or demand for transportation to St. Paul in the case of the "no-build" alternative and the possibility of no alteration of northern Dakota county population or transportation demand to St. Paul in both the "build" and "no-build" alternatives, the energy impact analysis for the "no-build" alternative may be based on faulty assumptions.

B. Second, has the future impact of future commercial development in northern Dakota county on the St. Paul business district been taken into account in economic forecasts for all alternatives? New shopping areas in Dakota county may be more convenient than downtown St. Paul for many parts of western St. Paul with a freeway link. Free parking, less traffic congestion, and easy accessibility to these future commercial areas in northern Dakota county might erode the market share of retail activity maintained by downtown St. Paul. Has this potential been assessed and included in the economic viability and development impact report?

C. Third, does the transportation/energy model being used to calculate energy impacts consider induced energy impacts from development patterns? According to many studies, such as The Costs of Sprawl, urban sprawl often associated with freeway construction, has negative energy and economic impacts on a metropolitan area.[1] Negative energy impacts can occur because suburban developments usually have lower densities and fewer neighborhood commercial areas than the central city and these factors require residents to travel longer distances by automobile. Energy impacts induced by any of the "build" alternatives should include energy consumption for construction of, and service delivery to development directly induced by, completion of a "build" alternative. While we realize that no model has been developed to measure these impacts, an evaluation of induced energy impacts that are not measured by the existing model would be in order.

[1] The Costs of Sprawl, prepared for the Council on Environmental Quality; and Office of Policy Development and Research, Department of Housing and Urban Development; and the Office of Planning and Management, Environmental Protection Agency by Real Estate Research Corporation, U.S. Government Printing Office, Washington D.C., April 1974.

A. Population estimates were not altered due to the "no-build" alternative. Northern Dakota County is assumed to have considerable growth before the year 2000. Without I-35E, the greatest impact on energy will be the rerouting of traffic to more circuitous alternate routes. As these routes overload, congestion sets in and energy consumption increases. These factors are taken into account in the energy consumption models.

B. The Development Guide for the region does not include any major regional shopping facilities in northern Dakota County which would be affected by I-35E. The growth projected is for heavy employment zones near and south of the junction of proposed I-35E and I-494. The employment is industry related which would not and cannot readily develop in St. Paul or its central area. Competition for regional shopping trips with downtown St. Paul should not be a significant factor. Providing job opportunities for St. Paul residents is.

C. Greater energy consumption due to sprawl is proportional to greater total VMT. However, a recent study(1) has shown that a freeway expansion into a suburban area does not generally lead to increased travel. This is particularly true in this case, where significant commercial and industrial development already exists in northern Dakota County. Work trips for many may actually be shortened as a result of a move to the suburban area. The urban sprawl problem referred to is handled in this metropolitan area in the regional Development Guide. Sprawl is reduced by designation of an Urban Service Area boundary. Services, utilities and transportation are concentrated in this area to encourage development. Outside this area, a whole different set of land control and development policies apply. A single transportation route does not in itself radically change the Urban Service Area and may only change the time frame for development slightly. It is doubtful that the potential change in energy consumption is measurable.

(1) The Vehicle-Miles of Travel - Urban Highway Supply Relationship. Cambridge Systematics, Inc. Dec. 1979.

Fourth, why are adverse economic impacts calculated for the "no-build" alternative assuming that downtown parking and auto congestion problems cannot be solved? Would it not seem that parking and congestion problems in the central business district can be solved independent of whether a freeway is built or not? The city is already taking actions to solve some of these problems by extending hours of the Super Shuttle and negotiating with the Post Office to expand the number of parking spaces in fringe areas of the downtown area.

D.

D. With the "no-build" it is assumed that no major route would be built in this corridor. The projected growth of demand indicates some routes near the CBD would overload thereby creating more severe congestion. Certainly more parking can be created in the downtown without I-35E. However, without the route, there is some adverse effect in that more parking has to be banned to handle the projected volumes.

Depending on how these four questions are answered, it might be valuable for you to review the following suggestions if any further examination of the 35E corridor is to occur:

(a) that additional estimates of direct and indirect energy impacts be made for the "no-build" alternative. These additional estimates should include an estimate of vehicle miles traveled (VMTs) from northern Dakota county based on an assumption that different levels of development will occur with the "no-build" alternative.

(b) that a qualitative evaluation be made of induced energy consumption not measured by the transportation/energy model. Such an evaluation should examine energy input into auxiliary construction from and delivery of services to developments directly induced by the completion of 35E. Road construction for residential development, sanitary sewage service, storm drainage, water supply, electrical service, gas service, and telephone service should be included.

(c) that an assessment of additional economic impacts on the St. Paul central business district be made reflecting: (1) other solutions to parking and traffic congestion problems in the downtown area under a "no-build" alternative, and (2) the convenience and drawing power of future retail shopping areas in northern Dakota county.

The Minnesota Energy Agency appreciates the opportunity to comment on the 35E reports. We look forward to working closely with your staff to encourage energy efficient corridor development.

Sincerely,

Mark Mason
Director

Regional and Local Government

Metropolitan Council
300 Metro Square Building
Seventh Street and Robert Street
Saint Paul, Minnesota 55101
Telephone (612) 291-6455
Office of the Chairman

December 8, 1981

Richard Braun, Commissioner
Minnesota Department of Transportation
Transportation Building
St. Paul, Minnesota 55155

RE: Recommended I-35E Preferred Alternate

Dear Commissioner Braun:

At its meeting on December 31, 1981, the Metropolitan Council considered the report I-35E in St. Paul. This report reviewed the Draft EIS for I-35E in St. Paul and recommended a preferred alternative. This consideration was based on a report of the Physical Development Committee, Referral Report No. 81-239. A copy of this report, which was adopted as presented, is attached.

The Council finds that a four-lane parkway with a direct connection to I-94 is the preferred alternative in the Pleasant Avenue corridor as outlined in Recommendation 3 of our attached report. This action by the Council completes our basic work on the Draft EIS. We are now assembling the draft report document, the transcript of the public hearing held September 9, 1981 and copies of comments received from agencies and interested parties. These materials will come to you under separate cover within the next ten days.

Sincerely,

Charles Weaver
Chairman

CW/nr

Enclosure

RECEIVED
COMMISSIONER'S OFFICE
Department of Transportation

METROPOLITAN COUNCIL
Suite 300 Metro Square Building, St. Paul, Minnesota 55101

MEMORANDUM November 30, 1981

TO: TRANSPORTATION SUBCOMMITTEE

FROM: Transportation Staff

SUBJECT: I-35E Preferred Alternate
Final Recommendations

Introduction:

This summarizes comments made on the staff report, I-35E in St. Paul, at the November 10, 17 and 24 meetings of your committee. Included are staff findings regarding the comments and a modified recommendation to transmit to Commissioner Braun of Mn/DOT. The responses to the comments are provided using the same decision process in the report. This framework continues to serve well to keep issues clarified and provide for a regional perspective.

Discussion of Comments:

Issue 1 - Need: Build or Not Build

One speaker made the suggestion to reuse the right-of-way for housing. Another questioned the Phase I report in rejecting alternates such as Lafayette. Speakers who expressed concern about property values seem to imply that a facility should not be built. For the rest, out of forty-plus speakers, the majority assumed that some improvement is to be provided. Indeed, many strongly urged action. The report conclusion to build was, on the whole, not challenged, but supported.

Issue 2 - Functional Classification: Local Arterial - Regional Arterial

This issue received few comments specifically directed to the main question raised in our report. Is this a regional or local road? Perhaps this reflects greater attention to details of design by speakers. comments favoring a freeway imply agreement with regional classification. A RIP 35E presentation made by John Baymiller did call for a local road on the Pleasant Avenue alignment, but further suggested through traffic should use Shepard Road. This implies that a regional facility is needed in the corridor. The Baymiller proposal is more fully discussed under Issue 5 below. Generally our conclusion to treat the improvement as a regional facility did not receive adverse comments. Those supporting our recommendation or one like it, for example speakers in favor of the St. Paul City Council position or in favor of Alternate C, as well as supporters of Alternate A would be supporting our conclusion to provide a regional facility.

Issue 3 - Corridor Location: Shepard Road - Pleasant Avenue

The majority of speakers did not question this conclusion. As with Issue 2, many comments implied approval rather than directly discussing the issue. We took all comments favoring alternates other than B (Shepard Road Freeway) to basically endorse the conclusion to use the Pleasant Avenue alignment. There were no comments favoring the use of Shepard Road. Those concerned with property values implied that the Pleasant Avenue location has the most direct effect, but did not suggest going back to Shepard Road. The Baymiller proposals came the closest by suggesting that Shepard Road be used for "through" traffic, but still accepted a Pleasant Avenue Corridor improvement. Our conclusion to use Pleasant Avenue was overwhelming accepted by nearly all speakers.

Issue 4 - Corridor Design and Truck Movement: Parkway - Freeway

On this issue, comments were made both for and against our report conclusions. Pro-parkway and pro-freeway sentiments emerged. Use of the Pleasant Avenue alignment for trucks and prohibiting truck traffic were both debated. Comments supporting the parkway were made by all neighborhood groups, several legislators and the City of St. Paul (Council-Person Hunt). As in the Draft EIS (DEIS) and in the staff report, the parkway alternates without truck traffic were cited as the most compatible with the residential and institutional land uses along Pleasant Avenue. The major impact, as documented in the Draft EIS, is gained through noise reduction. Even though some comments (RIP 35E) question the adequacy of the DEIS noise and air analysis, there is still agreement that the situation would be worse with trucks than without. Support for a full freeway without restrictions on truck traffic was made in comments by a representative of the Urban Council on Mobility, two trucking industry representatives and one or two others. They questioned the availability of Interstate funds for parkway construction and expressed concern about the adequacy of alternate routes for trucks. Funding will be available for a parkway. Staff and consultants have further evaluated and analyzed truck movements given parkway alternates. It is our feeling that the truck alternate routes will be adequate via Shepard Road given a direct connection (see Issue 5 below). The majority of comments by speakers did support our report conclusion that a parkway alternate was preferred. The questions raised about it were not serious enough to change the conclusion in the staff's opinion.

Issue 5 - Connections to I-94 and the Short Line

This issue received the most comment. Two groups of comments were offered, those regarding the Short Line and those dealing with I-94 pro and con.

The report conclusions and recommendations regarding the Short Line were opposed outright or judged to be premature by a legislator, neighborhood groups and individual citizens. St. Paul questioned both the timing of the recommendation and the suggested timing of the connection, citing lack of study on the problems of connecting the Short Line at the North end and the lack of funds for the project. Effected citizens asked for completion of an EIS before making a decision. The City asked us to keep the issue a local one and let St. Paul determine the future need to have a connection with I-35E. As noted in the staff report, we believe that in the long run the Short Line should be part of the solution in the corridor and, therefore, connected to I-35E. However, we agree with the City that it is improbable that the needed improvements can be made by the opening of I-35E. We, therefore, changed the recommendation made in the November 6, 1981 report (see the draft final recommendation at the end of this memo).

As regards the direct connection to I-94, the City of St. Paul comments endorsed a direct connection as that was also the City Council's position. Also all speakers in favor of a freeway accept the idea of a direct connection. Comments critical of this conclusion came from legislators and neighborhood groups along the Pleasant Avenue corridor. The common criticism was that traffic volumes on the Pleasant Avenue link would be higher and noise and air pollution would increase. The Draft EIS does not support this. The estimated noise level increase with an increase in traffic is not significant according to the noise analysis in the DEIS. Just as important according to our analysis is the problem with increased traffic on Shepard Road which would be diverted there with an indirect connection. This makes the truck route alternate less workable and endangers the feasibility of our conclusion to restrict truck movements to Shepard Road. Safety and increased traffic on 11th and 12th Street (as discussed in our report) are also to be considered.

A special set of comments, along with a design concept, was presented by John Baymiller on behalf of RIP 35E. This presentation basically argued against the use of 11th and 12th Streets as indirect connectors. It proposed instead an expressway design with at-grade intersections and traffic signals west along Pleasant Avenue beginning at Fifth and Sixth Streets. We have evaluated this proposal and so has the City of St. Paul. The urban design has some very attractive features; there are, however, some serious drawbacks. It will cause severe traffic impacts on cross streets, especially Kellogg and Fifth/Sixth Streets. It will not provide the capacity needed to handle the traffic. This is because the design concept proposed offers low capacity, and it further assumes diversion of traffic to Shepard Road. From the regional policy perspective, it also is designed to be a local traffic carrier and leaves Shepard Road the regional role. This would reverse the conclusions made in Issue 3.

The comments received on the connection issue lead us to recommend a modification of the Short Line recommendations, but do not change our conclusion that a direct connection to I-94 is preferred.

Issue 6 - CBD Traffic: The East CBD Bypass

This issue was discussed by the Citizen's League and St. Paul, both in support. The trucking representatives questioned the feasibility of the conclusion, but expressed more concern over the Shepard Road portion of the route than the Bypass specifically. Funding is seen to be the key question on this issue and led to a two-stage strategy recommendation by the Citizen's League. They proposed leaving the direct-indirect connection unaddressed until funding for the Bypass is obtained. This seems to us unadvisable because it will leave an incomplete recommendation in our preferred alternate. The EIS consultant staff has assisted us in further analysis on this issue, primarily by looking further at the data on truck movements and the traffic diversion from Shepard Road and Jackson-Sibley with Alternate C. We cannot document any serious capacity or safety problems in using Shepard Road for trucks. As indicated in our report, the ECBD Bypass should be provided in the long run to relieve Jackson-Sibley Streets of truck traffic. Our basic conclusion on Issue 6 is not changed.

Non-Issue Comments

Two speakers raised issues of impacts of noise and air polution on United Hospitals. These do not seem to fall under any of the above issues directly. Review of the Draft EIS, past Council actions on United Hospitals, and comments by appropriate health officials on the DEIS during public hearings all lead to the conclusion that no serious danger is posed to the health of patients by the preferred alternate.

The use of the term "6-lane parkway" in the draft recommendation was also questioned. That was an error in the use of terms. A four-lane through section was intended. Ramps for 7th Street and Raymond Avenue will cause merging auxillary lanes for a portion of the distance between 7th Street and Raymond Avenue.

Finally, we were asked to clarify or modify our actual recommendations, by the City of St. Paul. Suggested changes include clarifying the Short Line recommendations, commenting on improvements to Shepard Road and listing the interchange locations assumed with the recommended alternate.

Summary:

The draft recommendations have been modified to change the recommendation on the Short Line. Figure 1 attached shows the location of interchanges as well as other features of the preferred alternate. Figure 1 should be included in our report to Commissioner Braun. There are no further recommendations on improvements to Shepard Road intended in the staff recommended preferred alternate.

RECOMMENDATIONS

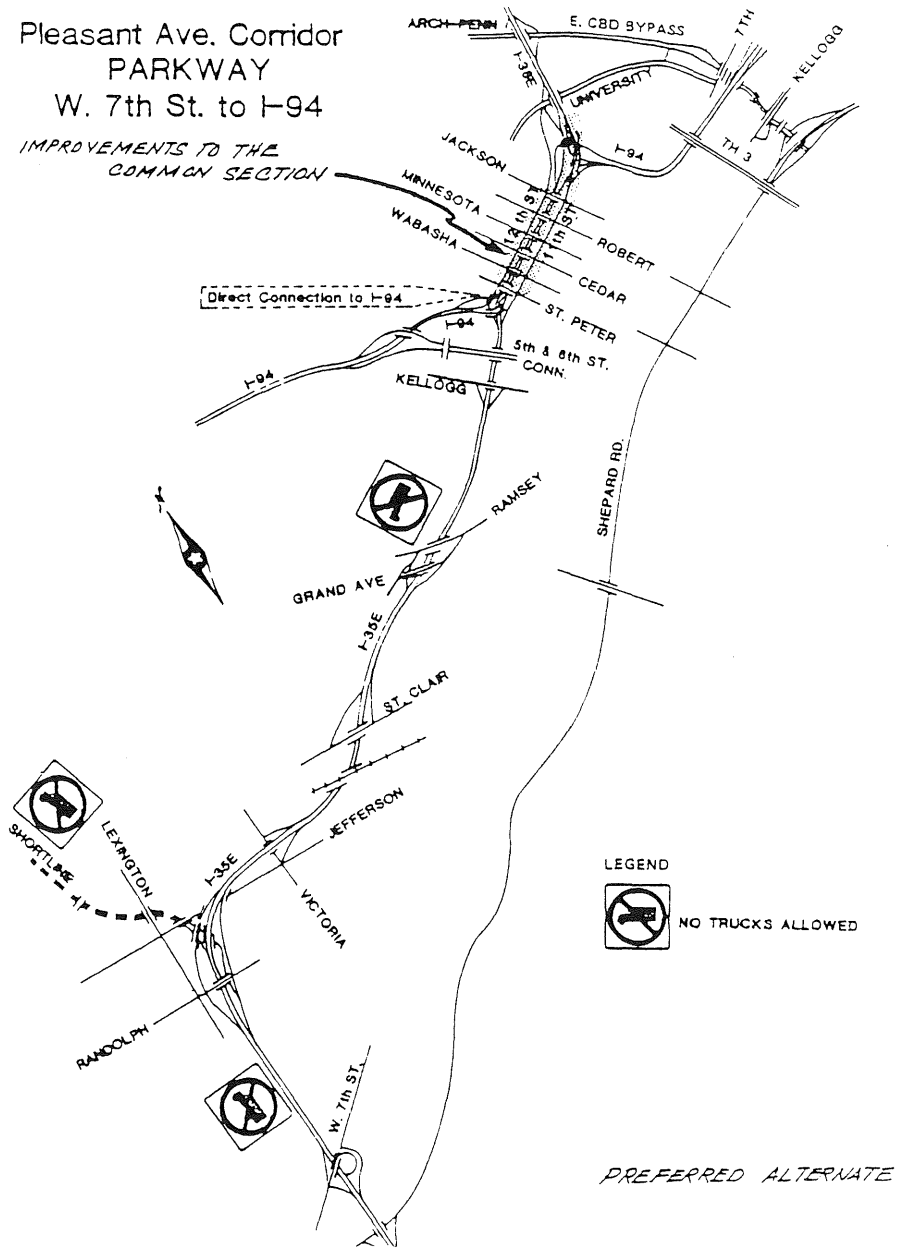
1. That the Metropolitan Council transmit the Draft EIS and public hearing record to the commissioner of the Minnesota Department of Transportation and include its report and this memorandum as the comments of the Metropolitan Council on the I-35E Draft Environmental Impact Statement.

2. That Phase III, preparation of the Final Environmental Impact Statement, begin as soon as possible.

3. That the commissioner of the Minnesota Department of Transportation (Mn/DOT) consider the following as the preferred alternative for I-35E in St. Paul (see Figure 1):

   Construction of a parkway in the Pleasant Av. corridor from W. 7th St. to downtown St. Paul with a direct connection to I-94. The roadway would be composed of four through-lanes plus auxillary lanes where needed. Trucks would be prohibited from this facility and the Short Line Rd. A connection between the Short Line and the Pleasant Av. corridor should be included in the design of the facility, but traffic should be prohibited until such time as needed improvements on the Short Line are completed. An east CBD Bypass should be included in the year-2000 transportation plan for St. Paul. It is a desirable component of the preferred alternative, but is not necessary in fulfilling the function and purposes of the project.

4. That the City of St. Paul initiate the necessary studies, and with the commissioner of Mn/DOT jointly pursue funding sources to implement the east CBD bypass, improvements to Shepard Road and any other needed improvements to related roadways.


Pleasant Ave. Corridor
PARKWAY
W. 7th St. to I-94
IMPROVEMENTS TO THE COMMON SECTION
ARCH-PENN
E. CBD BYPASS
I-35E
UNIVERSITY
7TH
KELLOGG
JACKSON
I-94
TH 3
MINNESOTA
WABASHA
4TH ST.
5TH ST.
ROBERT
CEDAR
ST. PETER
Direct Connection to I-94
I-94
5th & 6th ST. CONN.
KELLOGG
I-94
SHEPARD RD.
RAMSEY
GRAND AVE.
I-35E
ST. CLAIR
SHORT LINE
LEXINGTON
I-35E
JEFFERSON
VICTORIA
RANDOLPH
W. 7th ST.
LEGEND
NO TRUCKS ALLOWED
PREFERRED ALTERNATE

Metropolitan Transit Commission
801 American Center Building St. Paul, Minnesota 55101 612/221-0939

August 20, 1981

Mr. Ghaleb Abdul-Rahman
I-35E Project Manager
Metropolitan Council
300 Metro Square Building
St. Paul, Minnesota 55101

Re: FHWA-MN-EIS-81-02-D
Draft Environmental Impact Statement for
Interstate 35E from T.H. 110 in Dakota County, MN
to I-94 Near Downtown St. Paul, Ramsey County, MN
Minnesota Project I-IG 35E-4(19) 110
State Project 6280-220

Dear Mr. Abdul-Rahman:

Thank you for sending a copy of the draft Environmental Impact Statement for I-35E from T.H. 110 in Dakota County to I-94 near downtown St. Paul. Because this highway would be located in an area with existing transit service, and offers the potential of improved transit service to downtown St. Paul, the MTC anticipates using the highway for the operation of buses. The Western St. Paul Route Ridership Improvement Project, completed in March, 1976, analyzed transit service in that area and recommended a number of service improvements. One recommendation was for the implementation of five express bus routes which would use the portion of I-35E addressed by the DEIS.

Since we anticipate operating service on the highway, we have a number of comments on the DEIS. These comments do not support a single alternative as being more desirable than the others; rather they raise a set of transit-related issues which should be considered during the process of selecting the preferred alternative and designing the facility.

1. Alignment Selection

As the DEIS points out, the Shepard Road alternative would be ineffective in improving transit service to the southwest residential areas of St. Paul. However, the Pleasant Avenue alternatives do pass through those residential areas, and would allow for improved transit service to downtown St. Paul. The travel demand data show that downtown is the destination for a large percentage of the travel that would use a new highway in this corridor. To allow transit to meet as much of that demand as possible, the facility should be designed to allow for high quality transit service. From that perspective, the Pleasant Avenue alignment is superior to the Shepard Road alignment.

2. Parkway Designation

The fact that several alternatives include highway segments designated as parkways raises a concern about the definition of that term. The DEIS only identifies a parkway as a roadway from which trucks are prohibited; it is not clear how buses would be affected. The MTC is presently prohibited from operating service on some existing roadways because of their parkway designation. If the selected alternative for this corridor includes a parkway segment, that designation must be such that buses are allowed if the highway is to be beneficial for transit. A.

3. Park-and-Ride Facilities

The Western St. Paul Route Ridership Improvement Project contained the recommendation that park-and-ride facilities be developed at the intersections of the I-35E right-of-way with West 7th street and Randolph Avenue dependent upon land availability. Selection of the preferred alternative should consider how much land each would allow for such parking areas. B.

4. Right-of-Way for Future Transit Needs

Although none of the alternatives includes separate facilities for transit, consideration should be given to the fact that such facilities may be desirable at some future time.

A number of the Pleasant Avenue alternatives include highway segments with fewer lanes than were anticipated at the time that the right-of-way was acquired. This raises the possibility that excess right-of-way could be made available in those segments, depending upon how the highway is designed. Where it is possible to do so, the highway should be constructed so that any unused portions of the right-of-way form a continuous alignment upon which a transit facility could be added without requiring major disruption of the highway. C.

5. Highway Design Characteristics

As work progresses on the design of the highway, care must be taken that the design allows transit vehicles to make full use of the facility. Such design elements as bus stop locations on the proposed highway and on cross streets, sidewalks to provide access to bus stops and for general pedestrian movement, entrance and exit ramp locations to facilitate the transition between local and express bus service, and adequate clearances and roadway geometry are crucial to the successful operation of buses on the new facility. To assure that adequate attention is given to these concerns, the MTC should be a participant in future planning and design activities. D.

We appreciate the opportunity to comment on the DEIS. We would like to receive a copy of the final EIS when it is completed.

Sincerely,

Camille D. Andre
Chief Administrator

A. All parkway segments will allow buses and other high occupancy vehicles, as stated in the Traffic Impact Report, page 44, and further clarified on page 5 of the FEIS.

B. The feasibility of constructing park and ride lots at the West Seventh Street and Randolph interchanges was analyzed by MnDOT. It appears that there is insufficient land available for these to be suitable park and ride locations. The Victoria and St. Clair interchanges present potential for future park and ride facilities. These locations will be studied in greater detail by MnDOT and MTC. Any park and ride facilities that may be constructed in the future will be developed in coordination with the City of St. Paul.

C. On pages 146 and 147 in the Transportation and Traffic Impacts section of the DEIS, consideration is given to the use of high occupancy vehicle lanes in both the Pleasant Avenue and Shepard Road corridors. Even under the most favorable assumptions, the analysis concludes that usage of HOV lanes would be low. If HOV lanes were added, the required cross section would be six lanes. Thus, HOV lanes would not be feasible with Alternative C.

The I-35E parkway will provide a continuous fully controlled access corridor for transportation purposes which represents a long-term investment for movement by whatever means are appropriate to the time. The selected alternative will have a continuous raised median, but will only be "wide" roughly between the Short Line and Grand/Ramsey because of restricted right-of-way, auxiliary lanes for weaving, and other necessary roadway features. Fairly major reconstruction would probably be necessary south of the Short Line if transit lanes were to be added in the future.

D. As more detailed design plans are generated for the preferred alternative, the MTC will be allowed an opportunity to review them with the Minnesota Department of Transportation to ensure that transit vehicles and services may make full use of the facility.

METROPOLITAN WASTE CONTROL COMMISSION

July 7, 1981

Mr. Ghaleb Abdul-Rahman
I-35E Project Manager
Metropolitan Council
300 Metro Square Building
St. Paul, MN 55101

RE: I-35E Draft IES Review

Dear Mr. Abdul-Rahman:

Having reviewed the referenced report as it impacts the Metropolitan Disposal System, it appears that the Pleasant Avenue corridor will not affect our facilities. However, the Sheppard Road corridor crosses our facilities several ti

If the Sheppard Road corridor alternative is selected, during preparation of plans and specifications and prior to initiation of construction (including excavating and backfilling) near our facilities, a structural analysis will have to be performed and submitted for review and approval. Construction procedures such as surcharging (page 77) to accelerate settling must also be considered and reviewed. A.

Another concern is the discharge of runoff to the combined storm and sanitary sewer system. As indicated in the text, capacity problems exist within the combined Trout Brook system during storm events and any development in this discharge area would require construction of a new storm sewer system. For any proposal to discharge to the combined sewer system, the rate of discharge should not exceed the existing rate at any time. B.

Should you have any comments, please contact the Commission.

Very truly yours,

George W. Lusher
Chief Administrator

GWL:PHD:cll

A. The Shepard Road corridor (involved with Alternatives B, J and K) has not been selected. The preferred alternative is located only in the Pleasant Avenue corridor.

B. The preferred alternative would not involve any discharge of runoff to the combined Trout Brook system.

September 9, 1981

Charles Weaver, Chairman
Council Members
Metropolitan Council
300 Metro Square Building
St. Paul, MN. 55101

Dear Chairman Weaver and Council Members:

The Draft Environmental Impact Statement (DEIS) on the unfinished segment of Interstate Highway 35E and the Short Line Road in St. Paul is now before you for your analysis and recommendations to the State Commissioner of Transportation. As the Ramsey County Commissioner representing those metropolitan residents most directly affected by the various proposals for the I-35 E Corridor and the Short Line Road, I would like to make these comments.

The completion of this roadway has been embroiled in controversy for many years. In the early 1980's, a successful lawsuit by St. Paul residents blocked the construction of a high-speed freeway in the corridor. Subsequent state legislation restricted the type of roadway to be built in the corridor. State law provides that it must be a "parkway" with no trucks and reduced speed limits, and must have an "indirect" connection to I-94 in downtown St. Paul. Finally, several years ago, the legislature mandated the preparation of the DEIS now before you for the purpose of analyzing the environmental impacts of the 12 alternatives for the corridor on the neighborhoods along the corridor.

In a July 7, 1981 letter to the St. Paul City Planning Commission, the Mayor of St. Paul, George Latimer, proposed that Alternative J with certain modifications be selected from the 12 alternatives analyzed in the DEIS. Alternative J calls for a four lane parkway from West 7th to an indirect connection with I-94 in downtown St. Paul. Trucks would be prohibited on the parkway and the Short Line Road. The Mayor further proposed that improvements be made to Shepard Road and a Central Business District Bypass (CBDB) be constructed to accommodate trucks. Finally, the Short Line Road would not be connected to the parkway until the problems at the north end are resolved by the City.

The Mayor's position was debated before both the St. Paul Planning Commission and City Council. Both rejected the Mayor's call for an indirect connection, but otherwise endorsed his position.

I support the selection of Alternative J with the modifications proposed by the Mayor of St. Paul. Alternative J, with its indirect connection to I-94 and no trucks on a parkway, along with the Mayor's modifications - including no hook-up of the Short Line Road - is a realistic, achievable solution to a complex problem. It balances the transportation needs of the metropolitan area served by this corridor with the fundamental right of the neighborhood residents along the corridor to live in a safe and clean environment after the parkway is built. It complies with the existing state legislation. The City Council recommendation for a direct connection does not. Selection of any other alternatives than "J" will unfortunately prolong this already too long controversy as groups vie to change existing legislation and challenge the final EIS in court.

Sincerely,

Diane Ahrens
Ramsey County Commissioner

DA:gd

Diane Ahrens
Commissioner District 4
Ramsey County Board
316 Courthouse • St. Paul • Minnesota • 55102 • 298-4145

BOARD OF COUNTY COMMISSIONERS
DAKOTA COUNTY, MINNESOTA

Date August 18, 1981 **Resolution No.** 81-486

Motion by Commissioner Voss -- ***Seconded by Commissioner*** Atkins

WHEREAS, Interstate 35E is expected to serve as a vital traffic arterial between northern Dakota County and St. Paul; and

WHEREAS, the proper development of Interstate 35E as a freeway is needed in order to provide an adequete level of service for trucks and other vehicular traffic generated from within and outside the Metropolitan area; and

WHEREAS, improper development of Interstate 35E through St. Paul would have an adverse effect upon Interstate 35W and T.H. #3 (Lafayette Freeway); and

WHEREAS, Federal Interstate funding, which will end in 1983, appears to be an absolute necessity in order to complete Interstate 35E to downtown St. Paul,

BE IT THEREFORE RESOLVED, that the County Board of Dakota County strongly supports the development of the segment of Interstate 35E under consideration as a freeway from T.H. #110 to Interstate #94 (Alternative "A" or A' " in the Draft Environmental Impact Statement), for the following reasons;

1. Only a continuous freeway would appear to provide an adequete level of service for trucks and other vehicles.

2. The entire route as a freeway would be eligible for 90/10 ratio Interstate funding and this would ease the funding burden placed upon the State of Minnesota.

3. Only a continuous Interstate 35E route through downtown St. Paul with connections both north and south to Interstate 35 would relieve traffic demands upon other major routes and

(continue next page)

YES		NO	
Harris		Harris	
Hollenkamp		Hollenkamp	
Voss		Voss	
Atkins		Atkins	
Streefland		Streefland	

State of Minnesota)
County of Dakota) ss.

I, ***C. D. Onischuk,*** duly elected, qualified and acting County Auditor of the County of Dakota, State of Minnesota, do hereby certify that I have compared the foregoing copy of a resolution with the original minutes of the proceedings of the Board of County Commissioners, Dakota County, Minnesota, at their session held on the ..... day of ..... 19....., now on file in my office, and have found the same to be a true and correct copy thereof.

Witness my hand and official seal at Hastings, Minnesota, this ..... day of .....

.....
County Auditor

A.

A. Neither Alternative A, A' nor K was chosen as the preferred alternative. For a discussion of the rationale used in choosing the preferred alternative, see Section II "Preferred Alternative" of this FEIS.

BOARD OF COUNTY COMMISSIONERS
DAKOTA COUNTY, MINNESOTA

Date August 18, 1981 **Resolution No.** 81-486

Motion by Commissioner Voss ***-- Seconded by Commissioner*** Atkins

permit them to function as planned and designed.

BE IT FURTHER RESOLVED, that if an alternative, other than a continuous freeway route is adopted, the County Board of Dakota County urges the following provisions:

1. The design shall be generally consistent with Alternative "K" as illustrated in the Draft Environmental Impact Statement except that a direct connection shall be made to Interstate #94. Said connection would provide a continuous route for small vehicles through downtown St. Paul and provide eligibility for 90/10 Interstate funding.

2. Any alternative shall also provide a specific funding commitment, by some government agency, to the Central Business District (CBD) by-pass and short-line routes in order that truck traffic may be properly served if a continuous freeway route is not constructed as urged herein.

A.

	YES		NO
Harris	X	Harris	
Hollenkamp	X	Hollenkamp	
Voss	X	Voss	
Atkins	X	Atkins	
Streefland	X	Streefland	

State of Minnesota)
County of Dakota) ss.

I, *C. D. Onischuk*, duly elected, qualified and acting County Auditor of the County of Dakota, State of Minnesota, do hereby certify that I have compared the foregoing copy of a resolution with the original minutes of the proceedings of the Board of County Commissioners, Dakota County, Minnesota, at their session held on the 18th day of August, 19 81, now on file in my office, and have found the same to be a true and correct copy thereof.

Witness my hand and official seal at Hastings, Minnesota, this 24th day of August, 1981

Carl D. Onischuk
County Auditor

CERTIFICATION

City of

STATE OF MINNESOTA)
COUNTY OF DAKOTA) ss
CITY OF WEST SAINT PAUL)

WEST SAINT PAUL

I, Patricia J. Morrison, being the Clerk of the City of West Saint Paul, Dakota County, Minnesota, do hereby certify that the foregoing is a true and correct copy of a Resolution, duly passed by the City Council of said City on August 24, 1981; and that the same is on file and of record in my office.

-SEAL-

City Clerk

On motion of Ald. Finnegan Seconded by Ald. Jakway

RESOLUTION NO.

RESOLUTION REGARDING DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR INTERSTATE 35E FROM T.H. 110 (DAKOTA COUNTY) TO INTERSTATE 94 NEAR DOWNTOWN ST. PAUL

WHEREAS, Interstate 35E is expected to serve as a vital traffic arterial between northern Dakota County and St. Paul; and,

WHEREAS, the proper development of Interstate 35E as a freeway is needed in order to provide an adequate level of service for trucks and other vehicular traffic generated from within and outside the Metropolitan area; and,

WHEREAS, improper development of Interstate 35E through St. Paul would have an adverse effect upon Interstate 35W and T.H. #3 (Lafayette Freeway);and,

WHEREAS, Federal Interstate funding, which will end in 1983, appears to be an absolute necessity in order to complete Interstate 35E to downtown St. Paul,

BE IT THEREFORE RESOLVED that the City of West Saint Paul strongly supports the development of the segment of Interstate 35E under consideration as a freeway from T.H. #110 to Interstate #94 (Alternative "A" or "A'" in the Draft Environmental Impact Statement), for the following reasons:

1. Only a continuous freeway would appear to provide an adequate level of service for trucks and other vehicles.

2. The entire route as a freeway would be eligible for 90/10 ratio Interstate funding and this would ease the funding burden placed upon the State of Minnesota.

3. Only a continous Interstate 35E route through downtown St. Paul with connections both north and south to Interstate 35 would relieve traffic demands upon other major routes and permit them to function as planned and designed.

BE IT FURTHER RESOLVED that if an alternative, other than a continuous freeway route is adopted, the City of West Saint Paul urges the following provisions:

1. The design shall be generally consistent with Alternative "K" as illustrated in the Draft Environmental Impact Statement except that a direct connection shall be made to Interstate #94. Said connection would provide for a continuous route for small vehicles through downtown St. Paul and provide eligibility for 90/10 Interstate funding.

2. Any alternative shall also provide a specific funding commitment, by some government agency, to the Central Business District (CBD) by-pass and short-line routes in order that truck traffic may be properly served if a continuous freeway route is not constructed as urged herein.

THIS RESOLUTION WAS ADOPTED BY THE CITY OF WEST SAINT PAUL BY THEIR CITY COUNCIL ON THIS 24th DAY OF AUGUST, 1981.

Ayes: 6

Nays: 0

/s/ Kenneth H. Kube Mayor Attest: /s/ Patricia J. Morrison
City Clerk

A.

A. Neither Alternative A, A' nor K was chosen as the preferred alternative. For a discussion of the rationale used in choosing the preferred alternative, see Section II "Preferred Alternative" of this FEIS.

BEA BLOMQUIST
MAYOR

THOMAS EGAN
MARK PARRANTO
JAMES A. SMITH
THEODORE WACHTER
COUNCIL MEMBERS

CITY OF EAGAN
3795 PILOT KNOB ROAD
P.O. BOX 31199
EAGAN, MINNESOTA
55122
PHONE 454-8100

THOMAS HEDGES
CITY ADMINISTRATOR

EUGENE VAN OVERBEKE
CITY CLERK

August 19, 1981

GHALEB ABDUL-RAHMIN
I-35E PROJECT MANAGER
METROPOLITAN COUNCIL
300 METRO SQUARE BLDG
7 ST & ROBERT ST
ST PAUL MN 55101

Re: Comments Regarding the Draft Environmental Impact Study on Interstate Highway 35E in St. Paul

Dear Mr. Abdul-Rahmin:

In official action that was taken by the Eagan City Council at a regular meeting held on August 18, 1981, the attached resolution entitled, "Resolution Regarding Draft Environmental Impact Statement for I-35E from T.H. 110 (Dakota County) to I-94 near Downtown St. Paul," was approved. Please include this resolution as a part of the final environmental impact statement which represents the position of the City of Eagan.

It is uncertain at this time as to whether our Mayor, Bea Blomquist, will be able to be present to present the resolution at the public hearing scheduled for Wednesday, September 9.

If you have any questions regarding the action that was taken by the City Council, please feel free to contact this office at any time.

Sincerely,

Thomas L. Hedges
City Administrator

TLH/hnd

CITY OF EAGAN

RESOLUTION NO. _____

RESOLUTION REGARDING DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR INTERSTATE 35E FROM T.H.110 (DAKOTA COUNTY) TO INTERSTATE 94 NEAR DOWNTOWN ST. PAUL.

WHEREAS, Interstate 35E is expected to serve as a vital traffic arterial between northern Dakota County and St. Paul; and,

WHEREAS, the proper development of Interstate 35E as a freeway is needed in order to provide an adequate level of service for trucks and other vehicular traffic generated from within and outside the Metropolitan area; and,

WHEREAS, improper development of Interstate 35E through St. Paul would have an adverse effect upon Interstate 35W and T.H. #3 (Lafayette Freeway; and,

WHEREAS, Federal Interstate funding, which will end in 1983, appears to be an absolute necessity in order to complete Interstate 35E to downtown St. Paul,

A.

BE IT THEREFORE RESOLVED that the City of Eagan strongly supports the development of the segment of Interstate 35E under consideration as a freeway from T.H. #110 to Interstate #94 (Alternative "A" or "A'" in the Draft Environmental Impact Statement), for the following reasons:

1. Only a continuous freeway would appear to provide an adequate level of service for trucks and other vehicles.

2. The entire route as a freeway would be eligible for 90/10 ratio Interstate funding and this would ease the funding burden placed upon the State of Minnesota.

3. Only a continous Interstate 35E route through downtown St. Paul with connections both north and south to Interstate 35 would relieve traffic demands upon other major routes and permit them to function as planned and designed.

BE IF FURTHER RESOLVED that if an alternative, other than a continuous freeway route is adopted, the City of Eagan urges the following provisions:

1. The design shall be generally consistent with Alternative "K" as illustrated in the Draft Environmental Impact Statement except that a direct connection shall be made to Interstate #94. Said connection would provide for a continuous route for small vehicles through downtown St. Paul and provide eligibility for 90/10 Interstate funding.

2. Any alternative shall also provide a specific funding commitment, by some government agency, to the Central Business District (CBD) by-pass and short-line routes in order that truck traffic may be properly served if a continuous freeway route is not constructed as urged herein.

THIS RESOLUTION WAS ADOPTED BY THE CITY OF Eagan BY THEIR CITY COUNCIL ON THIS 18th DAY OF AUGUST, 1981.

/s/_____

Title: Mayor

ATTEST: Ed. J. VanOverbeke

Title: City Clerk

A. Neither Alternative A, A' nor K was chosen as the preferred alternative. For a discussion of the rationale used in choosing the preferred alternative, see Section II "Preferred Alternative" of this FEIS.

STATE OF MINNESOTA)
COUNTY OF DAKOTA) s.s.
CITY OF MENDOTA HEIGHTS)

I, Kathleen M. Swanson, being the duly appointed and acting City Clerk of the City of Mendota Heights, do hereby CERTIFY that the attached Resolution No. 81-63,"RESOLUTION REGARDING DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR INTERSTATE 35E FROM T.H. 110 (DAKOTA COUNTY) TO INTERSTATE 94 NEAR DOWNTOWN ST. PAUL", is a true and exact copy of said original resolution on file in my office.
Signed and sealed by my hand this 26th day of August, 1981.

Kathleen M. Swanson
City Clerk

CITY OF MENDOTA HEIGHTS
DAKOTA COUNTY, MINNESOTA

RESOLUTION NO. 81-63

RESOLUTION REGARDING DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR INTERSTATE 35E FROM T.H. 110 (DAKOTA COUNTY) TO INTERSTATE 94 NEAR DOWNTOWN ST. PAUL.

WHEREAS, Interstate 35E is expected to serve as a vital traffic arterial between northern Dakota County and St. Paul; and

WHEREAS, the proper development of Interstate 35E as a freeway is needed in order to provide an adequate level of service for trucks and other vehicular traffic generated from within and outside the Metropolitan area; and

WHEREAS, improper development of Interstate 35E through St. Paul would have an adverse effect upon Interstate 35W and T.H. #3 (Lafayette Freeway); and A.

WHEREAS, Federal Interstate funding, which will end in 1983, appears to be an absolute necessity in order to complete Interstate 35E to downtown St. Paul,

NOW THEREFORE BE IT RESOLVED, that the City of Mendota Heights strongly supports the development of the segment of Interstate 35E under consideration as a freeway from T.H. #110 to Interstate #94 (Alternate "A" or "A-1" in the Draft Environmental Impact Statement), for the following reasons:

1. Only a continuous freeway would appear to provide an adequate level of service for trucks and other vehicles.

2. The entire route as a freeway would be eligible for 90/10 ratio Interstate funding and this would ease the funding burden placed upon the State of Minnesota.

3. Only a continuous Interstate 35E route through downtown St. Paul with connections both north and south to Interstate 35 would relieve traffic demands upon other major routes and permit them to function as planned and designed.

BE IT FURTHER RESOLVED that if an alternative, other than a continuous freeway route is adopted, the City of Mendota Heights urges the following provisions:

1. The design shall be generally consistent with Alternate "K" as illustrated in the Draft Environmental Impact Statement except that a direct connection shall be made to Interstate #94. Said connection would provide for a continuous route for small vehicles through downtown St. Paul and provide eligibility for 90/10 Interstate funding.

2. Any alternative shall also provide a specific funding commitment, by some government agency, to the Central Business District (CBD) by-pass and and short-line routes in order that truck traffic may be properly served if a continuous freeway route is not constructed as urged herein.

Adopted by the City Council of the City of Mendota Heights, this 18th day of August, 1981.

CITY COUNCIL
CITY OF MENDOTA HEIGHTS

By /s/ Robert G. Lockwood
Robert G.Lockwood
Mayor

ATTEST:

Kathleen M. Swanson
City Clerk

A. Neither Alternative A, A' nor K was chosen as the preferred alternative. For a discussion of the rationale used in choosing the preferred alternative, see Section II "Preferred Alternative" of this FEIS.

STATE OF MINNESOTA)

COUNTY OF DAKOTA)

CITY OF APPLE VALLEY)

I, the undersigned, being the duly qualified and acting Clerk of the City of Apple Valley, hereby certify that this is an exact and true copy of Resolution No. 1981-143 as adopted by the City Council of the City of Apple Valley on the 13th day of August, 1981.

WITNESS my hand officially as City Clerk this 17th day of August, 1981.

SEAL

Richard G. Asleson, City Clerk

CITY OF APPLE VALLEY
RESOLUTION NO. 1981-143

A RESOLUTION REGARDING DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR INTERSTATE 35E FROM T.H. 110 (DAKOTA COUNTY) TO INTERSTATE 94 NEAR DOWNTOWN ST. PAUL

WHEREAS, Interstate 35E is expected to serve as a vital traffic arterial between northern Dakota County and St. Paul, and

WHEREAS, the proper development of Interstate 35E as a freeway is needed in order to provide an adequate level of service for trucks and other vehicular traffic generated from within and outside the Metropolitan area, and

WHEREAS, improper development of Interstate 35E through St. Paul would have an adverse effect upon Interstate 35E and T.H. #3 (Lafayette Freeway), and

WHEREAS, Federal Interstate funding, which will end in 1983, appears to be an absolute necessity in order to complete Interstate 35E to downtown St. Paul;

NOW, THEREFORE, BE IT RESOLVED that the City of Apple Valley, Dakota County, Minnesota, strongly supports the development of the segment of Interstate 35E under consideration as a freeway from T.H. #110 to Interstate #94 (Alternative "A" or "A'" in the Draft Environmental Impact Statement), for the following reasons:

A.

1. Only a continuous freeway would appear to provide an adequate level of service for trucks and other vehicles.

2. The entire route as a freeway would be eligible for 90/10 ratio Interstate funding and this would ease the funding burden placed upon the State of Minnesota.

3. Only a continuous Interstate 35E route through downtown St. Paul with connections both north and south to Interstate 35 would relieve traffic demands upon other major routes and permit them to function as planned and designed.

ADOPTED this 13th day of August, 1981.

M. J. Garrison, Mayor

ATTEST:

Richard G. Asleson, City Clerk

A. A. Neither Alternative A nor A' was chosen as the preferred alternative. For the rationale used in choosing the preferred alternative, refer to Section II of this FEIS.

August 25, 1981

Mr. Richard Braun, Commissioner
Minnesota Department of Transportation
Transportation Building
St. Paul, Minnesota 55155

Re: Comments
Draft I35E Environmental Impact Statement

Dear Mr. Braun:

Enclosed is a certified copy of Resoltuion #2099 passed by the City Council at its regular meeting of August 17, 1981. The Council had before it the EIS and gave much consideration to the contents of this resolution. Please consider this resolution as Burnsville's official statement on the Draft Environmental Impact Statement. We understand that these comments will be entered into the hearing record.

The City of Burnsville is obviously affected by any decisions on 35E in St. Paul. This city has continuously cooperated with Mn/DOT, the Metropolitan Council and other agencies in the construction of 35E. We have done so by participation in past public hearings, always exhibiting our support both in the form of financial and moral support. We have consistently approved plans and worked with your staff towards the implementation of these plans.

This city was never officially included in the distribution of the Draft EIS. It only became involved because of the kind consideration of other communities in northern Dakota County. Therefore, we request that in the future, as the many decisions on 35E in St. Paul are made, that we be kept posted at all times. We feel the need to make appropriate comments as the planning process continues.

We look forward to your cooperation.

Sincerely,

CITY OF BURNSVILLE

C. A. Siggerud, P.E.
Director of Public Works

CAS:ak
cc: Senator Howard Knutson
Representative Charles Halberg
Mr. Ghaleb Abdul-Rahman, Metropolitan Council
Mr. William R. Lake, FHWA Division Administrator
Mr. Douglas H. Differt, District Engineer
Mr. Russell Streefland, Dakota County Commissioner
Mr. John Voss, Dakota County Commissioner
Mr. Richard Asleson, Apple Valley Administrator
Mr. Thomas Hedges, Eagan Administrator
Mr. Orvil Johnson, Mendota Heights Administrator

CITY OF BURNSVILLE, MINNESOTA

RESOLUTION NO. 2099

RESOLUTION REGARDING DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR INTERSTATE 35E FROM T.H. 110 (DAKOTA COUNTY) TO INTERSTATE 94 NEAR DOWNTOWN ST. PAUL

WHEREAS, the City Council of the City of Burnsville has reviewed the I35E Draft Environmental Impact Statement, and

WHEREAS, Interstate 35E traverses the City of Burnsville and is expected to be open to traffic in the fall of 1981, and

WHEREAS, Interstate 35E will serve as a vital traffic arterial between the City of Burnsville, northern Dakota County and St. Paul, and,

WHEREAS, the proper development of Interstate 35E as a freeway is needed in order to provide an adequate level of service for trucks and other vehicular traffic generated from within and outside the Metropolitan area, and

WHEREAS, improper development of Interstate 35E through St. Paul would have an adverse effect upon Interstate 35W and T.H. #3 (Lafayette Freeway), and

WHEREAS, Federal Interstate funding, which will end in 1983, appears to be an absolute necessity in order to complete Interstate 35E to downtown St. Paul, and

WHEREAS, the property needed for the construction of Interstate 35E in St. Paul is already owned and a significant amount of construction has already been completed;

A.

NOW THEREFORE, BE IT RESOLVED that the City of Burnsville strongly supports the development of the segment of Interstate 35E under consideration as a freeway from T.H. 110 to Interstate 94 (Alternative "A" or "A[1]" in the Draft Environmental Impact Statement), for the following reasons:

1. Only a continuous freeway would appear to provide an adequate level of service for trucks and other vehicles.
2. The entire route as a freeway would be eligible for 90/10 ratio Interstate funding and this would ease the funding burden placed upon the State of Minnesota.
3. Only a continuous Interstate 35E route through downtown St. Paul with connections both north and south to Interstate 35 would relieve traffic demands upon other major routes and permit them to function as planned and designed.

Duly passed and adopted by the City of Burnsville by their City Council on this 17th day of August, 1981.

Paul F. Scheunemann Mayor

ATTEST:

Leslie J. Anderson Clerk

(SEAL)

A. Neither Alternative A nor A' was chosen as the preferred alternative. For the rationale used in choosing the preferred alternative, refer to Section II of this FEIS.

CITY OF
SOUTH ST. PAUL

OFFICE OF CITY RECORDER-TREASURER
451-1387

125 THIRD AVENUE NORTH
SOUTH ST. PAUL, MINN. 55075

South St. Paul, Minnesota
September 8, 1981

Regular City Council meeting - Mayor Michelson presiding.
Five Councilmembers present. Absent, Councilmember Milbert, Wicks

---

Moved by Councilmember Baumann Seconded by Councilmember Buss

RESOLUTION REGARDING DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR INTERSTATE 35E FROM T.H. 110 (DAKOTA COUNTY) TO INTERSTATE 94 NEAR DOWNTOWN ST. PAUL

WHEREAS, Interstate 35E is expected to serve as a vital traffic arterial between northern Dakota County and St. Paul; and

WHEREAS, the proper development of Interstate 35E as a freeway is needed in order to provide an adequate level of service for trucks and other vehicular traffic generated from within and outside the Metropolitan area; and

WHEREAS, improper development of Interstate 35E through St. Paul would have an adverse effect upon Interstate 35W and T.H. #3 (Lafayette Freeway); and

WHEREAS, Federal Interstate funding, which will end in 1983, appears to be an absolute necessity in order to complete Interstate 35E to downtown St. Paul

BE IT THEREFORE RESOLVED that the City of South St. Paul strongly supports the development of the segment of Interstate 35E under construction as a freeway A. from T. H. #110 to Interstate #94 (Alternative "A" or "A'" in the Draft Environmental Impact Statement), for the following reasons:

1. Only a continuous freeway would appear to provide an adequate level of service for trucks and other vehicles.
2. The entire route as a freeway would be eligible for 90/10 ratio Interstate funding and this would ease the funding burden placed upon the State of Minnesota.
3. Only a continuous Interstate 35E route through downtown St. Paul with connections both north and south to Interstate 35 would relieve traffic demands upon other major routes and permit them to function as planned and designed.

Adopted by the City Council of South St. Paul, Minnesota this 8th day of September, 1981.

5 yeas
0 nays

/s/ Charles D. McDermott
City Recorder-Treasurer

/s/ Charles A. Michelson
Mayor

CERTIFICATION

I, Charles D. McDermott, City Recorder-Treasurer of the City of South St. Paul and keeper of the records thereof, do hereby certify that the foregoing is a true and correct copy of a resolution duly passed and adopted by the City Council at a regular meeting held September 8, 1981.

City Recorder-Treasurer

SEAL

A. Neither Alternative A nor A' was chosen as the preferred alternative. For the rationale used in choosing the preferred alternative, refer to Section II of this FEIS.

City of Inver Grove Heights
8650 COURTHOUSE BOULEVARD
INVER GROVE HEIGHTS, MINNESOTA 55075
(612) 457-2111

September 9, 1981

Mr. Charles Weaver, Chairman
Metropolitan Council
300 Metro Square Building
St. Paul, MN 55101

RE: Draft EIS, I-35E

Dear Mr. Weaver:

Attached is a copy of a resolution passed by the City Council of Inver Grove Heights with regards to the above cited document.

Please include said resolution in the public hearing record for the matter.

Sincerely yours,

CITY OF INVER GROVE HEIGHTS

Bill Meeker
Planner I

WM:mh
encl.

CITY OF INVER GROVE HEIGHTS
DAKOTA COUNTY, MINNESOTA
RESOLUTION NO. 2698

RESOLUTION REGARDING DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR INTERSTATE 35E FROM T.H. 110 (DAKOTA COUNTY) TO INTERSTATE 94 NEAR DOWNTOWN ST. PAUL

WHEREAS, Interstate 35E is expected to serve as a vital traffic arterial between northern Dakota County and St. Paul; and

WHEREAS, the proper development of Interstate 35E as a freeway is needed in order to provide an adequate level of service for trucks and other vehicular traffic generated from within and outside the Metropolitan area; and,

WHEREAS, improper development of Interstate 35E through St. Paul would have an adverse effect upon Interstate 35W and T.H. #3 (Lafayette Freeway); and,

WHEREAS, Federal Interstate funding, which will end in 1983, appears to be an absolute necessity in order to complete Interstate 35E to downtown St. Paul,

BE IT THEREFORE RESOLVED that the City of Inver Grove Heights strongly supports the development of the segment of Interstate 35E under consideration as a freeway from T.H. #110 to Interstate #94 (Alternative "A" or "A1" in the Draft Environmental Impact Statement), for the following reasons:

1. Only a continuous freeway would appear to provide an adequate level of service for trucks and other vehicles.
2. The entire route as a freeway would be eligible for 90/10 ratio Interstate funding and this would ease the funding burden placed upon the State of Minnesota.
3. Only continuous Interstate 35E route through downtown St. Paul with connections both north and south to Interstate 35 would relieve traffic demands upon other major routes and permit them to function as planned and designed.

BE IT FURTHER RESOLVED that if an alternative, other than a continuous freeway route is adopted, the City of Inver Grove Heights urges the following provisions:

1. The design shall be generally consistent with Alternative "K" as illustrated in the Draft Environmental Impact Statement except that a direct connection shall be made to Interstate #94. Said connection would provide for a continuous route for small vehicles through downtown St. Paul and provide eligibility for 90/10 Interstate funding.
2. Any alternative shall also provide a specific funding commitment, by some government agency, to the Central Business District (CBD) bypass and short-line routes in order that truck traffic may be properly served if a continuous freeway route is not constructed as urged herein.

Adopted by the City Council of Inver Grove Heights this 24 day of August, 1981.

Ayes: Newton, Teare, Henderson, Tatone, Saed
Nayes: None

Howard B. Newton, Mayor

ATTEST:

Charlotte M. O'Donnell
Interim City Clerk

A. Neither Alternative A, A' nor K was chosen as the preferred alternative. For a discussion of the rationale used in choosing the preferred alternative, see Section II "Preferred Alternative" of this FEIS.

A.

WHITE : CITY CLERK
PINK : FINANCE
CANARY : DEPARTMENT
BLUE : MAYOR

CITY OF SAINT PAUL

Council File NO. 277377

Council Resolution

Presented By

Referred To Committee: Date

Out of Committee By Date

WHEREAS, the completion of the I-35E link in St. Paul has been a long standing issue for the City, and

WHEREAS, the Minnesota State Legislature directed the Metropolitan Council to prepare an Environmental Impact Statement analyzing all options for I-35E, and

WHEREAS, the Metropolitan Council has completed and released the draft Environmental Impact Statement for public review and comment, and

WHEREAS, the St. Paul Planning Commission, after completing an evaluation of the alternatives studied in the draft Environmental Impact Statement involving three months of weekly open meetings, a public information meeting at St. Luke's School on July 20, 1981, and a public hearing on August 10, 1981, has recommended completior of I-35E in the form of a modification of Alternative J based on the following findings:

1. Completion of I-35E would provide overall a positive impact on the economic, social, and environmental quality of the City and would be generally supportive of the goals and policies of the City's Comprehensive Plan.

2. There would be no new significant land use or ecological impacts resulting from a roadway in the Pleasant Avenue Corridor.

3. A Shepard Road freeway alternative would result in significant environmental degradation to the Mississippi River floodplain.

4. A four lane parkway in the Pleasant Avenue Corridor would enhance access to the St. Paul CBD, thereby improving CBD economic development potential, reduce traffic on neighborhood arterials, and adequately accommodate forecasted travel demand.

5. There will be no violations of air quality standards resulting from a four lane parkway in the Pleasant Avenue Corridor.

6. Noise impacts of a roadway on the Pleasant Avenue Corridor can be signifcantly reduced by prohibiting trucks on a parkway and further, providing mitigating measures such as noise walls where appropriate; there would be no significant difference in noise impact between a direct connection or indirect connection of a parkway to I-94/I-35E north.

7. The parkway alternative on Pleasant Avenue would provide the most positive visual and aesthetic integration with adjacent residential areas and historic sites.

8. Continuity of the interstate system is both logical and highly desirable and could be achieved by a direct connection of the parkway to I-94/I-35E without significant negative impact on adjacent land use activities in terms of noise, air quality, aesthetic or any other environmental impacts.

9. An improved north-south arterial route between the Lexington Avenue bridge and the Midway area would be highly desirable to accommodate heavy travel demand but additional study should be undertaken to determine if the Short Line is appropriate for this purpose and if so, how the north end of the Short Line should be modified before any connection to I-35E is made or the present truck prohibition lifted.

10. To fully accommodate travel demands of the I-35E corridor, roadway improvements in addition to a Pleasant Avenue Parkway are vitally needed, including, modifications to the Common Section of I-94/I-35E, widening of the Jackson on-ramp to I-35E, modifications to Shepard Road to provide lane width regularity, protected left turn movement, and a safe Chestnut interchange, and construction of an East CBD Bypass.

WHEREAS, the St. Paul City Council has further evaluated the alternatives analyzed in the draft Environmental Impact Statement, findings and recommendations of the Planning Commission, and the comments received at a special public hearing on August 26, 1981, and

WHEREAS, the St. Paul City Council has concluded that completion of I-35E as recommended by the Planning Commission would be consistent with the City's adopted Comprehensive Plan and would provide an overall positive impact on the social, e conomic, and environmental character of the City, and

WHEREAS, the St. Paul City Council is cognizant of the strong travel demand between northern Dakota County and the Midway area of the City, but has also concluded that further analysis is necessary before any changes can be considered to the Short Line, said analysis to evaluate design options for the north end and access points along the roadway, traffic volumes and speeds, noise, air quality, aesthetic, and land use impacts, residential street impacts of forecasted non-local traffic, and impacts on pedestrian movement, and said analysis to propose mitigating measures for any negative impacts identified, now therefore be it A.

RESOLVED, that the St. Paul City Council supports the completion of I-35E as a modification of Alternative J, as herein described:

1. Construction of a four lane parkway in the Pleasant Avenue Corridor from West Seventh Street to downtown St. Paul including:

   a. prohibition of trucks;
   b. 45 mile per hour speed limit;
   c. a raised, landscaped median and roadsides;
   d. architecturally treated lighting;
   e. continuous pedestrian and bicycle paths to be located, where feasible, within the existing right-of-way;
   f. appropriately located and designed pedestrian crossings and noise mitigation measures;
   g. grade separated interchanges at Shepard Road, West 7th, Randolph, Victoria, St. Clair, Grand/Ramsey, Kellogg and a grade separated crossing at 5th/6th Street crossing, and the design of these intersections should be reviewed by the affected communities;
   h. direct connection from the Parkway to I-94 east and I-35E north;
   i. major modifications to the common section of I-94/I-35E to provide lane continuity and to eliminate weaving.

2. Widening of the Jackson Ramp from 11th Street to I-35E north.

3. Improvement of Shepard Road to standardize lane widths, and provide shoulders, protected left turns, and an upgraded intersection with Chestnut, and the design of this intersection should be reviewed by the affected community.

4. Construction of an East CBD Bypass to connect Shepard/Warner Road to I-35E at Arch/Pennsylvania.

5. Continuation of the truck prohibition on the Short Line and no connection of I-35E to the Short Line until further study has been completed and a satisfactory resolution of traffic problems at the north end has been determined by the City Council, and be it further

RESOLVED, that the St. Paul City Council requests that the Minnesota State Legislature adopt the appropriate legislation to permit completion of I-35E as herein described, and be it further

RESOLVED, that upon receipt of the final Environmental Impact Statement in 1982, and in the event that any new or significant information is introduced to the public review record of the draft EIS, the City Council will evaluate further its support of Alternative J as modified and described herein, and be it further

RESOLVED, that the Mayor and City Council hereby transmit this resolution to the Metropolitan Council, the Minnesota Department of Transportation, and the Federal Highway Administration, and the Ramsey County delegation to the Minnesota State Legislature.

COUNCILMEN

Yeas: Hunt, Levine, Maddox, McMahon, Showalter, Tedesco, Wilson — 6 In Favor

Nays — 1 Against

Adopted by Council: Date SEP 3 1981

Certified Passed by Council Secretary

By

Approved by Mayor: Date SEP 8 1981

By

Requested by Department of:

By

Form Approved by City Attorney

By

Approved by Mayor for Submission to Council

By

A. Alternative J was not selected as the preferred alternative. For a discussion of the rationale used in choosing the preferred alternative, see Section II of this FEIS.

Organizations and Groups

DCDC

DOWNTOWN COMMUNITY DEVELOPMENT COUNCIL
506 Endicott Building St. Paul, Minnesota 55101 (612) 221-0488

August 31, 1981

Mr. Gahleb Abdul-Rahman
Metropolitan Council
300 Metro Square Building
St. Paul, Minnesota

Dear Mr. Abdul-Rahman,

I am writing you concerning the I-35E/ Pleasant Avenue issue and alternatives.

The DCDC, District 17 Planning Council, is the officially recognized St. Paul citizen participation council for the Downtown and State Capitol areas. The DCDC regularly reviews district development plans calling for the use of public monies.

Concerning I-35E, the DCDC Board of Directors has discussed this issue in depth including review of the alternatives as well as the Environment Impact Statement. An excellent presentation was given by the City of St. Paul. Discussion centered around the EIS criteria, safety, and traffic flow. Alternative 'J' was also reviewed in depth.

After much discussion, a MOTION was passed that the DCDC support Alternative 'J' with the following revisions:

- that the Parkway have a direct connection to I-94;
- that the improvements to Shepard Road be implemented; and
- that the bike paths and amenities be maintained through State and/or Federal funding.

The DCDC also strongly endorses the construction of the East CBD (central business district) bypass. This constitutes the official position of the DCDC.

The following is the reasoning behind this position. First, it was felt that Eleventh and Twelfth Streets could not reasonably handle the additional traffic even if the Jackson Street ramp improvements are carried out; therefore, a direct connection would be best for traffic flow. The Police Department also agrees. Second, the East CBD bypass along with Shepard Road would serve as the truck route.

We request that you incorporate this position into all documents concerning this issue. Please feel free to contact us for further information. Thank you.

Sincerely,

Timothy Hilger
Chairman

GRAND AVENUE BUSINESS ASSOCIATION

2142 St. Anthony Av. Telephone 644-2948

SAINT PAUL, MINNESOTA 55104

August 20, 1981

Mr. Ghaleb Abdul Rahman
Transportation Planner
Metropolitan Council
S. 300
Metro Square Bldg.
St. Paul, Mn. 55101

Dear Mr. Abdul Rahman,

The Grand Avenue Business Association would like to go on record favoring a direct connection via the Pleasant Avenue Corridor between Interstate 35E and Interstate 94 in downtown St. Paul.

Sincerely,

Harvey Giese, President
GRAND AVENUE BUSINESS ASSN.

RICE DISTRICT MERCHANTS & PROFESSIONAL MEN'S ASS'N, INC.

CHARLES A. RAUSCHNOT, PRESIDENT

~~868 RICE STREET~~ ST. PAUL, MINNESOTA ~~55117~~-
7420 Stillwater Blvd. N. 55110

Clarence Torp, Honorary Life President
Stanley B. Pavel, Sec'y-Treas.

Affiliated with St. Paul Association of Commercial Clubs, Inc.

Sept. 15, 1981

To: The Metropolitan Council:Chaleb Abdul-Rahman,I-35E Project Mgr.

Rice District Merchants & Professional Men's Ass'n, Inc. urges the completion of I-35E Freeway Alternate A. through the City of St. Paul in the long standing Pleasant Ave. Corridor. We support Alternate A. Freeway for the following reasons:

1. Safety. Alt. A. the six lane freeway with direct connection to I-94 and I-35E to the North is the safest of all the twelve alternates. It is designed with restricted access and grade-separated interchanges. This is the safest of all highway designs.

2. Mobility. Alt. A. is the most efficient, from the standpoint of Metro mobility, because it provides the "greatest opportunity for mobility and unrestricted movement."

3. Economics. Alt. A. is the least costly when the Total cost of completing of I-35E Freeway Alternate A. through the City of St. Paul.

4. Alt. A. Freeway would be the safest route for trucks.

5. Threat of Lawsuits. Against Alt. A. six lane Freeway with a direct connection to I-94 and I-35E to the North should [illegible] to post a bond which could [illegible] of the loss of Federal[illegible], which was planned for this Freeway Which was to be built through the Pleasant Ave. Corridor known as Alt. A. six lane Freeway with a direct connection to I-94 and I-35E to the North

Sincerely,

Charles A. Rauschnot, Pres.

Sept. 15, 1981

To: The Metropolitan Council:Ghaleb Abdue-Rahman, I-35E Project Mgr.

Rice Area Citizens, Inc. urges the completion of I-35E Freeway Alternate A. through the City of St. Paul in the long standing Pleasant Ave. Corridor. We support alternate A Freeway for the following reasons:

1. Safety. Alt. A. the six lane Freeway with direct connection to I-94 and I-35E to the North is the safest of all the twelve alternates. It is designed with restriced access and grade-separated interchanges. This is the safest of all highway designs.

2. Mobility. Alt. A. is the most efficient, from the standpoint of Metro mobility, because it provides the "greatest opportunity for mobility and unrestricted movement."

3. Economics. Alt. A. is the least costly when the total of completing of I-35E Freeway Alternate A. throught the City of St. Paul.

4. Alt. A. Freeway would be the safest route for trucks.

5. Threat and Lawsuits. Against Alt. A. six lane freeway with a direct connection to I-94 and I-35E to the north should be required to Post a bond which could run into the millions of dollars, because of the loss of Federal money which was ear-marked for this Freeway; which was to be built through the Pleasant Ave. Corridor known as Alt. A. six lane Freeway with a direct connection to I-94 and I-35E to the North.

Sincerely,

Charles A. Rauschrot, Pres.

Sept. 10, 1981

To: The Metropolitan Council:Chaleb Abdul-Rahman,I-35E Project Mgr.

The Association of Commercial Clubs Inc. urges the completion of I-35E Freeway Alternate A. through the City of St. Paul in the long standing Pleasant Ave. Corridor. We support alternate A Freeway for the following reasons:

1. Safety. Alt. A. the six lane freeway with direct connection to I-94 and I-35E to the North is the safest of all the twelve alternates. It is designed with restricted access and grade-separated interchanges. This is the safest of all highway designs.

2. Mobility. Alt. A. is the most efficient, from the standpoint of Metro mobility, because it provides the "greatest opportunity for mobility and un restricted movement."

3. Economics. Alt. A. is the least costly when the total cost of completing of I-35E Freeway Alternate A. through the City of St. Paul

4. Alt. A. Freeway would be the safest route for trucks.

5. Threat of Lawsuits. Against Alt. A. six lane Freeway with a direct connection to I-94 and I-35E to the North should be required to Post a Bond which could run into the millions of dollars, because of the loss of Federal money, which was ear-marked for this Freeway: which was to be built through the Pleasant Ave. Corridor known as Alt. A. six lane Freeway with a direct connection to I-94 and I-35E to the North.

Sincerely,

Charles A. Rauschnot
Past Pres. of Assoc. of Com. Clubs

MINNESOTA TRANSPORT SERVICES ASSOCIATION

1821 UNIVERSITY AVENUE ST PAUL, MINNESOTA 55104 TELEPHONE AREA 5'2) 646-4075

Serving Minnesota's Local Cartage — Household Goods Moving — Short Haul Trucking — Public Warehousing and Related Industries

ABE ROSENTHAL
Executive Vice President
General Manager

September 28, 1981

Mr. Charles Weaver, Chairman
Metropolitan Council of the Twin
Cities Area
300 Metro Square Building
7th and Robert Street
St. Paul, MN 55101

Dear Mr. Weaver:

Subject: I-35E - Pleasant Avenue Corridor and Proposed Restrictions Against Use of St. Paul Roadway Constructed and Financed With Federal Highway Use Taxes

This letter is to inform you and your agency that Minnesota Transport Services Association believes that City of St. Paul proposal for completing a road from the Lexington bridge to I-94 in the City of St. Paul, Minnesota, would in our opinion violate federal law and the rights of the membership of our organization because it proposes the building of a "Parkway" with restrictions against use by trucks. A.

Minnesota Transport Services Association (MTSA) is a 45-year old trucking industry trade association of approximately 100 mostly family owned small business firms involved in "for hire" public transportation of freight and goods, public warehousing and associated industries who provide our trucking members with trucks, trailers, trucking equipment repairs and supplies, accounting, insurance, and other services.

MTSA trucking members provide public transportation of freight and goods ordered by Metro area manufacturers, wholesalers, retailers, and consumers. It is the demands of Metropolitan area (including St. Paul) citizens for efficient, economical, and safe movement of freight and goods that controls the movements of our trucks into, out of, and within St. Paul. In other words, MTSA trucking members are a public utility; that is, they do not own a single article they haul.

You don't have to be a transportation engineer, planner, or practitioner to know that the City of St. Paul truck routes are archaic, congested, unsafe, inefficient, and uneconomical and require immediate upgrading and expansion. (See MTSA Exhibit 1.)

It is imperative that the Metropolitan Council and the City of St. Paul respond at this time to trucking's need for safe, efficient, and economical truck routes on the Pleasant Avenue corridor. The City of St. Paul has severe motor vehicular traffic problems from a safety, energy use, air and noise pollution point of view throughout the city and particularly those streets located in the western and southern areas of St. Paul. (See MTSA Exhibits 2 and 3.)

A significant part of the safety, energy and efficiency problems is directly caused by the failure of our state to complete a vital segment of I-35E from the Lexington Bridge to I-94 near the downtown St. Paul area.

Recently the St. Paul City Council conducted hearings and recommended completion of the so-called Pleasant Avenue corridor as a "parkway" (restricted against use by trucks), directly connected to I-94. The Council failed to respond to the requirements of federal law concerning design and use of federally financed roadways and the imposition of a restriction against trucks use of the federally financed road. There is no provision in the draft environmental impact statement or the St. Paul plan for "equal roads" to serve the needs and requirements of freight and goods movement in St. Paul. (See attached letter from the Federal Highway Administration to the Highway Commissioner.)

According to 1979 data, approximately 56.4% of all federal and 39.3% of all state highway use taxes collected in Minnesota are paid by the trucking industry, and the roadway is being built with federal and state highway use tax dollars. (See MTSA Exhibit 4.) To date, at 1980 dollars an estimated $54 million has been spent.

Since no satisfactory alternative truck route to completion of I-35E as planned originally has been suggested in the draft environmental impact statement, we emphatically protest the efforts of certain city officials and anti-freeway partisans attempt to cloud this issue by claiming that building an East CBD Bypass and certain limited improvements of Shepard Road would provide a satisfactory alternative truck route. Their illusionary truck route even contains a claim that certain other street problems in St. Paul, such as "Sibley Street" truck traffic problems would be solved. This is simply not the fact.

A. Title 23, USC, Section 109(b) as amended by the Federal Aid Highway Act of 1981 limits interstate construction funding to "a pavement design to accommodate the types and volumes of traffic anticipated for the twenty-year period from date of authorization of the initial basic construction." This does not require that trucks be specifically provided for. For a discussion of alternate truck routes, see pages 62 to 79.

MTSA opposes these suggestions as being not responsive to federal law and to the area's needs. The trucking industry rights and privileges under federal law would be violated under these St. Paul recommendations which place a truck use restriction on the "Parkway" built with our highway use tax dollars. That is an intolerable situation to MTSA and the citizens of the entire metropolitan area including St. Paul who would have to suffer the ill effects of an unreasonable and illegal government act. A.

I am personally also a homeowner and real estate taxpayer residing within 3 1/2 blocks of the proposed road corridor. I personally therefore also have a citizen's interest in seeing the freeway completed to relieve the vehicle congestion on our western and southern area streets of St. Paul. We suffer every day with the traffic patterns actually used by trucking and motorists in our part of St. Paul. MTSA supports completion of the Alternative "A Freeway" on the Pleasant Avenue corridor. We have taken this position because of safety, economics, mobility, air and noise pollution, and funding considerations.

The six lane freeway, directly connected to I-94 and I-35E provides the safest design for the traffic needs of the area. Metro area mobility requires it because it provides the greatest opportunity for mobility and unrestricted movement of motorists and trucking.

This is the least costly approach if you include the <u>total</u> cost of completing any of the other alternatives.

This approach is totally funded on a 90-10 federal interstate funding approach, and there would be no funding problems for completing the Alternative "A Freeway." State and Federal funds have already been allocated to build it. There are no sources for the additional millions of dollars needed to upgrade Shepard Road and to build the easterly CBD bypass which must be built if Pleasant Avenue becomes a parkway. Any funding for this purpose cannot come from the 90-10 interstate sources, will have to come from 70-30 funding, and will require 3 times more state funds than Alternative "A Freeway" approach. B.

Recently Commissioner Richard Braun of Mn/DOT testified that Minnesota has an acute shortage of highway funds needed to maintain its road system. Any funding for upgrading Shepard Road and building the CBD bypass under the Parkway alternates will have to be found elsewhere and there is no revenue available to St. Paul or the Metro Council to fulfill this illusionary proposal. There will be no legislative support to fund the Parkway. We do not believe that our state legislature is willing to increase taxes so that millions of dollars can be allocated to build a Parkway for St. Paul. MTSA has hired Arnold Kempe to address the legal issues in the restrictions against truck use, and he will be writing you on the subjects. We believe that federal funds will be cut off from this project if the "Parkway" proposal with its deficiencies is ultimately approved by the State of Minnesota.

Safety and economics, energy use, air and noise pollution and funding, the all important issues in this matter, support completion of a freeway from the Lexington Avenue bridge to I-94. All other approach is destined to continue this dispute into the decade of the 1980's because action shall be taken to deprive St. Paul and the state, the federal funds allocated for this project.

Very truly yours,

MINNESOTA TRANSPORT SERVICES ASSOCIATION

Abe Rosenthal

Abe Rosenthal
Executive Vice President

mh

Attachment: September 19, 1975, letter from Dean Carlson, Division Administrator, FHWA, to Frank Marzitelli, Commissioner of Highways. C.

Exhibits:
1. St. Paul Truck Routes
2. St. Paul Traffic Counts - No. 1
3. St. Paul Traffic Counts - No. 2
4. Highway User Taxes - 1979 Data

Copies to:
Mr. Drew Lewis, Secretary of Transportation
Mr. Ray Barnhart, Jr., Federal Highway Administrator
Mr. William Lake, Division Administrator, Federal Highway Administration
Mr. Arnold Kempe, Kempe & Murphy Ltd.
Mayor George Latimer
Ms. Ruby Hunt, City Council Member
Mr. Leonard Levine, City Council Member
Mr. Ronald Maddox, City Council President
Mr. George McMahon, City Council Member
Ms. Joanne Showalter, City Council Member
Mr. Victor Tedesco, City Council Member
Mr. William Wilson, City Council Member
Commissioner Dick Braun, Minnesota Department of Transportation

B. The preferred alternative is eligible for Interstate funding for the provisions described in the cost section on page 31. The East CBD Bypass and improvements to Shepard Road are not a part of the preferred alternative. Funding sources for those projects will be determined if and when they are undertaken.

C. Attachments to this correspondence may be found in the I-35E DEIS public hearing record.

The Minnesota State Automobile Association
7 TRAVELERS TRAIL, BURNSVILLE, MINNESOTA 55337 • PHONE 890-2500 • AREA CODE 612 • CABLE ADDRESS: MINNAUTO

EDWARD M. PIERCE
President

ROUTING
Admin. ____
P. R. ✓
H. R. ____
CS/PIO ____

SEP 10 1981

For your information ____
Take appropriate action ✓
Please reply ____
Prepare reply for Chmn sig ____

September 4, 1981

Mr. Charles R. Weaver, Chairman
Metropolitan Council
300 Metro Square Building
Seventh Street and Robert Street
Saint Paul, Minnesota 55101

Dear Mr. Weaver:

The Minnesota State Automobile Association has been interested in the controversy surrounding the completion of I-35E in the Pleasant Avenue corridor in St. Paul for several years.

Initially, we favored the completion of that segment of the Interstate System as originally proposed and, in 1975, we participated as amicus curiae in a lawsuit brought in Ramsey County District Court as a part of that effort. Since that time, we have participated in the consideration of several alternatives.

We are satisfied that the years of delay and thousands of hours of public hearings have resulted in some acceptable options for the metropolitan area and the state of Minnesota.

The St. Paul City Council recently approved Option J by a vote of 6 to 1. Basically, Option J would provide for the completion of a parkway in the Pleasant Avenue corridor with a connecting link to I-94. It is our understanding that the Metropolitan Council will be considering this matter in the near future. We would ask that you give special consideration to Option J when this matter comes before you.

Two important factors in our decision to support this option are:

1) A connecting link with I-94 will allow an uninterrupted flow of traffic resulting in substantial energy savings.

2) The direct connection of the proposed packway with I-94 will provide a much safer thoroughfare than those options which would route the parkway onto St. Paul streets. National traffic safety statistics indicate that controlled access divided highways which terminate into city or residential streets are the most dangerous roadways in the nation.

We would ask your support in this matter.

Sincerely,

Edward M. Pierce
President

EMP:sab

Urban Council on Mobility

September 30, 1981

Mr. Ghaleb Abdul-Rahman
I-35E Project Manager
Metropolitan Council
300 Metro Square Building
St. Paul, Minnesota 55101

Re: Public Hearing
FHWA-MN-EIS-81-02-D
Federal Highway Administration - Region 5
I-35E from TH 110 in Dakota County, Minnesota
to I-94 near Downtown St. Paul, Minnesota

Dear Sir:

We have tolerated the delay in the completion of I-35E for over 26 years, and our patience is nearly exhausted.

In 1972, I-35E in the Pleasant Avenue Corridor [Alternative A, 6 lane freeway] was 75% completed, 90-95% of the right-of-way acquisition was completed, ten of the fifteen bridges were built at an investment cost of over $54,250,000 in 1980 dollars, and it has not produced a dime's worth of service to the taxpaying public during these ten years.

In 1972, this section of I-35E could have been completed for $12 million dollars. The cost of completing it now will exceed $50 million dollars, and it is presently costing us taxpayers from $1½ to $3 million dollars per month to delay this road. Unconcionable!

We support the Alternative A - 6 lane freeway for the following reasons:

1. Safety. Alt. A, the six lane freeway with a direct connection to I-94 and I-35E to the north is the safest of all the twelve alternates. It is designed with restricted access and grade-separated interchanges. This is the safest of all highway designs.

2. Mobility. Alt. A is the most efficient, from the standpoint of Metro mobility, because it provides the "greatest opportunity for mobility and unrestricted movement." (Page 18, I-35E DEIS)

3. Economics. Alt. A is the least costly when the total cost of completing any of the others is factored in -- even the attendent costs of the "no build" Alt. I.

These three facts are all that should be necessary for the proper decision to complete the freeway under Alt.A., but there are several subject matters in the DEIS that require comment:

A. Funding. Alt. A is totally funded by 90-10 interstate funding, and there are no funding problems for completing the Alt. A, I-35E Freeway. State and Federal funds have already been allocated to build it. Conversely, there are no identifiable sources for the additional $38 million dollars needed to upgrade Shepard Road [no costs were identified for this in the DEIS] and to build the easterly CBD by-pass which must be built if Pleasant Avenue becomes a parkway. Any funding for this purpose can not come from the 90-10 interstate sources, will have to come from 70-30 funding, and will require 3 times more state funds than Alt. A.

Minnesota has an acute shortage of highway funds needed to upgrade its inadequate and deteriorating secondary road system. Present highway revenues permit only the Patch & Repair levels of service. Any funding for upgrading Shepard Road and building the CBD by-pass under the parkway alternates will rob from these already limited funds. When the rest of the Metro area and the out-state areas are made aware of St. Paul's squandering its 90-10 legacy, and that St. Paul will be demanding millions of dollars from the acutely limited highway funds, there will be widespread support from legislators, other than the three from the Summit-Crocus Hill area, to remove the present legislative restrictions on the Alt. A Freeway, and conversely, there will be no support to create legislation needed to build the Parkway. We believe that no state legislator is willing to tell his or her constituents that their roads will have to wait so that $38 million dollars can be allocated to St. Paul's folly -- St. Paul which turned down a fully funded interstate freeway and is on record for a parkway with a direct connection. It will take corrective legislation to permit the direct connection. The only difference between St. Paul's choice and the freeway is that trucks will be permitted to travel on the freeway. We find it difficult to justify an expenditure of over $38 million dollars which would be required to build a special route for the trucks.

B. Legislation. Legislative action will be required before any of the alternatives, except the "no-build" Alt. I, can be built.

C. Air Pollution. The resultant traffic congestion inherent with all the alternates, except Alt. A, will cause the greatest air pollution. One car stop-and-go driving over the same distance that 12 cars travel at 50 mph will emit more pollution than all of the 12 cars combined.

A. See page 191 response B to correspondence from the Minnesota Transport Services Association.

B. The 1982 State Legislature amended M.S. 1980 161.12 and 161.1245 and authorized the Commissioner of Transportation to construct a parkway along the Pleasant Avenue corridor in St. Paul.

C. Traffic volumes, speeds, level (quality) of service and other factors were considered in the evaluation of air quality impacts. The implication that all alternatives other than Alternative A involve "traffic congestion" and "stop-and-go traffic" is not substantiated in the "Traffic Impacts" study conducted by Barton-Aschman Associates, Inc. Likewise, the assertion concerning acceptable air quality is at odds with the results of the "Air Quality Impact" study prepared by Environmental Research and Technology, Inc.

Noise. The DEIS devotes a great deal of space to state noise standards. All this is moot, for on May 14, 1981, H.F.1434 became law, and on Page 38 of that law it states: D.

"No standard adopted by any state agency for limiting levels of noise in terms of sound pressure in the outdoor atmosphere shall apply to any interstate highway."

Therefore, no state agency can set noise standards higher than the federal standards on freeways.

D. The Minnesota State Legislature exempted interstate highways from the MPCA Noise Standards, subsequent to preparation of the noise study. The effective date of the legislation was August 1, 1981. The FHWA Design Noise Levels address significant noise level increases and will be considered as proper criteria.

Landscaping. The section dealing with landscaping is quite misleading inasmuch as it portrays the freeway as a sterile concrete strip and the parkway as a beautifully landscaped green area with paths and trails along side of it. Any of the landscaping that could be done with the parkway can be done with the freeway, and that includes the paths and trails. E.

Short Line Road. The Short Line Road is a city street, funded by the city, and controlled by the city. It is in no way a part of the freeway system. We believe that the folks along the Short Line area have been mislead. The city can post the Short Line against truck traffic whether a parkway or a freeway is built, and if the city wants to discourage traffic on it, the city need only to post several stop signs along its route.

E. Freeways can be landscaped and can include paths and trails. More space would be available within the existing right-of-way with a four-lane roadway rather than a six-lane roadway. A parkway (no trucks) will have less noise impact than a freeway. Therefore, fewer and smaller scale noise barriers will be needed along the corridor allowing less visual intrusion to be experienced. Landscaping is an essential element of a parkway alternative, but an incidental of a freeway alternative.

Dangerous Design. The parkway indirect connection alternates would require at-grade, signalized intersections. This is the most dangerous of all highway designs. East/West traffic from the parkway would encumber the traffic on six North/South streets (St. Peter, Wabasha, Cedar, Minnesota, Robert, and Jackson). Eleven stop-and-go signals will be involved. At-grade intersections would be designed for 5th and 6th Streets also. The University and Snelling intersection would lose its dubious distinction of being the worst accident area in St. Paul. There are presently many lawsuits throughout the country whereby accident victims are suing the federal government and the states for building roads that are unsafe in design when a known safer road could have been built. The United States and Minnesota could be leaving itself wide open to multimillion dollar lawsuits, the cost of which, could be astronomical.

Weaving Movement Corrected. The Alt A. Freeway with the direct connection will correct the "weaving movement" of I-35E and I-94 in the "common section". The design for grade separating these two roads, by bridging one over the other, had been on the drawing boards and completed before the I-35E DEIS was finalized. No space in the DEIS was devoted to showing this design, and no mention was made relative to the greatly improved safety in the "common section" as a result of eliminating the present at-grade weaving by grade separating the two movements. F.

F. Common section improvements associated with a direct connection (and other I-94 improvements) will reduce weaving conflicts considerably. (A complete discussion of those improvements has been added on pages 105 - 106.) Through movements will not have to change lanes, and I-35E to I-94 movements and I-94 to I-35E movements will not have to cross (weave) in the common section with the proposed design improvements.

Interstate Funding Deadline. Drew Lewis, U.S. Secretary of Transportation, has made it clear that there will be no further extension of interstate funding programs. Any interstate program must meet the 1983 design approvaldeadline to be eligible for 90-10 funding. If the parkway alternate is built, and is proven to be wrong and/or inefficient, the 90-10 interstate dollars will no longer be available to correct the problem and to upgrade it to interstate standards. G.

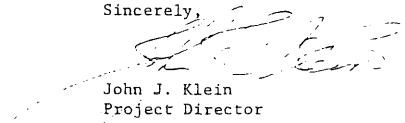
This freeway has been delayed by a small group of obstructionists who have since 1972 subjected this project to myths, misrepresentations, untruths, threats, mischievous use of well intentioned environmental laws, boogie man tactics, and pure unadulterated baloney. The I-35E DEIS has dispelled most of the above, but again they are puffing up their paper tiger and threatening lawsuits to stop the freeway -- even the parkway. We have been assured, and we are convinced, that every technical detail has been met by the Metro Council staff in the preparation of this DEIS. All the T's have been crossed, and all the i's have been dotted. Proper notices have been given, and the required meetings have been held. If this obstructionist group tries to get an injunction or a restraining order on this matter, we are convinced that they will be required to post a substantial bond in the multi-million dollar range. That should put an end to their nonsence. There is, however, one group that could have a legal basis for a lawsuit in this matter, and that is the trucking industry. If interstate funds are used for any of the alternates and no provision is made for truck traffic, this will be in violation of the law.

G. See page 191 response B to correspondence from the Minnesota Transport Services Association.

Four hundred years ago Lord Bacon told Queen Elizabeth I that there are three things that make a nation great: fertile soils, busy workshops with industrious people, and the easy conveyance of men and goods from place to place. It is in this "easy conveyance of people and goods from place to place" that America has excelled and far surpassed the rest of the world. Should not we in Minnesota learn from this and start doing everything we can in this respect for our workers and our businesses? We just might improve our business climate and save some lives and precious energy resources into the bargain.

LET US GET ON WITH THE COMPLETION OF ALL OF OUR LONG OVERDUE FREEWAYS!

Sincerely,



John J. Klein
Project Director

1181 Edgcumbe Road
#1402
St. Paul, Minnesota 55105
July 6, 1981

Mr. Ghaleb Abdul-Rahman
Metropolitan Council
Metro Square Building
Seventh and Robert Streets
St. Paul, Minnesota 55101

Dear Mr. Abdul-Rahman:

The Wilder Park Association has formally gone on record as opposed to utilization of the Short Line Road for the movement of heavy traffic, including trucks. Our position was stated in the June 12 letter of Wilder Park Association president, John Geisler.

The enclosed petitions, signed by 233 residents of the Wilder Park tower and town houses, further register our strong opposition to any change in the present use of the Short Line Road.

The vast majority of Wilder Park residents were home owners in the three neighborhood districts bordering Wilder Park prior to our move here, and the expectation was that our neighborhood environment would remain essentially the same. Indeed, it was that expectation which, to a great extent, attracted us to Wilder Park. The desirability of our 282 homes would be severely eroded if freeway traffic were routed along the Short Line Road.

We urge your rejection of any alternative which would change the essential character of this route and the adjacent areas.

Sincerely,

Evangeline S. Burton

Evangeline S. Burton

Enclosures:
Petitions
Resolution

WILDER PARK ASSOCIATION

Resolution unanimously adopted by the Board of Directors at their May 19, 1981 meeting.

WHEREAS Wilder Park is a model of a highly desirable residential complex which was created by the cooperative efforts of the City of St. Paul and the Wilder Foundation; and

WHEREAS this model residential facility provides excellent housing and a high quality of life for more than 400 tax-paying citizens of the City of St. Paul; and

WHEREAS this high quality of life would be seriously damaged if the Short Line Road were to be given a greater role in the movement of traffic than it now has; therefore,

BE IT RESOLVED by the Wilder Park Association that the Short Line Road should continue to be used as a route of moderate traffic volume; and

BE IT FURTHER RESOLVED that the Wilder Park Association strongly urges the Mayor of St. Paul, the St. Paul City Council, and the Metropolitan Council to reject any option for the Short Line Road which would substantially alter the present character of this route and of the adjacent areas.

A. A. Refer to the Commissioner of Transportation's correspondence of December 16, 1981, on page 14.

June 1981

PETITION

We, the undersigned residents of Wilder Park, do hereby petition the Mayor of St. Paul, the St. Paul City Council, and the Metropolitan Council to reject any options for the Short Line Road which would give it a greater role in the movement of traffic than it now has.

Name	Address
Rick Wiltgang	1137 Edgcumbe Road
Fred W. Wiltgang	1137 Edgcumbe Road
Gladys R. Wiltgang	1115 - Edgcumbe Rd
Craig J. Olson	1115 - Edgcumbe Rd
D. Thomas Olson	1133 EDGCUMBE RD
Helen M Gentz	1103 Edgcumbe Rd.
Christine Duelstar	1145 Edgcumbe Road
Dick Seaberg	1107 Edgcumbe Road
Ernest L. Lamson	1135 Edgcumbe Road
Charlene Lamson	1135 Edgcumbe Road
Hanna Kaufmann	1139 Edgcumbe Road
Peter Kaufmann	1139 Edgcumbe Road
Arlene Vizzi	1127 Edgcumbe Road
Peter D. Desombre	" " "
Irene Bonnemann	1149 Edgcumbe Rd
Patrice Brady	1152 Edgcumbe Rd.
Donna M Cronin	1157 Edgcumbe Rd.
Carole Howe	1163 Edgcumbe Rd.
Mr & Mrs Phillips	1147 Edgcumbe
Eleanor A Cunell	1147 Edgcumbe Rd.
Beverly N. Hamilton	1143 Edgcumbe Rd
Don Arnold	1169 Edgcumbe Rd
Rosalie Vonnemacher	1123 Edgcumbe Rd.
Vincent Vonnemacher	1123 Edgcumbe Rd.
Helen Coffey	1181 Edgcumbe Rd #412
Geadye Olson	1181 Edgcumbe Rd #415
Irene Maloney	1181 Edgcumbe Rd #415
Martha E Hoover	1181 Edgcumbe Rd #413
Helen Cowley	1181 Edgcumbe Rd #414
John S. Mantin	1181 Edgcumbe Rd #416
Robert G Hunter	863 Burr St. St Paul
Mary M Hunter	1181 Edgcumbe Rd #416
Bernard F Benecke	1181 Edgcumbe Rd apt 411
Charlotte Kaphingst	1181 Edgcumbe Rd apt 407
Olive A Koengel	1181 Edgcumbe Rd apt 410
Marjorie Vonda	1181 Edgcumbe apt 404
Charles B Parr	1181 Edgcumbe Rd apt 403
Irene Brandt	1181 Edgcumbe Rd apt 405

Frances MacDonald	1184 St. Clair Ave. St. Paul
Retha Creech	1180 St. Clair Ave. St. Paul
Richard F. Fasar	1168 St Clair St Paul
Lorraine C. Fasar	1168 St. Clair St Paul 55105
Joe Carchedi	1166 St Clair St Paul
Ann Carchedi	1166 St. Clair St. Paul
Thomas Carchedi	~~1382 Juliet Ave St Paul~~
Jerry Cherewatti	1164 St. Clair Ave, St. Paul
Stuart MacDonald	1154 SAINT CLAIR AVENUE, ST. P
Rudette C. Niemeyer	1186 St. Clair Avenue - St Paul
Arnold H. Niemeyer	1186 St Clair Ave.
Linda Johnson	1182 St Clair Ave St. Paul
Gary Johnson	1182 St. Clair Ave. St Paul
Kyle B Anderson	1181 Edgcumbe Rd, #1416, St Paul, Mn 55
Helen Lyons	1181 Edgcumbe Rd #1410 "
Frances F. Peyton	1181 Edgcumbe #1403
Evangeline L Burton	1181 Edgcumbe Rd #1402 - St. Paul
Betty Christenson	1181 Edgcumbe Rd 1415 " "
Robert S Christenson	1181 Edgcumbe Rd, 1415 " "
Catherine Reyter	1181 - Edgcumbe Rd #1403 - St Paul
Helen Paradise	1181 Edgcumbe Rd #1405 St Paul
Mildred Utter	1181 Edgcumbe Rd. #1207 " "
LaRue Hansen	1181 Edgcumbe Rd.
Marcia Soderholm	1181 Edgcumbe Rd
Richard L Henderson	1181 Edgcumbe #1411 690-3323
Mary E Henderson	1181 Edgcumbe #1411-690-3323
Joyce A Andrews	1181 Edgcumbe #1406 698-2586
Edna C Fondoy	1181 Edgcumbe #1406-698-2585
Virgie B. Lee	" " 1409 - 698-4324
Judith A Klein	1181 " #1412-699-0615
Theresa Huebener	1181 Edgcumbe 1414-698-6450
Richard L Hillstrom	1181 Edgcumbe Rd St Paul #14
Betty Agrand	1181 Edgcumbe Road Apt. 1202
Mr. & Mrs. Ray King	" 1201
Dorothy Samuelson	" " 1203
Hazel Hunday	" " 1205
Helen McGaughey	" " 1208
Gladys S. Brooks	" " 1209
Shirley M Helmer	" " 1212
Fred L Helmer	" " 1212
Doris M Sweeney	1-14
Rosemary O'Shaughnessy	" " 1210
Mary Trumbull	" " 1216

Virginia C. Kavanaugh	1181 Edgecumbe Rd #909	
Alan L. Livingston	1181 Edgecumbe Rd #915	
Edward H. Livingston	" " " #915	
Fred Mehler	1181 Edgecumbe Rd #905	
Mrs. Ida C. Wentworth	1181 " " #905	
Ralph Cooper	1181 " 715	
Mildred B. Reed	1181 " 902	
Edwin W Reed	1181 " 902	
Edna Fagerlie	1181 - Edgecumbe Rd # 916	
Janet Alford	1181 Edgecumbe Rd 1603	
L E Carothers	1181 Edgecumbe Rd #901	
C.H. Watson	1181 " " 901	
Ellen M. Melchior	1181 Edgecumbe Rd #914	
Kenneth Hopkins	1181 Edgecumbe Rd #916	
Virginia Adams	1181 Edgecumbe Rd #912	
Patricia M Johnson	1181 Edgecumbe Rd #911	
R.A. Johnson	" " " "	
Adline Dickson	1181 Edgecumbe Rd #906	
Calvin L. Dickson	1181 Edgecumbe Rd. #906	
Leo J Hurley	Apt 1610	
Ketha C. Wright	Apt 1614	
Harry McMahon	Apt. 1609	
Ruth M. Mahon	Apt 1609	
Vincent P. Cuttle	Apt 1607	Res
Emmett Mitchell	Apt 1615	1181 Edgecumbe
Pat Mitchell	Apt 1615	
Rosalie B McGrough	Apt. 1616	
Carla Khouri	Apt 1602	
Farid S Khouri	Apt. 1602	
Kenneth M. Greenwell	Apt 1617	
Mrs. Robert Otis	Apt 1605	
Robert K Otis	" "	
Gertrude Winters	Apt 1611	
Kenneth E McCluskey	1181 Edgecumbe Rd #110	
Eileen Schleiter	1181 " Rd 1107	
Freda McInery	1181 Edgecumbe Rd 1102	
Lazi C Kalmoe	" " " 1103	
Margaret A. Roberts	1181 Edgecumbe Rd - 1109	
Mildred P Benson	1181 Edgecumbe Rd 1110	
Arvin Flackerud	1181 Edgecumbe Rd 1112	
Hugo J Seeby	1181 Edgecumbe Rd 1114	
Myrtle Mattinson	1181 Edgecumbe Rd 1108	
Chas S Masten	1181 Edgecumbe Rd 1105	
Edna Martin	1181 Edgecumbe Rd 1105	

Melvin T. Becker	1181 Edgecumbe Road	1507
Leticia (Toy) Peifer	1181 Edgecumbe Rd	1508
Arthur J. Cinkus	" "	1509
Philip LaVelle	"	1512
George Lee Smith	"	1511
Geraldine R Smith	"	1511
Conrad Howard Burdessie	" "	1516
Vivian + John O Neal	" "	1505
Evelyn Mary Hancock	1181 Edgecumbe Rd	1501
Phyllis E Lee	1181 Edgecumbe Rd	1504
[illegible]	1181 " "	"
Cecilia M. Kostecki	1181 Edgecumbe	1510
Paul A Hamilton	1181 Edgecumbe Rd	1501
[illegible]	" " "	1503
[illegible]	1181 Edgecumbe Rd	Apt 8
Earl Wilfred Lund	" "	"
Genevieve Smith	1181 Edgecumbe Road	#803
Evelyn Lund	1181 Edgecumbe Rd	#805
C. F. Burke	1181 Edgecumbe Rd	#803
Adeline Burke	1181 Edgecumbe	808
Mary Costello	1181 Edgecumbe	802
Eugenie O'Connell	1181 Edgecumbe	811
Richard O'Connell	1181 Edgecumbe	811
Mrs. Dorothy P. Moore	" "	814
Harold Jordan	" "	816
Sadie N. Maskuck	1181 Edgecumbe	#301
Adaline Lieberman	1181 Edgecumbe	#302
		#303
Gertrude Puglisi	1181 Edgecumbe	#304
		#305
		#306
		#307
Betty Heisel	1181 Edgecumbe Rd	#308
Isabel Jack Bernstein	1181 Edgecumbe	#309
Rosemary Martin	" "	#310
Idele Ilse	" "	#312
Eugene A Roney	1181 "	#314
Thelma J. Roney	1181 "	314
Cecilia Sukeas	1181 "	#307
Dean H. Field	1181 " "	712
Blanche Field	1181 " "	712
Jerome H. Foley	1181 " "	708
Olivia Oman	1181 " "	713
Paul T. Burton	1181 " "	1716

Fred J Baker	1181 Edgecumbe Road #1008
Terry V Martin	Apt 1004, 1181 Edgecumbe Rd
Florence A Murphy	Apt 1007 1181 Edgecumbe Rd.
R.A. Schoonmaker	Apt 1012 1181 Edgecumbe Rd
Margo Schoonmaker	Apt 1012 1181 Edgecumbe Rd.
John Seham	Apt. 1011 1181 Edgecumbe Rd
Elsie Seham	Apt. 1011 1181 Edgecumbe Rd.
Katherine Martin	Apt 1001 1181 Edgecumbe Rd
Patricia M. Townsley	1181 Edgecumbe #202
Len Chickett	1181 Edgecumbe Rd #205
Phyllis M Chickett	1181 Edgecumbe Rd. #205
Francis E Boyd	1181 Edgecumbe Rd #212
Lester E Boyd	1181 Edgecumbe #212
Mabel A. Lindgren	1181 " " #208
Mr. & Mrs. Paramore	1181 Edgecumbe Rd #215
Ruth Faubert	1181 Edgecumbe Rd #216
John E. Bowes	1181 Edgecumbe Road - 601
Eleanor Kinunen	1181 Edgecumbe Rd. #6
Jane Lalancette	1181 Edgecumbe Rd #611
Mary H Pattee	1181 Edgecumbe Rd # 606
Wm R Swain	1181 Edgecumbe Rd # 603
E Chapeau	1181 Edgecumbe Rd #613
Jean & Wellington	1181 Edgecumbe Apt 607
Gloria MacRae	1181 Edgecumbe Apt. 610
Margaret Mahoney	1181 Edgecumbe Apt 614
Clarence Holland	1181 Edgecumbe Rd - St Paul 55105
Lucienne R Devombre	1181 Edgecumbe St Paul
Edward E Lamb	1181 Edgecumbe Rd St Paul
Eleanor Bowes	1181 Edgecumbe Rd.
Patrick T. Bowes	1181 Edgecumbe Rd.
Lucille La Fave	1181 Edgecumbe Rd
Laverne La Fave	1181 Edgecumbe Rd #503
Mrs Roland Fazio	1181 Edgecumbe Rd
Margaret McCarty	1181 Edgecumbe Rd.
Mr & Mrs James Buford	1181 Edgecumbe Rd.
Mr & Mrs D.T. Kennedy	1181 " 514
Mary Eggert	1181 Edgecumbe Rd 55105 1706
Betty Kostohryz	1181 Edgecumbe 1701
Don Kostohryz	1181 Edgecumbe 1701
Mary T Tolerson	" " 1705
Margie David Engesseth	" " 1706
Myrtle Mohr	" " 1714
[illegible]	" " 1703

Marion A. Belisle	1181 Edgcumbe #704 St. Paul Minn. 55105
Julia Breidenbach	1181 Edgcumbe Rd St Paul, Mn 55105
A. J. Briselli	1181 Edgcumbe Rd #716 St Paul Minn 5510
Marianne Brunschi	1181 Edgcumbe Rd #711 St Paul 55105
John N Lein	1181 Edgcumbe Rd #711 St Pa
Marie Nisti	1181 Edgcumbe Rd #71
Shirley Raynes	1202 St Clair Ave St Paul 55
Carol Baird	1202 St Clair Ave 5510
Virginia Mallum	1198 St. Clair Ave 55105
Marjorie E Jorgensen	1170 St Clair Ave 5510
[illegible] Dumouth	1181 Edgcumbe #101 Cit 55105
Margaret Hesselt	1181 Edgcumbe #102 Cit 55105
[illegible]	1181 Edgcumbe #[illegible] Cit 5510
Helen Sterling	1181 Edgcumbe #106 Cit 55105
Mrs. D. M. DeCosta Sr.	
Cindy [illegible]	1181 Edgcumbe #116 Cit 55105
Mary Whitman	1181 Edgcumbe 116 55105

JOHN E. DIEHL
ATTORNEY AT LAW
26 KENWOOD PARKWAY
SAINT PAUL, MINNESOTA 55105

OFFICE TELEPHONE
612-373-7641

HOME TELEPHONE
612-222-6175

September 1, 1981

Mr. Ghaleb Abdul-Rahmen
Metropolitan Council
300 Metro Square Building
St. Paul, Minnesota 55101

Dear Mr. Abdul-Rahmen:

R.I.P. 35-E has studied through a network of volunteers (most of whom have special expertise in the areas studied), almost all of the special studies, as well as the draft Environmental Impact Statement. This is to convey our comments on these documents.

Please note the following enclosed comment documents: General E.I.S.; Air; Aesthetics; Noise; Historic; and Land Use.

We would welcome an opportunity to discuss our views of the deficiencies in these studies.

Very truly yours,

Greg Filice

John E. Diehl

JED/hg

Enclosures

GENERAL/MISCELLANEOUS COMMENTS

Draft E.I.S.

I. First, we wish to reiterate the point that has already been made as a matter of record: Phase I of the E.I.S. project omitted certain identified alternatives for nonenvironmental reasons, which is improper. This presents a serious deficiency in the draft E.I.S. which cannot be corrected without reviewing the study to include those alternatives. Rather than setting forth our reasoning in detail, and citing the relevant statutes and court decisions, we hereby incorporate by reference our position statement, submitted at the time Phase I was completed. A.

II. In a similar vein, we submit that the alternatives that were studied create or reveal a bias in the entire study favoring construction in the Pleasant Avenue corridor. There are ten "alternatives" that involve construction in the Pleasant Avenue corridor, with only one other route (Shepard Road) and primarily only one design in that corridor (Alternative J also involves an "upgraded" Shepard Road, but that use still contemplates the use of the Pleasant Avenue Corridor). This approach preordained the outcome and is thus improper. B.

III. The E.I.S. and supporting special studies did not study the impact of on-ramps and off-ramps. It did not study the impact that vehicles travelling to and from the roadway would have on neighborhoods adjacent to the roadway. These are important elements of the overall impact of the project. Since they were not studied, a rational choice between alternatives cannot be made. C.

IV. When considering "parkway" alternatives, the study does not consider the possibility that motorists will be more likely to obey speed limits with some alternatives than with others. This is most important in considering the adverse effects and benefits of the means of connection of a Pleasant Avenue alternative to I-94 and I-35E to the north (direct or indirect connection). The indirect connection will slow motorists down, and traffic speed will be more like posted speed limits with an indirect connection. It may also help ensure that trucks do not use the roadway if they are prohibited. D.

A. As addressed on page 25 and 26 of the DEIS, seven potential I-35E corridors, reflecting the basic routing options for I-35E between the study termini, were identified in Phase I of the study.

The I-35E "Phase I Report" evaluated alternate corridors based on transportation needs and environmental criteria such as impact on metropolitan land use development, compatibility of alignment with existing and planned land use, and discouragement of through traffic in neighborhoods. The report concluded that only the Shepard Road and Pleasant Avenue corridors would meet these needs and criteria. (For further detail, see page 20 of the "Phase I Report.") In addition, the "Phase I Report" and the Draft Environmental Impact Statement by including the Shepard Road alternative went far beyond the August 1972 stipulated settlement to prepare an environmental impact statement on the segment of I-35E within the City of St. Paul, "between a point at West Seventh Street and a point at the junction of Interstate Highways 94 and existing 35E."

B. Variations among the Pleasant Avenue alternatives were developed in response to the concerns of government agencies and public input gathered during Phase I and Phase II of the study process.

C. Since all proposed interchanges are with important existing arterial city streets or roadways of a higher class, traffic to and from the facility will not use local neighborhood streets as the primary access route since other faster and more convenient arterial routes are available. Therefore, neighborhoods will not be disrupted by traffic "filtering" through the neighborhoods to access the main facility.

D. Traffic speeds during rush hours were calculated separately for each alternative and these were used in the impact analysis. Parkway alternatives with indirect connections generally exhibited higher speeds than the corresponding direct connection alternative, due to reduced traffic volumes. With an indirect connection, motorists would be forced to slow down, but this would not begin until a few thousand feet before the first intersection. There is no evidence to suggest that the existence of an indirect connection, by itself, would cause traffic to obey speed limits or otherwise slow down on the miles of roadway preceding the first at-grade intersection. The design speed of the parkway was 50 mph.

With a direct connection, the only difference between the interstates to the north and south and a Pleasant Avenue roadway will be shrubbery, trees, and a few speed limit signs. The roadbed was designed with 65 mph speeds in mind. Motorists travelling at interstate speeds as they enter the "parkway" (55 mph or faster) will not slow down.

The lower speeds with an indirect connection will markedly lower the noise impact on receptors near the roadway. Other adverse effects which are related to vehicle speed will also be less with an indirect connection. Since this was not considered, comparisons between the various alternatives are invalid.

The study does not consider the effect of other special measures to reduce speed.

V. The traffic volumes on a Parkway with a direct connection in the Pleasant Avenue corridor and a freeway in the corridor would be similar. Since the speeds would also be similar, the impact would be the same. The "Parkway" issue would be an artificial designation. Therefore, the adverse impacts would be similar in many respect such as with noise. This is not reflected in the E.I.S. analysis because, as mentioned above, differences in vehicle speeds depending on the type of connection were not considered. E.

VI. The draft E.I.S. has a further deficiency in its lost analyses in that they ignore the cost of acquiring the property in the Pleasant Avenue corridor. This value, at least reflecting the actual acquisition costs (if not current value), demolition and construction to date, is essential to any valid comparison between the use of this corridor and the Shepard Road corridor. F.

VII. Two separate elements were combined in Alternative "B": (1) a freeway in the Shepard Road corridor and, (2) trucks on the Short Line. The costs, effects and impacts of these elements are quite different. To combine them often masks the impacts of each element. For instance the noise impact of a Shepard Road freeway is not great because of the low number of receptors and high noise levels already present in the corridor. In contrast the noise impact of trucks in the Short Line is great. Since they were considered, the noise impacts tend to cancel each other out and the combination gets an average rating. This is misleading. The study should have studied these elements separately. G.

VIII. Many contradicting statements are present in the various documents. For instance, in many places the statement is made that the increased traffic with a direct connection will increase noise. In other places it says that doubling the amount of traffic will not change the amount of noise significantly. H.

IX. Similarly, if Shepard Road were chosen as the site for the road, the total cost of building in that corridor would not only be reduced by the savings from not revamping the "common section," it would also be reduced by the value of the property in the Pleasant Avenue corridor, which would be sold for development (See the Land Use study, pp. 131-133 which indicates 207 acres that could be developed). These omissions are serious deficiencies in the E.I.S. I.

X. Another deficiency relating to property value is the gross inconsistency found on page 168 of the draft E.I.S. There it is stated that "it is neither possible nor appropriate to quantitatively evaluate the potential property value impacts." The report goes on to say that many properties will suffer a decreased value, while other property, with improved access and mobility, would have higher value. The "study" then concludes, "These benefits far outweigh the number of dwellings adversely affected by noise and aesthetics." J.

This statement is an outrage.

Within St. Paul, for instance, we can see virtually no properties that will be benefitted, and without an ability to quantify the damage to property, it cannot be said that the benefits, presumably to suburban areas, outweigh the detriment.

A further deficiency is exposed by this crude statement. This erroneous line of thought implies that there is a relatively small, finite number of properties that will suffer reduced value. The study is deficient in not analyzing the broad effects through the Historic Districts and the neighborhoods, and the fact that much of the prime property (that supports the values in the entire region) are the properties closest to the corridor.

E. The traffic volumes in the Pleasant Avenue corridor are different between alternatives, as indicated by Screenline 4. Therefore, since speeds were based on the volume/capacity ratio, the speeds are different as well. In any event, noise on the parkway would be less than on a freeway due to the prohibition of trucks.

F. The cost estimate presented in the DEIS was considered adequate for the intended level of detail at the location/design stage of the project. The updated cost of completing a parkway in the Pleasant Avenue corridor can be found on page 31.

G. Alternative B has not been selected as the preferred alternative and is no longer under consideration. However, if I-35E was not built in the Pleasant Avenue corridor, few trucks would use the Short Line because there would be no connection to the Short Line constructed.

H. These statements are not contradictory; a doubling of traffic may not cause a significant noise impact depending on what the existing ambient noise levels are.

I. The cost of improving the common section was not included in the cost estimate for the Shepard Road freeway alternative. Please refer to Table 1, page 37 of the DEIS. The present value of the Pleasant Avenue corridor property was considerd in the corridor selection (see Note 5, page 37 of the DEIS). Also, the environmental impacts of the Shepard Road corridor were a major factor in the decision.

Land use development potentials were calculated for the build versus the no-build project alternatives and are compared on pages 177-179 of the DEIS. This gives an indication of what development could potentially occur if the Pleasant Avenue corridor were not selected for construction of I-35E.

J. This section has been revised as shown on pages 80 to 84 of the FEIS.

XI. Legal Standards

The legal standards governing the final decisions in this project require that the Commissioner's decision be reasonable in light of all the alternatives; the Commissioner cannot go against the plain evidence of the impact statement; he cannot proceed when the E.I.S. is deficient on its face (such as in this case, where the study indicates there is no difference in noise impact with double the traffic volume with a direct connection versus an indirect connection); and, when one alternative is superior, the burden is on the Commissioner in justifying the selection of a lesser (more damaging) alternative. No project can go forward so long as there is a feasible, prudent alternative.

Comments on Air Quality Impacts of Proposed I-35E Project

in Saint Paul, Minnesota Special Study

I. Grossly inadequate monitoring of pollutants along the three study corridors was done. Previous data were available only for two sites anywhere near the corridors: 754 Randolph Street and 10th and Minnesota Streets. Even at these sites, data are not available for all pollutants known to be affected by motor vehicles. For ozone, the nearest site for which data are available is Roseville, Minnesota. As a part of the EIS, three more sites were studied, but only for carbon monoxide. Therefore, extrapolations and assumptions about present and future conditions in the corridor are tenuous. A.

Since readings in the corridors were made only during a one month period, the variation with season is unknown. The effects of various meteorological conditions can only be guessed at.

More extensive readings in the corridors should have been made, and all motor vehicle generated pollutants should have been measured. Since violations of standards have been documented in recent years in the Twin Cities for total suspended particulates, lead, ozone, and carbon monoxide, this is not merely an academic exercise. There may presently be unrecognized sites of pollution along the corridors.

II. A model was used to predict future pollution. Too many variables on which the model depends were not stated. For example, on pages 54-55, freeway and ramp speeds, traffic volumes and turning movements, and signalization data are not given. B.

III. Local geology and how it might effect buildup of pollutants was not considered. For instance, an earlier study of the Pleasant Avenue Corridor[1] found that the area in between United Hospitals and the bluff to the west frequently experiences stagnation of air. Carbon monoxide levels of 30 parts per million were predicted. This is far above safe levels for healthy individuals and farther above safe levels for persons with heart or lung disease. Since hospitals care for sick people, some of whom have problems with oxygen delivery to tissues, these issues are of critical importance. This problem of air stagnation at this site was not even addressed by this document. C.

Instead of using regional data on air movements, the study should have extensively measured air movements in this and similar microenvironments in the three corridors. Another potential trouble spot is near the intersection of the PleasantAvenue Corridor and the Short Line Corridor where bluffs create a pocket that might have inadequate "ventilation."

The study itself remarks that "marked local variation exists within corridors," but no attempt is made to measure the variation.

Before a rational choice of corridors or alternatives can be made, microenvironments along the corridors should be studied thoroughly. Measurements of air movement patterns and efficiencies should give a clear picture of diurnal variation, seasonal variations, variations with different meteorological conditions, and variations between weekdays and weekends.

IV. The study assumes that the Federal Motor Vehicle Emission Control Program (FMVECP) will continue on schedule. The present federal administration has indicated it would like to delay implementation and/or relax standards. Therefore, the assumptions underlying the predictions of this study are in jeopardy. A choice between corridors and alternatives should not be made based on the assumption that FMVECP will continue as scheduled. D.

This point is expecially important for carbon monoxide which is near or above legal limits now. The conclusion that a roadway will not contribute to violations of standards is based on reductions in carbon monoxide emissions as predicted by the FMVECP.

V. It appears as if the probability that traffic will be faster on a parkway with a direct connection as opposed to an indirect connection was not considered in this analysis. This is inappropriate. E.

VI. The study states that "all sites are treated as open (non-street canyon)." As stated above, there are several sites along the Pleasant Avenue Corridor and the Short Line Corridor that are like canyons, either from the local terrain or from a combination of the terrain and man-made structures. Therefore this configurational assumption is invalid. F.

A. The effect of the project on regional ozone would be negligible; therefore, monitoring of this pollutant for the project study would be irrelevant. Although CO monitoring was performed for only one month, meteorological adjustment factors were conservatively applied to account for worst case conditions. Adjustment factors for future conditions (accounting for both growth and per vehicle emission reductions) were incorporated. In view of this, we feel that the monitoring performed adequately and conservatively reflected the air quality situation along the corridors and that additional monitoring is not warranted.

B. Presentation of such data is not normally part of an EIS and would not normally facilitate the choice of the best alternative.

C. The critical air quality parameter in assessing the absolute and relative impacts of the proposed alternatives is worst case (highest eight-hour) CO, which is obtained from modeling which automatically incorporates worst case meteorological condition (including a near-stagnation wind speed of 1.0 m/sec. or 2.2 mph). Therefore, the additional analytical work suggested, while quite extensive in scope, would not provide any additional information in evaluating this parameter. (For further discussion of the effect of local topography on the air quality analysis, see pages 42 to 44. For further information on the effects of air pollution levels on high-risk populations, see pages 39 to 41.)

D. Although the possibility of legislative changes or delays in this area cannot be ruled out, it must be recognized that the FMVECP is the only available analytical tool for predicting future vehicular emissions. This is an accepted and approved EPA procedure.

E. Traffic speeds were estimated on the basis of standard analytical methods, which incorporate such factors as traffic volume, mix, roadway type and geometry, and other factors related to level of service.

F. For an explanation of the effects of local topography on air quality analysis, see pages 42 to 46.

VII. Nitrogen dioxide was measured with a technique which is of questionable reliability and which is not an "established" EPA technique. An alternative cannot rationally be chosen until accurate data on nitrogen dioxide are gathered with an "established" EPA technique or one that is generally accepted as either equivalent or better than "established" EPA techniques. G.

VIII. The special study on historic sites did not consider the harmful effects of air pollution on important structures. Nor did the study on the urban environment consider the effect of air pollutants on structures not of historic importance like individual residences. The study on historic sites stated that these effects would be considered in the study on air quality. However, this was not addressed in the study on air quality. It should be before an alternative is chosen. H.

Reference:

1. [illegible]

G. Measurement of nitrogen dioxide was not determined to be necessary for alternative selection. There is a negligible variation in the regional burden impact of this pollutant among all alternatives (including the no-build).

H. This information has been included on pages **46 to 48** of this FEIS.

AIR POLLUTION IMPACT

HEALTH CARE FACILITIES

STATEMENT TO THE MINNESOTA LEGISLATURE

THIS IS TO BACKGROUND THE AIR, NOISE AND VIBRATION PROBLEMS THAT A FREEWAY WILL CAUSE FOR THE AFFECTED INSTITUTIONS.

IT NEEDS TO BE EMPHASIZED THAT THE HOSPITALS OBJECTED VIGOROUSLY IN 1956 BUT WERE PUT OFF BY THE MINNESOTA HIGHWAY DEPARTMENT WITH ASSURANCES THAT THEY WOULD BE PROTECTED FROM THE FREEWAY. AS DOUBTS AROSE, FURTHER INQUIRIES WERE PUT ASIDE BY TOO GLIB ASSURANCES. IN SEPTEMBER OF 1975, THE UNITED HOSPITALS SENT A RESOLUTION CONTAINING THEIR STANDARDS FOR NOISE, AIR QUALITY, AND VIBRATIONS TO THE MINNESOTA HIGHWAY DEPARTMENT WITH A REQUEST TO RESPOND WITHIN 60 DAYS STATING WHETHER OR NOT THE DEPARTMENT COULD COMPLY. THERE IS STILL NO SATISFACTORY ANSWER.

WE DO HAVE SUBSTANTIAL EVIDENCE OF THE DAMAGE THAT THIS WOULD CAUSE, NOTWITHSTANDING THE HIGHWAY DEPARTMENT'S LACK OF RESPONSE.

1. DR. HAROLD PAULUS, PROFESSOR OF ENVIRONMENTAL STUDIES AT THE UNIVERSITY OF MINNESOTA CONDUCTED AND EIGHT (8) MONTH, ON-SITE METEOROLOGICAL AND AIR QUALITY STUDY IN THE CORRIDOR IN QUESTION. THE CENTRAL PROBLEM THAT HE FOUND RELATES TO THE UNUSUAL TOPOGRAPHY OF THAT AREA. THE PROPOSED FREEWAY IS WALLED ON ONE SIDE BY THE BLUFF, AND ON THE OTHER SIDE BY THE HOSPITAL, CREATING A DEAD AIR SPACE WHICH HOLDS THE POLLUTED IN A NEARLY STATIONARY CONDITION. THE HOSPITAL'S AIR INTAKES THEN DRAW THIS CONTAMINATED AIR INTO IT'S AIR CONDITIONING SYSTEM. DR. PAULUS SAID THAT ACCEPTABLE HOSPITAL STANDARDS (FOR AIR POLLUTION IN THE HOSPITAL) OF 9 PARTS PER MILLION PER ONE HOUR AVERAGE AND 15 PARTS PER MILLION MAXIMUM, WOULD BE FREQUENTLY AND SERIOUSLY VIOLATED WITH CARBON MONOXIDE LEVELS RISING TO MORE THAN 30 PARTS PER MILLION. METEORLOGICAL STUDIES SHOW THAT ON A TYPICAL DAY, WIND VELOCITY OF 25 MILES/HOUR WOULD BE RECORDED AT THE KSTP TOWER, WHILE AT THE SAME TIME THE WIND VELOCITY AT THE BASE OF THE BLUFF WOULD BE 3 MPH, WHICH WOULD BE INADEQUATE TO CLEAR THE AIR IN THE AREA. A.

2. DR. ARTHUR FROM, DIRECTOR OF THE CARDIAC CARE UNIT AT THE UNIVERSITY OF MINNESOTA HOSPITALS WARNS THAT DR. PAULUS' FINDINGS NEED TO BE GIVEN SERIOUS CONSIDERATION BECAUSE OF THE UNIQUE AFFINITY OF CARBON MONOXIDE FOR THE BLOOD'S HEMOGLOBIN. THE AFFINITY OF CARBON MONOXIDE IS 250 TIMES GREATER THAN OXYGEN'S AFFINITY FOR HEMOGLOBIN. BECAUSE CARDIO-RESPIRATORY PATIENTS ARE OFTEN IN PRECARIOUS BALANCE VIS-A-VIS BLOOD AND OXYGEN, THE HOSPITAL'S STANDARDS FOR AIR QUALITY CAN BE A MATTER OF LIFE AND DEATH. THEIR STANDARDS CANNOT BE A MATTER OF "NEGOTIATION," COMPROMISE, OR ENGINEERING EXPERIMENTATION.

3. THAT PART OF ST. PAUL THAT LIES IN THE MISSISSIPPI RIVER VALLEY IS SUBJECT TO FREQUENT PERIODS OF THERMAL INVERSION WITH VARYING HOURS, DAILY, OF AIR STAGNATION. THERMAL INVERSIONS ARE NATURALLY CONDUCIVE TO THE ACCUMULATION OF AIR POLLUTANTS. THIS CAN BE NEARLY A DAILY OCCURANCE DURING THE SUMMER MONTHS. B.

POLLUTION CONTROL AGENCY PERSONNEL TESTIFIED BEFORE THE I.S.C. THAT THE HOSPITAL'S LOCATION IMMEDIATELY ADJACENT TO THE LOOP IS AN IMPORTANT FACTOR REGARDING CARBON MONOXIDE POLLUTION. CATALYTIC CONVERTERS WHICH CUT DOWN ON CARBON MONOXIDE EMMISSIONS ARE NOT OPERATIVE UNTIL CAR ENGINES ARE WARMED UP, WHICH MINIMIZES THEIR EFFECT IN COMMUTER, SHORT TRIP TRAFFIC.

A. Refer to the air quality analysis on pages 32 to 46 of this EIS and to the "Air Quality Impacts Report," Appendix C of the DEIS. MnDOT will also be applying for an Indirect Source Permit for this project as noted in response C below.

B. See comment A on page 139. The air quality analysis included such vehicle engine conditions as the length of time that the engine had been runnning (warmed up).

C.

4. THE MINNESOTA HIGHWAY DEPARTMENT HAS NO AIR QUALITY STUDIES "THEY WOULD CARE TO SIGN" IN THE WORDS OF ONE OF THEIR REPRESENTATIVES. THE I.S.C. WAS UNWILLING TO ACCEPT DR. PAULUS' TESTIMONY. ONE OF THE COMMITTEE MEMBERS SUGGESTED TO THE HIGHWAY DEPARTMENT REPRESENTATIVE "MAYBE ONE YOU COULD INITIAL WOULD DO. WE ARE NOT TOO PARTICULAR." THIS CAVALIER ATTITUDE IS AN OUTRAGE.

5. DR. PAUL VERAKLASEN, A NATIONALLY RESPECTED CONSULTANT FOR THE UNITED HOSPITALS, WHO HAS COOPERATED FULLY WITH THE MINNESOTA HEALTH DEPARTMENT TO HELP THE HOSPITALS ADJUST TO THE IMPACT OF NOISE HAS STATED, "IN MY 25 YEARS OF CONSULTING EXPERIENCE, THIS IS THE WORST SITUATION I HAVE SEEN REGARDING THE IMPACT OF VEHICULAR TRAFFIC ON 'SENSITIVE' INSTITUTIONS."

D.

THE NOISE LEVEL WILL BE SEVERE, ACCORDING TO DR. VERAKLASEN, EVEN IF TRUCKS ARE PROHIBITED. THE HOSPITALS ON ONE SIDE OF THE ROADWAY AND THE BLUFF ON THE OTHER CREATE AN ECHO CHAMBER. THE ONLY WAY TO PROTECT THE HOSPITALS FROM THE NOISE WOULD BE TO BUILD A WALL NEARLY AS HIGH AS THE BLUFF. CURRENT PLANS CALL FOR A 14 FOOT WALL. THE HOSPITAL FLOORS ABOVE THAT LEVEL WILL BE EXPOSED TO THE FREEWAY NOISE AS IT REBOUNDS FROM THE BLUFF. TRIPLE GLAZING OF THE WINDOWS OF THE HOSPITAL WILL PROVIDE SOME PROTECTION.

THE HOSPITAL STANDARDS FOR NOISE INCLUDE:

MAXIMUM LEVEL OF NOISE FROM HIGHWAY, AT ANY WINDOW SURFACE, SHALL NOT EXCEED 70 DBA;

AT THE MAIN ENTRANCE, SHALL NOT EXCEED 65 DBA;

IN OUTDOOR REST AND RECREATION AREAS USED BY PATIENTS, SHALL NOT EXCEED 55 DBA; AND

WITHIN THE HOSPITAL BUILDINGS, SHALL NOT EXCEED 45 DBA.

THE OPINION OF P.C.A. STAFF AT THE I.S.C. MEETING AT WHICH THEY APPEARED WAS THAT THE HOSPITALS AND THE HIGHWAY COULD NOT OCCUPY THE SAME CORRIDOR.

NOISE AT THE ROADWAY LEVEL CAN BE PREDICTED TO BE FROM 77 TO 82 DBA WITH OCCASIONAL LEVELS OF 92 DBA. THE UNITED HOSPITAL COMPLEX IS A MAJOR INVESTMENT FOR THE CITIZENS OF ST. PAUL. . . IT WILL BE IN THE NEIGHBORHOOD OF $70 MILLION WHEN IT IS OPERATIONAL . . . AND THE THREAT TO THAT FACILITY DOES NOT SEEM REASONABLE GIVEN THE FACT OF AVAILABLE ALTERNATIVES, WHICH ARE MUCH MORE EASILY IMPLEMENTED.

CITIZENS OF ST. PAUL HAVE HOPES FOR THE ESTABLISHMENT OF A FOUR HOSPITAL COMPLEX IN A QUIET CAMPUS WHICH WILL BE AESTHETICALLY PLEASING AND CONDUCIVE TO MAXIMUM DEVELOPMENT AS ST. PAUL'S MAJOR PRIVATE HEALTH CARE FACILITY.

THE PROPOSED ROAD WILL THREATEN THAT OBJECTIVE.

MS. SUE PAYNE
APRIL, 1978

C. MnDOT prepares project air quality reports for many highway projects. These are normally sent out to reviewing agencies and the public before the DEIS is prepared. The air quality reports are prepared for project air quality permits (indirect source) from the MPCA and for their approval. The procedures used in this submittal are approved by the EPA and MPCA.

D. For further information, see the noise analysis on pages 50 to 52 of this FEIS, and refer to the "Preliminary Noise Analysis," Appendix D of the DEIS.

Preliminary Noise Analysis Report

There are several major deficiencies of the noise analysis.

I. The study begins by saying that it is a preliminary report. "This preliminary report represents only an initial step in the investigation of probable noise impacts (and abatement measures, and it isnot based on detailed design plans.)" A rational choise of alternatives cannot be made based on such a preliminary analysis. The study says that detailed analysis and consideration of noise abatement measures would be done after a choice is made. This means that a choice is going to be made based in incomplete data. What should be done is that detailed complete analyses should be done before an alternative is chosen. If necessary, this could be based on assumptions about design and abatement possibilities. A.

II. There are many problems with the methodology of the study.

A. The method of study was to measure ambient noise levels in limited sites along the corridors, to use models of highway noise to predict added noise from the roadway, and to mathematically predict future noise levels when the roadway is present. This ignores the effects of local geological features such as the extensive bluffs along Pleasant Avenue. For instance, noise projected north from the roadway may be reflected south by the bluffs and compound the impact of noise on neighborhoods to the south. B.

What should have been done is the following:

1) Noise should have been generated from the roadbed to approximate highway noise
2) Levels of sound should have been recorded at many sites in the corridor to measure the increase in noise that might be expected from a roadway.

B. The study states that an elevated roadway has less noise impact than an at grade roadway. This is not due to receptors located on hills above the roadway as exist in the Pleasant Avenue corridor. Added to this is the fact that no natural features such as structures or vegetation will buffer those receptors from noise impact. C.

C. When mitigation of noise was considered, the fact that many receptors are located above the roadbed was not considered. Since sound received by these receptors will be travelling upward from the roadway and laterally (figure 1), mitigation devices will not be able to work, will be less effective, or will have to be higher. They may not be feasible to build them high enough to mitigate the sound. If so, the assumption which underlies the study that mitigation could reduce noise by 12 dBA is invalid.

D. Another problem that may arise when receptors are a roadbed is that noise barriers on the side of the roadway opposite the receptor may reflect noise moving away from the hill back towards the hill. (Figure 1) This was not considered in the noise study. D.

A. The noise study scope of work was patterned after that successfully employed for similar highway projects in Minnesota. The scope of work was approved by the FHWA, Metropolitan Council and MnDOT. A choice of comparison of alternatives is obtainable from the data presented and noise abatement generally noted.

B. The FHWA requires the use of an approved highway noise prediction model. The DEIS results were based upon the use of such a model. For an explanation of the influence of bluff reflection on noise levels, see page 61 of this FEIS. (There are also several methodological problems with the postulated physical source approach such as: 1) developing suitable individual sound sources representative of traffic noise in terms of directivity, spectrum shape and amplitude, 2) the number of such sources required to represent a "line source" of traffic could also present issues of set up and calibration logistics as well as cost.)

C. The DEIS acknowledges that there may be instances where use of barriers may be impractical. Figure 14 on page 95 shows those locations which the MnDOT design team considers use of barriers effective and necessary in reducing future traffic noise. Factors such as relative elevation of the roadbed and receptors are included in the MnDOT detailed studies. The figure referred to in this comment represents a hypothetical, non-representative situation. The actual geometrical relationships between the roadway, noise barriers, bluff and receptors vary along the Pleasant Avenue corridor. For example: 1) the distance between the roadway centerline and the top of the bluff ranges from 550 feet at Linwood Park to 300 feet at the United Hospitals complex, 2) the height of the bluff is approximately 110 feet, and 3) most receptors are not on the edge of the bluff, but have a setback from the edge. The effect of these factors actually provides some noise reduction. See Figure 5 on page 53 and Table 8 on page 55 for noise levels in these areas. Further analysis indicates that applicable noise standards will not be violated even without barriers.

D. The detailed design of any barrier does include considerations such as reflection. The use of a line view source rather than a point source is a truer representation of traffic noise. This is because vehicles along the length of the facility contribute to noise. This is why accepted procedures all use a line source approach.

E. When studying ambient noise, times of monitoring were arbitrarily chosen. No attempt was made to determine what times of day were associated with maximum noise. This leads to two problems.

1) To the extent that noise measurement at the arbitrary time is less than the noise at the noisiest time, the study will underestimate present noise and future noise.

2) One purpose of the study was to compare impact at different sites. If one site was studied during its noisiest time and another was not, the data collected at the two sites cannot be properly compared. Since it was not known how the readings compare or relate to the maxima, valid comparisons between sites cannot be made.

Ambient noise levels along the corridor vary substantially throughout the day and night. There are presently almost no "urban" sounds at night or on weekends in some locations through most of the night. In contrast, noise from a roadway will have less severe swings from maxima to minima. Therefore, the relative impact of roadway noise will be greatest when background noise is at its minimum. (Figure 2)

The study should have monitored typical sites on a 24-hour basis to define these relationships. To ignore the times (indeed, not even know the times) when the ambient noise levels are at their minima is to underestimate the impact of the roadway.

The study did not separately assess the impact of noise for weekdays and weekends. Ambient noise in the city is less on weekends and more people are home during the day. The impact of a roadway is likely to be greater on weekends and more people will be effected. This was not addressed in the study.

Similarly, the differences in present and future noise levels in different seasons were not studied.

F. The study does not say explicitly what assumptions were made about highway speeds. Apparently, it was assumed motorists would travel at posted speeds. This is unlikely to be the case with alternatives with a direct connection to I-94. Since the only difference between interstate to the north and south of the Parkway and the parkway itself would be a few trees and speed limit signs. Motorists will travel faster on a directly connected parkway than an indirectly connected parkway if the posted speed limits are the same. This will increase noise. Therefore, all comparisons between noise impact of directly and indirectly connected alternatives are invalid.

G. The study has further inadequacies in the number and location of study sites. Receptors for noise impact were few in number. There were only 8 along the Pleasant Avenue corridor and 20 in all corridors. Night time measurements were only made at 3 along the Pleasant Avenue corridor and 2 at other sites. The daytime receptors were separated by large distances. There were no receptors for 1.8 miles in the middle of the Pleasant Avenue Corridor.

H. Although the study states that receptors were placed at the location closest to the roadway for each impact site, this was not the case for at least some sites. For instance, the receptor for area 7 was 550 feet away. In area 7c, houses are much closer to the roadway than that along Grove Street, Crocus Place, and Crocus Hill. Area 8, 8a, and 8b have the same problem in that homes on Grand Avenue near Summit are only about 150 feet from the road but the study claims the nearest structure is 400 feet away. Since the center of the roadway was chosen for study, the effect of noise on on and off ramps which may be substantially closer to neighborhoods is ignored.

I. Alternative B includes allowing trucks on the short line. No support is given for this combination. The noise impact of trucks on the Short Line is high. The impact of the Shepard Road Freeway is low. These tend to cancel each other out and tend to mask the impacts of each part of the combination. The separate parts should have been studied separately.

III. The special study on the impacts on historic sites and districts was thorough in identifying such sensitive areas, but did not assess any impacts, apparently leaving that to the separate studies, such as this one on noise.

Accordingly, to be complete, this study should have separately assessed the noise impact from the prespective of the historic points. This was not done.

E. The type of program suggested by the reviewer is neither required by regulatory agencies nor necessary to determine noise impacts of a proposed highway. In predicting noise levels and assessing noise impacts, the Federal-Aid Highway Program Manual, Transmittal 282, October 9, 1978, Vo. 7., CH. 7, Sec. 3, item b) was employed. (FHWA has since adopted less stringent regulations to replace FHPM 7-7-3.) See pages 50 to 51 for further discussion of the noise methodology.

F. As noted in item 2 on page 50, speed was determined on the basis of traffic volume and roadway conditions.

G. Refer to response C to the September 1, 1981 correspondence from EPA Region V.

Noise levels were predicted for all sections of the corridor; however, because homogenous land use types are found along the corridor, only limited areas for measurement were needed to represent the area. Further sampling would not bring forth any new information. See pages 50 to 51 for further discussion of the noise monitoring program.

H. Alternative B is no longer under consideration as a project alternative.

I. There are no specific noise standards which apply to historic properties. In applying noise standards to such properties, their specific use was considered. See also Table 9 on page 56.

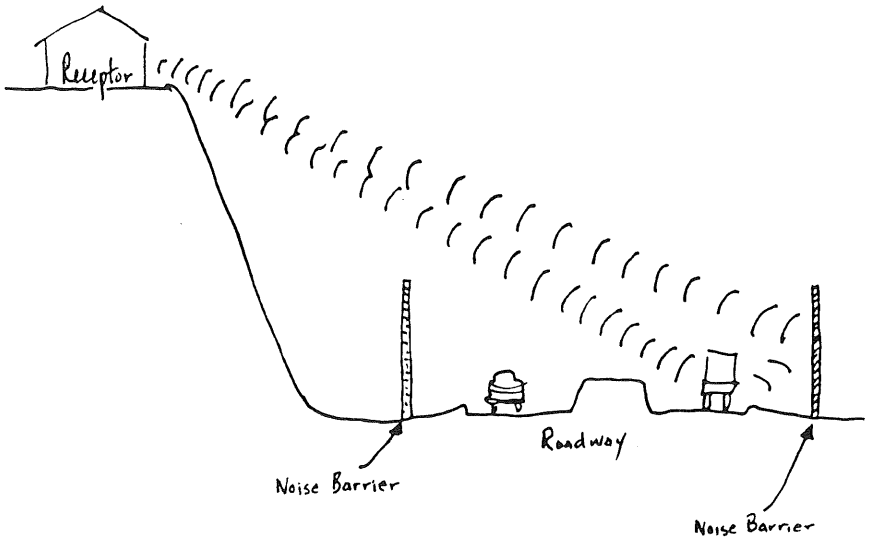
IV. The results of the noise study contain some incongruous data and conclusions. Among them are the following. J.

A. In several tables, the study leaves the impression that there will be no additional noise attributable to the roadway at receptors 400-500 feet from the roadway. This implies that one would not be able to hear the cars. (Of Table 4, receptor 6 and receptor 7 are parkway alternatives.) In some cases, the Parkway will reduce ambient noise (if Table 4, receptor 6 and alternative J and K) along the corridor. This is not compatible with common sense and leaves the model open to question.

B. Text figure 2 (page 3 of report) states that typical sound of heavy traffic at 300 feet registers 59 dBA. Alternate C which is a parkway is projected to generate more than 60-69 dBA 50% of the time at locations 150 to 1000 feet from the roadway. This means that the roadway will generate up to 10 times more noise than the example of heavy traffic given in the text figure. However, the reports' discussion states that the impact will be minimal. These data are not compatible. If the test figure is correct, the noise from the roadway will be very distracting and not compatible with psychological health.

V. Quality of noise was not addressed specifically in this report. Present sounds may have a dBA level that is not far from the dBA level of a planned roadway but they may be desirable or neutral. Roadway noise is undesirable for most people. For instance, night noise along the Pleasant Avenue Corridor during the summer consists almost entirely of crickets chirping. Even if highway noise won't be much louder, it will be much more of an intrusion. K.

Figure 1



Noise barriers between a bluff and the roadway may be too low to mitigate noise. Noise barriers on the opposite side of a roadway from a bluff may reflect noise up to the bluff and add to the impact of highway noise.

J. The following points respond to comments IV A and B.

- At some receptors 400-500 feet from the roadway, there may not be any increase in noise level due to the proposed roadway. There are several means in which this condition can be achieved:

  1. If local traffic is present, it may dominate parkway produced noise (as at receptor 6, for example). Predicted traffic noise levels in Table 4 do not include contributions from local streets.

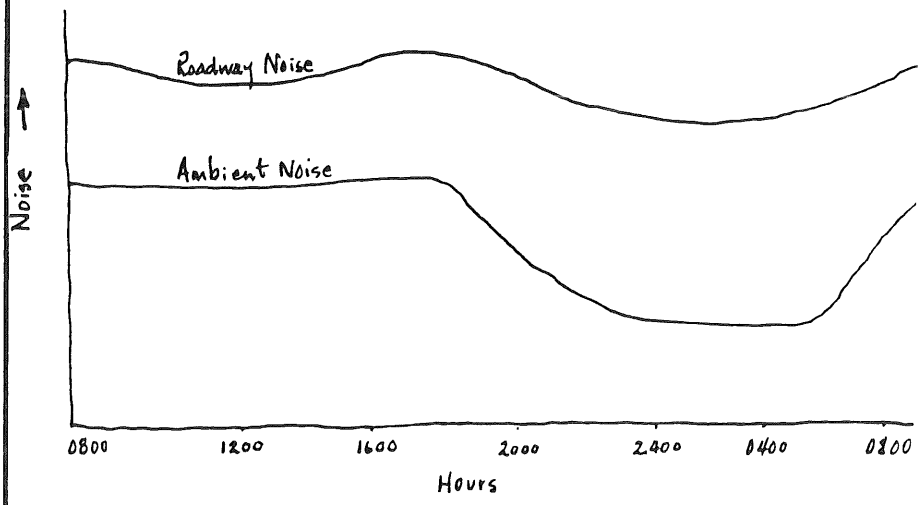
  2. If barriers are employed, it is possible that there will be instances in which highway noise is reduced to levels below existing local street produced noise levels.

- As noted in the PNAR and on page 36, peak hour traffic conditions were employed to predict future noise levels. For this reason, the statement that certain noise levels exist for ". . . 50% of the time . . ." is incorrect. The correct interpretation is ". . . 50% of the peak hour..." At other times, noise levels will be lower.

- The use of text Figure 2 (from the PNAR) to judge noise impact is not appropriate and out of context. In the PNAR, Figure 2 (which presents noise levels for a variety of typical sources of noise), was intended to help orient the reader to different noise levels. The PNAR clearly notes that noise impact is based upon comparing predicted noise levels with existing noise levels and the FHWA Design Noise Levels.

K. The PNAR contains a discussion of the various factors determining noise impact. In particular, the concept of the "A" frequency weighting scale is discussed in relationship to the human ear. While the report does not specifically explore the subject of noise quality, exclusive use of the "A" scale for prediction of future levels is employed. Furthermore, the FHWA Design Guideline noise levels were developed on the basis of a traffic noise spectrum. Thus, the quality of traffic noise, and its relationship to noise impact is implicitly accounted for in the FHWA Design Guidelines. Individual perception of noise can vary among different people.

Figure 2



A comparison of fluctuactions of roadway noise and ambient noise in a hypothetical case. The proportional additional impact of roadway noise is greatest between 2200 and 0600 when ambient noise is at its lowest level. This results from the fact that ambient noise has greater variations than does roadway noise. To study the impact of noise at other times, such as during the day underestimates the maximum intrusion of the roadway into the environment.

Historic Sites Assessment Report

I. The study is an extensive and complete cataloguing of sites although some extensive landmarks are mentioned only briefly such as the Summit Hill Historic District. A.

II. The study treats direct impacts fairly well but it is only a preliminary analysis. For example the report states that the design of the road and excavation and construction near the James J. Hill House may have severe impacts. It states that the final design plans should be made in such a way as to not adversely affect this site and other sites. However, the choice of alternatives is supposed to be based on these considerations. It is not known if one alternative may have unavoidable adverse impacts that another alternative may not have. B.

III. Indirect impacts are not adequately assessed. The impact of a roadway on sites near but not directly in the right of way are not discussed. For instance, the roadway may cause such adverse impact that residents will not keep up houses near the corridor or they may leave them. The quality of the several historic sites and districts along the corridor may deteriorate because of the presence of the road. The various alternatives may differ in this regard. These questions should be addressed. C.

IV. The study is deficient in its failure to take adequate account of the so-called street scape of the historic districts, and especially the Victorian Promenade, Summit Avenue from the Cathedral to Ramsey Hill (and points west). This is not only a part of the historic district, it is the only such street in America to be preserved, and the properties on this street will be directly affected by the road facility directly below these properties to the east. D.

A. Upon reviewing the Historic Sites Assessment Report, the State Historic Preservation Office made recommendations as to the historic significance of the sites inventoried. Depending on their significance, impacts to these sites were subsequently documented in further detail in the DEIS and the Preliminary Case Report on Historic Properties/Draft 4(f) Supplement.

B. The development process for this project does not normally include detailed design features for the various alternatives to be available at the time the Historic Sites Assessment Report is drafted. All parkway alternatives have similar impacts regardless of whether a direct or indirect connection is built. Unavoidable adverse impacts to significant historic properties are discussed in further detail in the Preliminary Case Report/Draft 4(f) Supplement required under Section 106 of the National Historic Preservation Act, and in Sections III-E and V of this FEIS.

C. Indirect impacts to historic properties were addressed in greater detail in the DEIS, the Preliminary Case Report on Historic Properties/Draft 4(f) Supplement, and are included in Sections III-E and V of this FEIS.

D. The Summit Avenue streetscape was analyzed in preparation of the Urban Landscape/Aesthetic Analysis. It was found that there were no significant aesthetic impacts to the streetscape as there is limited view of the proposed facility from this area of Summit Avenue. Therefore, it required no further study.

Urban Landscape/Aesthetic Analysis Special Study

There are several major deficiencies in this study and analysis.

I. The study ignores the obvious differences between the present environments in the two corridors that were studied. (Other possible corridors were ignored.) One (Pleasant Avenue) courses through several desirable, well-developed, in-town neighborhoods from West Seventh Street to Grand Avenue and then through an equally well-developed and desirable downtown neighborhood with residences and other institutions, including a large hospital complex. The other (Shepard Road) course through industrial areas, railroad yards, and empty space. If the overall picture is taken into account, it clearly would be desirable to try and find some feasible alternative in the Shepard Road Corridor. Instead, 10 alternatives all primarily in the Pleasant Avenue Corridor were studied and only one in the Shepard Road Corridor. The few residential areas along the Shepard Road corridor are already in industrial areas and already have some undesirable views. The study points out that the roadway that was stuided in that corridor might be unsightly but it failed to consider that this is essentially like what presently exists. In contrast, a major roadway is very different from what exists in the Pleasant Avenue Corridor and its impact would be much worse because of the contrast. A.

II. Only one alternative in one alignment was considered in the Shepard Road Corridor. This is not in the present alignment of Shepard Road for unstated reasons and this increases cost. It is a freeway and not a parkway again for unstated reasons. This increases its cost and adverse environmental impact. The comparison between this single choice and between 10 different alternatives in the Pleasant Avenue Corrodor is based in favor of a choice of a Pleasant Avenue alternative. Much more desirable alternatives in the Shepard Road Corridor could have been studied. It is as if the worst possible example of a Shepard Road Corridor choice was used for comparison with all the Pleasant Avenue choices. In effect the only corridor that was studied in depth was Pleasant Avenue. This did not appear to be for environmental reasons. B.

Why the alignment of the Shepard Road alternative has to be near Irvine Park is unexplained. This also increases the adverse impact. The study does not state why with a little imagination an improved road could not be built in the existing right-of-way. C.

III. The study discusses the impact of roadways in Pleasant Avenue in the context of the grading and construction that has already taken place. It should discuss the positive and negative affects of changing thegrade. For instance, a below grade roadway is in general less harmful to the environment in an aesthetic sense and because of muffling of noise. The impact of covering the whole roadway below grade should have been discussed, but it was not. D.

IV. The study ignores the unsightliness of noise barriers which may have to be erected to mitigate excess noise (see noise study). Since these are likely to be necessary their impact on the aesthetics should have been taken into account. E.

V. Finally, the report fails to educate the reader relative to alternatives. None of the findings or the aesthetic impact describe the advantages of the no-build alternative in general, or of the alternative of not building the elevated roadway in the vicinity of Ramsey Hill, the Pleasant Hill Nursing Home, Irvine Condominiums and United Childrens Hospitals. An elevated roadway would be ruinous to the aesthetics of the area, and the study is deficient in its failure to study alternatives to this. F.

A. The Urban Landscape/Aesthetic Analysis Special Study examined the Pleasant Avenue and Shepard Road corridors' land use characteristics and visual qualities. Sections including Inventory of Public Facilities, Views of the Road and Views from the Road described each corridor's individual characteristics. Mitigation was recommended according to visual impact intensity, location and surrounding land use.

B. See response to comment B of the John Diehl correspondence dated September 1, 1981, on page 202.

C. The unique location of the Shepard Road corridor in the Mississippi River floodplain adjacent to the river bluff presented severe limitations for roadway design.

D. Views of the Road and Mitigation sections of the Urban Landscape/Aesthetic Analysis Special Study describe the existing depressed portions of alignment. Covering the roadway was dismissed as not being cost effective.

E. The need for noise abatement had not been established during preparation of the Urban Landscape/Aesthetics Analysis. Noise wall visual impact is contingent upon wall location, height, construction material and treatment. MnDOT solicits public participation and comment on noise wall design and location as a part of its project development process.

F. The Pleasant Avenue corridor alignment between Ramsey Hill and United Hospitals will be generally depressed below the existing Pleasant Avenue elevation. Ramsey Avenue and Grand Avenue will pass over the mainline via structure.

The aesthetic impact of the no-build alternative is closely related to the scale of the proposed development as compared to that of the adjacent neighborhood. The proposed land use concept under the no-build alternative, as discussed in the "Land Use Report," Appendix P of the DEIS, would vary proposed housing density to remain somewhat consistent with nearby housing. Public open space would occur intermittently throughout the corridor.

Land Use

The study on land use stipulates that the primary land use effects of all alternatives except "B" have already taken place due to prior freeway construction. It then details unavoidable land use effects of various alternatives in 21 different categories. Mitigation measures are outlined for most impacts, however, for many of them the mitigation is:

> Provide roadway realighment and design modifications to the extent possible. Conduct required mitigation studies.[1]

This indicates that the ultimate impact is unknown, and is therefore not measurable in the EIS. It is conceivable that supposed mitigating measures will have a negative effect on other areas such as noise, air pollution, and aesthetics. A.

The detailed short and long-term negative and positive effects attempt to downplay the impact on the immediate area of the freeway, by contending that they are overshadowed by the long-term positive effects for the metropolitan area as a whole!

We question the short list of negative effects on "Man's Environment." The list should be greatly expanded, and considered in juxtaposition with the alleged postitive effects. For example, the long-term effects (Land Use,; p. 13) do not include the noise, pollution, aesthetic, or economic impact on the areas surrounding the Pleasant Avenue Corridor. B.

To offset those negative effects, with positive effects such as enhanced accessibility for residents of northern Dakota County, or new tax bas and enhanced growth potential in Dakota County, is to make a value judgment that we dispute. C.

We do not accept the implication that potential development in suburban areas is somehow more valuable than preserving the pleasant nature of existing neighborhoods in the inner city.

---

[1] Mitigation measures for items 14, 15, 16, 17, 18,, 19, 20, 21, Land Use, Special Study p 12.

A. The project development process did not allow for the development of detailed mitigation measures at the time the Land Use Special Study was drafted. Impacts of possible mitigation measures are considered prior to their selection. Refer to pages 93 to 107 for proposed mitigation measures.

B. The Land Use Special Study primarily addresses local government development plans and policies, assesses each alternative's growth inducing potential, and evaluates their consistency with local plans. Other special studies prepared for this project address the issues of noise, aesthetics, economic impacts and other specific impacts.

C. This statement fails to recognize that the long-term positive impacts cited in the Land Use Special Study apply to the City of St. Paul as well as to Dakota County. Accessibility improvement provided by a regional facility includes enabling residents of the area served by the facility to travel to regional opportunities (i.e., work, recreation, and shopping) more quickly and easily, thus enlarging the range of options open to them.

A Criticism of the

PRELIMINARY NOISE ANALYSIS REPORT

When a citizen's groups concerns itself with a topic such as the construction of a major highway through its residential neighborhood, the citizens themselves are not presumed to have the technical background to initiate engineering or socialogical studies, but rather, the citizens are expected to comment on and criticize the reports of the so-called experts which the government has employed.

In the summer of 1972, members of R.I.P.-35E (Residents in Protest over 35E) were permitted to examine the raw files of the Minnesota Higway Department (MNDOT) at its headquarters in downtown St. Paul. Among the many documents was the following:

FROM: U.S. Dept. of Transportation

TO: Mr. M.T. Walder
Commissioner of Highways April 8, 1971

The construction of this portion of Interstate 35E will result in a substantial increase in the ambient noise level in the general area. Due to the existence of two hospitals adjacent to the planned alignment, this additional noise should be a significant factor for design consideration.

(Signed) John S. Bowers
Engineering Coordinator for
W.W. Fryhofer, Div. Eng'r

As a result of this forthright statement, a $4,000 study was made by a Minneapolis based consulting firm who in turned hired a professor from the University of Minnesota who was a noise expert.

Howard Needles Tammen & Bergendoff
6750 France Ave. So.
Minneapolis, Minnesota

Attn: Mr. Richard D. Beckman September 8, 1971

Tentatively, St. Luke's Hospital, Childrens Hospital and the Lindsey and Jefferson Schools have been identified as possible sensitive impact sites by the Highway Department. Observe also that there are a large number of community residences within several hundred feet of the proposed roadway. The noise impact zone sometimes extends out as far as 500 feet from the center line, depending on roadway elevation. Generally speaking community residences have less protection against outside noises than say hospitals because they are not well sealed and may or may not be air conditioned. In most situations that I am aware of in the Twin Cities area the great impact of freeway noises has been on community residences. Therefore, I think we would be remiss if at least one community residence noise study was not conducted.

(Signed) Prof. Lambert

So ten years ago to this month, the Minnesota Highway Department knew that this particular corridor required a special noise study focused on community residences.

This was not the end of Prof. Lambert's correspondence with the consulting firm. He wrote (in part):

> Howard Needles Tammen & Bergendoff
> 6750 France Ave. So.
> Minneapolis, Minnesota
>
> Attn: Mr. Richard D. Beckman October 5, 1971
>
> .... By the way, a newspaper reporter called me about I-35E noise and asked if the roadway was to be depressed. I confessed ignorance about the whole situation and said nothing about the matter to him. I did offer to talk about depressed roadway configurations in general from a noise reduction viewpoint. Apparently, some word had gotten to him about I-35E so I am wondering about the situation. Frankly, I think the less said the better at this point in time.
>
> (Signed) Prof. Lambert (1)

The noise cover-up has begun. Here in print we have the first indications that the highway department and its hired consultants know how disruptive freeway noises are to the surrounding communities and the department of highways will suppress this information rather than release it to the press.

On March 1, 1973, members of R.I.P. 35-E and experts from Artronics, Inc., St. Paul, recorded the sounds along Interestate 94 just west of the MdDot headquarters and at the pedestrian overpass at #94 and Victoria. Later that Spring, we replayed the tapes with sophisicated sound equipment and at proper decibel levels. We started in the late afternoon and finished some three hours later. Throughout the experiment, we were asked by the neighbors to cease and desist. When we started to play the tapes by St. Luke's hospial, a member of the staff came out and asked us to stop as we were disturbing the patients. Obviously, the noise levels from a six lane, high speed freeway would have a devastating effect on the surrouding areas.

It was thus with a great deal of anticipation that we have awaited the noise analysis of a full fledged E.I.S. report.

---

(1) Unfortunately, in the summer of 1972, the Minnesota Department of Transportation would not allow any members of R.I.P.-35E to photocopy any of the documents at the headquarter building, resulting in some loss of accuracy.

The Preliminary Noise Analysis Report ("Report") is an inadequate and superficial document which is of little or no value in assessing the noise impart of the various alternative designs. The Report states in its Summary section:

> The proposed project (and its alternatives) involves the construction (or reconstruction) of a highway section with full (or partial) access control and thus constitutes a Type IA project according to Volume 7, Chapter 7, Section 3 of the Federal Aid Highway Program Manual (FHPM-7-7-3). This designation requires a detailed anaysis of traffic noise impacts and abatement measures as well as an identification of those areas where exceptions to the Design Noise Levels (per FHPM-7-7-3) are necessary.(1)

Thus, FHPM-7-7-3 requires at least these three considerations:

a. A detailed analysis of traffic noise impacts.

b. A detailed analysis of noise abatement measures.

c. Identification of those areas where exceptions to the Design Noise Levels.

It is upon this kind of in-depth analysis that the final decision on where to build the road, if at all, is to be made. But it is not working out that way at all. Here we having a preliminary report which is completely deficient in point "c" above, extremely superficial in point "b" and cursory in point "a". As the report itself states:

A.

> This preliminary report represents only an initial step in the investigation of probable noise impacts and abatement measures, and it is not based upon detailed design plans....Exceptions to the Design Noise Levels will be formally requested in the Final Noise Report as necessary. (1)

After ten years of so-called study, is this the best MnDOT can do? Or is it more of "the less said the better at this point in time"?

METHODOLOGY

The methodology of the Report was sloppy at best, and then ranged quickly downward to highly deficient and outright non-existent. As examples:

B.

A. Receptor locations. Receptor #3's location in Appendix A is described at "Watson & Baldwin". Hudsons Street Atlas, 1977-78 Edition lists one Baldwin Ave. in Elk River, one Baldwin Drive in Apple Valley, and one Baldwin Drive in Circle Pines; and no Baldwins in St. Paul.

C.

B. Receptor Location Homogeneous Areas. The entire residential area on the north side of the Pleasant Avenue corridor from the Short Line to the "Common Area" in front of the Capital, a distance of approximately 13,000 lineal feet (Figure 3), is identified by only two receptors, numbers 7 and 8, but to make the report look good, these areas are subdivided into seven parts.

(1) ENVIRONMENTAL RESEARCH & TECHNOLOY, INC., "Preliminary Noise Analysis Report, Federal Project I-IG 35E -4 (19) 110 SP 6280, From: I-35E (Lexington)Bridge, St. Paul, Minnesota To: Existing I-35E in the St. Paul Downtown Area", July 1980.

A. Noise was one of many concerns studied in an appropriate level of detail in an EIS. The FEIS contains more details relative to the noise impact of the preferred alternative on pages 52 to 56. A final noise report will be prepared. Noise has been and is one of the important factors in this project.

B. The base map provided to all study disciplines and reproduced in the DEIS (Figure 20, page 117) indicates the presence of Baldwin Street. These maps were relied upon for the noise study work. (It should be noted that receptor number 3's location at the corner of Watson and Baldwin is incorrectly shown on Figure 20, page 117 of the DEIS: the notation for receptor number 3 should be moved to the right by approximately one quarter of an inch.)

C. These areas contain approximately 100 receptor sites as identified in Tables 4-11. Also, refer to response to comment C, page 129, of the September 1, 1981 correspondence from EPA Region V.

C. Receptor Area 21. Although listed as a receptor area in the tables, no description or location is given in Appendix A.

D. Receptor Durations/Times. After ten years of so-called study, MnDOT has relied on a report which has reduced the in-field measurements of ambient noise levels to mere minutes; some 15 minutes at unspecified periods of the day for 10 receptors, and one hour for the other ten.

E. Ambient Freeway noise. It should be particularly noted that the receptors listed in Appendix A which are nearest the I-94 Interstate Freeway, namely numbers 17, 18, 19, and 20, all have duration times not more than 15 minutes and since they are at "unspecified" times, these duration times could be at either "peak" or "off peak traffic periods during the day".

Appendix A is the critical document for the study of the ambient noise levels as they presently exist along the Pleasant Avenue corridore. A careful review of the locations of the receptors and the time limits for measurements at each location clearly shows that MnDOT deliberately restricted the number of locations and then severly abbreviated the recording time as well to produce a most favorable report.

Since the purpose of the Report is to ascertain the expected noise impact on the adjacent neighborhoods in the years 1990 and 2000, or one year after expected completion and then eleven years after completion, a study/the now existing noise levels on similar roadways at expected traffic volumes would be in order. But what, in fact, does the Report show? For the four receptors closest to an operating Freeway, namely numbers 17, 18, 19, and 20, all located in and north of the "Common area" segment by the Capital, not one shows a decibel reading, at either L_{10} or L_{50} in excess of 70 dBAs. Using Tables 4 thru 13, one could assume that that part of the Interestate system never exceeds acceptable Federal noise standards, even though the traffic volume is far in excess or that predicted for the Pleasant Avenue corridor. It is nothing less than a miracle. Since the MnDOT never measured the nighttime ambient noise level at those four receptors, we must remain silent on whether a miracle happens in the dark of evening as well.

Unfortunately, but typically, the Report does not tell us the actual or projected traffic volumes at the various receptors or along the various receptor areas. Receptors 18 and 19, about 2500 feet from each other, appear to be located on terrain somewhat similar to the 13,000 foot long north side of the Pleasant Avenue corridor. If the study had correlated the time, traffic volume and terrain characteristics for these receptors, we would be able to more closely evaluate the study. As it is, all receptor noise levels are highly suspect.

D. Appendix A of the PNAR does contain a listing of noise measurement locations; however, no noise measurements were made at receptor area 21, hence it is not included in Appendix A. (It is shown in Figure 3, however.)

E. Refer to page 50 for further discussion of the noise analysis methodology.

F. Noise levels are influenced by location, topography, and other factors. They are not determined solely by traffic volumes.

G. Traffic data is contained in the I-35E Transportation/Traffic Data Report. The PNAR states that predicted noise levels are for peak hours day and night, this corresponds to the times 4 to 5 p.m. (day) and 6 to 7 a.m. (night) respectively.

If the study of present noise levels throughout the corridor is so deficient, what can we expect about the prediction of future noise levels? Since this noise study only cites some other study (see page 9, Report) and then tells us that it has additionally modified that study, we are again left in the dark about the specific traffic predictions upon which this report is based. To cite FHPM-7-7-3 once again, it requires a detailed analysis of traffic noise impacts, and this report does not comply with this requirement. H.

Since freeway noise levels are generally directly proportional to traffic count, everything else being equal, Let us examine one receptor point and see what happens. Receptor number 8 is given as located at the top of Ramsey Hill at Summit Avenue. It would overlook the proposed interchange at the bottom of the hill. This intersection would be a non-grade separation, so that Ramsey and Grand Avenues would either go under the proposed freeway or they would have to go over it, and the freeway would then be depressed somewhat. The freeway roadbed in the first instance would be about twenty feet (20') in the air. If depressed, the roadbed would be about three to six feet (3' - 6') in the ground. One would expect the noise levels from the two different designs to be radically different. The Report does not mention these two design differences. In the Recommedation Report(1), supposedly bases on the facts discovered in the noise Report, the area known as "Pleasant, Between Grand & Kellogg" is forecasted to have some 56,000 vehicles under Alternative "C" in the year 2000, and about half that number, 25,300 under Alternative "J" for the same year. If we look in the noise Report at Table 8, I. J.

(1)City of St. Paul Planning Commission, I-35E Recommendation, St. Paul, Mn., August, 1981.

H. The traffic noise model officially approved by the FHWA and described in FHWA-RD-77-108 was used in this study. An additional descriptor, L_{50}, required by the MPCA, was added to the model.

I. Refer to comment F above.

J. Only one design exists: the depressed section (Grand over) will be used. The proposed grade of I-35E is more than 10 feet below the existing ground. Topography, such as the depressed section, was not considered in the PNAR for predicting noise propagation. Topographic considerations are being specifically taken into account in detailed noise studies for the preferred alternative. See page 61 for more detail.

we find that this receptor, located some 750 from the proposed centerline, has an ambient noise level (L_{10}) today of 60dBA, daytime, and in Table10, a nighttime ambience of 51dBA. It is certainly pretty quiet at night time on the hill. Now look what happens under Alternatives "C" and "J".

Table 8 L_{10} Daytime, year 2000

	Alt. "C"	Alt. "J"	Today
Receptor 8	62	61	60

Table 10 L_{10} Nighttime, year 2000

	Alt. "C"	Alt. "J"	Today
Receptor 8	61	60	51

Here is our miracle again. Despite the addition of 50,000 vehicles a day in "C" and 25,3000 vpd in "J", there is virtually no increase in the noise level at Receptor 8 over today's condition (daytime), whether there are 25,000 vehicles a day or twice as many. With additional study, other amazing figures come to light. For instance, in Table 10, it is actually quieter at Receptor Areas 2, 2A, 3 and 3A under Alternative "C" than Alternative "J" even though the first alternative has twice as many cars on it than the second.

The logarithmic scale of the noise tables dampens our understanding of the severity of (seemingly) minor changes. A change of 10 decibels increases the sound energy intensity ten times. A 20 decibel increase will show a one hundred times increase in sound energy intensity. So if you look at Table 4, Receptor 3, you will find the measured noise level there is 52. The future projected noise level for Alternatives A and A1 is 75 - or about one hundred twenty five (125) times higher noise level than now existing! Receptor 3 is identified as a residential and school area.

Lets look at Receptor 10, near St. Luke's Hospital. There the ambient noise level is supposedly 60dBA. Under Alternatives A and A1, the forecast is 76dBA. In the Butler Report(1), the predicted noise dissipation from a standard 6-Lane Highway, with 8,000 vehicles per hour, 5% trucks, 53 mph is as follows:

HIGHWAY NOISE (dBA,L_{10}) AT VARIOUS DISTANCES FROM EDGE OF 6-LANE HIGHWAY

	100	125	200	300	400
No Barriers	78	77	74	71	69

(1) Walter Butler Engineering Company, Inc., I-35E Report, prepared for MnDOT, St. Paul, Mn., March 1975, p. II-11.

K. As noted on page 50, traffic speeds are intimately related to traffic volumes. For lower traffic volumes, higher speeds were employed. Traffic noise is directly proportional to both volume and speed. Thus, an increase in speed (and resulting noise component increase) associated with decreases in traffic volume (and resulting noise component decrease) tend to be offsetting factors in regard to traffic noise. The overall effect is that the volume changes referred to do not result in significant noise level increases. Also, at greater distances from the roadway, roadway traffic noise will tend to have a decreasing influence on local noise levels.

L. The most important reasons for the use of logarithms in a noise report are convention and the fact that impact criteria and standards are interpreted in terms of logarithms. Other reasons relate to the operation of the human ear, perception of sound, and convenience. As noted in the PNAR, a 3 decibel change in traffic noise would, in most cases, not be noticeable; 5 to 6 would produce a perceivable change, and a 10 decibel increase would be perceived by most people to be doubling of the "loudness" of a sound.

This table appears to be the same one used in this report. In Table 4, Receptor 10 is located 200 feet from the roadway, and the noise level is estimated to be 76dBA, or 2dBAs higher than the Butler table. This would indicate that there are factors in this vicinity which would cause noise levels to become concentrated and not as diffused as on flat, open ground. Since this appears to be so, then the Butler report figures could be raised 2dBAs for this section. Since the Hospital is about 100 feet from the roadway, the predicted noise level at the second floor level could be a minimum of 80dBA, or one hundred times higher noise energy level than today. "The less said the better."

GARBAGE IN --- GARBAGE OUT

Since the methodology of the Report is so suspect, what can we gleam from it that is useful. The following are major factors to consider:

A. The construction of any of the "build" alternatives will violate both FHWA Design Noise Levels and the Minnesota Pollution Control Agency (MPCA) standards.

B. The "No Build" alternative will not exceed these Standards in the Pleasant Avenue corridore.

C. The "No Build" alternative was not adequately studied - only passing references were made to it.

D. The Pleasant Avenue corridore is the most sensitive area and would be the most damaging to the adjoining neighborhoods.

E. Truck traffic is extremely noisy and should be outlawed through residential areas.

M.

M. FHWA design noise levels can be achieved with mitigation measures. The MPCA noise standards do not apply as a result of legislation passed in 1981 (see page 52).

NOISE BARRIERS

The report gives us only a very sketchy analysis of the various areas which will be affected by the substantial increase in noise pollution despite the requirement that a detailed analysis be made

> of traffic noise impacts and abatement measures as well as an identification of those areas where exceptions to the Design Noise Levels (per FHPM-7-7-3) are necessary.

N.

This Report is completely deficient and does not meet standards required of an E.I.S. becasuse there is

- No analysis of the noise impact areas
- No analysis of the abatement measures
- No identification of the areas where there are to be requests for noise exceptions

In addition, the Report points out that the constructon of the roadway in the Pleasant Avenue corridore will cause noise pollution throughout the area inexcess of both Federal and State guidelines.

The Report states:

> To achieve the desired noise reductions for the alternative using the Pleasant Avenue corridor would require approximately 5.7 lineal miles of barriers. (1)

How effective these barriers would be is anyone's guess, as barriers are sound reflectors and not sound dampeners. In the valley configuration, with air inversionsfrequent and common, the noise will not dissipate as on open, flat land, but will stay confined in and near the general area of the roadway. It is conceivable that the construction of the barrier walls will not appreciably affect the over all noise level. If an additional study bears this out, will it cause the highway department to stop construction of the road? Or will they, as is more likely, merely request exceptions from noise standards for the entire roadway?

O.

(1) Report, p. 47.

N. The level of noise information contained in the DEIS was sufficient to compare alternatives. More detailed noise information for the preferred alternative is contained in this FEIS on pages 52 to 56. A final noise report will be prepared. No exceptions to FHWA standards are anticipated.

O. The State of Minnesota is one of the leaders in the successful design and construction of highway noise barriers. A considerable body of practical experience is contained within MnDOT. Extensive studies of barriers constructed have proven their effectiveness. The conditions noted are not unique or necessarily related to noise.

The Butler Report states:

> St. Clair Ave. to Grand Ave. - Ramsey St., Segment 5, includes the beginning of the high-value "bluff" community to its left. The "bluff" homes are about 250-300 ft. away from the proposed I-35E main lanes. However, the sidehill between the 2 entities is of such steepness that to construct noise abatement structures would involve wall of unreasonable heights (up to 50 ft.).... Without a doubt, the Grand Ave. - Ramsey St. to Kellogg Blvd. segment (Segment 6) is the most noise-sensitive portion of the proposed I-35E link.(1)

What are the proposed noise barrier solutions? If walls of 50 feet seem unreasonable, what of walls 47.5 feet in height? How high are the walls on I-94 one mile east of the Mississippi River bridge? What about a 3.5 mile tunnel? What about not building the road?

P.

(1)Butler Report, pp. II-17, 18.

To summarize briefly the Report's deficiencies:

1. It is inadequate in the number of Receptor locations - 2 receptors for a 13,000 feet residential area is too few.
2. It measured the ambient noise levels for too short a time at each receptor.
3. It did not correlate noise readings with pertinent traffic information.
4. It attempts to generalize from too little information.
5. It often reaches conclusions that fly in the face of reality - i.e., it is quieter with twice as many cars on a roadway than with half that number.
6. It does not give the basic information on which the noise projections are forecast, assuming only a standard, open, flat physical terrain.
7. It does not specifcally identify impacted areas.
8. It does not speak to specific solutions so that the public can have a general idea of what is proposed and thus evaluate the various alternatives.
9. It does not adequately study the "no build" alternative.

Q.

P. See page 93 for discussion of the proposed noise abatement measures. No abatement is proposed in the specific areas noted here. In general, noise levels are predicted to be well below FHWA standards.

Q. For discussion of these issues, see individual responses above.

JOHN E. DIEHL
ATTORNEY AT LAW
26 KENWOOD PARKWAY
SAINT PAUL, MINNESOTA 55105

OFFICE TELEPHONE
612-373-7641

HOME TELEPHONE
612-222-6175

September 30, 1981

Metropolitan Council
300 Metro Square Building
St. Paul, Minnesota 55101

Ladies and Gentlemen:

Please note the enclosed document, which is the "position paper" of the R.I.P. 35E group relative to the options available for the use of the Pleasant Avenue Corridor.

This is the result of our effort to thoroughly review each and every special study and the draft E.I.S. Unlike most comments, which seem to relate to preferences for one alternative or another, this addresses the content and findings, or lack of findings, of the various studies.

We submit that the study has serious deficiencies which, at the least, require a cautious approach in the selection of alternatives.

Very truly yours,

John E. Diehl

JED/hg

cc: Ghaleb Abdul-Rahman

PLEASANT AVENUE CORRIDOR

POSITION PAPER

R.I.P. 35-E Environmental Legal Defense Fund

September, 1981

Introduction

The debate over the disposition of the plans for I-35E in St. Paul has been brought closer to a decision with the preparation of the first draft of the legally required Environmental Impact Statement (EIS) on this project. We have carefully examined the many sub-issues in this controversy. Such examination provides overwhelming support for the indirect connection parkway compromise. This paper sets forth and summarizes the important points and conclusions. More detailed comments on certain aspects have already been submitted to the Metropolitan Council.

This discussion will cover (1) a review of the historic developments, (2) needs for a roadway, (3) traffic, (4) traffic speed, (5) safety, (6) noise, (7) truck traffic, (8) air quality, (9) disruption of historic neighborhoods and quality of life, (10) impact on neighborhoods away from the roadway, (11) traffic congestion, (12) East Central Business District (ECBD) bypass, and (13) the common section. It will conclude with a restatement of our position and the reasons therefore.

Historic Review

As early as the 1920's, Pleasant Avenue was identified as a major roadway, and in the post World War II era, when the interstate highway system was being planned, an interstate highway was planned for the Pleasant Avenue Corridor. The plan was thus developed when the automobile had just come into widespread use, when railroads were the principal means of commercial transportation, and when our historic areas were not yet valued in the way that they are today. At that time the damage of such highways to their surroundings were not known, and the importance and techniques of an integrated planning process were not recognized.

Indeed, the present regional transportation plans were developed after the interstate routes were laid out and merely assumed the validity of those routes and "planned around them".

Whatever public attention may have been given to these decisions (the draft EIS states that a hearing was held some 25 years ago "and no objections were raised to the proposed location of I-35E"), the entire process was conducted without the modern knowledge that freeways are ruinous to the urban environment.

In 1972, this awareness began to emerge in St. Paul and many of the people affected initiated litigation to stop the project. The state Department of Transportation (then the "Highway Department") conceded that the legal requirements for an environmental evaluation had been ignored, and pursuant to a stipulated settlement of that litigation all work on I-35E in St. Paul was stopped pending such a study. The current draft EIS is being offered as that required study.

In 1975, the Legislature deleted the inner city Saint Paul segment from the I-35 statutory route, but a parkway without a direct connection to I-94 was expressly allowed. In ensuing years the constitutionality of that statute was litigated and upheld and, in 1978, the law was amended to clearly require the completion of the EIS.

Now the questions are (1) is the draft EIS sufficient to allow an informed decision; (2) is it sufficient to meet the legal requirements of an environmental study; and (3) what alternative should be selected.

Needs for a Roadway

One major need for a roadway is to facilitate the flow of traffic as a part of the metropolitan highway network. The draft EIS and previous studies have clearly shown that the important deficiency of the present network is that there is no efficient, convenient conduit for traffic from southwest St. Paul and from northwest Dakota County to downtown St. Paul. The draft EIS documents that all of the build alternatives correct this deficiency and that there are no important differences between them in their ability to meet transportation needs.

A. There are important differences between the ability of the alternatives to meet transportation needs. There are significant differences in terms of goods movements, level of service and regional accessibility as described in the Significant Impacts section of the summary in the DEIS.

A second major need for a roadway is to facilitate economic development in St. Paul and the Metropolitan region. This need is closely related to the first. The draft EIS documents that any of the build alternatives will support economic development in the city and the region equally well with one exception, and that there are no important differences between them. The exception is that the various alternatives will have vastly different impacts on property values along and near the roadway. (See discussions on the neighborhoods below.)

B. See page 80 for revisions related to property values.

Traffic

The draft EIS is in many ways a summary document. Many special studies were done on specific issues and aspects of the problem. One of these special studies was on traffic patterns. This is one of the most important ones and in our opinion was performed appropriately and the conclusions are sound. It shows the following facts about a roadway in the Pleasant Avenue Corridor.

With any of the Pleasant Avenue Corridor build alternatives, approximately 60,000 vehicles originating south of the Mississippi River will cross the River on the Lexington Avenue Bridge. Thirty thousand of these will be destined for southwest St. Paul and will travel on Shepard Road, West Seventh Street, and Montreal Street. The other 30,000 will continue on a Pleasant Avenue Roadway. This number will be essentially the same regardless of whether the road is a freeway or parkway, whether it is directly or indirectly connected, or whether it connects to the Shortline. C.

For alternatives with a direct connection to I-94, whether a freeway or a parkway, 30,000 additional vehicles will enter on the Pleasant Avenue Roadway north of the River. These are vehicles from many, scattered sites in St. Paul which will travel to downtown St. Paul or north of downtown. The drivers will be attracted to the Pleasant Avenue Roadway because of the drawing power of a throughway (the so-called "funnel effect"). That is, they will chose this route despite the fact that they have other routes that are similar in distance and convenience. The effect of this is to double the number of vehicles in the Pleasant Avenue Corridor and thus more than double the adverse impact on neighborhoods along and nearby the corridor. (see sections on"Traffic Speed", "Noise", and"Air Quality"). D.

The beneficial effects of a direct connection on other neighborhoods will be negligible for the following reasons. For neighborhoods south of the Mississippi River, there will be no difference between a direct or indirect connection because all of the extra vehicles attracted by a direct connection will come from north of the River. As to the neighborhoods north of the River, the extra vehicles will come from many, scattered sites within St. Paul which will reduce traffic on city streets in other neighborhoods by only a few percent. The difference in these other neighborhoods will not be noticeable. It is our position that doubling the detriment in our neighborhoods with no perceptible improvement in other neighborhoods is not supportable.

Traffic Speed

Traffic speed is a major determinant of impact on neighborhoods adjacent to any roadway. Increased speeds increase noise dramatically. Very low speeds which occur with congestion increase air pollution because of inefficient engine operation and because of the large number of vehicles in the roadway per unit of time.

The highest speeds on the Pleasant Avenue Roadway will occur with freeway alternatives. They will have tremendous adverse impacts on nearby neighborhoods.

A directly connected parkway will have similar speeds and similar adverse impacts most of the time. Although the speed limits will be lower, many vehicles will enter the section from interstates to the north and south. They will be traveling at interstate speeds, from 55 to 65 mph. Most will not slow down just because of a speed limit sign unless they actually see a policeman on their side of the roadway. Because of this inertia factor the directly connected parkway will essentially be a freeway with more landscaping.

C. Volumes crossing the Lexington Bridge vary between 50,000 and 60,000 vehicles per day (vpd) depending upon the alternative. Figure 10 in the Traffic Impact Report shows that 22 percent (or 11,000 to 13,200 vpd) of the traffic crossing the Lexington Bridge exits at Shepard Road, West Seventh Street or Montreal Street. More than 30,000 vpd from the Lexington Bridge will therefore continue north past West Seventh Street. The route volumes are significantly different approaching the central area of St. Paul if there is a direct versus indirect connection to I-94.

D. The number of vehicles entering the northbound lanes of 35E north of the river varies between 19,600 vpd for a direct connection parkway to 30,900 vpd for a direct connection freeway. The value for a direct connection parkway alternative includes the east CBD bypass.

A route which is more desirable in terms of distance and travel time will, in fact, be chosen. This is the way in which the "funnel effect" operates.

Most segments (12 of 14) on Pleasant Avenue will not double in traffic volume when comparing the indirect to the direct connection alternatives. The most significant volume differences are on the sections near the downtown. The additional vehicle trips which would use the Pleasant Avenue corridor with a direct connection will be removed from collector and arterial streets. Therefore, other areas will experience improved conditions with regard to traffic impacts. In addition, the effects of an increase in vehicle traffic on a Pleasant Avenue freeway or parkway can be more easily controlled than they can on surface streets.

Even if a doubling of traffic volumes were to occur, this does not imply a doubling of environmental impacts. Noise, for example, will not increase proportionately to traffic volume. Air quality, considering background levels, also will not increase proportionately. See the Air Quality and Noise Impact sections of the DEIS. Examining receptor P.A.-6 for Alternatives C and D (in which case there is a doubling of traffic volumes) shows that the air quality impact is not doubled. Similarly, the special study on noise does not indicate a doubling at receptor 17 between C and D, at which point there is a doubling of traffic volume.

During rush hours, the situation will be different on a directly connected parkway. Then, because of high traffic volumes, there will be congestion, slow speeds, and stopping. This congestion will increase the air pollution markedly. E.

Thus a directly connected parkway will have freeway speeds most of the time with very high noise levels. During rush hours it will have very low speeds and excessive air pollution.

A parkway with an indirect connection will have substantially slower speeds than a freeway or a directly connected parkway, because motorists traveling south will have to slow down to travel on city streets for six blocks before getting on the parkway. The speeds they resume on the parkway will probably approximate the posted speed limits. This will substantially reduce the noise impact on nearby neighborhoods. There will also be less congestion during rush hours because of the lower traffic volumes. Thus travel will be more efficient and more pleasant and there will be less air pollution during rush hours. F.

A major deficiency of the draft EIS was that these differences in roadway speeds were not considered. It was assumed that traffic speeds on parkways with direct or indirect connections would be the same. Because of this, any suggestions that impacts would not be much different between directly or indirectly connected parkway alternatives are invalid.

Safety

Traffic safety would be greatest with an indirectly connected parkway, because speeds will be lower than with other routes, congestion will be the least, and increased risk and danger in the common section will be avoided. G.

Noise

Traffic noise is the single most harmful aspect of the proposed roadway upon nearby neighborhoods. Any roadway will generate noise and thus have an adverse impact on the neighborhoods. The most important responsibility of the highway department and its advisors is to choose the alternative that will meet the major needs of the city and region and that will have as little adverse impact on the neighborhoods as possible.

The special study on noise describes itself as only a preliminary analysis and affords us with only a general idea of what the noise impacts will be. As mentioned in detail in our written comments to the Metropolitan Council, the sampling along the corridors was inadequate. Local conditions such as the prominent bluffs and their impact on the behavior of noise were not taken into account. Hypotheses about noise behavior were not tested by generating noise in the right-of-ways and studying its behavior. These deficiencies in the study do not allow one to make an intelligent choice of alternatives based on solid estimates of the impacts of the various alternatives. A proper noise study should be done before a choice of alternatives is made. H.

Without a proper noise study, building any roadway is risky. Severe uncorrectable problems may result. If a choice is made it must be the one with the least risk which still satisfies the major needs of the city and region.

Some general facts about noise are well accepted. First, roadway noise increases with traffic speed. Among the alternatives, the parkway with an indirect connection will have the lowest speeds. Traffic volumes also affect noise impacts although less so than traffic speed. Again, a parkway with an indirect connection will have the lowest volumes. Since all three types of alternatives, a freeway, a directly connected parkway, and an indirectly connected parkway, will meet the major needs of the city and region, the only logical choice is an indirectly connected parkway. I.

Truck Traffic

Truck utilization, whether trucks are allowed on or prohibited from a particular route, is critical to environmental impacts. Of course, if an interstate is built in the Pleasant Avenue Corridor, trucks would use that facility. This would cause the worst noise pollution and, in turn, neighborhood detriment of any of the alternatives. The alternatives that provide for other uses of that corridor, where no trucks are allowed,are clearly preferred. J.

What about the commercial transportation needs of the community? First the principal need described in the draft EIS is to move trucks between Dakota County and the Midway. That need would be met only by truck use of the Short Line, which is not feasible without extensive upgrading and the construction of a facility to connect the north end of the Short Line to Snelling and/or I-94. These difficult changes are not contemplated in any project studied and therefore are beyond consideration here. K.

E. A capacity analysis, shown on Figure 30 of the Traffic Impact Report, shows that 11 of 12 segments on the Pleasant Avenue corridor operate at level of service C or better. This indicates that severe congestion, slow speeds and stopping will not occur. Figure 44 of the same report shows that with the addition of the East CBD Bypass the remaining congestion problem would be relieved.

F. There is no reason to believe that southbound traffic in the indirect connection alternative once leaving 12th Street will travel any slower than normal freeway traffic after the usual acceleration distance. It is true the entering speeds from 12th Street would be slower than from a direct connection but the same a short distance west.

Traffic speed differences between direct and indirect connection alternatives were used for the appropriate environmental impact assessment. They were calculated based on the volume/capacity ratio for each roadway segment.

G. This is not true since with an indirect connection more traffic will use local streets which generally have higher accident rates than that of a parkway. Also, as explained on pages 144 and 145 of the Traffic Impacts, Safety Improvements section, the existence of an at-grade intersection on the indirectly connected parkway causes further safety hazards not encountered with the direct connection. Speed differences on a parkway should be similar on most segments whether a direct or indirect connection is provided. Facilities with full access control (i.e., grade separations, interchanges) have the best safety records (lowest accident rates). The preferred alternative has full access control.

H. A discussion of the methodology for the noise analysis can be found on pages 50 to 51.

I. See response F to "A Criticism of the Preliminary Noise Analysis Report" on page 219.

J. Commercial trucks over 9,000 pounds are to be prohibited from using the parkway chosen as the preferred alternative. Refer to pages 5 and 102.

K. The DEIS does not point out that the principal need for truck movements was from Dakota County to the Midway area. An equally important truck movement was assumed to be from Dakota County to the St. Paul CBD.

Thus, this truck traffic is going to continue using Trunk Highway 51 (Snelling Avenue). It should be stressed that even an interstate in the Pleasant Avenue Corridor will not serve the Midway, since traffic cannot come from or go to the west on I-94 when using the Pleasant Avenue route. Even if they could, the Trunk Highway 51 route is much more direct. Accordingly, no alternative will lessen the Midway bound truck traffic on Snelling Avenue.

The other problem area involving trucks is the present Sibley Avenue truck route. In fact, this is a problem regardless of the disposition of the Pleasant Avenue Corridor. L.

Some persons in Lowertown favor an interstate in the Pleasant Avenue Corridor. This presumably is to remove trucks from the area in Lowertown that is to be developed for residential use and route them into areas already devoted to residential use. This position is narrow-sighted, parochial, unfair, and illogical. Among other things, allowing trucks in the Pleasant Avenue Corridor will not eliminate the truck traffic on Sibley. This situation would clearly be resolved with the E.C.B.D. bypass.

Obviously, the inclusion of the E.C.B.D. bypass is an essential ingredient in meeting truck traffic needs and minimizing the damage that truck traffic causes to all areas of the city.

Air Quality

Air pollution from a roadway is a major harmful aspect. The special study on air pollution was only a general analysis and had many deficiencies as outlined in our written comments to the Metropolitan Council. Among the deficiencies were that sampling of air quality was only done at one site in each corridor and only for one pollutant (carbon monoxide). Seasonal changes and the influences of different meteorological conditions were not measured. The study states that there are many variations in local conditions along each corridor which will affect the behavior of air pollutants yet the local conditions were not studied. M.

One particularly sensitive site which was shown in earlier studies to have dangerous local conditions is the right-of-way adjacent to United Hospitals. The earlier studies showed that the air is stagnant much of the time in this area due to geographical features and that pollutant concentrations would frequently exceed federal and state standards and be dangerous to the health of the patients. This was not even considered in the draft EIS or special study on air.

A rational choice of alternatives cannot be made with the information from the special study on air. A proper and detailed study should be done.

Without a proper air study, building any roadway is risky. This is especially so in the narrow and confined corridor at the base of Ramsey Hill. If a choice is made, it should be a roadway which has the least amount of traffic and least amount of congestion. This choice is the parkway with an indirect connection.

Quality of the Historic Neighborhoods

Along Pleasant Avenue

The Summit Hill, Crocus Hill and Ramsey Hill neighborhoods are unique architectural examples of the Victorian era. The quality of the architecture and the well preserved states of these neighborhoods are unequalled in the United States. Summit Avenue between the Cathedral and Western Avenue is the only "Victorian Promenade" remaining that is almost entirely preserved. The finest areas of these neighborhoods are along the bluffs adjacent to the Pleasant Avenue Corridor right-of-way.

In previous sections, specific impacts upon these neighborhoods including air and noise pollution have been discussed. Other impacts such as the placement of on- and off-ramps and traffic flow through these neighborhoods have not even been considered. For instance, vehicles travelling northeast on a Pleasant Avenue Roadway with a direct connection could not connect directly to the westbound lanes of I-94. Such motorists may exit before the direct connection and travel through the Summit Hill, Crocus Hill or Ramsey Hill neighborhoods. The draft EIS did not even consider this aspect of the roadway. Noise barriers may have to be constructed adjacent to many of the historic structures in these neighborhoods which would seriously damage the present atmosphere and quality. Since these and other aspects were not studied, the impact on the quality of these historic neighborhoods has not been considered. N.

These neighborhoods are desirable to live in because of their historic nature, the unique houses, and the lack of major detractions such as major roadways or factories. However, there are major disadvantages. The taxes are high. Energy costs are extraordinary. The houses are large and old and repair and maintenance costs are high. Just one decade ago, many houses were uninhabited, Grand Avenue was run down, and the neighborhoods were in serious jeopardy. The rekindled interest in living "in

L. Trucks on Sibley Avenue would be greatly reduced if the East CBD Bypass is eventually constructed.

M. Air quality has been determined not to be a significant impact in relation to I-35E. Refer to pages 42 to 46 for further discussion of the air quality analysis methodology, and pages 39 to 41 for a discussion of sensitive populations.

N. The development process does not normally allow for detailed design and mitigation measures to be available at the time the DEIS is prepared. This level of detail presented in the DEIS is considered appropriate for comparison of alternatives. The selection of a directly connected parkway alleviates the concern noted here. The indirect connection also would not create any significant impacts.

town" and in restoring houses of historic value in recent years tipped the balance in favor of revitalizing these inner city neighborhoods. If a major adverse influence is introduced into these neighborhoods, it may tip the balance against the continued viability of the neighborhoods. As an example, a homeowner living in an historic house may decide it is not worthwhile to pay the high costs and put up with an objectionable roadway, and he may decide to move. His property value will have dropped substantially because of the roadway, and the only way for him to obtain a reasonable return on his investment may be to convert his house into a duplex, condominiums, or rental property. The house will be modified and its historic value lessened. The loss of one historic house will detract from the neighborhood and other homeowners may follow suit. The effects will multiply, and eventually St. Paul may lose these historic neighborhoods as well as the strong tax base that they represent. O.

Even if they are not lost, the property values in these neighborhoods will drop, reducing the tax base. This will not occur just for properties adjacent to the roadway but for most other properties as well, because the properties along the right-of-way are the best and they form the cornerstones of property values for the neighborhoods. If their property values fall, property values throughout the neighborhoods will fall. The health of the city is going to depend heavily in the next decades on its ability to raise the tax revenues necessary for the maintenance and rebuilding of many essential city services and public assistance programs. Jeopardizing these neighborhoods and destroying the city's credibility in regards to their concern for other neighborhoods could make the difference when future taxpayers and property owners make the choice between city and suburb.

O. Impacts to historic properties are addressed in the historic section of the EIS, pages 84 to 92 and pages 109-124. Loss of property value was determined not to be an impact to historic properties in the historic analysis nor was it a concern raised by the State Historic Preservation Office, Advisory Council on Historic Preservation, Department of the Interior or any local authority involved in historic preservation. For further discussion of the effects of highway location on residential property values, see pages 80 to 84.

The Consequences of the Choice of an Alternative

Upon Neighborhoods Away From the Corridor

Any build alternative will improve existing conditions everywhere but in the corridor chosen for the roadway. In trade, any build alternative will harm the surrounding neighborhoods to some extent.

For neighborhoods south of the Mississippi River, traffic volumes will decrease to varying extents with any build alternative. Traffic volumes there will not differ among the various build alternatives.

For neighborhoods in St. Paul, any build alternative in the Pleasant Avenue Corridor will alleviate traffic congestion in many other neighborhoods. All alternatives in the Pleasant Avenue Corridor are similar in this regard. The traffic volumes are essentially the same away from the Pleasant Avenue and Short Line corridors with directly connected or indirectly connected roadways. This seems anomalous on the face of it since traffic would increase in the Pleasant Avenue Corridor by 30,000 vehicles. However, these vehicles will be drawn from many different neighborhoods in St. Paul so that the diminished traffic in those neighborhoods would be only a few percent and would not be noticeable. P.

P. Summit Avenue, Shepard Road and West Seventh Street do show significant differences in traffic volumes between the direct and indirect connection alternatives. In addition, Randolph, Jefferson, St. Clair, and Dale also show differences in volumes.

Traffic increases in the Pleasant Avenue corridor between direct and indirect connection alternatives vary between approximately 9,000 vpd and 30,000 vpd increases, depending upon the specific segment.

The only meaningful difference in impact of the various build alternatives on neighborhoods away from the corridors concerns where trucks will be allowed. This is addressed in the "Truck Traffic" section.

Traffic Congestion

For consideration of this issue, there are essentially three circumstances: (1) the status quo (no build); (2) an indirectly connected roadway; and (3) a directly connected roadway. With the status quo, there are certain traffic patterns that produce congestion, such as on South Lexington Parkway. Furthermore, other areas, although perhaps not congested, have high traffic volumes. All build alternatives, including the indirectly connected parkway, will provide relief in these problem areas. The relief will be similar with all Pleasant Avenue Alternatives. It must be pointed out that a direct connection will cause congestion on the Parkway itself. The direct connection will stimulate an increase from 30,000 to 60,000 vehicles per day which is beyond the capacity of the roadway. Q.

Q. Congestion will not be severe on Alternatives A and A'. Further, the remaining direct connection alternatives may experience limited congestion at only one location on the parkway -- the southbound off-ramp junction at Grand-Ramsey. This is mediated by eliminating the north ramps at Grand-Ramsey and with inclusion of the East CBD Bypass mainline volumes reduce to less than 40,000 vpd which is under capacity.

The directly connected roadway alternatives in Pleasant Avenue will increase traffic and congestion on feeder streets (Randolph, Jefferson, St. Clair, and Dale), so with these choices congestion actually would be worse. R.

The indirectly connected parkway will lessen congestion since it will not have the dramatic "funnel effect" which will increase congestion on the parkway and its feeder streets.

However, there has been a question of whether there would be congestion on 11th and 12th streets if they were used for the indirect connection. Based on all traffic projections and on the draft EIS these routes can handle the traffic without problems with only minor improvements. Plus, this will provide additional stimulus to upgrade the "Jackson Ramp", which is presently a source of considerable congestion.

R. Traffic volumes on Randolph, Jefferson, St. Clair and Dale are greater for the indirect connection alternatives since these routes would be used as through routes to the CBD to a greater extent with an indirect connection alternative than with a direct connection alternative.

E.C.B.D. Bypass

We favor the development of multiple facilities which together will meet the diverse needs of the city. To this end, we support an indirectly connected parkway to move people downtown (we do not share the view of the President of the City Council that a road that goes downtown is a road going "no where"), but we insist that this be developed in coordination with the upgrading of Shepard Road and the development of the E.C.B.D. bypass.

The E.C.B.D. bypass would utilize abandoned railroad right-of-way to the east of downtown and would connect Shepard and Warner Roads with I-35E north of Downtown.

These facilities would serve in coordination with existing interstate, freeway, and arterial routes to, collectively, meet the transportation needs of the area. And, as noted above in the section on Truck Traffic, the E.C.B.D. bypass will provide a truck route that will meet those needs with minimum detriment to existing neighborhoods and urban development proposals.

The Common Section: "The Capital Weave"

This issue concerns any of the so-called direct connection alternatives because of the traffic that those facilities will add to the common section.

The common section is already one of the most dangerous segments of highway in the state with its multiple curves, multiple entrance and exit lanes, required speed reductions, and high traffic volumes. This segment has frequent traffic jams where traffic comes to a dead stop. It is proposed by some that the Pleasant Avenue facility should connect directly in this "weave" area, and it is suggested that two additional lanes (one each direction) will handle the additional traffic in this area without problems.

However, the traffic data indicate that with a direct connection, the volume will increase 47,500 vehicles per day from the present 80,500 to 128,000 by the year 2000. This number of vehicles alone would require four lanes. More to the point, that segment could not safely and efficiently handle the additional volume. There are presently severe geographic restrictions on this segment. There are presently multiple lanes and multiple options requiring extensive weaving. Under these circumstances additional lanes are inefficient. There are 25 possible routes through this section now and a direct connection would add 5 more! These characteristics make the proposal of a direct connection an absurdity.

Summary

The original position of RIP-35E was to have no major roadway in the Pleasant Avenue Corridor. Since it has been demonstrated that a roadway there would bring major benefits to the city and the region, we have changed our position and we will now accept an alternative which achieves those benefits as long as the impact on our neighborhoods is minimized. The alternative that meets these criteria is alternative J, a parkway with an indirect connection to I-94 and an E.C.B.D. bypass.

As outlined herein, alternative J meets the traffic and economic needs of the city and region. The indirect connection does not diminish its ability to meet these needs. The indirect connection will bring lower speeds, less congestion, less noise, less air pollution, and it avoids further risk and danger in the common section.

A parkway with a direct connection as opposed to an indirect one will not improve traffic conditions noticeably away from the corridor. It will not enhance economic development anywhere.

A decision about what type of roadway should be built should not be based on minor differences in levels of state and federal funding. St Paul should build what is best for St. Paul. If we can demonstrate the need for a roadway, we can find a way to get the funds. If different factions unite in this issue, we can find a way to get the funds to build the E.C.B.D. bypass and to upgrade Shepard Road.

At the crux of the decision over what roadway should be built is the quality of life in St. Paul. At a time when other cities such as Detroit, Cleveland, and Newark are wondering how to rebuild their cities and bring people back in from the suburbs, St. Paul still has a vital group of neighborhoods. Yet St. Paul is not without problems. Its residents pay higher taxes and put up with more crime, more social problems, and more school problems than suburbanites. Many people who live in town are willing to put up with these detractions because the neighborhoods are pleasant and because they believe that vital cities are essential to the future of our region and the nation. They have made a commitment to the future of St. Paul. It is in the best interest of all of St. Paul to preserve the quality of life in its neighborhoods and to keep these residents enthused and committed to a vital city.

This is especially important with this issue because people who have lived in the Pleasant Avenue area for a long time or who have moved there recently know that a compromise on this roadway project was reached before, that it was generally agreed upon, and that it was written into law. Residents have made very important decisions about their homes and their futures based on this compromise. Most realize that the draft EIS process has been going on, that it was possible that a careful examination of the facts would reveal the compromise was not an optimal one, and that it would have to be modified. However, the EIS process has shown that the compromise is the best alternative by far. If a different alternative is chosen, thousands of people will become further angered and disillusioned and distrustful of the governments' commitment to the neighborhoods and to St. Paul.

S.

S. The Jackson Street ramp will most likely warrant eventual upgrading as a separate project.

There is currently an eight-lane cross section in the common section area. Two of these lanes (one in each direction) are largely unused presently because of the lack of lane continuity. Improvements to the common section proposed as part of this project (described on page 105) and the remodeling of I-94 as a separate project will effectively address this problem. The common section volumes will not exceed capacity in the common section. An East CBD Bypass will further improve the level of service in this area.

northern sound
390 kiowa avenue, st. paul, mn 55112
612-633-8475

September 30, 1981

Metropolitan Council
c/o Mr. Ghaleb Abdul-Rahman
300 Metro Square Building
St. Paul, MN 55101

SUBJECT: I-35E DRAFT ENVIRONMENTAL IMPACT STATEMENT (6/4/1981)
AND PRELIMINARY NOISE ANALYSIS REPORT (7/1980)

Dear Council Members:

Mr. John E. Diehl asked me to review the subject documents, and to relay to you my findings on behalf of the R.I.P. 35-E members.

In preparing my comments, I have avoided repeating any previous concerns expressed by the R.I.P. 35-E members and limited my contributions to very fundamental deficiencies in the noise analyses. It is my opinion that any attempt to evaluate the noise impact of the proposed project, based on the information provided by the subject documents, could lead to serious erroneous conclusions.

The I-35E Draft Environmental Impact Statement (EIS) and Preliminary Noise Analysis Report (NAR) are deficient because:

1a. No predictions are made for the future noise levels in the Pleasant Ave. area for the "no build" alternative (I). A.

*This information is needed to truly understand the definite degradation of the environment from the various alternatives.

1b. The statistical significance of background noise observations is questionable since many surveys were only 15 minutes long (NAR, p. 56) and only performed once. B.

Such a spartan monitoring program leads Environmental Research & Technology, Inc. (ERT), to state that the 50dBA (L50 nighttime noise standard) is "close to or exceeded by existing conditions." A condition that the consultant fails to mention is only true along existing and busy traffic corridors.

*What are the existing background noise levels, day and night, in the quieter neighborhoods that could be impacted by the project?

2a. ERT indicates that "Noise from heavy duty trucks and from autos, decrease gradually with decreases in speed." (NAR, p. 44) This statement is grossly misleading since a 10 mph difference could account for a 3 decibel difference. C.

*A 10 mph speed increase on a road would double the noise energy from the road and it would be comparable to doubling the volume of traffic.

*Did the computer model used to predict the noise levels for the various alternatives give due consideration to traffic speeds?

2b. The definition of "parkway" (EIS, p. 26) allows for:

a. Posted speed limits up to 54 mph
b. Extensive use of interchanges (i.e., grade separated intersections) D.

The design speed for the "parkway" is not identified. The design speed of a road is highly dependent on curves, grade variations, visual range, at-grade intersections, traffic lights, ...

ERT states that "artificial speed limits" (resulting from the design speed limit being greater than the posted speed limit) are"extremely difficult to enforce." (NAR, p. 44) This philosophy, echoed in many Minnesota Department of Transportation (MnDOT) reports, implies that if a road is designed for 70 mph, motorists will drive it at 70 mph!

*What is the design speed for the"parkway"? Was the"parkway" design speed used in the computer predictions?

A. Noise levels are assumed to remain at or near the existing levels in a no-build situation. This assumption is employed as standard practice in environmental studies for which there is no evidence to support alternative assumptions.

B. Please refer to pages 50 to 51 of the text for further discussion of the noise analysis methodology.

C. The computer model does include traffic speed as one of the factors used to compute traffic noise. Appropriate traffic speeds (and other parameters) relating to each alternative and section on the highway were used to compute noise levels in the PNAR. See response F to the paper entitled "A Criticism of the Preliminary Noise Analysis Report" on page 219.

D. Speed limits and design speed were not directly used in predicting traffic noise. As noted on pages 50 to 51, the traffic speed used in a given instance was a function of traffic volume. The design speed for a parkway is 50 mph.

3. Presently, urban interstates MUST be constructed using tined (surface grooves transverse to the traffic flow) concrete surfaces according to the local FHWA district. E.

Tined concrete highways are capable of producing much higher (10 decibels and higher) noise levels than those predicted by the computer model used by ERT. Furthermore, the noise ultimately produced by a tined concrete road is highly dependent on the construction practices for the specific project and as a result, very difficult to control.

If the project in question "happens" to end with a gross variation from the specifications for the tined texture, and dramatically high noise levels, it will be difficult and costly to correct. MnDOT can testify regarding the difficulty of overlaying concrete roads with quieter surfaces.

*What material(s) and surfaces will be used for the proposed roads?

4. The Preliminary NAR predicts noise levels for the years 1990 and 2000. F.

*Are these the worst noise years? When will the proposed roads be at their peak noise emissions? What will be their impacts?

5. No mitigative measures (e.g., requiring best available quiet construction equipment) are considered for 3 years of construction noise. G.

The reports fail to discuss the duration of daily construction (8 hours?, 24 hours?) and weekend activities. The reports state that the MPCA Noise Standards will be exceeded (NAR, p. 49) and that the "contractor shall comply with all applicable laws."

*One of the above statements must be inaccurate; or the applicability of the law would have to change.

6. The EIS is deficient by implying that the MPCA Noise Standards would govern the noise emitted by the proposed roads. As of the spring of 1981, interstate highways are exempt from meeting such standards. H.

*Since there is no "acceptable limit," any noise increase may be improper.

Fundamental deficiencies have been identified on: relative noise impacts (1a. and 1b.), speed assumptions and impacts (2a. and 2b.), road surfaces (3), worst noise years (4), construction noise (5), and applicable standards (6). Forging ahead to the decission-making process with the identified deficiencies is not advisable.

Sincerely,

Alfonso E. Perez

cc: Mr. John E. Diehl

E. The pavement type has not been determined since a parkway alternate could be either bituminous or concrete construction. The noise levels predicted by the computer model more closely reflect concrete pavement (tined) than bituminous.

F. Noise levels are based on design year traffic as required by FHWA procedures.

G. The general discussion of construction noise in the PNAR was based upon the best available data at the time. This level of detail was considered appropriate for making a comparison among alternatives. A detailed study of construction noise will be included in the "Final Noise Report" and will comply with the City of St. Paul's noise ordinance.

H. See page 194, response D to correspondence from the Urban Council on Mobility. See page 52 of the FEIS and response to the MPCA letter of July 1, 1982, on page 152.

LEXINGTON HAMLINE COMMUNITY COUNCIL

1168 Selby Avenue • St. Paul, Mn. 55104 • Phone: 645-3207

September 30, 1981

Mr. Ghaleb Abdul-Rahman
I-35E Project Manager
Metropolitan Council
300 Metro Square Building
7th Street and Robert Street
Saint Paul, Minnesota 55101

Dear Mr. Abdul-Rahman:

This is a written statement submitted on behalf of the Short Line Coalition concerning the draft Environmental Impact Statement (DEIS) on Interstate Highway 35E in Saint Paul. The Short Line Coalition consists of a number of neighborhood community councils and associations which have banned together for the purpose of addressing issues concerning the Short Line Road, including the connection of the South end of the Short Line Road to the I-35E corridor examined in the DEIS. Presently the Short Line Coalition consists of the following neighborhood groups and associations:

The Lexington-Hamline Community Council
The Snelling-Hamline Community Council
The Merriam Park Community Council
The Wilder Park Association
The Randolph Heights Association
The District 11 Coalition

The governing boards of all of these groups have adopted a "position statement", a copy of which is attached to this written statement and is hereby submitted as an exhibit.

The DEIS describes positive and negative impacts of twelve proposed alternatives considered for I-35E from Highway 110 in Dakota County to Highway I-94 near Downtown Saint Paul. Except for the "no build" alternative, all alternatives propose an interchange between the Short Line Road and the Pleasant Avenue corridor. Should such an interchange be built, major traffic increases on the Short Line Road would result, with an increase of approximately 20,000-30,000 vehicles per day.

The DEIS inadequately addresses the significant environmental impacts which would occur if such an interchange were built and if such traffic increases did occur on the Short Line Road. While the DEIS does identify the fact that significant problems will occur at the North end of the Short Line if a connection at the South end is built, the document inadequately addresses all of the environmental impacts and costs resulting from the interchange. The DEIS section on "Takings and Relocations" fails to mention the need to condemn properties at the North end. The table of costs of the various alternatives also ignores this question. The special study on "vibrations" was not extended to cover the Short Line Road. The DEIS only seriously considers one solution to the problem of traffic congestion at the North end of the Short Line: extending the Short Line North along the railroad right-of-way to Snelling. This solution is proposed in spite of the fact that the traffic study recognizes that Snelling Avenue can absorb no more traffic. There are other alternatives which should be studied for the North end (and the South end) of the Short Line; unfortunately, the DEIS fails to propose and examine any other alternatives.

A. Although the Short Line is referred to in the preferred alternative (see page 14), no connection will be made until further traffic and environmental studies are done by the City of St. Paul to assess potential positive and negative impacts. Special emphasis would be placed on the north end to supplement work done already in this impact assessment.

The Mayor of Saint Paul, George Latimer, has proposed that Alternative J, with some modifications, be selected as the preferred alternative. These modifications include an "indirect connection" in Downtown Saint Paul between the Pleasant Avenue Parkway and I-94, the construction of a East CBD Bypass, and no connection of the Short Line at its South end until the problems at the North end are resolved. The Short Line Coalition supports Mayor Latimer's position. It is a realistic and practical solution. It is a "do something" alternative. It balances the metropolitan need of moving people from Southwest Saint Paul and Dakota County to Downtown Saint Paul with the rights of the affected neighborhoods to a clean and safe environment. We urge the Metropolitan Council to select Alternative J, with the modifications proposed by Mayor Latimer.

Very truly yours,

Mark G. Mishek
Chair-Short Line Coalition

MGM:jj

Attachment

SHORT LINE COALITION

POSITION STATEMENT

A. There should be no alterations to the present traffic system until the impacts at the North End and along the route of the Short Line Road are evaluated and the following minimum requirements are established for the route:

1. There should be no trucks on the Short Line Road.
2. The route should have low traffic volumes, and have a low speed limit.
3. The Short Line Road must be landscaped with greenery. This must be done in such a way that the landscaping is a living noise barrier.
4. The Selby Avenue Bridge should be restored and maintained.
5. The noise levels along the Short Line should not exceed the standard of of L.D. 10 for daytime - 65 decibles (a).
6. There must be no significant deterioration of air quality.
7. There must be longer pedestrian cross times at Selby and Snelling, Dayton and Snelling, and Marshall and Snelling. Provisions must be made for unimpeded pedestrian traffic.
8. Non-local traffic must be discouraged on residential streets, e.g., cul-de-sacs, barriers, and the like.

B. These are explicit standards for the Short Line Road. Aggrieved residents and businesses must be fairly and equitably compensated for violations of these standards.

summit hill
summit hill
association

September 25, 1981

Mr. Charles Weaver, Chairman
Metropolitan Council
300 Metro Square Building
St. Paul, Minnesota 55101

Mr. Martin N. Kellogg
339 Mt. Curve Blvd.
St. Paul, Minnesota 55105

Mr. Dean Maschka
1965 Millwood
Roseville, Minnesota 55113

Mr. Charles L. Rafferty
532 East Jessamine Avenue
St. Paul, Minnesota 55101

Mr. Tom Newcome
W-1360 First National Bank Bldg.
St. Paul, Minnesota 55101

Mr. John Bergford
2218 Mount View Avenue
Minneapolis, Minnesota 55405

Ms. Joan Campbell
947 17th Avenue S.E.
Apt. 2
Minneapolis, Minnesota 55414

Ms. Gladys S. Brooks
5056 Garfield Avenue South
Minneapolis, Minnesota 55419

Mr. Alton J. Gasper
5406 Hampshire Drive
Minneapolis, Minnesota 55419

Mr. Ernest A. Lindstrom
7406 Fremont Avenue South
Richfield, Minnesota 55423

Ms. Patricia T. Hasselmo
516 Westwood Drive South
Golden Valley, Minnesota 55416

Mr. Dirk deVries
18600 Woolman Drive
Minnetonka, Minnesota 55343

Mr. Roger Scherer
7118 North Willow Lane
Brooklyn Center, MN 55430

Ms. Marcia Bennett
654 N.E. 48th Avenue
Columbia Heights, MN 55421

Ms. Mary M. Hauser
616 Hall Avenue
Birchwood, MN 55110

Ms. Kathleen C. Ridder
1744 Dodd Road
Mendota Heights, MN 55118

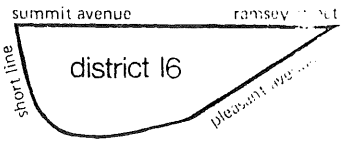
Mr. William Sando
Rt. 2, Box 281
Prior Lake, MN 55372

Mr. Richard Braun
Minnesota Commissioner
of Transportation
Transportation Building
Room 411
John Ireland Blvd.
St. Paul, MN 55155

Mr. James E. St. John
District Engineer
Federal Highway Adm.
Suite 490
Metro Square Building
St. Paul, MN 55101

Re: Comments on Draft Environmental Impact Statement for I-35E in St. Paul

Dear Mr. Braun, Mr. St. John, and Members of the Metropolitan Council:



a non-profit corporation founded to maintain and develop the residential character of the summit hill neighborhood
return address: 1067 goodrich avenue, saint paul, minnesota 55105

The District 16 Planning Council in the City of St. Paul and the Summit Hill Association Board of Directors have been deeply concerned for approximately ten years with the various proposals for the completion of a roadway in the Pleasant Avenue corridor in St. Paul. Over the years, the various members of the Board and Planning Council have spent a great deal of time analyzing the proposals, and evaluating their potential positive or negative effects on the district. We now submit to the Metropolitan Council, prior to the September 30, 1981, deadline, the following comments on the draft Environmental Impact Statement.

The District.

The District 16/Summit Hill area is bounded on the north by Summit Avenue, on the west by the Short Line Road, and on the south and east by the Pleasant Avenue corridor, thus, well over one-half of the perimeter of our planning district is significantly impacted by the various proposals contained in the draft Environmental Impact Statement for Interstate 35E in St. Paul. There are approximately 7,500 persons living in the district which are affected in various ways by such completion. The members of the District 16 Council/Summit Hill Association Board are elected by popular vote in the district, and, in this instance, I believe, accurately represent the consensus of opinion of those 7,500 constituents.

District Council Formal Action in Response to the Draft EIS.

At its June 1981 regular meeting, the District 16 Council/Summit Hill Association Board adopted a four-part resolution calling for:

1. Construction of a parkway, not a freeway, in the Pleasant Avenue corridor with:

(a) no trucks;

(b) no greater than a 45 mile per hour speed limit.

2. That there be no direct connection to the Short Line Road.

3. That there be no direct connection on the north to Interstate 94.

4. That there be no trucks on the Short Line Road.

Rationale.

As I am sure you are aware, the District 16/Summit Hill area is an historic neighborhood, and in the opinion not only of the residents of the district, but on a national level, including persons associated with the National Trust for Historic Preservation, it may be one of the very few Victorian residential areas which has been virtually preserved in its original state. The district contributes significantly and tangibly to St. Paul. Over the past ten years the area has been the subject of substantial influx of private capital for restoration through the movement into the area by new families. This movement into the area is a product of today's de-emphasis on suburban living and the revitalization of central city areas now occurring in various metropolitan areas throughout the country. Such activity contributes to an expanding tax base, to energy conservation, and to commercial and small business revitalization of our cities.

The District 16 Council/Summit Hill Association Board is utterly and completely opposed to the construction of a freeway in the Pleasant Avenue corridor. It is utterly and completely opposed to freeway speed limits, utilization of the corridor as a truck route, and direct connection to Interstate 94 on the north.

A direct connection to Interstate 94 will substantially increase daily and peak traffic count, and regardless of some of the details that may be contained in the draft Environmental Impact Statement, which are, in our opinion, open to serious question, such traffic will radically increase noise and air pollution. The construction of a four lane, 9-ton roadway in the Pleasant Avenue corridor with a direct connection to Interstate 94 allows easy and quick future conversion to full freeway status. The presence, at some time in the future, of a freeway in the Pleasant Avenue corridor will radically impact the historic area and the quality of life in the Summit Hill/District 16 area. It will, in all likelihood, not only affect property values, but will affect the attitudes of future persons considering moving into the area and closer to the central city, and will also cause the vacation of the area by a number of families due to the intolerable noise, air and inconvenience levels.

A.

A. Refer to page 62 for further discussion of traffic volumes; pages 32 to 61 for updated information on air quality and noise impacts; pages 102 to 105 for a discussion of assurances against freeway conversion; and pages 80 to 84 for information on property values.

There has been no true need shown, in our opinion, in either the testimony given or in the Environmental Impact Sstatement for a direct connection, other than the apparent inconvenience of a number of stoplights on the 11th and 12th Street passages to the north of an indirect connection. It is flatly erroneous to maintain that $15 million must be spent, and a number of St. Paul neighborhoods adversely affected in a radical way, to reduce travel time across the downtown to the north by as little as 90 seconds to 3 minutes. It is also erroneous to maintain that a through freeway with direct connection to Interstate 94 will provide better access to downtown and its surrounding commerce. It seems quite clear, in our judgement, that an indirect connection will equally facilitate and even encourage increased entry to downtown from the south and north. B.

It is additionally our judgement that construction of an interstate type roadway with direct connection and limited access throughout its traverse of our neighborhoods will continue to accelerate suburban tiering and urban sprawl in St. Paul. Such a plan represents anachronistic and outdated planning. While it is true that St. Paul has experienced a moderate population decline between 1970 and 1980, it is clear to us that the central city residential areas, particularly the West Seventh Street, Summit Hill, and Ramsey Hill areas are being repeopled at a substantial rate. Population decline is, in large part, due to smaller family size and not due to a decrease in the number of actual family units residing within the city. Schools have closed in St. Paul and there are empty commercial structures in St. Paul. It is our judgement that the completion of an interstate traverse across St. Paul will only contribute to these difficulties and result in the urban sprawl which is now being regretted by a number of cities across the country who a number of years ago felt it was necessary to construct a traversing interstate system for the benefit of suburban development.

It is the responsibility of the Federal Highway Administration, the Minnesota Department of Transportation, and the Metro Council to adopt long range planning objectives and applications which benefit the Metropolitan Area, and in that process, balance the relative interests of the municipalities and localities involved. For the stated reasons, direct connection to I-94 should be rejected as poor planning. C.

The Draft EIS.

The draft Environmental Impact Statement does not properly or carefully deal with a number of problems and issues, including noise, air and transportation movement. By this letter, the District 16 Planning Council/Summit Hill Association Board does hereby adopt the portion of the RIP-35E presentation to you dealing with specific comment on the Draft EIS content and accuracy. D.

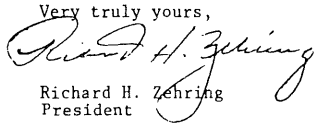
Conclusion.

Mayor George Latimer's modified Alternate J will satisfy all relevant interests, and will not, in our judgement, generate any further legal, legislative or political rancor. It appears clear that approval by the Metro Council, the Commissioner of Transportation and the FHWA of modified Alternate J will permit completion of the roadway in a timely manner, and in time to utilize available federal funding. We feel we must remind all people that although modified Alternate J does propose a "parkway", that the plan isn't really a parkway in the usual aesthetic sense. The residents of our district and the members of our Board have made substantial and enormous compromise in endorsing modified Alternate J. This compromise should be considered in your deliberations, and the willingness of our district to proceed with any major road construction in the Pleasant Avenue corridor should be recognized as significant.

Above all, in the construction of limited access roadways today, the immediately affected neighborhoods must be heavily considered.

If you have any questions in regard to the above or would like any further clarification, please do not hesitate to call us.

Very truly yours,



Richard H. Zehring
President

RHZ/jll
cc: Governor Albert H. Quie
Rep. Bruce Vento
Senator Donald Moe
Rep. Fred Norton
Mayor George Latimer
Councilwoman Ruby Hunt
James Bellus, Director, St. Paul PED
Peggy Reichert, Director of Planning, St. Paul PED
Mary C. Means, National Trust for Historic Preservation
William Sumner, Publisher, St. Paul Dispatch-Pioneer Press
Elberta R. Matters, Publisher, The Grand Gazette

B. Since I-35E is a part of the interstate system and the regional principal arterial system, a direct connection is desirable from a system connectivity perspective. A direct connection will also reduce other arterial street traffic in St. Paul as mentioned above.

C. The responsible agencies noted here have considered national, state, regional and local needs in their decision-making process. They have balanced broader transportation needs against local concerns as appropriate when considering a major transportation investment of this size.

D. Refer to the September 1, 1981 correspondence from J.E. Diehl and G. Filice on pages 202 to 224.

St. Paul, Minnesota Area Local
American Postal Workers Union, AFL-CIO

MAILING ADDRESS BOX 9065, MAIN POST OFFICE
ST. PAUL, MINNESOTA 55165
612 227-6912

September 23, 1981

Mr. Charles Weaver
Chairman
Metropolitan Council
Suite 300
Metro Square Building
St. Paul, MN 55101

Re: I-35E Pleasant Avenue Corridor.

Dear Sir:

Enclosed find the resolution passed at the St. Paul Trades and Labor Assembly pertaining to the I-35E corridor and to the decision that the Metropolitan Council must make.

The St. Paul Trades and Labor Assembly favored a freeway in the Pleasant Avenue corridor, but several years ago modified their position and accepted the idea of a parkway. With completion of the EIS, Alternative 'J' came before the Assembly, and the enclosed resolution was the result. The Assembly believes that any traffic corridor is created to draw traffic, not only from nearby areas and neighborhoods, but also from outlying communities. The Assembly's position is based on several facts which include, but are not limited to:

1. The money to complete the roadway and direct connection is available now.

2. If an indirect connection is completed, it could not be changed until another pot of money could be found.

3. The availability of money now allows for MNDOT to create as safe an exchange in the common section as possible.

4. The concerns of the Selby-Snelling communities cannot be met or cannot even be studied at this time because there are no funds.

5. The Shepard Road-East CBD bypass may never come about because money is not available.

Another important consideration is that a direct connection will greatly reduce the impact on the surrounding neighborhood.

Some proponents of an indirect connection claim that the corridor will attract traffic and have an adverse affect on the neighborhhods. But, figures from the EIS by Barton-Ashman prove otherwise as follows:

Trips Passed/on	Direct Connection	Indirect Connection	Change
Hospital	56,000 per day	22,000	-34,000
Shepard Road	17,000	22,900	+ 5,900
I-94	116,000	124,900	+ 8,900
West 7th	5,600	8,500	+ 2,900
Lexington Bridge	60,600	56,200	- 4,400

Please note from the above figures, that a direct connection causes 34,000 more trips per day in the corridor. The IES states this increase will will not significantly affect noise or pollution. The 34,000 trips as noted above will be reduced by 4,400 by an indirect connection at the Lexington bridge. However, 29,600 trips a day will impact the neighborhoods surrounding the corridor. The figures above show where 17,700 of those trips will go. The important figure is that the remaining 11,900 trips, which are north/south trips, will have to use Lexington, Dale or Hamline in order to get where they are going, thereby impacting the neighborhoods.

As long as the money is available, the project should be completed in the best, safest manner, and that is with a direct connection in the common section.

Thank you for your consideration of our views. Any questions or comments can be addressed to me at the above address.

Sincerely,

Jim Bryan
Chairman
Civic Committee
Trades and Labor Assembly

Enclosure

cc: Tony DeZiel
File

JB/sm

WHEREAS: The position of the Trades and Labor Assembly was to have a freeway in the Pleasant Avenue corridor; and

WHEREAS: The Trades and Labor Assembly reluctantly agreed to modify its position to allow a parkway with a direct connection to I-94; and

WHEREAS: The EIS statement just completed verifies that position as the best for the citizens of St. Paul, the downtown business community and the metro region; and

WHEREAS: The state law now appears to require an indirect connection between I-94 and the parkway, therefore, be it

RESOLVED: That the Trades and Labor Assembly adopt the position that if the state law permits or is changed to permit a direct connection, and a direct connection is achieved between I-94 and the I-35E parkway, the Assembly will support the remainder of the Mayor's modified 'J' Plan.

A. The traffic volumes used represent a freeway with direct connection (Alternative A) and a parkway with an indirect connection (Alternative D). Thus, they are not directly comparable. Such an analysis as presented here should be used to consider only very gross traffic shifts and does not represent proof of the assertion.

CITIZENS LEAGUE
530 Syndicate Building
Minneapolis, MN 55402

September 25, 1981

MEMORANDUM

TO: Members, Metropolitan Council

FROM: Curt Johnson, Executive Director, Citizens League

SUBJECT: The I-35E controversy

Enclosed are our recommendations to you concerning the resolution of the I-35E controversy in Saint Paul. We are recommending that the Metropolitan Council propose a solution, not just analyze alternatives. It seems to us that the broad outlines of an acceptable plan are emerging: a parkway with trucks prohibited and a separate bypass route for trucks.

Concerning the most controversial question, that of a direct or indirect connection between the parkway and the freeways on the north edge of downtown Saint Paul, we are recommending that you delay a decision on the direct-indirect question until you know whether funds for the bypass will be made available.

CITIZENS LEAGUE
530 Syndicate Building
Minneapolis, MN 55402

September 24, 1981

CITIZENS LEAGUE STATEMENT TO METROPOLITAN COUNCIL
CONCERNING I-35E

At this time, two months before a final decision is supposed to be made, a consensus on a construction plan for Interstate 35E from the Lexington Ave. bridge into downtown Saint Paul has not been reached.

Nearby residents are strongly opposed to a freeway with trucks along this five-mile stretch known as the Pleasant Ave. corridor. During the 1960s, right-of-way was acquired and cleared, and construction began on a six-lane freeway. This was halted in the early 1970s by legal action brought by the city of Saint Paul and neighborhood organizations and individuals.

Currently, the Metropolitan Council is preparing a report for the State Commissioner of Transportation, as required by law, which analyzes several options for a corridor ranging from a full-fledged freeway to "no-build." This report is known as a draft environmental impact statement (EIS). The Council intends to submit the draft EIS to the Commissioner in November so that a decision on what, if anything, to build can be made before the end of the year. Then a final EIS will be prepared on the preferred alternative. Federal law requires that a project will be withdrawn from the interstate system if the final EIS is not completed by September 30, 1983, and if a construction contract is not awarded by September 30, 1986. The EIS is subject to approval by the Minnesota Environmental Quality Board and the Federal Highway Administration.

Dakota County interests are seeking an unrestricted link for cars and trucks using I-35E from the north and the south through Saint Paul. Consequently, they favor a six-lane freeway in the Pleasant Ave. corridor.

Within Saint Paul the freeway option has little support. Instead, neighborhood, business and government groups appear to agree on an alternative with these outlines: a four-lane parkway, with special landscaping, bike trails, reduced

speed limits, and, most significantly, a prohibition on truck traffic. Trucks would be diverted to Shepard Road along the Mississippi River to downtown and then would go north of the east edge of downtown along a new right-of-way to link up with I-35E. This is called the "east CBD (central business district) bypass."

While there seems to be little disagreement about the acceptability of a special route for trucks, many persons question whether the east CBD bypass is a realistic option. There is no such route on existing state highway plans and it isn't known whether the estimated $19 million can be found to build it.

Because of the uncertainty surrounding the east CBD bypass, some persons fear that, current intentions notwithstanding, trucks eventually would be allowed to use the parkway.

To reduce that likelihood -- and to discourage too many cars -- neighborhood residents near the parkway are supporting an alternative in which the parkway would not be connected to the freeways on the north edge of downtown Saint Paul. Instead, the traffic using the parkway and continuing on I-35E to the north would be diverted along local streets on the northern edge of downtown to a freeway access ramp. This alternative is known as the "indirect connection." A parkway with an indirect connection is the only option that could be built consistent with an amendment to state law enacted in 1978. A few months ago Saint Paul Mayor George Latimer urged the adoption of the indirect connection. Since then, the Saint Paul Planning Commission and then the Saint Paul City Council adopted resolutions, which Latimer did not veto, favoring a parkway with a non-stop, or "direct," connection A. to I-94 and then to I-35E going north. A change in state law would be needed to implement that alternative.

A. The 1982 State Legislature has amended M.S. 1980 161.12 and 161.1245 allowing a direct connection to be built.

Supporters of a direct connection say they want to avoid unnecessary traffic on downtown streets. The additional car traffic on the parkway as a result of the direct connection would not produce appreciably higher noise levels in the neighborhoods, since trucks, the chief producers of freeway noise, still would be prohibited, according to these supporters.

Supporters of the indirect connection contend that it is the only option possible under state law. Thus, they argue, nothing will ever be built in the corridor without an indirect connection. They believe the noise level difference would be significant. And, because the east CBD bypass may not get built, they want the indirect connection to guard against the parkway becoming an attractive option for trucks in the coming years.

One related issue concerns how the parkway would connect to the Short Line Road, a depressed, controlled-access, north-south highway built in the 1960s in central Saint Paul. Now it does not connect with any freeway. Originally, it was contemplated that the Short Line would connect with I-35E. But there always has been controversy over how the road should connect at its northern end. For several years it has just emptied out at Selby Ave. near Snelling Ave. Resicents near the Short Line strongly oppose truck traffic on that road. There appears to be general agreement in Saint Paul that the parkway should not be connected to the Short Line, even for cars, until a decision is made on where traffic would go at the northern end.

Leadership by the Metropolitan Council is critical -- Legally, the Metropolitan Council can fulfill its obligation by passing on to the Commissioner of Transportation its analysis of alternatives, without suggesting a preferred alternative. The Commissioner then would decide.

We think the Council should propose a preferred alternative. The entire region has a stake in the outcome. Although only five miles in length, this segment will affect traffic on other major roads in the metropolitan area. And it affects the degree of access which the rest of the area, particularly the southern part, has to downtown Saint Paul, one of the region's two "metropolitan centers." B.

The Metropolitan Council was created to determine a regional consensus on issues just as this one. In fact, only the Council may be able to assemble the necessary components of a strategy that can succeed.

The Council has a respected history of leadership on transportation issues in the region. Most recently it was able to settle highway controversy on the western side of the metropolitan area which had spanned almost two decades.

Ironically, even if the Commissioner of Transportation selects a preferred alternative, state law (the Metropolitan Reorganization Act) gives the Council veto power over that choice.

Our chief interest here lies in the process which is followed. But in our review of the controversy over the last few weeks, we have developed some general feeling about the nature of a workable solution.

First, it is difficult to imagine a solution which does not provide for a parkway with trucks prohibited on the Pleasant Ave. corridor, accompanied by a separate route for trucks with an east CBD bypass.

There seems to be widespread agreement in Saint Paul on the double route approach. It represents a continuing redefinition of a "freeway." Originally, freeways provided unrestricted access to all types of vehicles at all times of the day. Then preference was given at access points during certain times of the day to buses, vans and carpools. The next change occurred when the lanes were authorized exclusively for certain destinations or for certain types of vehicles (such as the high-occupancy-vehicle lanes approved for I-394). Now the double route approach involves the concept of an entire roadway set aside for certain vehicles. C.

Second, and most controversial at this time, is the question of an indirect or direct connection of the parkway with the freeways to the north of downtown.

We think the Council's interest might be better served by concentrating on the *sequence* of the decision first, before getting into the *substance*.

It is difficult for us to see how the Council can decide on indirect versus direct connection until it knows whether the east CBD bypass can be built. D.

Perhaps, therefore, the Council can submit its preferred choice to the Commissioner in two parts, sequentially. The first part would deal with the double route (parkway and truck route). Later, when the Council learns from the Commissioner about the availability of funds for the bypass, the Council can decide whether to provide a direct or indirect connection.

B. The Metropolitan Council has recommended a preferred alternative. The decision was announced December 3, 1981. It is Alternative C (parkway from West Seventh Street to CBD, no connection to the Short Line until issues at the north end of the Short Line are resolved, direct connection). This also includes the construction of the East CBD Bypass as a desirable component of the year 2000 transportation plan.

C. The Shepard Road, East CBD Bypass route would not be set aside for trucks only. All traffic types would be allowed to use it.

D. Not until the year 2000 will truck traffic increase to the point where streets such as Sibley become badly congested and an East CBD Bypass would be especially needed. Until this time, there would be little pressure to open I-35E to trucks.

The Council might draw the attention of the Commissioner to several factors which could bear on the availability of dollars for the bypass (currently estimated to cost $19 million):

(1) The fact that the city of Saint Paul using its own funds built Shepard Road as a local street, but which now would be part of the bypass route. This could count as a contribution by the city toward the expense of the project.

(2) The fact that the total cost of construction of the remaining sections of interstate highway in the metropolitan area is about $500 million, of which the $19 million bypass would be less than 4 per cent.

(3) The fact that modifications in other freeway designs have been made elsewhere in the metropolitan area to accommodate special circumstances, costing several million dollars.

(4) The fact that the parkway, with trucks removed, does not need to be built to the same standards as a freeway, which must accommodate heavy trucks. The parkway should be built to no higher standard than is required for the type of traffic it will accommodate, with whatever dollar savings that are realized being diverted to the bypass. E.

(If the parkway is built to standards which accommodate car traffic -- but not to standards required for accommodating the heavy truck traffic -- this will provide further assurance that the parkway never will be opened to trucks.)

(5) The possibility of some sort of user fee or toll imposed on vehicles using the bypass. F.

If funds can be found for the bypass, then the Council will be in a much better position to decide on the merits of an indirect or direct connection, free of the question of trucks using the parkway.

If funding cannot be found, it might then be desirable for the Council to explore other routes for truck traffic that haven't yet come to be discussed as serious options. One such option would be to channel trucks along the yet-to-be-completed I-494 link in Dakota County and then north on the Lafayette Freeway. That approach, of course, would not likely be popular with another set of neighborhoods. But, if a truck route alternative can be found, then the Metropolitan Council might again be able to make a decision on the indirect-direct issue without the complicating factor of the trucks on the parkway.

If options for truck routes cannot be found, then the Council must decide on the direct-indirect issue, knowing that pressures always will be present to open the parkway to trucks.

E. Whether or not trucks are normally allowed, emergency and maintenance vehicles must be accommodated in terms of vertical and horizontal clearances. Also, since buses will be allowed, the roadway will have to be designed for such vehicles. However, pavement will be designed for the type and volume of traffic expected. (See **page 102 for a discussion of pavement** design.) Truck traffic will be limited as noted above, costs will not be appreciably lower. Diversion of any savings is not feasible under current rules.

F. A user fee or toll would have added costs associated with requirements for fee or toll collection.

Individuals and Businesses

DONALD M. MOE
Senator 65th District
Room 323 State Capitol
St. Paul, Minnesota 55155
(612) 296-4264

Senate
State of Minnesota

September 30, 1981

Mr. Galeb Abdul-Rahmen
Project Manager I35E
Metropolitan Council
300 Metro Square Building
St. Paul Minnesota 55101

Dear Mr. Abdul-Rahmen,

Attached for the record are our comments on the Draft

Enviornmental Impact Statement- 35E

Sincerely,

Donald M. Moe
State Senator

Fred C. Norton
State Representative

COMMITTEES • Public Employees and Pensions, Vice Chairman • Energy and Housing • Governmental Operations • Employment • Legislative Audit Commission, Chairman • Legislative Commission on Pensions and Retirement • Council on Black Minnesotans

COMMENT FOR RECORD
ON DRAFT ENVIRONMENTAL IMPACT STATEMENT
I-35E
METROPOLITAN COUNCIL

September 30, 1981

Submitted by:
Senator Donald M. Moe
Representative Fred Norton

The Environmental Impact Statement presently under scrutiny is the result of years of discussion and contention. The legislation requiring the statement was a carefully negotiated compromise between the many valid interests and groups involved in the issue. We find Alternative "J" to be the only alternative that complies with state statute (Laws of Minnesota 1978, Ch. 740) and the spirit of that delicate compromise.

The well known history of the 35E issue dates back to the mid-forties, when in a different political, social and environmental climate, Congress passed legislation creating a system of interstate freeways, known as the National System of Interstate and Defense Freeways. The system was designed for efficient movement between and through metropolitan areas. The primary motivation was efficiency and little regard was given to neighborhood, or other factors. Thirty years later as these systems were completed, the negative effects upon neighborhoods, air quality, urban aesthetics, and sometimes economic development were becoming clear. Then too, the federal government began to see the possible negative influence of a number of projects, and in a concern for the environment and natural resources, the Congress passed the National Environmental Protection Act (1969) which required that the environment and natural resources be considered in planning federally funded projects.

Although acquisition of the 35E corridor began in 1964, it was not until the late sixties that the actual construction of the roadbed in the Pleasant Avenue corridor between West 7th Street and 194 began. Once this construction had started the concern of the City of St. Paul, and neighborhood organizations in the vicinity of the planned freeway was increased. In 1972 the St. Paul City Council passed two resolutions regarding 35E. The first, (Council file no. 258276) requested an in-depth study of alternate routes for the freeway, and the second, (Council file no. 259251) requested the Minnesota Highway Department to halt construction, conduct public hearings and prepare an Environmental Impact Statement, (EIS). On August 1 of that year the City of St. Paul joined the West Seventh Street Association, the Ramsey Hill Association, the Summit Hill Association, and the South Lexington Avenue Association, and several citizens in bringing a class action suit to stop further construction of 35E between 7th Street and the 194 junction, and to prepare an EIS. A stipulation for settlement without prejudice was reached when the Minnesota Highway Department (one of the defendants) agreed to proceed with an EIS.

The Minnesota Highway Department then contracted with the Walter Butler Engineering Company, a consultant, to conduct an EIS. Federal regulations regarding the preparation of environmental impact statements changed, and when the Butler document was finally published in 1975, it had

become a "report". Earlier, however, in late 1974 the city council was becoming especially sensitive to traffic and noise problems along South Lexington Avenue that the vacation of local streets was causing. Also, RIP 35E, a citizens group opposed to the freeway, had organized and had proposed a parkway alternative to the freeway. On December 31, 1974, the St. Paul City Council passed a resolution, (Council file no. 264811), expressing sympathy for the traffic problems, urging the Highway Department to formally consider the RIP proposal, and a proposal to connect the Shortline to the freeway.

When the 1975 legislative session convened it had become apparent that the problems surrounding the 35E sector were common to other uncompleted segments of the interstate in the Metropolitan area. The legislature enacted what became known as the "Freeway Moratorium" (Minnesota Statutes 1976, Ch. 161). The moratorium required that the Metropolitan Council Transit Advisory Board study the proposed routes, consult with the cities and municipalities involved, and report its findings to the legislature. The same legislation required that the Minnesota Highway Department prepare an Environmental Impact Statement for all the routes in question, and to consider the findings of the Metropolitan Council studies in preparation of these statements. While this moratorium did effect freeway construction, it did not prohibit the construction of a parkway along the Pleasant Avenue corridor, provided that the parkway did not have a direct link to the interstate.

In its 1975 report to the legislature the Metro Council Transit Advisory Board identified the following unresolved major issues in the 35E question:

-Feasibility of connecting Shepard Road to 35E along the railroad right of way east of downtown.

-Consideration of Lafayette Freeway as an alternative.

-Neighborhood concern about additional traffic on the Shortline, and upgrading of Shortline connection to Snelling and 194.

-Air and noise pollution downtown and around United Hospitals.

-Effects of "no build" on other areas and parts of the system.

The report did consider factual data available at the time, and based recommendations upon it. It did not, however, resolve the many issues related to the problem. That was left to the 1977 Legislature.

In January 1977, there was little agreement about the location of 35E. There was, however, general agreement that an improved road should be constructed. In that session the House and Senate passed differing versions of bills to lift the freeway moratorium. These were sent to conference committee, but it did not reach a recommendation before adjournment.

That fall, in an effort to reach a consensus, the several factions in the Pleasant Avenue corridor controversy held a series of meetings under the direction of John Boland, then chairman of the Metro Council. Representatives of the City of St. Paul, the AFL-CIO, the various neighborhood groups and members of the House and Senate from the affected areas were all involved

in these discussions. This long and delicate negotiation process resulted in the 1978 compromise legislation voted on by the House and Senate, and passed with only 2 opposing votes. This legislation allows only the construction of a parkway with an indirect connection to 194, in the Pleasant Avenue corridor.

This proposal received the support of the St. Paul City Council, the AFL-CIO, the RIP 35E group, all Ramsey and Dakota County legislators, and the affected communities in St. Paul. With an indirect connection assured the opposition to the building of a parkway in the corridor lessened.

The Draft EIS sets out many alternatives, but only one, Alternative "J", meets the compromise criteria and the transportation needs of the East Metro Area. The Mayor of St. Paul and the staff recommendation of the St. Paul Planning Department agree with this proposal.

Since 1972 there have been two court cases, many bills introduced into the legislature, and two major bills enacted into law. There have been at least seven resolutions by the St. Paul City Council, and resolutions by the other affected municipalities. The Metro Council has heard hours of testimony by citizens, legislators, design professionals, city representatives, neighborhood representatives, environmental experts, and others and has produced four major studies or reports. Add to this the countless meetings and efforts of labor leaders, community and neighborhood groups, and it is apparent that a phenomenal amount of human energy has been devoted to the resolution of this problem. Plan J sets out the soundest transportation plan recognizing the numerous political forces at work in the area. We support the efforts of all those who built the compromise. We are afraid that any other plan will turn the clock back four years, and further delay a final decision while attempts are made to repeal the legislation established by the 1978 compromise. We intend to abide by the agreement reached in 1978 to permit a parkway with an indirect connection to 194.

Donald M. Moe

Senator Donald M. Moe, District 65

Fred Norton

Representative Fred Norton, District 65A

BURLINGTON NORTHERN RAILROAD

INDUSTRIAL DEVELOPMENT AND
PROPERTY MANAGEMENT DEPARTMENT

Room 1018
176 East Fifth Street
St. Paul, Minnesota 55101
Telephone (612) 298-2121

Mr. Richard P. Braun
Commissioner of Transportation
Department of Transportation
State of Minnesota
St. Paul, MN 55155

September 10, 1981

Dear Mr. Braun:

We appreciate receiving your February 13 letter in response to our letter of January 26, 1981, about the I-35E location problem in St. Paul.

Since that time copies of the I-35E Draft Environmental Impact Statement as well as a Summary thereof have been made available for our review. The City of St. Paul has also prepared the 35E Issues Summary of July 1981, which we have read. Last evening Metropolitan Council and the Minnesota Department of Transportation co-sponsored a public hearing on the matter and we presented a written statement to the Council members dated September 8, 1981, copy attached. Verbal comments were also made to highlight our views.

As stated in the letter, we are opposed to any alternative but the direct connection covered by the Alternate A or Alternate A' routes. We still feel that serious consideration could be given to construction of either of the two routes in tunnels to protect the sensitive areas as has very effectively been done on I-94 in Minneapolis and also at Fort Snelling on Highway No. 5. Other land uses can then be made of the area above the tunnels which would be much more desirable than sound barrier construction. A.

The Alternate A or Alternate A' proposals could be further modified to limiting traffic on the Short Line until the northern terminus is resolved. From the views expressed at the hearing, it appears that a congestion problem might exist at the present Short Line terminus at Selby Avenue. The need decidedly appears to exist for the Short Line connection to handle traffic into the Midway area of St. Paul. B.

If the full I-35E route is to function as a true Interstate system, as contemplated by the Federal law creating The National System of Interstate and Defense Highways, we feel that approval should proceed along the lines suggested. Therefore, we recommend that your approval be on the basis herein suggested.

We would be glad to discuss the matter with you at any time.

Very truly yours,

J. C. Kenady
Vice President

Attach.

cc: Mr. Charles Weaver
Chairman
Metropolitan Council
300 Metro Square Building
St. Paul, MN 55101

→ Mr. Ghaleb Abdul-Rahman
Project Manager I-35E
Metropolitan Council
300 Metro Square Building
St. Paul, MN 55101

A. The tunnel feature was considered but was not selected. The major factor against selection of a tunnel design was the high cost to construct and maintain a tunnel. The sensitive nature of the area will be protected by the parkway alternative. The corridor has long been identified for transportation use. Long-range planning and development has recognized and reflected that use.

B. The preferred alternative recommends that the Short Line not be physically linked to I-35E until resolution of the various Short Line issues (see page 14 for further discussion).

REPUBLIC AIRLINES, INC.

July 6, 1981

Ghaleb Abdul-Rahman
Metropolitan Council
300 Metro Square Bldg.
St. Paul, MN 55101

Dear Mr. Abdul-Rahman:

My views are still the same as the original letters written to legislators in 1976. See the enclosed correspondence.

Let's complete 35E as originally planned 20 years ago.

Sincerely,

Louis E. Farrell
Regional Director-Flying-MSP

(Home) 2034 No. Co. Ln. Rd.
White Bear Lake, MN 55110

LEF/jv
CC: State Representative Dr. Robert Reif

ATTACHMENTS

2034 North County Line Road
White Bear Lake, Minnesota 55110
February 19, 1976

The Honorable Mac McCollar
The State Capitol
St. Paul, Minnesota 55155

Dear Mr. McCollar:

The controversy over the deletion or resumption of construction on Interstate 35E from the state capitol area to the Lexington Avenue bridge must be reaching a decision stage.

I would like to lend any assistance possible for the completion of this project based on some of the following items:

1. A freeway through St. Paul is needed now, not alternate plans that will take many years to finalize.

2. All of us in the northern St. Paul suburbs who:

   (a) work in South Minneapolis,
   (b) use the International Airport,
   (c) attend sporting events, or
   (d) need to drive south

   are forced to thread our way through conjested St. Paul.

3. Shepard Road is the most dangerous poorly maintained stretch of road I have seen. I'm sure the police accident records will bear out this statement.

4. One half of the price has already been paid for by the taxpayers. Let's finish it before inflation puts the cost out of sight or federal funding isn't available.

My friends, neighbors and all of the people I've talked to from the White Bear Lake area would appreciate any pressure you can apply for the completion of this project. If there is any positive action that my friends or myself can contribute, please contact me.

Yours very truly,

Louis E. Farrell

Robert W. Reif, M.D.
District 49B
Ramsey County
Committees:
Appropriations
Health and Welfare
Labor/Management Relations

Minnesota
House of
Representatives

Rodney N. Searle, Speaker

March 31, 1980

Louis E. Farrell
2034 N. County Line Road
White Bear Lake, MN 55110

Dear Mr. Farrell:

I know you are concerned about financing the construction of this highway. I share your concerns and will push for early completion.

The enclosed plan will show you what is ahead of us.

Sincerely,

Bob Reif
State Representative
District 49B

RWR/lk

Encl.

Reply to ☐ 384 State Office Building, St. Paul, Minnesota 55155 (612) 296-8859
☐ 2344 South Shore Blvd., White Bear Lake, Minnesota 55110 (612) 429-3990

REPUBLIC AIRLINES, INC.

April 21, 1980

Minnesota House of Representatives
Robert W. Reif, M.D.
District 49B
Ramsey County
384 State Office Building
St. Paul, MN 55155

Dear Bob:

Thank you for the information on the I-35E Alternative Study. It appears that the use of the Parkway will still require using local streets with stop signs and the associated traffic congestion.

I assume the fastest way from the north end of the city to the International Airport area would be the truck route - Shepard Road.

I appreciate anything you can do in this endeavor.

Sincerely,

Louis E. Farrell
2034 N. County Line Rd.
White Bear Lake, MN 55110

2034 North County Line Road
White Bear Lake, Minnesota 55110
March 20, 1979

The Honorable Dr. Reif
The State Capitol
St. Paul, Minnesota 55155

Dear Dr. Reif:

As you suggested, this note is a follow up to our short conversation last Sunday, about the completion of 35E through St. Paul.

Enclosed are copies of correspondence from 1976. Needless to say, I feel the issue should be resolved by completing the original plan.

Thank you for any influence that you can assert toward reaching this goal or a suitable compromise.

Yours very truly,

Louis E. Farrell

enclosures

2034 North County Line Road
White Bear Lake, Minnesota 55110
February 17, 1976

Senator John Milton
The State Capital
St. Paul, Minnesota 55155

Dear Senator Milton:

The controversy over the deletion or resumption of construction on Interstate 35E from the state capital area to the Lexington Avenue bridge must be reaching a decision stage.

I would like to lend any assistance possible for the completion of this project based on some of the following items:

1. A freeway through St. Paul is needed now, not alternate plans that will take many years to finalize.

2. All of us in the northern St. Paul suburbs who:

   (a) work in South Minneapolis,
   (b) use the International Airport,
   (c) attend sporting events, or
   (d) need to drive south

   are forced to thread our way through conjested St. Paul.

3. Shepard Road is the most dangerous poorly maintained stretch of road I have seen. I'm sure the police accident records will bear out this statement.

4. One half of the price has already been paid for by the taxpayers. Let's finish it before inflation puts the cost out of sight or federal funding isn't available.

My friends, neighbors and all of the people I've talked to from the White Bear Lake area would appreciate any pressure you can apply for the completion of this project. If there is any positive action that my friends or myself can contribute, please contact me.

Yours very truly,

Louis E. Farrell

JOHN MILTON
Senator 49th District
4101 East County Line
White Bear Lake, Minn. 55110
and
Room 805 State Capitol
St. Paul, Minnesota 55155
(612) 296-4168

Senate
State of Minnesota

March 1, 1976

Louis Farrell
2034 North County Line Rd.
White Bear Lake MN 55110

Dear Mr. Farrell:

Thank you for your letter of February 17th.

I agree with you that it is silly to leave Highway 35E incomplete. I would support a reasonable and expeditious resolution of the current impasse.

Thank you for sharing your concern with me.

Very truly yours,

John Milton

JM/kmf

COMMITTEES • Health, Welfare and Corrections • Chairman, Health Subcommittee • Chairman, Select Committee on Nursing Homes • Governmental Operations • Government Structure Subcommittee • State Boards and Commissions Subcommittee • Metropolitan and Urban Affairs
SERVING • Arden Hills, Centerville, Columbus Township, Gem Lake, Lake Links, Linwood Township, Little Canada, Maplewood, Mounds View, North Oaks, Roseville, Scandia, Vadnais Heights, White Bear Lake, White Bear Township

MAURICE "MAC" McCOLLAR
DISTRICT 48B
RAMSEY COUNTY
3563 WHITE BEAR AVE.
WHITE BEAR LAKE, MINNESOTA 55110

COMMITTEES:
FINANCIAL INSTITUTIONS AND INSURANCE
HEALTH AND WELFARE
TAXES

332 STATE OFFICE BUILDING
ST. PAUL, MINNESOTA 55155
TELEPHONE: 296-4319

State of Minnesota
HOUSE OF REPRESENTATIVES
MARTIN OLAV SABO, Speaker

February 27, 1976

Mr. Louis E. Farrell
2034 North County Line Road
White Bear Lake, Minnesota 55110

Dear Mr. Farrell:

I also share your concern over the resumption of construction on Interstate 35E. The State has already invested large sums of money to buy and build bridges and right of ways. It would cost 185 million to use an alternative route. The highway is needed and I support the completion of this Interstate.

Thank you for your letter. Your input is important to me. Please keep it coming.

Sincerely yours,

Mac

Mac McCollar
State Representative

MMc iw

RAUENHORST CORPORATION
DESIGNERS • BUILDERS • DEVELOPERS/MINNEAPOLIS • CHICAGO • MILWAUKEE

September 25, 1981

Mr. Chaleb Abdul-Rahman
Metropolitan Council
300 Metro Square Building
St. Paul, Minnesota 55101

Re: I-35E Environmental Impact Statement; from TH 110
(Dakota County) to I-94 near downtown St. Paul

Dear Mr. Abdul-Rahman:

I have reviewed the draft E. I. S. for the segment of I-35E from TH 110 (Dakota County) to I-94 near downtown St. Paul and would like to be recorded as being in support of Alternate A for this segment of freeway.

I support Alternate A for the following reasons:

1. It appears to be the safest of all of the alternatives considered by the study report.

2. It appears to be the most efficient because it provides the greatest opportunity for mobility and unrestricted movement.

3. It appears to be the most cost effective in terms of what must be expended as a total cost to complete the system.

Please enter this letter of support for Alternate A as a part of the official record of the public hearing on the draft E. I. S. report for the afore referenced segment of I-35E.

Very truly yours,

RAUENHORST CORPORATION

Robert A. Worthington, A.I.C.P.
Director of Planning & Governmental Affairs

RAW/pas

cc: Governor Al Quie
Highway Commissioner Richard Braun

EXECUTIVE OFFICES 2200 NORTHWESTERN FINANCIAL CENTER

Mr. Ghaleb Abdul-Rahmen
Twin Cities Metropolitan Council
300 Metro Building
St. Paul, Minnesota 55101

Re: I-35E Draft Environmental Statement

Dear Mr. Abdul-Rahmen, September 1, 1981

I wish to express my criticism of the I-35E Draft Environmental Statement for the following reasons:

1. Incompleteness. Federal law requires (PPN 90-1, et al) the EIS report to consider all feasible alternatives including the "no build" alternative. A.

POINT A. The Alternative considering the extension of the Lafayette Bridge north to I-35E was dropped in the preliminary stages because it was considered to be not "cost effective". Cost effectiveness is not grounds for dropping an alternative, or the Sheppard Road alternatives would not be considered.

Point B. The cost effectiveness of the Lafayette alternative included the cost of previous work on the Pleasant Avenue corridor which should not have been so included. If only the additional cost of connecting the Bridge to the North was given, the Lafayette alternative would have been the lowest cost of all alternative.

Point C. In the sub-study, Social Impacts of Proposed I-35E, prepared by Barton-Aschman Associates, they state on page xx, "those alternatives that appeared to adversely affect minorities were eliminated in Phase 1 of the I-35E planning process". I have a copy of Phase 1, and it is not discussed there. If that was the reason the Lafayette alternative was eliminated, it is worthy of discussion.

Point D. All alternatives having to do with the Pleasant Avenue corridor utilize the original 6-lane roadway, with perhaps some modification of the ramps. Viable and feasible alternatives within this corridore are possible if only all roadbed construction were restricted to on grade crossings at Ramsey-Grand, Kellogg, 5-6th Street intersections. Such a scaled down project would come close to meeting Minnesota and Federal noise and air pollution standards. B.

Point E. The "No build" alternative was not adequately discussed on either the local impact of such an alternative (increased real estate taxes, for instances), decreased costs for the state, country and city (lights, hospitalization, snow removal, reduction in neighborhood values, road maintenance, etc.), nor on a regional basis (shopping on Grand Avenue vs. going out to a large shopping center in Eagan, for instance). C.

Point F. The "No build" alternative was negatively presented when it was discussed - i.e.," In fact, the no-build alternative (I) would be more disruptive since it would introduce a large new residential population that would have to be assimilated into the existing community" (Social Impacts, p. xxix). D.

Point G. The Common Area section in front of the State Capital can not accomodate any additional traffic. The Butler Report shows traffic volume (Fig. 23) on 5-71 along the I-94 corridore at 85,500 vehicles per day. This is capacity for a six lane Freeway. The estimated traffic on Pleasant Avenue for a Direct Connection is 60,000 ADT. Since each lane of a Freeway can only accomodate 12,000 ADT, at least four and probably six new lanes would be necessary to handle the traffic in the Common area with a Direct connection. Since the plans state only one new lane is to be built in each direction, the Highway department is deliberately building a highly dangerous and lethal interchange. E.

Point H. The period of time permitted the citizens to respond to the EIS and the forums made available to the citizens are wholely inadequate, particularly as the neighborhoods affected believed that only an indirect connection, if any, was feasible.

Sincerely yours,

Thomond R. O'Brien
480 Grand Hill
St. Paul, Minnesota

A. Cost or social impacts were not used exclusively to eliminate any of the potential I-35E corridors. Selection of alternative corridors during Phase I of this study was based on a number of transportation and environmental criteria. See page 20 of the "I-35E Phase I Report."

B. A roadway with at-grade intersections did not meet the alternative selection criteria adopted in Phase I of this study (refer to page 20 of the "I-35E Phase I Report"). Furthermore, at-grade crossings would change the functional classification of the roadway from a major regional arterial to a minor arterial, which is inconsistent with the recommendations of the Metropolitan Council.

C. Land use, costs and regional travel considerations were considered for the no-build alternative and are presented in the appropriate section of this EIS.

D. The no-build alternative was favorably presented in other sections where positive impacts would occur. An example of this is in the Economics section of the DEIS.

E. It is not apparent that 85,500 vpd is capacity for a six-lane freeway. A 1979 count of the same segment mentioned shows a volume of 96,300 vpd. The 60,000 ADT estimated traffic quoted is the maximum north of the river and south of the common section. In addition, this value varies between 50,000 and 60,000 among direct connection alternatives. The present common section cross section is eight lanes. However, only six lanes are effectively utilized at the west end of the section. With the two additional lanes proposed, nearly four lanes of capacity would, in effect, be added. Capacity analysis shows that the common section will provide an acceptable level of service.

Mr. Ghaleb Abdul-Rahman
I-35 E Project Manager
Metropolitan Council
300 Metro Square Bldg
St. Paul, Mn 55101

Re: I-35E EIS Report

Dear Mr. Abdul-Rahman, September 30, 1981

I herewith deliver to you today my 20 page paper in criticizm of the Draft Environmental Impact Statement for I-35E.

On or about September 1, I prepared a report on the noise impact study. In that paper, I quoted a University Professor without giving his full name and title. I would appreciate it if you would kindly note on my paper his proper address:

Mr. Robert F. Lambert
Director of Electrical Engineering
University of Minnesota
Minneapolis, Minnesota

Thank you very much.

Thomond R. O'Brien
480 Grand Hill
St. Paul, Minnesota 55102

The purpose of this paper is to show as clearly as possible that:

1. Any proposed Freeway of either four or six lanes constructed in the Pleasant Avenue corridor would overload <u>existing</u> and <u>proposed</u> lane capacity in the "Common Area" section in front of the Capital Approach area.

2. If an I-35E Freeway connection is built, it should be built in the La Fayette corridor.

3. That no further major construction should take place in the Pleasant Avenue corridor, and that the existing roadway should be paved only with low level connectors (on grade) to existing Pleasant Avenue and Grand Avenue.

A FREEWAY OF EITHER FOUR OR SIX LANES BUILT IN THE PLEASANT AVENUE CORRIDOR CONNECTING DIRECTLY TO I-94 WILL EXCEED THE EXISTING AND PROPOSED LANE CAPACITY.

Any such public expenditure is contrary to public health and welfare, and thus, is, or would be found to be, illegal.

POINT 1. The existing design of the Interstate Freeway in front of the State Capital ("the Common Area") is approximately three lanes in each direction with an additional lane more or less continuously in each direction for exit or entering traffic. Essentially, the Common Area corridor is a six lane system.

POINT 2. The Butler Report(1) states:

> The average capacity of a 4-lane freeway is about 48,000 vehicles per day. (Page IV - 61.)
>
> ...this corresponds to about 115,000 vehicles per day. A traffic load of this order...requires the equivalent of about 10 - 12 freeway lanes. (Page I - 52.)

Using the Butler Report as a guide, an acceptable rule of thumb is 10,000 vehicles per day per lane; and this assumes straight and level traffic without weaving conjestion or on-ff ramps. A.

POINT 3. The present traffic volume exceeds the design capacity. According to the Butler Report, traffic volumes in 1970 and 1972 were as follows:

CITY OF ST. PAUL ARTERIAL STREET TRAFFIC VOLUMES

	1970	1972
INTERSTATE ROUTES:		
I - 94 (E-W)	79,825	85,500

(Source: Butler Report, p. I-62, Table I-10.)

A. Capacity of a roadway is more adequately defined in terms of vehicles per hour (vph). A capacity in terms of vehicles per day is less definitive since it depends upon the peaking characteristics of the daily traffic. Since the peaking characteristics vary between specific locations, a daily capacity value obtained from open roadway section cannot arbitrarily be applied to another section. It should also be noted that the Butler report was never adopted as part of the documentation of this EIS process and data contained within the report may no longer be applicable.

(1) Walter Butler Engineering Co., Inc. and Tuncay M. Aydinalp, I-35E Report, prepared for the Minnesota Department of Highways, March 1975. Herein refered to as "Butler Report".

These above figures are non-specfic as to location. In 1972, Mr. Aydinalp gave to a meeting with members of R.I.P.-35E these specific location counts:

AVERAGE WEEKDAY TRAFFIC
I-94 and VICTORIA
(In thousands)

1969	1970	1971	1972
93.5	93.6	100.8	110.5

Unfortunately, the EIS Study[1] does not update the Butler Report, probably because it would then verify the Butler Report figures and thus show that existing I-94 is already carrying far more traffic than it was designed for. Using the Butler Report's rule of thumb,

> ... about 115,000 vehicles per day. A traffic load of this order...requires the equivalent of about 10 - 12 freeway lanes.

In this section, there are today just 8 lanes, and going East into the Common Area, the roadbed decreases to just six lanes.

POINT 4. The proposed (forecasted) traffic volume for the Year 2000 will far exceed the available lanes.

I-94 Traffic Forecast, Year 2000
By location (ADT in thousands)

Snelling Ave.	Hamline Ave.	Victoria Ave.	Marion St.	5-6th St.	Mounds Blvd.
127.7	119.9	119.6	116.0	112.7	86.1

(Source: EIS Study, p.19, Fig. 6.)

Again using the Butler Report's rule of thumb, these estimates would require 12 - 14 lanes in the Snelling area, and 10 - 12 lanes east from Hamline. These estimates are probably low. The purpose of low estimates in this area being to minimize the traffic conjestion and thus disguising the work which must be done to bring this area up to acceptable standards of safety.

(1) Twin Cities Metropolitan Council, et al, I-35E Draft Environmental Impact Statement, St. Paul, June, 1981. Herein refered to as "EIS Study".

B. The 1981 I-94 volumes at Victoria are 96,800 vpd.

C. Improvements described on pages 105 to 106 of the FEIS are anticipated to allow an adequate level of service in the common section area.

D. The greatest increase in traffic volumes on I-94 will occur under the no-build alternative. The smallest increase on I-94 occurs with Alternatives A and A'. The difference between these two estimates in the year 2000 is less than 10,000 vpd on I-94 at Victoria. The fact that the greatest increase in traffic on I-94 in this area is with the no-build alternative shows that the addition of the proposed 35E links would not adversely affect traffic volumes on I-94.

The upgrading of an existing Freeway facility apparently does not require an EIS study, no matter how expensive such a project may turn out to be nor how much additional environmental harm such action would cause. But since this part of the Freeway system is already demonstratably inadequate, and a major new Freeway system is being proposed to join it and add even more conjestion and environmental problems, it should be a requirement of the Final EIS study of I-35E that all proposed additions to the I-94 corridor (including the Common Area) must be included in the final study along with their environmental considerations.

POINT 5. The forecasted volume of traffic for I-35E in the Pleasant Avenue corridor, if a direct connection is made to I-94, requires the facility to be a 6 lane roadway. E.

I-35E Traffic Forecast, Year 2000
By location (ADT in thousands)

Lex'ng Brdg.	Short Line	St.Clair Ave.	Grand Ave.	5-6th. St.	Penn. Ave.
60.0	70.2	50.1	63.6	55.8	104.1

(Source: EIS Study, p.19, Fig. 6.)

If a 4 lane facility is built, it will soon be overcrowded, and the center medium's trees and landscaping will be torn out and replaced by two lanes of concrete. That is why the EIS Study can say: F.

> If a direct connection is made between the proposed I-35E and I-94, the basic traffic volumes in the corridor remain essentially the same regardless of whether the facility is a freeway or a parkway.
> (Source: EIS Study, p. 137.)

POINT 6. The traffic forecast for the Common Area in the Year 2000 is deliberately too low. This is the space where two major interstate systems meet. The commingled traffic count should be approximately the sum of the separate parts, but according to the EIS Study, it is not. G.

E. All four-lane facilities, with the exception of A', are parkways which due to slower speeds and truck prohibitions will attract somewhat less traffic volume. This is documented in the Traffic Impact Study, Figures 9 and 29. In addition, a capacity analysis, shown in the impact study, demonstrates that the direct connection parkway alternatives will operate at an acceptable level of service at all segments between the river bridge and the common section with one exception. This exception (at southbound Grand-Ramsey off-ramp) is eliminated through deletion of the north ramps of the Grand-Ramsey interchange or in the use of an East CBD Bypass.

F. A four-lane facility is considered adequate through the design year. Any subsequent changes to the roadway would require appropriate additional study.

G. The traffic volumes shown in Figure 6 of the DEIS are meant to be representative volumes. They do not provide sufficient detail with which to make the kind of calculations shown here. Many of the vehicle trips represented by the Marian Street, Fifth-Sixth Streets, Pennsylvania and Mounds Boulevard volumes are in fact destined for the St. Paul CBD and exit the freeway before they reach the I-35E/I-94 common section between and under St. Peter and Jackson Streets.

Route volumes approaching the common section are not directly additive because of the heavy exiting and entering volumes near the CBD and the differences in peaking characteristics of each route.

G.

Traffic Forecast, Year 2000
Common Area (ADT in thousands)

Marion St.		Penn.
116.0		104.1
	Common Area	
5-6th St.		Mounds Blvd.
55.8		86.1

(Source: EIS Study, p. 19, Fig 6.)

Seemingly, traffic forecasting is neither a science nor an art. Rather, it is a form of witchcraft. You add alittle here, you subtract alittle there, and out comes a brew which only the Inner Circle can love. Or so it would seem with the forecast for the Common Area.

If the traffic forecasts on the West side of the Common Area were added together, and the same done with the East side forecasts (the assumption being that few vehicles are either entering or leaving the freeway system once they are actually in the Common Area segment), then, the traffic volumes are as follows:

ADT Volume in thousands

West Side of Common Area	East Side of Common Area
172.8	190.2

Thus, some 18,000 more vehicles on the East side, and this may be due to additional traffic coming in from the LaFayette Bridge and other downtown traffic flowing into the north bound I-35E lanes. Or course, some of this miscellaneous traffic also goes into the Common Area headed West, so we might assume these additional traffic additions probably cancel out other traffic subtractions.

The question is, What would be a reasonable estimate of the combined traffic in the Common Area?

Answer A. If you average out the two sides of the equation, the estimated ADT for the Common Area is 181,000 vehicles per day.

Answer B. If you use MnDOT Witchcraft, you say the ADT is 125,000 vehicles per day.

If Answer A is correct, you need 18 - 20 lanes in the Common Area to handle the expected traffic.

If Answer B is correct, you need 12 - 14 lanes in the Common Area to handle the expected traffic. But the Highway Department is only going to provide 8 lanes in the Common Area. H.

POINT 7. The MnDot has known for years that the Common Area segment is dangerous and unsafe, and yet the EIS Study glosses over these problems. Since the Common Area is a vital part of any proposed use of the Pleasant Avenue corridor, a full and complete study of the problems associated with this segment must be included in any final EIS report.

In the summer of 1972, members of R.I.P.-35E were permitted by MnDOT to inspect its records concerning proposed I-35E. Photocopying was not allowed. In the masses of boxes were found the following quotes concerning the area then known as the Capital Interchange: I.

-- Most of this section is "...deficient in weaving capacity."

-- "A short weaving area plus Jackson Street on-ramp traffic and restricted sight distances in this section make weaving movements ... a hazard even during off-peak traffic periods."

-- "A compound weave (in this section).... Through volumes will be at possible capacity during the peak-hour traffic period and thus prevent any weaving in this section."

-- "...considerable congestion is anticipated in this movement particularly by trucks weaving from left to right, and some type of lane control should be investigated."

Inspite of the obscure language of the engineers the message is loud and clear - weaving movements even during off-peak hours are hazardous and during peak-hour periods, they are nearly impossible.

Clearly, the only way to construct an interchange which has 6 to 8 to 10 to 12 lanes running east to west with a freeway of 6 lanes running north-south is to have them grade separated and especially so in an area of limited length and width.

H. The number of lanes to be provided in the common section under the direct connection alternatives which corresponds to the 125,000 ADT is ten lanes. This is composed of the eight existing lanes and two additional lanes planned for. Analysis shows that adequate capacity can be provided for through, merge and weave movements in the common section area for the alternatives being considered. With Alternatives J and K, which incorporate the East CBD Bypass, the best overall level of service for the common area results due to lower common section volumes. The level of service in the common section is discussed on page 144 in the Transportation and Traffic, Congestion Reduction section of the DEIS.

I. Because of concerns over safety and weaving, weaving movements between I-94 and I-35E in the common section have essentially been eliminated. See **pages 105 to 106 for a discussion of the** common section.

POINT 8. The EIS Study is nearly completely silent about the problems associated with the Common Area, and after more than ten years of study, it does not either address itself to the problems nor to the solutions if there are any to be found.

The ground area on the north side of the Common Area is under the control and jurisdiction of the Capital Approach Commission. Two major buildings stand guard over any encroachments into this area, the Veterans Building and the National Guard Armory. It would be very difficult for the Highway Department to get permission to extend any bridge work into this area or to widen its right of way into this area.

On the south side of the Common Area stands St. Joseph Hospital and its parking ramp which effectively restricts any encroachment to the south.

If there were to be a grade separation for the two freeways, there would also have to be some system of separation for the city arterial streets which now cross over the Common Area. These grade separations must be approximately 20 feet in height for a combined interchange approximately 40 feet in height overall. This would mean that some sections of the weaving system would extend 20 feet above the existing bridges which cross over the Common Area. The bridges themselves must be extended. Yet the EIS Study mentions none of these problems, their costs, any Environmental damage which may result from this action, the length and extent of the disruption of existing traffic, etc. The cost alone in trying to make this section safe may easily exceed $25,000,000.

J. J. No additional level of roadway has been planned. See pages 105 to 106 for a discussion of the common section.

THERE EXISTS AT LEAST ONE OTHER PRUDENT AND FEASIBLE ALTERNATIVE TO CONSTRUCTING I-35E IN THE PLEASANT AVENUE CORRIDOR.

Given the nearly impossible constraints of upgrading the Common Area section to handle existing traffic loads and the truly impossible constraints of upgrading it to handle a Direct Connection via the Pleasant Avenue corridor, some other alternatives must be considered if a "build" decision is to be properly made. Such an alternative:

- should not increase the traffic conjestion in the Common Area.
- should be constructed in an existing transportation corridor so as not to disrupt residential neighborhoods.
- should be relatively inexpensive to complete.
- should be of maximun value to St. Paul, by increasing its tax base, by stimulating commercial development, and by attracting new residential development.

There is such an alternative -- its called the LaFayette Connection.

The LaFayette connection was superficially examined in the Draft EIS and then discarded because it did not pass an arbitrary cost/benefit standard. Yet the EIS Study proposes and studies in some detail the Alternative J plan which would cost far more to complete and would do less for the city than the completion of the LaFayette connection.

POINT 9. The LaFayette connection would by-pass the Common Area. While only a small percentage of traffic on I-35E has now been identified in the EIS Study as being "Interstate", the LaFayette connection would permit this traffic and local traffic to circulate through St. Paul C.B.D. without entering the Common Area conjestion. Since the peak demand periods for this type of movement corresponds to the peak demand periods on existing I-94, this cross-over separation of the two Freeway systems is the only prudent and feasible solution.

K. On pages 25 and 26 of the DEIS, the Corridor Selection Process outlines the procedure used to evaluate the Lafayette corridor as well as all the potential corridors. The evaluation critieria are also listed. It is with respect to these criteria that the Lafayette corridor was rejected.

A primary concern in the Phase I evaluation was the extent to which an alternative met the basic transportation purpose of the route consistent with other land use criteria concerning disruption. The initial evaluation was used to narrow and select those options which most nearly met the basic route needs, then analyze fewer corridors in greater depth to select and compare alternatives. The Phase I evaluation approach is, in our opinion, a predecessor to the currently required Scoping Reports.

POINT 10. When MnDOT built the LaFayette Bridge, it must have had some idea what to do with the North end! The suspicion exists that there are many alternative designs already made which would connect the LaFayette Bridge to I-94 via a major diamond interchange and also extend the roadbed north to existing I-35E. The Butler Report and the Draft EIS both show rather crude extensions leading directly north from the bridge. By slightly bending the access route to the Northeast a few degrees, the roadway would pass around the existing businesses. Furthermore, the new construction, by being off to one side, could take place without disrupting existing traffic flow. The new roadbed would then lie in an existing transportation corridor - the railroad yard complex James J. Hill devised one hundred and twenty years ago.(1)

The Butler Report states quite clearly: L.

> If the over-riding criterion is to relocate proposed I-35E away from the residential parts of the Pleasant Ave. corridor in St. Paul, the new T.H. 3 corridor represents the only other feasible alternative studied. (Emphasis in the original.) (Source: Butler Report, p. E-15.)

Because of the enormous costs of modifying the Common Area (and then not solving the problem) and the now apparent inability of MnDOT or the City of St. Paul to use the Short Line route for either a

L. There is not one overriding criterion used in selecting a corridor location. Several criteria adopted in Phase I of the I-35E study as identified on page 20 of the "Phase I Report" were used in identifying the Shepard Road and Pleasant Avenue corridors for further study.

(1) See Butler Report, Page IV - 63, Fig. 43.

truck route or a major cars-only arterial, the LaFayette Connection provides the only way to get to the Midway area other than using Snelling Avenue. (Everyone knows that there is no left turn to the Midway area from north bound I-35E pass the Short Line interchange. It was decided in 1959 that there was "small demand" for such a movement[1].)

Surprise upon surprise, however. It seems alot of people travelling North across the Lexington Avenue do want to go towards the Midway area after all. The EIS Study states:

> (Figure 6) indicates only 8% of the northbound travelers desire to continue beyond the north study terminus at I-694/I-35E. The same figure shows that 41% of travelers northbound across the bridge desire to travel the Short Line to destinations in the Snelling/University Avenue area as well as for destinations westbound on I-94, to TH 280 and to downtown Minneapolis. The figure also shows that 22% of the northbound travelers at the bridge exit at Shepard Road and at West Seventh. Another 7% exit at Randolph. Thus, only 30% desire to travel north in the corridor past Randolph. (P. 21.)

It should be pointed out that the vast majority of travelers continuing on the Freeway will be exiting into C.B.D. The Highway Department is thus caught in a very tight situation - most of the travelers coming over the Lexington Avenue Bridge from Dakota County are not headed Northeast towards the Capital at all - they are headed to the Midway area, Highland Park, and Minneapolis.

M. Nineteen percent of the northbound trips across the Lexington Bridge continue past the St. Paul CBD, while 11 percent are destined for the CBD itself. See Figure 10, page **69.**

Traffic volume is removed from the corridor because of vehicles exiting southwest of the St. Paul CBD. However, traffic volume is added from interchanges at Randolph, Victoria, St. Clair and Grand-Ramsey. The net result is a general increase in traffic volumes in the Pleasant Avenue corridor from the Lexington Bridge to the St. Paul CBD.

These travel desire patterns are explained in detail on pages 18 to 21 of the DEIS under FUTURE TRAVEL - Travel Patterns - Build Scenario and are updated on page 62 of the FEIS. This current analysis also forecast a minor northeastbound I-35E to westbound I-94 movement in the Cathedral area.

(1) MnDOT, Comparative Analysis of Alternative Freeway Locations, Jan. 1959. The foreword stated that this report was based on traffic assignments derived from the 1950 survey, with assigned demands projected to volumes to be anticipated in 1975. "A major feature of the plan was provision of limited access connections between I-94 to the West and I-35E to the Southwest. However, it was necessary that these connections be located in an area of relatively high right of way costs and, due to the acute angle of intersection between the two Interstate routes, the geometrics and grades for these connections were something less than desirable. The preliminary traffic assignments indicated only a small demand for this particular movement and, since a number of alternative routes would be available, it was agreed by all agencies that these particular connections could be eliminated without seriously affecting the level of traffic service." (Pages 17, 19.)

They will not use the Pleasant Avenue Corridor. So in order to justify the construction of the corridor, the Highway Department is trying to say that the people in Highland Park will use it to get downtown. This is clearly false. These travelers will continue to use existing West Seventh, Randolph, St. Clair, Grand and Summit Avenues. If they had any preference, they would probably like to travel down Pleasant Avenue as it was before it was ripped up by proposed I-35E. M.

The Butler Report states:

> The data suggests that the majority of the link users are likely to be St. Paulites from the area to the southwest of the City's C.B.D. A major reason advanced for I-35E construction in the Pleasant Ave. corridor is that it will relieve conjestion on the North-South oriented arterial streets in the project area. (Source: Butler Report, p. B-4.)

This is an example of fuzzy thinking, but it persists in the EIS Study. Because St. Paul sits on a bluff overlooking the Mississippi valley, there are only a few natural travel routes in the North-South direction. Figure 4 shows only two routes for trucks west of the C.B.D. - Snelling Avenue and Dale Street. Without the Short Line connection, these would be the only two permitted truck routes. With the LaFayette connection, there would be a superb interchange feeding to the north and west. The citizens of St. Paul will not accept any new truck routes in the North-South axis. The proposed Pleasant Avenue Freeway is a diagonal connection going Southwest to Northeast. As such, it relieves neither the North-South streets, nor the East-West Streets. The Pleasant Avenue route performs no necessary service in relieving St. Paul oriented traffic and the travel demand on it to and from Dakota County is too low to justify building it. N.

N. A Pleasant Avenue facility relieves traffic on east-west streets because it provides a more convenient route to the St. Paul CBD and other destinations for residents of southwest St. Paul. To the extent that the Pleasant Avenue route is chosen over I-94 to access the St. Paul CBD and other travel routes, it relieves the north-south access routes.

THERE SHOULD BE NO FURTHER CONSTRUCTION ON THE PLEASANT AVENUE CORRIDOR BUT FOR SURFACING TREATMENT AND ON-GRADE CONNECTORS TO GRAND AVENUE AND PLEASANT AVENUE.

The EIS Study only considered 4 and 6 lane roadbeds in the Pleasant Avenue corridor. The 4 lane roadbed is essentially the same configuration as the 6 lane with some landscaping and bike paths. When the B.I.P-35E group proposed the Parkway Now! concept, it envisioned an indirect connection from the Duke Street cut off to the Common Area utilizing on-grade surface roadways. Such an indirect connection would accomplish the following goals: O.

-- it would assure that no further up-grading of the roadway could occur - thus, once an indirect connection, always an indirect connection.

-- it would absolutely assure that the Pleasant Avenue corridor would not violate either Federal nor State standards for noise or air pollution.

-- it would not disrupt traffic in the Grand Ave. to Kellogg segment.

-- it would not environmentally harm the hospitals and homes which can not be protected if I-35E is constructed in the corridor.

-- it would permit the construction of a "New Town In Town" along the Pleasant Ave. corridor.

-- it would create new tax base and long term employment as some 27,000 residents were attracted into the area.

-- it would materially enhance the quality of life in St. Paul.

POINT 11. The time given to citizens for response to the EIS Study is too short. The compromise reached in the middle 1970's was for an indirect connection. However the thrust of the EIS Study all along has been to justify a full freeway configuration. There are literally hundreds of points which could be made from the EIS Study which shows that a Freeway in the Pleasant Avenue corridor would be an extremely bad decision. But the response time is so short, that these points can not be pointed out. In addition, the EIS Study has absolutely ignored expert testimony which contradicts the Study - i.e., potential noise and air pollution in and around St. Luke's Hospital. Whenever the Study

O. This proposed solution does not meet the criteria for corridor selection adopted in the Phase I Report (see page 20 Phase I Report). It does not provide adequate capacity, and changes the function of the route. Forty-seven percent of the vehicles traveling north in the Pleasant Avenue corridor continue north on I-35E past the St. Paul CBD. This indicates that regional trips are occurring. An on-grade facility with at-grade intersections would not serve these regional trips adequately and therefore this is not a suitable alternative. The proposed solution is also undesirable from a land planning viewpoint and is disruptive to existing major development. In addition, it does not meet interstate design standards and would most likely not be fundable with regular interstate funds.

touches on a sensitive point, it says that it will study the problem in the future (i.e., the Short Line and the Common Area messes), but this is not an acceptable defense for the whole corridor has been under study for 20 years or more - why can't the MnDOT tell us what the bad features really are? The citizens deserve to know, and an intelligent decision can not be made without this type of information.

Point 12. The EIS Study was done by professional highway engineers who are insensitive to sociological problems. In Appendix VII, the EIS Study lists the preparers of the Study and their qualifications for the job. There are seventeen categories of study. The number of preparers and editors engaged on the Study are as follows:

	Number of preparers and Editors	Total Years of Experience
Transportation Planning	8	104
Civil Engineering	7	148
Hydrology	4	60

These three categories total more than half of the experience/years of the study, and almost half of the manpower committed to the Study.

The categories of Air/Noise/Water are as follows:

Air Quality	1	10
Noise	1	8
Water Quality	2	19

The categories of Social effect are:

Economics	2	15
Socioeconomics	1	7
Historical/Arch.	1	13

Is it any surprise that those aspects of the study which have to do with the quality of life in St. Paul are so meager?

790 cleveland avenue south suite 217 st. paul, minnesota 55116
phone (612) 698-0302

shepard park

great living . high above the mississippi

September 9, 1981

State of Minnesota
Department of Transportation
St. Paul, Minnesota

We are writing this letter to be presented at the public hearing conducted on September 9, 1981, regarding Interstate 35E being completed through the city of St. Paul. Although I am unable to attend the hearing I would like this letter made part of the public record.

We are the owners and developers of an area along Shepard Road between Alton and Rankin Streets that is called Shepard Park. Just within these three blocks there are over 200 residential units fronting on Shepard Road and the existing truck traffic on Shepard Road is both unappropriate and especially noisy and annoying to our residents. We are therefore extremely concerned about this traffic and would like it substantially reduced, if not completely eliminated.

It is our opinion that I 35E being completed through St. Paul as a freeway rather than a parkway would encourage more truck traffic on that route and thereby decreasing truck traffic on that part of Shepard Road between Alton and Rankin Streets. We therefore believe that your decision should be in part based on the possibility of reducing this truck noise to over 200 residential units in Shepard Park.

Thank you for your consideration.

Very truly yours,

SHEPARD PARK

Stuart H. Nolan

bj

• condominium sales office: phone (612) 690-0541 •
• 2353 youngman avenue, apartment 111 • st. paul, minnesota 55116 •

September 17, 1981

Phil and Carol Gersmehl
1551 Dayton
St. Paul, MN 55104

Ghaleb Abdul-Rahman
Metropolitan Council
7th and Robert
St. Paul, MN 55102

Dear Sir:

We have examined the I-35E Draft EIS in some detail. You and your team are to be congratulated on putting the package together in such a manner and on such a restricted schedule. Under those constraints, a few lapses are unavoidable. Some of these are old stories, like the question of "hot spot" monitors at the North End of the Short Line. I realize they are costly, but the community has a written promise from its government and a distinct feeling that its concerns have been heard but not addressed. The long written record of promise, reminder, reassurance, and on-the-record complaint at public hearings, combined with the EIS's skirting of the issue, may give ample legal ammunition for a protracted delay of the project. A.

Of even greater significance is a serious internal inconsistency: the EIS proposes to solve the Selby interchange problem by extending the Short Line along the railroad right-of-way to Snelling (pp. 148-9), but the group working on the section on social impacts was apparently not informed of that extension proposal, because the Table of Takings and Relocations (p. 161) makes no mention of the need to condemn property at the North End of the Short Line. Such a lapse might be forgiven if it were a minor oversight in the heat of a deadline rush, but condemnation and services provision were identified as major questions at the December 9 hearing (you have a copy of our transparencies), and your own transcript of the hearing (dated December 29) notes the condemnation issue as a major concern. Moreover, I underscored the problem in my written comments on the transcript (February 20, 1981). Page 31 of the EIS talks about including the Short Line in the EIS, but a halfway job that discusses traffic and noise but ignores social impacts and relocations can not go unchallenged by active groups such as Snelling-Hamline and Lexington-Hamline. A full tabulation of those impacts will be needed before any road link of the Short Line to I-35E can be attempted.

Sincerely, Phil Gersmehl

Phil Gersmehl, Associate Professor
Dept. of Geography, University of Minnesota

Carol Gersmehl

Carol Gersmehl (Do you know how many feet the roadway of the proposed Shortline extension along railroad right-of-way would be from my kitchen?)

P.S. A few other points:
(1) There are some sizeable areas of Kingsley and Lino soils along the route; the Draft EIS section on soils is incomplete.
(2) The top of p. 146 has a mistyped "not." (3) Check maps for misplaced commas.
(4) The sophistry in last 2 paragraphs on page 168 provides a priceless quotation for classroom use. Seriously, if the benefits "far outweigh" adverse effects, why not compensate those who suffer the adverse effects?

A. The Short Line Road is not a part of the selected alternative. Therefore, air quality and relocation impacts in this area require no further clarification. Further study of the Short Line area will be conducted by the City of St. Paul prior to allowing a connection to be constructed.

Appendices

APPENDIX A - FORECASTED DESIGN YEAR NOISE CONTOURS

Figures A-1 through A-8 show contour lines $L_{10}75$, $L_{10}70$ and $L_{10}65$ (daytime) for freeway and direct connection parkway alternatives. These contour maps are for unabated project conditions (topography and noise barriers were not considered) and provide correlation of the noise levels at the 20 receptor areas with their associated land uses.

FIGURE A-1

FORECASTED DESIGN YEAR NOISE CONTOURS (Without Abatement)

WEST 7th to RANDOLPH

FREEWAY ALTERNATIVE

KEY

75 dbA

70 dbA

SCALE

1": Approximately 500'

NORTH

I35E

FIGURE A-2

FORECASTED DESIGN YEAR NOISE CONTOURS (Without Abatement)

WEST 7th to RANDOLPH

PARKWAY ALTERNATIVE

KEY

75 dbA

70 dbA

65 dbA

SCALE

1": Approximately 500'

NORTH

135E

FIGURE A-3

FORECASTED DESIGN YEAR NOISE CONTOURS (Without Abatement)

RANDOLPH to ST. CLAIR

FREEWAY ALTERNATIVE

KEY

75 dbA

70 dbA

SCALE

1": Approximately 500'

NORTH

135E

FIGURE A-4

FORECASTED DESIGN YEAR NOISE CONTOURS (Without Abatement)

RANDOLPH to ST. CLAIR

PARKWAY ALTERNATIVE

KEY

75 dbA

70 dbA

65 dbA

SCALE

1″: Approximately 500′

NORTH

135E

FIGURE A-5

FORECASTED DESIGN YEAR NOISE CONTOURS (Without Abatement)

ST. CLAIR to GRAND/RAMSEY

FREEWAY ALTERNATIVE

KEY

75 dbA

70 dbA

SCALE

1": Approximately 500'

NORTH

I35E

FIGURE A-6

FORECASTED DESIGN YEAR NOISE CONTOURS (Without Abatement)

ST. CLAIR to GRAND/RAMSEY PARKWAY ALTERNATIVE

KEY

- 75 dbA
- 70 dbA
- 65 dbA

SCALE

1": Approximately 500'

NORTH

135E

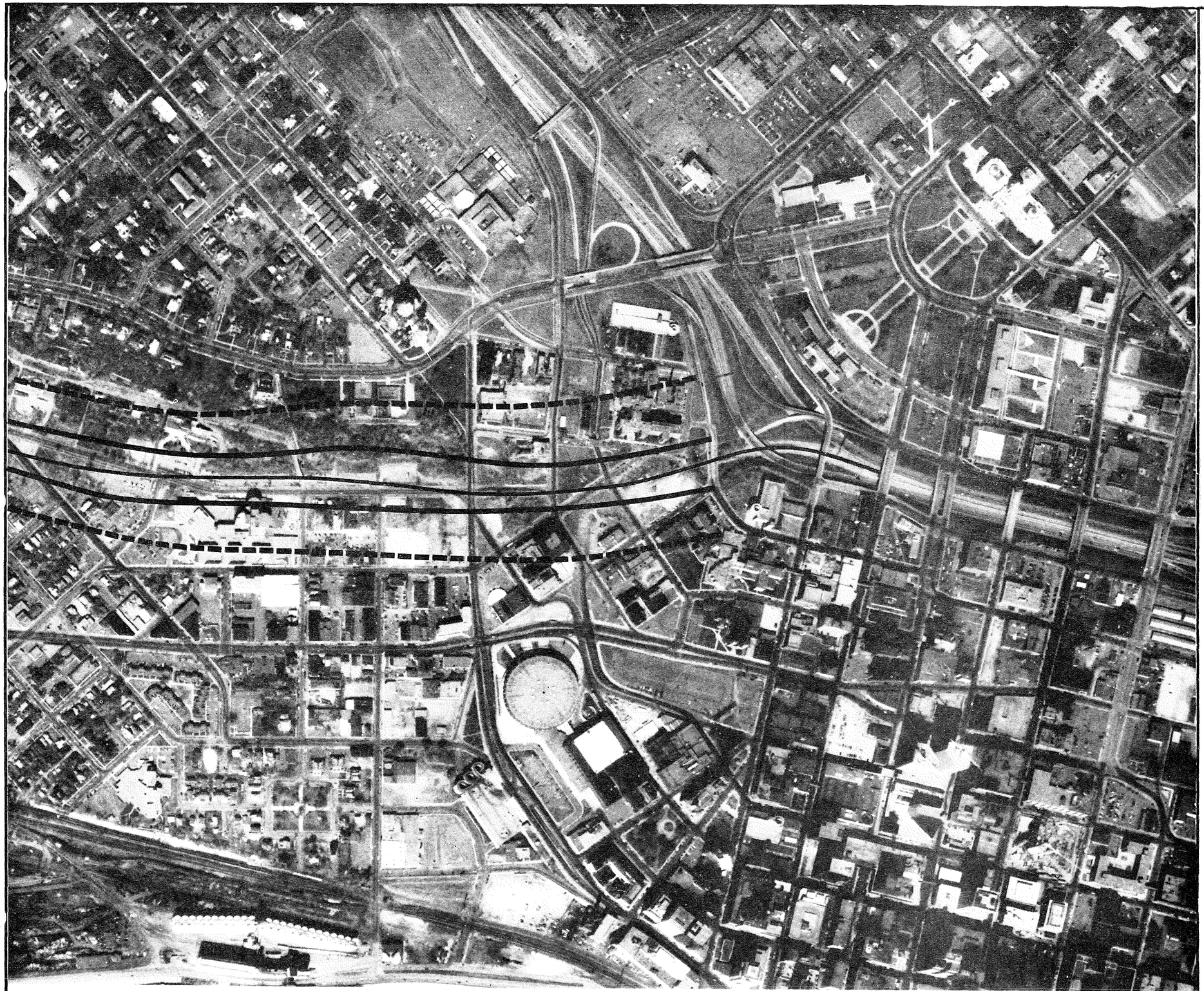


FIGURE A-7

FORECASTED DESIGN YEAR NOISE CONTOURS (Without Abatement)

GRAND/RAMSEY to COMMON SEGMENT

FREEWAY ALTERNATIVE

KEY

75 dbA

70 dbA

SCALE

1": Approximately 500'

NORTH

I35E

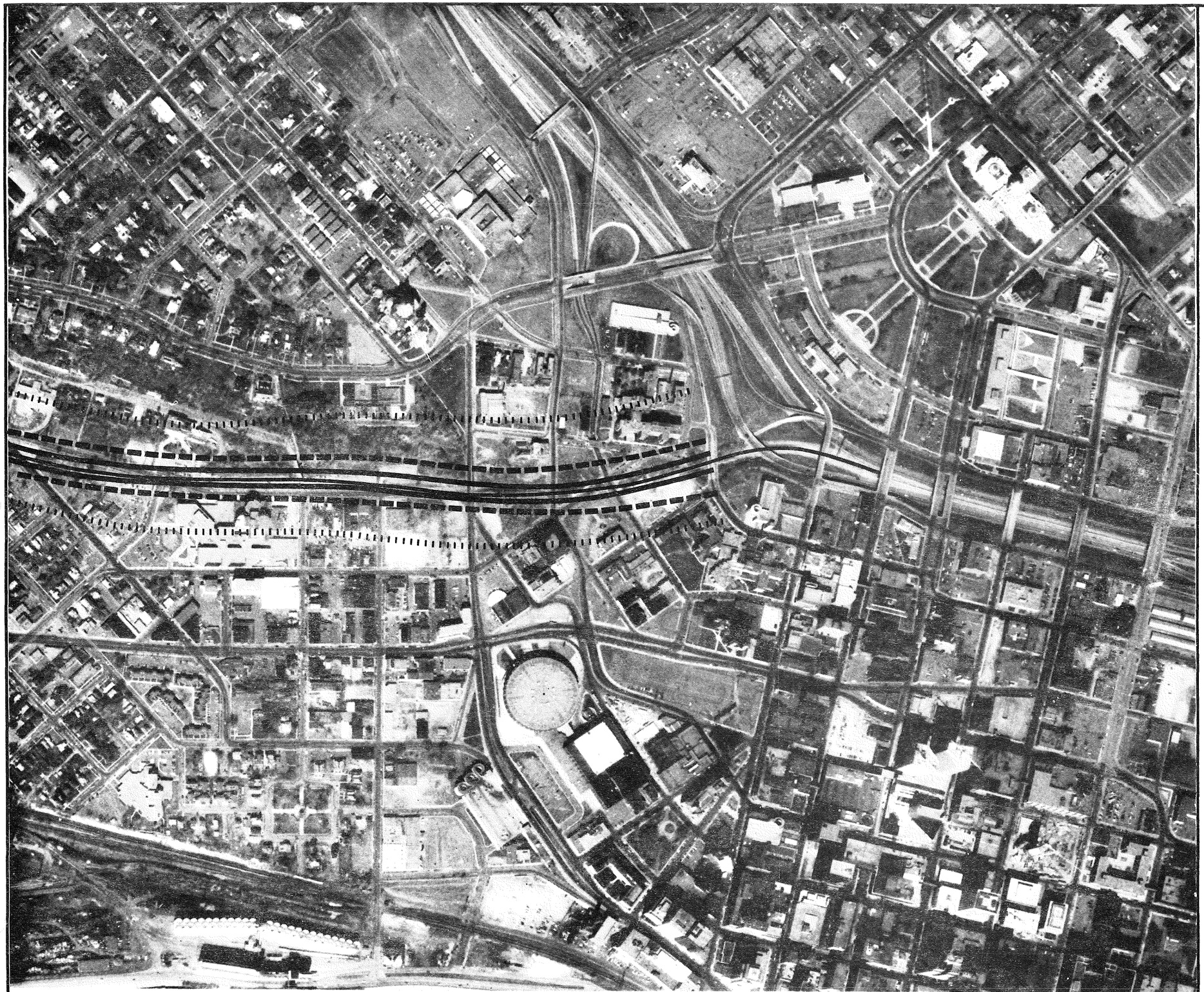


FIGURE A-8

FORECASTED DESIGN YEAR NOISE CONTOURS (Without Abatement)

GRAND/RAMSEY to COMMON SEGMENT

PARKWAY ALTERNATIVE

KEY

75 dbA

70 dbA

65 dbA

SCALE

1": Approximately 500'

NORTH

I35E

APPENDIX B - MEMORANDUM OF AGREEMENT AND SUPPORTING DOCUMENTATION FOR THE SECTION 106/4(f) PROCESSES

		Page
A.	Advisory Council on Historic Preservation (6/10/82)	294
B.	Advisory Council on Historic Preservation (10/8/82)	295
C.	Advisory Council on Historic Preservation (10/22/82)	296
D.	Memorandum of Agreement	297
E.	U.S. Department of Transportation, Federal Highway Administration (9/16/82)	299
F.	Minnesota Department of Transportation (9/7/82)	303
G.	Minnesota Department of Transportation (9/13/82)	308
H.	Minnesota Historical Society (9/10/82)	310
I.	Metropolitan Council of the Twin Cities (6/28/82)	311
J.	City of St. Paul (8/6/82)	314
K.	City of St. Paul (9/17/82)	322
L.	United Hospitals, Inc. (9/28/82)	323

Advisory Council On Historic Preservation

1522 K Street, NW
Washington, DC 20005

JUN 10 1982

Mr. William R. Lake
Division Administrator
Federal Highway Administration
Suite 490 Metro Square Building
7th and Roberts Streets
St. Paul, MN 55101

Dear Mr. Lake:

Thank you for your letter of March 19, 1982, transmitting the analysis of impacts and alternatives for Interstate 35E near downtown St. Paul, Minnesota. After carefully reviewing this material and discussing the project with your staff, we have concluded that it provides a thorough treatment of the need for I35E and the justification for selecting the alignment along the Pleasant Avenue corridor (alternative C). We agree with FHWA's assessment that the impacts upon the James J. Hill House, a National Historic Landmark, are of primary concern in our consultations.

We understand, however, that your office is now investigating an alternative not covered in the material sent with your letter of March 19 that may avoid the Hill House. This alternative substitutes an interchange at 5th/6th Street for the one proposed at Kellogg Street, moving access ramps northwest and thus eliminating the need to take any property from the Hill House. We understand that the assessment of this alternative requires evaluating the changes to the secondary road system in St. Paul as well as evaluating the technical feasibility of constructing the interchange at this point. We look forward to learning the results of your investigation. Upon reviewing this investigation with your staff, we believe that sufficient information will be available to conclude consultations on I35E pursuant to the Council's regulations, "Protection of Historic and Cultural Properties" (36 CFR Part 800).

Please contact Michael Quinn at 202-254-3495 if we can be of assistance in this matter.

Sincerely,

Jordan E. Tannenbaum

Jordan E. Tannenbaum
Chief, Eastern Division
of Project Review

Advisory
Council On
Historic
Preservation

1522 K Street, NW
Washington, DC 20005

OCT 8 1982

Mr. William R. Lake
Division Administrator
Federal Highway Administration
Suite 490, Metro Square Building
7th and Roberts Streets
St. Paul, MN 55101

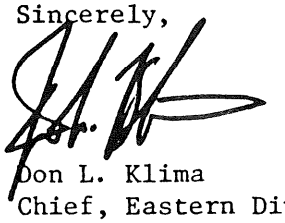
Dear Mr. Lake:

On September 20, 1982, we received your proposal, including the written concurrence of the Minnesota State Historic Preservation Officer, for the completion of Interstate 35E in St. Paul, Minnesota. We appreciate your continuing efforts to eliminate damage to all historic properties in the vicinity of this undertaking.

In accordance with 36 CFR Part 800, the Executive Director does not object to your determination of no adverse effect for the Armstrong House. In addition, we have reviewed your proposal for dealing with effects on the James J. Hill House and on the Hill Historic District and find that it represents the agreement reached by the consulting parties. A Memorandum of Agreement has been prepared and forwarded to the Chairman of the Council for ratification. A copy of the ratified Agreement will be provided for your records. The ratified Agreement will complete compliance with the Council's regulations, 36 CFR Part 800.

Thank you for your cooperation.

Sincerely,



Don L. Klima
Chief, Eastern Division of
Project Review

Advisory
Council On
Historic
Preservation

1522 K Street, NW
Washington, DC 20005

OCT 2 2 1982

Mr. William R. Lake
Division Administrator
Federal Highway Administration
Suite 490, Metro Square Building
7th and Roberts Streets
St. Paul, MN 55101

Dear Mr. Lake:

The Memorandum of Agreement for the completion of Interstate 35E, in St. Paul, Minnesota, has been ratified by the Chairman of the Council. This document constitutes the comments of the Council required by Section 800.6(c)(3) of our regulations. A copy of the Agreement is enclosed.

The Council appreciates your cooperation in reaching a satisfactory resolution of this matter.

Sincerely,

Don L. Klima
Chief, Eastern Division of
Project Review

Enclosure

Advisory
Council On
Historic
Preservation

1522 K Street, NW
Washington, DC 20005

MEMORANDUM OF AGREEMENT

WHEREAS, the Federal Highway Administration (FHWA), Department of Transportation, proposes to assist in funding the construction of Interstate Highway 35E (I35E) from Trunk Highway 110 in Dakota County to I94 near downtown St. Paul, Minnesota (Minnesota Project I-IG 35E-4 ( ) 110, State Project 6280-222); and,

WHEREAS, FHWA, in consultation with the Minnesota State Historic Preservation Officer (SHPO), has determined that this undertaking as proposed would have an adverse effect upon the James J. Hill House (NHL) and the Historic Hill District, properties included on the National Register of Historic Places, and the How Residence, a property eligible for inclusion on the National Register of Historic Places; and,

WHEREAS, pursuant to Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. Sec. 470f, as amended, 90 Stat. 1320) and Sec. 800.4(d) of the regulations of the Advisory Council on Historic Preservation (Council), "Protection of Historic and Cultural Properties" (36 CFR Part 800), FHWA has requested the comments of the Council; and,

WHEREAS, pursuant to Section 800.6 of the Council's regulations, representatives of the Council, FHWA, and the Minnesota SHPO have consulted and reviewed the undertaking to consider feasible and prudent alternatives to avoid or satisfactorily mitigate the adverse effect;

NOW, THEREFORE, it is mutually agreed that the implementation of the undertaking in accordance with the following stipulations will mitigate adverse effects on the above-mentioned properties.

FHWA will insure that the following stipulations are carried out.

STIPULATIONS

1. Mitigation for the adverse impact on the James J. Hill House will include:

   a. Construction of the design concept (currently identified as Layout 3D Study 4) which is intended to preserve intact the existing features of the former James J. Hill estate through construction of a retaining wall approximately 10' southeasterly of the existing exposed wall which is approximately 110' northwesterly of the existing centerline of Pleasant Avenue.

   b. Conveyance to the Minnesota Historical Society of the portions not required for highway right of way of lots 9, 10 and 11 of Block 70, Dayton and Irvine's Addition (formerly a part of the James J. Hill property), following completion of construction of I35E and in accordance with applicable state and federal laws and policies.

2. Mitigation for the adverse impact on the Historic Hill District will include:

   a. Construction of the alternative identified in stipulation 1.a.

   b. Exercise of special care during design and construction so as to avoid encroachment upon the steps and walkways of the German Bethlehem Presbyterian Church and the walled approach to the Selby Avenue Tunnel.

   c. Construction of a pedestrian overpass at Walnut Street, connecting the pedestrian path adjacent to the Hill property to Walnut Street on the south side of the highway to maintain continuity between the Historic Hill District and the Irvine Park Historic District. The State Historic Preservation Officer will be consulted during design of the overpass to provide for compatibility with historic properties.

   d. Application within the highway right-of-way of landscaping techniques appropriate for a parkway design to mitigate specific adverse aesthetic impacts on historic properties.

   e. Monitoring of construction activities in the area between Grand Avenue/Ramsey Street and Kellogg Boulevard which were formerly occupied by a Cooper's shop, People's Church, Mitsch house, Searle house and Flandrau house to allow for archaeological review if evidences of those buildings are unearthed.

3. Mitigation for the adverse impact on the How Residence will consist of the application of landscaping techniques appropriate for a parkway design within the highway right-of-way.

Robert R. Nelson — Oct 8, 1982
Executive Director
Advisory Council on Historic Preservation — Date

[signature] — 9-13-82
Minnesota Department of Transportation — Date

William R. Lake — 9/16/82
Federal Highway Administration
Department of Transportation — Date

Russell W. Fridley — 9/10/82
Minnesota State Historic Preservation Officer — Date

Alexander Aldrich — 9/14/82
Chairman
Advisory Council on Historic Preservation — Date

U.S. Department
of Transportation

**Federal Highway
Administration**

Region 5
Minnesota Division

Suite 490, Metro Square Building
7th & Roberts Streets
St. Paul, Minnesota 55101

September 16, 1982

Mr. Robert R. Garvey
Executive Director
Advisory Council on Historic Preservation
1522 K Street N.W.
Washington, D.C. 20005

RE: I 35E in St. Paul, Mn.
FHWA-MN-EIS-02-F
36 CFR Part 800.6

Dear Mr. Garvey:

The purpose of this letter is to obtain final Council comments to satisfy FHWA responsibility under Section 106 of the National Historic Preservation Act as amended for the referenced undertaking through compliance with the 36 CFR Part 800 procedures. Specifically, this letter summarizes project development and consultation activity associated with the referenced undertaking to conclude the nature of impact and proposed mitigation on the German Bethlehem Presbyterian Church, the James J. Hill House, the Hill Historic District, the Selby Avenue Tunnel, the Armstrong House, the How Residence, the College Hill Condominiums, the St. Paul Masonic Temple and five potential archeological sites.

The ACHP Staff, generally represented by Mr. Mike Quinn, has actively participated in the consultation process for this project. The staff reviewed the draft EIS and commented by letter dated July 13, 1981. Later, the staff reviewed the I 35E Preliminary Case Report on Historic Properties and provided comments by letter dated June 10, 1982. Frequent telephone contacts were made between Mr. Quinn and Mr. Jim St. John of my staff to consult on project development in response to historic concerns. Finally, Mr. Quinn participated in an on site meeting organized by Minnesota SHPO Mr. Russell Fridley on August 26, 1982, where the latest view of impacts and potential mitigation were thoroughly discussed.

Mr. Quinn acknowledged his site inspection by letter of September 1, 1982, in which he described a promising alignment developed by the Minnesota DOT in consultation with the City of St. Paul and the Minnesota Historical Society. Subsequent to Mr. Quinn's visit, the concept has been refined to also accommodate United Hospital's concerns expressed during the August 26 meeting. A copy of its current status, described as Layout 3D, Study 4, is enclosed for your information and aid in reviewing this package. By letter of September 2, 1982 (copy enclosed), Mn/DOT Commissioner Richard P. Braun directed that the Final EIS and historic documentation be completed using Layout 3D, Study 4.

Local consultation was concluded by a meeting among Assistant SHPO Mr. Dennis Gimmestad, Mn/DOT Preliminary Design Engineer (and its historic

specialist) Mr. Clem Kachelmyer, and Mr. St. John of my staff on September 3, 1982. Discussion was formalized by an exchange of correspondence between Mr. Kachelmyer (memorandum dated September 7, 1982) and Mr. Fridley (letter dated September 10, 1982). Copies of these correspondence are enclosed for your information. Minnesota SHPO Fridley signed the proposed MOA as part of this exchange.

Regarding the specific involvements associated with the proposed undertaking, we offer the following conclusions based on project development and the consultation process for your consideration:

1. Five potential archeological sites (Cooper's Shop, People's Church, Mitsch House, Searle House, and Flandrau House) were identified in the Pleasant Avenue corridor which the SHPO determined not likely to be of National Register quality based on existing information. Stipulation 2.e. of the MOA provides for on-site archeological review if further evidence is unearthed during construction.

2. The St. Paul Masonic Temple was discussed as a site of potential local significance in the draft EIS. It was destroyed by fire since issuance of the draft, and had to be demolished as a health and safety hazard. There remains no further historic interest in this property.

3. The Armstrong House is located on Fifth Street in St. Paul and was described by earlier documents as experiencing adverse effects resulting from the proposed undertaking. It will not be physically affected by this project as currently envisioned. Its access is modified, but not adversely affected. Its neighborhood setting remains out of character to the house both before and after the undertaking. Since the I-35E project would not affect future potential for preservation or adaptive reuse of this structure, we conclude with a finding of no adverse effect per Part 800.4(c) and supported by Mr. Fridley's September 10, 1982 letter referenced earlier, and request the Council's concurrence per Part 800.6(a).

4. The College Hill Condominiums are more directly affected as a result of Layout 3D, Study 4, than by earlier design concepts. The building is not physically affected. Mr. Fridley's letter of September 10 referenced earlier, confirms our opinion shared by Mn/DOT that the structure does not meet eligibility criteria in and of itself, and no particular historic mitigation is proposed.

5. The How Residence is a structure within the Hill Historic District that meets National Register criteria. Although it is not physically affected by the proposed undertaking, it will experience adverse esthetic effects. Mitigation is addressed by Stipulation 3 in the MOA.

6. The German Bethlehem Presbyterian Church is in the Hill Historic District, and meets National Register criteria in and of itself. Preliminary documents indicated need for a physical taking from the property as well as modification to steps at the front of the structure. Current design concepts shown in Layout 3D, Study 4, show that physical acquisition and modification will not be necessary, so physical impacts have been eliminated. The remaining "minimal adverse effects" (See Mr. Fridley's letter of September 10) are addressed by Stipulations 2.b. and 2.d. of the MOA.

7. The Selby Avenue Tunnel also lies within the Hill Historic District and meets eligibility criteria in and of itself. As with the German Bethlehem Presbyterian Church, the Selby Avenue Tunnel will not be physically impacted by the undertaking using Layout 3D, Study 4. Earlier concepts would have potentially altered the tunnel entrance area. To insure protection, mitigation of potential adverse effect is documented by Stipulation 2.b. of the MOA. The SHPO's comment on this result is again part of Mr. Fridley's letter of September 10.

8. As is summarized in Mr. Kachelmyer's memorandum of September 7 and Mr. Fridley's letter of September 10, the proposed undertaking will include construction within the Hill Historic District within existing right-of-way acquired for the project during the 1960's. Effects on items of historical interest have been avoided or impact greatly mitigated through project development and the consultation process. Those minimal adverse effects which remain are addressed by Stipulation 2 of the MOA.

9. Finally and perhaps of greatest importance, the James J. Hill House and former grounds will be minimally affected as a result of project development and the consultation process. In particular, Layout 3D, Study 4, avoids the archeologically significant lower foundation wall located on Mn/DOT property parallel to Pleasant Avenue which was once an integral part of the Hill House and grounds. Preservation of the wall avoids physical impact on the historic qualities of the former James J. Hill property and leaves comparatively minimal adverse esthetic impacts as is documented by Mr. Kachelmyer's September 7 memorandum and Mr. Fridley's September 10 letter. Mitigation is addressed by Stipulations 1 and 2.c. of the MOA.

In consideration of the above, the supporting information enclosed, and the close consultation by Mr. Quinn of your staff with participants in St. Paul, we request that the Council conclude the consultation process by concurring in the Finding of No Adverse Effect for the Armstrong House (Item 3 above), and by signing the Stipulation page of the enclosed Memorandum of Agreement. We also request that the enclosed "Draft" condition page entitled "Memorandum of Agreement" be formally typed on Council stationery and attached to the fully executed "Stipulations" page.

In order to expedite processing of the Final EIS, we request that the fully executed MOA (two pages), or a copy fully suitable for reproduction, and evidence of concurrence in the Finding of No Adverse Effect, be mailed directly to the following address:

Mr. Donald E. Trull
Regional Administrator
Federal Highway Administration
18209 Dixie Highway
Homewood, Illinois 60430
Attention: Mr. Lionel Wood

This will allow Mr. Wood to insert fully executed Part 800 documentation into the signature copy of the Final EIS. Another clean copy set of the executed MOA and No Adverse Effect concurrence should be returned to this office. We will make sufficient copies from it to insert into circulation

copies of the Final EIS. The Advisory Council on Historic Preservation will of course receive a signed Final EIS when it is available.

We appreciate the efforts your staff, in particular Mr. Quinn, has devoted to the consultation process for I-35E in St. Paul, and request your prompt action on this package to culminate all our efforts.

Sincerely yours,

William R. Lake
Division Administrator

SF-00006-02

STATE OF MINNESOTA

Office Memorandum

DEPARTMENT Mn/DOT-Design Services
Room 612H

TO : Dennis A. Gimmestad
Assistant State Historic
Preservation Officer

DATE: Sept. 7, 1982

FROM C. P. Kachelmyer
Preliminary Design Engineer

PHONE: 296-3276

SUBJECT: S.P. 6280-222 (I 35E)
Minn. Proj. I 035-4( )
FHWA-MN-EIS-81-02-D
From T.H. 110 in Mendota Heights
To I 94 in St. Paul
Dakota and Ramsey Counties
MHS Referral File #1205

Enclosed is a copy of Layout 3D Study 4 which was developed in cooperation with the Metropolitan Council, the City of St. Paul and the Federal Highway Administration and following extensive study to balance effects on historical properties, local access, traffic circulation needs, and proposed development plans. This layout is based on the concepts included in Study 3 which was discussed at the meeting at the James J. Hill House on August 26 and of which copies were furnished to you and to Mr. Mike Quinn of the Advisory Council on Historic Preservation. However, the I35E and ramp alignments and profiles have been slightly revised in order to accommodate the access needs expressed at that meeting by Mayor George Latimer and the representatives of United Hospitals.

As a direct result of the consultation process afforded under Section 106 of the National Historic Preservation Act of 1966, Layout 3D Study 4 is being adopted as a part of the preferred alternate for I35E. Therefore, we request your review and comments of the SHPO relative to the effects of this layout on historical, archaeological, architectural or cultural areas.

Please note that this Layout 3D Study 4 provides the following:

1. At the German Bethlehem Presbyterian Church there will be no construction beyond the existing sidewalks along Ramsey Street and Pleasant Avenue.

2. In the vicinity of the James J. Hill House, the existing wall along Walnut Street and the existing wall across lots 9, 10 and 11 approximately 110' northwesterly of and parallel to the existing centerline of Pleasant Avenue will be preserved in their existing condition and location with no construction to extend behind the faces of those walls. The excavation for roadway construction will be contained by a retaining wall to be built approximately 10' southeasterly of the existing wall parallel to Pleasant Avenue.

3. The paved approach to the Selby Avenue Tunnel which is contained within walls will be preserved intact, as will the tunnel itself.

4. Proposed construction within the Historic Hill District includes the following:

   a. Modifications within the existing street right of way at the German Bethlehem Presbyterian Church.

   b. Construction approximately to the face of existing wall parallel to Pleasant Avenue specified in #2 above.

   c. Obliteration of Kellogg Boulevard from north of Pleasant Avenue to College Avenue, including the removal of the temporary wooden barricades at the end of the Selby Avenue Tunnel approach.

   d. Backslope construction for the entrance ramp from Kellogg Boulevard to approximately 300' westerly.

   e. Street reconstruction within existing rights of way at miscellaneous locations between Kellogg Boulevard and Victoria Street within the National Register District and/or State Register District.

   f. Construction of a pedestrian structure at Walnut Street.

5. The Armstrong House, located between Smith Avenue and Fifth, Main and Sixth Streets will be retained in its existing location, although access options will be somewhat reduced. It is our belief that the proposed construction will not have any adverse effect upon this property, including from noise or aesthetics.

6. Although roadways will be modified in the vicinity of the College Hill Condominiums, we believe they will produce no effect upon that property. We do not believe that a determination has been made as to whether or not that property is eligible for inclusion on the National Register of Historic Places.

Enclosed is a proposed draft of a Memorandum of Agreement to mitigate adverse effects of this proposed construction.

We would appreciate your early review and response. Should you have any questions, please feel free to call me at any time.

Enclosures

cc:
R. W. Fridley - MHS
J. E. St. John - FHWA
G. Abdul-Rahman - MC
R. P. Braun
F. C. Marshall - L. A. Korth
L. L. Hansen - R. D. McAtee
K. K. McRae
D. W. Gerdes - R. Winter
M. M. Christensen
C. P. Kachelmyer
File

DRAFT

MEMORANDUM OF AGREEMENT

WHEREAS, the Federal Highway Administration (FHWA), Department of Transportation, proposes to assist in funding the construction of Interstate Highway 35E (I35E) from Trunk Highway 110 in Dakota County to I94 near downtown St. Paul, Minnesota (Minnesota Project I-IG 35E-4( )110, State Project 6280-222); and,

WHEREAS, FHWA, in consultation with the Minnesota State Historic Preservation Officer (SHPO), has determined that this undertaking as proposed would have an adverse effect upon the James J. Hill House (NHL) and the Historic Hill District, properties included on the National Register of Historic Places, and the How Residence, a property eligible for inclusion on the National Register of Historic Places; and,

WHEREAS, pursuant to Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. Sec. 470f, as amended, 90 Stat. 1320) and Sec. 800.4(d) of the regulations of the Advisory Council on Historic Preservation (Council), "Protection of Historic and Cultural Properties" (36 CFR Part 800), FHWA has requested the comments of the Council; and,

WHEREAS, pursuant to Section 800.6 of the Council's regulations, representatives of the Council, FHWA, and the Minnesota SHPO have consulted and reviewed the undertaking to consider feasible and prudent alternatives to avoid or satisfactorily mitigate the adverse effect;

NOW, THEREFORE, it is mutually agreed that implementation of the undertaking in accordance with the following stipulations will mitigate adverse effects on the above-mentioned properties.

1. Mitigation for the adverse impact on the James J. Hill House will include:

   a. Construction of the design concept (currently identified as Layout 3D Study 4) which is intended to preserve intact the existing features of the former James J. Hill estate through construction of a retaining wall approximately 10' southeasterly of the existing exposed wall which is approximately 110' northwesterly of the existing centerline of Pleasant Avenue.

   b. Conveyance to the Minnesota Historical Society of the portions not required for highway right of way of lots 9, 10 and 11 of Block 70, Dayton and Irvine's Addition (formerly a part of the James J. Hill property), following completion of construction of I35E and in accordance with applicable state and federal laws and policies.

2. Mitigation for the adverse impact on the Historic Hill District will include:

   a. Construction of the alternative identified in stipulation 1.a.

   b. Exercise of special care during design and construction so as to avoid encroachment upon the steps and walkways of the German Bethlehem Presbyterian Church and the walled approach to the Selby Avenue Tunnel.

   c. Construction of a pedestrian overpass at Walnut Street, connecting the pedestrian path adjacent to the Hill property to Walnut Street on the south side of the highway to maintain continuity between the Historic Hill District and the Irvine Park Historic District. The State Historic Preservation Officer will be consulted during design of the overpass to provide for compatibility with historic properties.

   d. Application within the highway right-of-way of landscaping techniques appropriate for a parkway design to mitigate specific adverse aesthetic impacts on historic properties.

   e. Monitoring of construction activities in the area between Grand Avenue/Ramsey Street and Kellogg Boulevard which were formerly occupied by a Cooper's shop, People's Church, Mitsch house, Searle house and Flandrau house to allow for archaeological review if evidences of those buildings are unearthed.

3. Mitigation for the adverse impact on the How Residence will consist of the application of landscaping techniques appropriate for a parkway design within the highway right-of-way.

Executive Director
Advisory Council on Historic Preservation — Date

Minnesota Department of Transportation — Date 9-13-82

Federal Highway Administration
Department of Transportation — Date 9/16/82

Minnesota State Historic Preservation Officer — Date 9/10/82

Chairman
Advisory Council on Historic Preservation — Date

Minnesota
Department of Transportation
Transportation Building
St. Paul, Minnesota 55155

Phone 296-3420

September 13, 1982

Mr. William R. Lake
Division Administrator
Federal Highway Administration
Suite 490 Metro Square Building
St. Paul, Minnesota 55101

In reply refer to: 330
S.P. 6280-222 (I 35E)
Minn. Proj. I 035-4( )
FHWA-MN-EIS-81-02-D
From T.H. 110 in Mendota Heights
To I 94 in St. Paul
Dakota and Ramsey Counties

Dear Mr. Lake:

Enclosed are two copies each of the following:

1) Layout 3D Study 4, the preferred alternative between Duke Street and I-94, which was developed as a result of extensive study to balance effects on historical properties, local access, traffic circulation needs, and proposed development plans.

2) Memorandum of September 7, 1982 from C. P. Kachelmyer, Mn/DOT Preliminary Design Engineer to Dennis A. Gimmestad, Assistant State Historic Preservation Officer relative to Layout 3D Study 4.

3) Letter of September 10, 1982 from the State Historic Preservation Officer relative to the impacts of Layout 3D Study 4 and review of the Draft Memorandum of Agreement.

4) Draft Memorandum of Agreement signed by the SHPO and the Commissioner of Mn/DOT.

We request your concurrence in the determinations by the State Historic Preservation Officer as expressed in his letter of September 10 and your acceptance of the Memorandum of Agreement.

Following your review and acceptance, we request that one copy of the Memorandum of Agreement be forwarded to the Advisory Council on Historic Preservation for completion of the review procedures under Section 106 of the National Historic Preservation Act of 1966.

The second signed copy of the Draft Memorandum of Agreement is for use in the Final Environmental Impact Statement (FEIS) being prepared for the project under direction of the Metropolitan Council.

We certainly appreciate the fine cooperation and considerable effort which you and your personnel have given to the resolution of problem areas and the advancement of this project.

Sincerely,

F. C. Marshall
Assistant Commissioner
Technical Services Division

Enclosures

MINNESOTA HISTORICAL SOCIETY
FOUNDED IN 1849
690 Cedar Street, St. Paul, Minnesota 55101 • (612) 296-6126

September 10, 1982

Mr. C. P. Kachelmyer
Preliminary Design Engineer
612H Transportation Building
Mn/DOT-Design Services
St. Paul, Minnesota 55104

Dear Mr. Kachelmyer:

RE: Review of Layout 3D Study 4
and proposed Memorandum of
Agreement for I-35E, St. Paul,
Ramsey County, Mn

MHS Referral File Number: I-205

Thank you for the opportunity to review and comment on this most recent alternate for I-35E. It has been reviewed pursuant to responsibilities given the State Historic Preservation Officer by the National Historic Preservation Act of 1966 and the Procedures of the National Advisory Council of Historic Preservation (36CFR800).

We are, of course, delighted that this alternate avoids the serious adverse effects of previous alternates. Further, we believe that appropriate mitigation for the remaining minimal adverse effects on the Historic Hill District, the James J. Hill House, and the How Residence has been included in the proposed Memorandum of Agreement.

We concur that the project, as now proposed, will have no adverse effect on the Armstrong House, and that construction within existing rights of way in the district should have no adverse effect. We also applaud your efforts to avoid an impact on the College Hill Condominiums, even though it is our opinion that this property does not meet the criteria of eligibility for the National Register of Historic Places. Likewise, monitoring of construction in the area between Grand Avenue/Ramsey Street and Kellogg Boulevard to allow for archaeological review is encouraged, although we do not believe that these properties meet the National Register criteria.

The cooperation of the Minnesota Department of Transportation and the city of St. Paul in resolving the difficult issues in this complex project has been most heartening. We look forward to working with you in carrying out the terms of the Memorandum of Agreement.

Sincerely,

Russell W. Fridley

Russell W. Fridley
State Historic Preservation Officer

June 28, 1982

300 Metro Square Building
Saint Paul, Minnesota 55101
Telephone 612/291-6359

Mayor George Latimer
347 City Hall
15 Kellogg Blvd. West
Saint Paul, Minnesota 55102

Dear Mayor Latimer:

The City of St. Paul has cooperated with the Metropolitan Council, Minnesota Department of Transportation and Federal Highway Administration (FHWA) over the past few years to aid in the development of an Environmental Impact Statement (EIS) and to hold public hearings, all to facilitate decisionmaking toward construction of I-35E through St. Paul. The City's technical support through its staff and decisions at appropriate intervals from its Council and your office have been both essential and helpful.

We have again reached a critical point in the State and Federal project development processes where a clear statement of the City's position is needed to facilitate the decisionmaking process. When FHWA approves the Final EIS in accordance with the National Environmental Policy Act, it will simultaneously conclude consultation regarding properties protected by Section 106 of the National Historic Preservation Act with the Minnesota State Historic Preservation Officer, Mr. Russell W. Fridley, and the Advisory Council on Historic Preservation (Washington, D.C.), and it will make a Section 4(f) determination pursuant to the 1966 Department of Transportation Act.

The particular Section 4(f) issue is whether it is feasible and prudent to avoid taking the lower retaining wall of the James J. Hill House. This wall is adjacent to Pleasant Avenue and across from United Hospitals. As determined by the Minnesota SHPO, this wall has archeological value for preservation in place and is, therefore, protected by both section 106 and Section 4(f) cited above.

On April 20, 1966, the land needed for highway construction was identified and acquisition commenced. Purchase of right-of-way by Mn/DOT at the Hill mansion site was completed in 1968 prior to its listing on the National Register in 1974, and prior to the promulgation of Executive Order 11593 in 1973 which extended protection to properties eligible for inclusion on the National Register. In addition, although the Hill house was declared a National Landmark in 1961 by the National Park Service, boundaries for the landmark were not defined until 1977.

The property was purchased as a result of routine I-35E project development that was later stopped by Court action in 1972. Project reevaluation in accordance with a Stipulated Settlement dated August 21, 1972 has led to preparation of the EIS, holding of public hearings, and application of Section 106 and Section 4(f).

The original alignment and plans for a six-lane freeway (I-35E) approved during the 1960's required taking the lower wall from the former James J. Hill property. When Mn/DOT applied the currently envisioned concept (a directly connected four-lane parkway described in the Draft EIS as alternate "C") to the original 1960's alignment, the resultant design still required taking of the wall as it would have for the six-lane freeway concept which is no longer being considered. Mn/DOT's engineers have developed three design alternatives with which it is feasible (can be done by engineering) to avoid taking the wall. These are: (1) to interchange with Kellogg Boulevard with a mainline parkway grade depressed sufficiently to avoid the hospital and wall, (2) to interchange with 5th/6th Streets in lieu of Kellogg Blvd., or (3) to carry the mainline parkway through the area with no interchange between Grand Avenue and 11th and 12th Streets. Layouts which display these alternatives have been provided by Mn/DOT.

The first design to avoid the wall was discussed in the preliminary case report for Section 106 consultation which accompanied the DEIS. This alternative would require an alignment shift and significant lowering of the grade. It would require acquisition and relocation of the Hoikka House (mental health facility), the Catholic Youth Center, Northwestern Bell building, potential hospital expansion sites, some of the existing parking from the Labor Temple, and is estimated to cost approximately $7 million more than a design to take the wall. The design would place access to the hospital's delivery area and frontage road on a platform above I-35E.

Subsequent to development of the first design alternative presented in the Draft EIS and preliminary case report, Mn/DOT has continued to look for other feasible means to avoid the wall with less community impact and cost. The second alternate design shifts the proposed interchange from Kellogg Boulevard to 5th/6th Streets. This reduces the cross section adjacent to the wall and hospital enough to return the grade line to a moderately depressed situation. It would not require significant additional right-of-way, thus avoiding the extreme community and developmental impacts described for the first alternative. However, the shift in location of the interchange would move I-35E/downtown St. Paul traffic to streets other than those expected to carry that load since the early 1960's, and would combine it with I-94 traffic destined for the downtown.

The third alternative misses the wall and avoids the adverse community impacts of the first alternative, or the local traffic service impacts of the second alternative, because it provides no interchange in this area. This would leave I-35E with no access point between Grand Avenue on the south and 11th and 12th Streets on the north.

The decision to be made is whether to take the lower retaining wall on the former James J. Hill property with appropriate mitigation or to construct one of the three alternatives designed to miss the wall. Mitigation would probably include archeological salvage of the area behind the wall with some type of relocation/restoration of the wall itself. It is the responsibility of FHWA under Section 106 of the National Historic Preservation Act and Section 4(f) of the Department of Transportation Act to fully evaluate the prudency of the three identified feasible alternatives before it may select the design which would take the wall.

Since the City of St. Paul, its citizenry, and its residential, business and service communities will directly gain by the benefits of the design concept selected, and also suffer the consequences of the adverse impacts associated with that concept, it is essential that project decisionmakers clearly understand the specific concerns of the City with each of the four concepts described in this letter. Section 106 and Section 4(f) provide strong protection for features such as the lower retaining wall on the former Hill property. The courts have supported Section 4(f) particularly by requiring FHWA and U.S. DOT to consider the prudency criteria very thoroughly before reaching a Section 4(f) determination.

This letter asks the City to express its specific concerns about each alternative design concept discussed above. The information you provide will be a major factor in selecting the specific design given the protection provided by Section 106 and Section 4(f). In your reply, you should especially consider whether there are truly unusual factors present and/or whether the cost of resultant community disruption reaches extraordinary magnitudes for each of the three feasible alternatives. For each alternative, please describe the unique or truly difficult problems (if any) it may cause the City of St. Paul, its citizens and its residential, business, and service communities.

While this request requires a very significant input from the City regarding I-35E, your staff has been in very close contact with the day-to-day progress of Metropolitan Council, MnDOT, and FHWA staffs during project development, and they should be in an excellent position to aid your reply. We ask for your earliest possible reply so that the remaining key decisions can be made quickly and properly. This will expedite completion of the Final EIS and related documents, and lead to early completion of this long awaited facility.

Sincerely,

Ghaleb Abdul-Rahman
Project Manager

JM214A

CITY OF SAINT PAUL
OFFICE OF THE MAYOR

347 CITY HALL
SAINT PAUL, MINNESOTA 55102
(612) 298-4323

GEORGE LATIMER
MAYOR

August 6, 1982

Mr. Ghaleb Abdul-Rahman
Metropolitan Council
300 Metro Square Building
St. Paul, Minnesota 55101

Dear Mr. Abdul-Rahman:

Thank you for consulting me regarding this critical point in the planning of the Interstate 35E link in St. Paul. I will do my best to assist you in your efforts to conclude consultation on the properties protected by the National Historic District Preservation Act and the Department of Transportation Act, as you requested in your June 28, 1982 letter.

The City of St. Paul has long been committed to revitalization of our neighborhoods, and to the preservation of our heritage. Beginning in the 1960s, we have gone to great lengths to improve the quality of life in St. Paul, including providing new housing for a variety of income groups, assisting home owners with rehabilitating their residences, encouraging small business revitalization, and implementing a comprehensive program of downtown redevelopment. St. Paul has become nationally known for these efforts.

Throughout these years, preservation of historically significant sites and of the character of neighborhoods have been the priority of city officials and community leaders alike. We are very proud of our Heritage Preservation Commission's efforts, particularly since preserving the heritage of an older city is a complex process: the city has limited vacant land to support continued growth, and some redevelopment is a necessary part of the current and future vitality of the city. Tough choices must sometimes be made, in which one must carefully weigh the various interests and issues. This is especially true in St. Paul's downtown area.

It is within this context that we have considered the benefits and the liabilities of completing the Interstate 35E link in St. Paul. During St. Paul's review of the Draft Environmental Impact Statement in 1981, I asked the St. Paul Planning Commission to consider each of the alternatives, and to recommend the one which would best meet local and regional transportation objectives, while minimizing adverse impacts on our neighborhoods and on the overall urban environment. In its September 3, 1981 resolution, supporting a directly connected parkway in the Pleasant Avenue corridor, the City Council concluded, in part, that "completion of Interstate 35E would provide overall a positive impact on the economic, social and environmental quality of the city", and that "the parkway alternative on Pleasant Avenue would provide the most positive visual and aesthetic integration with adjacent residential areas and historic sites". The subsequent recommendations made by Metropolitan Council Chairman Charles Weaver and Minnesota Department of Transportation Commissioner Richard Braun were agreeable to us, in that Alternative C, which they selected, includes most of the elements the city supported. The St. Paul City Council, Chairman Weaver and Commissioner Braun made these choices on the assumption that the design concept which had been drafted for Alternative C would remain basically the same, with only minor changes during the final design and engineering phases of the project.

You have now requested that the city evaluate three design alternatives which would avoid the taking of the lower wall from the James J. Hill Mansion. We have done an exhaustive review of the three, comparing each with the previously drafted design concept for Alternative C. Our evaluation is based upon past and current commitments to development made by the city, as well as the St. Paul Comprehensive Plan (specifically the Street and Highway Plan, the Downtown Development Plan, and the Traffic Control Plan). We have also referred to the Downtown Circulation Study, currently being prepared by the Planning Commission. I would like to share with you our evaluation of each of the three alternatives, as compared with the previously drafted design concept.

DRAFT EIS DESIGN CONCEPT FOR ALTERNATIVE C

Half diamond interchange at Kellogg Boulevard.

This design would greatly improve access from Dakota County and the southwest area of St. Paul into downtown St. Paul. The large traffic carrying capacity of the parkway in the Pleasant Avenue corridor would alleviate congestion on West Seventh Street and Shepard Road, and the direct connection would reduce the volume of through traffic using downtown streets. Interstate 94 traffic bound to and from downtown St. Paul would use the new Fifth/Sixth Street pair, while the major downtown access for Interstate 35E would be at Kellogg Boulevard. We have further evaluated this design in terms of its current and future implications for economic development, circulation, aesthetics and historic sites in the City of St. Paul.

Economic Development Impacts

The Rice Park area is an eligible National Register Historic District, which the city has taken great care to preserve. Investments in place include the total restoration of one of the city's most important historic structures, Landmark Center. Restoration of the St. Paul Hotel is underway, while next door to it a new 26-story condominium office tower topped by luxury housing units, is being built. The Ordway Music Theatre will be constructed on the west side of Rice Park, beginning in 1983. These projects represent a total public and private investment of over $80 million.

The planning for this area has presumed that the I-35E interchange would be at Kellogg Boulevard. Access via Kellogg Boulevard would provide a direct route to the Rice Park area with its major redevelopment and restoration projects, described in the previous paragraph, as well as to the United Hospitals Complex. In addition, the area which would be served by the Kellogg interchange (often referred to as Lower Cathedral Hill) contains some significant redevelopment sites. These sites would become much more attractive for development of an intensity appropriate to downtown St. Paul.

By routing I-35E traffic onto Kellogg Boulevard, this design would allow for more effective use of the traffic capacity of Kellogg, as well as of other major east-west streets. This means that motorists attempting to reach the Town Square retail center and the Lowertown area would be faced with fewer traffic conflicts and a lower level of congestion at peak hours. The result would be that downtown St. Paul would be able to draw a greater share of the regional retail market, as well as to become a more attractive location for major employers.

Impacts on Circulation

During the past 15 years, the city has planned and implemented its downtown traffic patterns and parking programs based on the assumption that the I-35E interchange would be at Kellogg Boulevard. Our investments in Kellogg Boulevard, the Kellogg Bridge to the East Side, the Eighth/Ninth Street pair, Seventh Place, the Civic Center, and the upcoming restoration of the Civic Center parking ramp are evidence of this. We still believe that we need an interchange at Kellogg Boulevard, and we have planned our commuter parking locations with that in mind. The Civic Center ramp is our most heavily used commuter parking site and we intend in the future to construct others ringing the core: along Kellogg Boulevard, north of Ninth Street, and east of Jackson. In addition to improving our downtown circulation patterns, we must continue to implement this program in order to meet the requirements of the State Implementation Plan for Air Quality.

The Downtown Circulation Study, currently underway in St. Paul, proposes various improvements in transit service and in the pedestrian environment downtown. These include reverse flow bus lanes on Fifth and Sixth Streets as well as wider sidewalks with landscaping, improved bus waiting areas, ornamental lighting, and other amenities, on a number of downtown streets, including Fifth and Sixth Streets. We believe these types of improvements are essential to downtown's continued vitality, particularly because transit and pedestrian travel are far superior to the auto for trips made within downtown. By using Kellogg Boulevard as the I-35E access, the Fifth/Sixth pair would retain enough capacity to be an effective carrier of buses, and improvement of the pedestrian environment would be more feasible.

Impacts on Aesthetics and Historic Sites

As I discussed earlier in this letter, the St. Paul City Council supported a directly connected parkway in the Pleasant Avenue corridor in part because of its potential for being visually integrated into the surrounding environment. The Alternative C Design Concept would help to minimize the visual impact of the project in the downtown area, especially as compared with Alternative One, described below.

The half diamond interchange at Kellogg Boulevard would use less land area than the loop ramp proposed in Alternative One, and would be less of a physical and visual barrier between the Historic Hill District and downtown. Finally, the Kellogg interchange would provide good access to the Rice Park District, while avoiding extremely heavy traffic volumes through the district.

ALTERNATIVE ONE

Modified Kellogg Boulevard interchange, with loop ramp; cantilevered frontage road adjacent to United Hospitals; requires relocation of Hoikka House, the Catholic Youth Center, and the Northwestern Bell Building.

This alternative was previously reviewed by the city. Please refer to my January 22, 1982 letter, which was included in your Preliminary Case Report, and my April 29, 1982 comments on that report. Summarized below is our evaluation of Alternative One.

Economic Development Impacts

The Lower Cathedral Hill area encompasses the land adjacent to the Pleasant Avenue corridor, from the United Hospitals Complex on the west to St. Joseph's Hospital on the east. Major investments have taken place in this area during the past three years, the largest of which is the United Hospital's new facility which was completed in 1979. The complex was designed and constructed based on the assumption that an I-35E interchange would be provided at Kellogg Boulevard, similar to the one described in the Draft EIS Design Concept above.

Alternative One proposes to lower the grade of the Pleasant Avenue alignment so that the United Hospital's delivery area and frontage road would be placed on a platform above the roadway, at an estimated $7 million additional cost to the project. Although these changes are feasible from an engineering point of view, they present some very difficult problems. One is that the frontage road would have to end at Walnut, instead of one block farther east, at Chestnut. Chestnut is a key local access route. The United Hospitals master plan, a major part of which has been implemented during the past decade, calls for expansion of the Hospital campus both east and south of the existing buildings. Alternative One would use a significant part of the acreage to the east, and would also effectively cut off the remaining parcels from the rest of the complex. The City of St. Paul has worked closely with officials of the United Hospitals in implementing their master plan, and supports this expansion scheme. We could not support a roadway design which, in addition to causing a large increase in the project cost, has such adverse impacts on the current and future operations of this important local employer and regional service provider.

The loop ramp portion of Alternative One would also affect other significant development parcels, on both sides of the Pleasant Avenue corridor between Kellogg and Fifth/Sixth Streets. It has been previously estimated that these parcels could support, at a minimum, $15 million worth of new construction. Alternative One could decrease the square footage of these parcels by as much as 50%, which would severely reduce their potential for the intensity of development appropriate for this location on the edge of downtown St. Paul.

Impacts on Circulation

Alternative One would provide an interchange at Kellogg Boulevard, which would be similar to the Draft EIS Design Concept in its impacts on downtown circulation. Access to Rice Park, the Town Square retail center, and Lowertown would be comparable, and Alternative One would adequately serve our current and future commuter parking locations. However, it would make local access in the United Hospitals area more difficult; as described above.

Impacts on Aesthetic and Historic Sites

The loop ramp and cantilevered frontage road required as part of Alternative One would have the effect of creating a much greater visual intrusion on the area as a whole. As I stated in my previous letter, I believe Alternative One would cause an adverse impact on the Historic Hill National Register District of a much larger scale than the removal of the lower retaining wall of the Hill Mansion. The Pleasant Avenue corridor, under Alternative One, would become a much larger barrier, isolating the Hill District from downtown. The Draft EIS Design Concept, on the other hand, would help to minimize this visual isolation.

Relocation Impacts

Unique among the design concepts being considered, Alternative One would require the acquisition of significant new right-of-way. The Hoikka House, a mental health facility, as well as the Catholic Youth Center, Northwestern Bell Building, and some vacant sites would have to be acquired, and existing uses would have to be relocated.

The current location of the Hoikka House is ideal, in that it is near United Hospitals and other support services. Being on the edge of downtown, it has no nearby residential community to contend with. Past efforts to relocate such sensitive groups have been extremely difficult, because property owners within close proximity of any proposed relocation site usually resist.

ALTERNATIVE TWO

Shift proposed interchange from Kellogg Boulevard to Fifth/Sixth Streets.

The St. Paul Planning staff has spent a great deal of effort looking at this alternative, because it was the one which seemed most likely to be feasible. Indeed, Alternative Two would still provide access to downtown St. Paul from Dakota County, which is important from both the local and regional perspective. But the concentration of I-94 and I-35E traffic onto only one corridor within downtown is a major change from the Draft EIS Design Concept. We have evaluated it in terms of its current and future implications for economic development, circulation, aesthetics, and historic sites in the City of St. Paul.

Economic Development Impacts

The Rice Park area is an eligible National Register Historic District, which the City has taken great care to preserve. Investments in place include the total restoration of one of the city's most important historic structures, Landmark Center. The 26-story AmHoist project, a condominium office development which will include a parking garage and luxury housing units, is now under construction, as is the restoration of the St. Paul Hotel. The Ordway Music Theatre will be constructed on the west side of Rice Park, beginning in 1983. These projects represent a total public and private investment of over $80 million.

The planning for this area has presumed that the I-35E interchange would be at Kellogg Boulevard, not Fifth/Sixth Streets. Such a change would mean routing a great deal more regional traffic through the heart of this Historic District, which would interfere with access to existing and proposed development. The greater traffic volume would aggravate existing traffic conflicts along Fifth/Sixth Streets,including access to our retail center and the Lowertown area. On the west edge of downtown, the College Hill condominiums and the old Miller Hospital area would be less desirable as residential sites.

Circulation Impacts

Again, all alternatives evaluated in the Draft EIS presumed access from I-35E at Kellogg Boulevard, not Fifth/Sixth Streets. The City has also made this same assumption in implementing traffic and parking programs for the past 15 years. Our investments in Kellogg Boulevard, the Kellogg Bridge to the East Side, the Eighth/Ninth Street pair, Seventh Place, the Civic Center, and the upcoming restoration of the Civic Center ramp are evidence of this. While Alternative Two would still provide the critical link between Dakota County and downtown St. Paul, it is much less desirable with regard to downtown circulation.

The biggest problem we have with Alternative Two, from a circulation standpoint, is that we have planned our commuter parking locations with the Kellogg interchange in mind. The Civic Center ramp is our most heavily used commuter parking site, and we intend in the future to construct others ringing the core: along Kellogg Boulevard, north of Ninth Street, and east of Jackson. By continuing to implement this program, we have met the requirements of the State Implementation Plan for Air Quality. The Fifth/Sixth Street access from I-35E would mean less direct routes to these commuter parking locations, and would complicate our efforts to meet air quality standards.

Alternative Two would also have negative impacts on transit service downtown. Fifth and Sixth Streets currently are the heaviest bus carriers and operate at capacity for buses given today's traffic volumes and right-of-way configurations. Increases in traffic caused by concentrating the I-35E and I-94 access on Fifth and Sixth Streets would be likely to cause delays in bus movement, making transit service slower and more expensive. I do not believe this would make sense, in light of our long-standing local and regional commitment to transit service. As far as future development is concerned, Alternative Two makes it difficult if not impossible to implement our plans for reverse-flow bus lanes, improved bus waiting areas, wider sidewalks, and other pedestrian amenities which are very important to downtown's attractiveness and future economic growth.

Impacts on Aesthetics and Historic Sites

I have discussed the economic development aspects of the Rice Park area above, and I have also mentioned that Alternative Two would make it difficult for the city to improve the pedestrian environment along Fifth and Sixth Streets. But there are also potential impacts to historic sites. The pavement width along Fifth and Sixth Streets varies greatly: between 40 and 60 feet. One solution, assuming that Alternative Two were chosen, would be to widen the pavement in certain blocks, so that it would be possible to provide three lanes for auto and truck traffic plus a wider lane for buses. The problem is, the blocks where this would be necessary are within the Rice Park District. The pavement on both sides of Landmark Center is only 40 feet wide, with sidewalks no wider than 12 feet. I simply do not believe it is either desirable or prudent to consider widening the right-of-way in this area. We would, in effect, be compromising a Historic District which is well-preserved and is leveraging additional major economic development, in order to preserve a much less important site.

ALTERNATIVE THREE

No interchange at Kellogg Boulevard or Fifth/Sixth, reducing the number of downtown interchanges to two, at Grand/Ramsey and at Eleventh/Twelfth Streets.

The Draft EIS concluded that any build alternative would improve access to downtown St. Paul, with major economic benefits to downtown and the City as a whole. All build alternatives presumed that there would be a connection at Kellogg Boulevard. I am convinced that eliminating this strategic access point, which would have served the downtown core, could seriously compromise the project's ability to provide these benefits.

Economic Development Impacts

The Kellogg Boulevard interchange would have brought motorists from Dakota County and the southwest area of St. Paul directly into the Lower Cathedral Hill area, as well as very near the Civic Center and the Rice Park District. Equally important is the need for access to the downtown retail center, adjacent to the Seventh Place Mall. Alternative Three fails to adequately serve these regional traffic generators. I am concerned that this could impair downtown St. Paul's ability to compete with other regional shopping centers (i.e., suburban malls), both now and in the future. It is also likely to make downtown's remaining development sites (most of which are in the vicinity of I-35E and Kellogg) less attractive to investors. If I-35E were completed using Alternative Three, we would have to resign ourselves to a very circuitous route for reaching the downtown core, including many of downtown's major employers, businesses, and cultural attractions.

Impacts on Circulation

During the past 15 years, the city has planned and implemented its downtown traffic patterns and parking programs based on the assumption that the I-35E interchange would be located at Kellogg Boulevard. Our investments in Kellogg Boulevard, the Kellogg Bridge to the East Side, the Eighth/Ninth Street pair, Seventh Place, the Civic Center, and the upcoming restoration of the Civic Center ramp are evidence of this. While Alternative Three would still provide the critical link between Dakota County and downtown St. Paul, it is much less desirable with regard to circulation within the downtown.

We believe that we need an interchange at Kellogg Boulevard, and we have planned our commuter parking locations with that in mind. The Civic Center is our most heavily used commuter parking site and we intend in the future to construct others ringing the core: along Kellogg Boulevard, north of Ninth Street, and east of Jackson. By continuing to implement this program, we have met the requirements of the State Implementation Plan for Air Quality. Eliminating the Kellogg Boulevard interchange would mean less direct routes to these commuter parking locations, and would complicate our efforts to meet air quality standards. Alternative Three would also be likely to hinder bus travel to and from downtown St. Paul, and would no doubt cause major changes in plans to use I-35E for express bus service. In addition, emergency access to United Hospitals and to other downtown properties, for police and fire protection, would be impaired.

On a more localized level, Alternative Three would cause traffic problems which would be very difficult to solve. Traffic bound for downtown using the Grand/Ramsey interchange would be forced to use streets which are needed for local auto and pedestrian access, such as West Seventh Street and Exchange Street. Aside from capacity limitations on these streets, it would be inappropriate to route a large volume of regional trips onto streets which should primarily serve local access to the United Hospitals and Irvine Park areas. These are areas which, by nature of their function, are very sensitive to traffic noise. Traffic congestion would be especially severe immediately before and after Civic Center events.

Similar traffic conflicts would occur on some of downtown's north-south streets. Motorists bound for the downtown core who did not exit I-35E at Grand/Ramsey would have to exit at either end of the common section, and use north-south streets, (such as St. Peter, Wabasha and Jackson, which are already crowded at peak hours), to reach their destinations. We must also consider the impact on the common section. Alternative Three would force even more traffic onto this part of the interstate system, which now operates at capacity and will continue to do so.

Impacts on Aesthetics and Historic Sites

Although Alternative Three would be effective at avoiding impacts on the lower retaining wall of the Hill Mansion, it could adversely impact other historic sites. The historic Irvine Park neighborhood, just southwest of the Civic Center, is a great source of pride to St. Paul, and to the residents there who have spent so much effort to restore the area to its former splendor. The city and Irvine Park residents continue to wrestle with traffic problems in the area, not the least of which are the truck route on Chestnut Street and congestion before and after Civic Center events. I cannot see how Alternative Three could do anything but exacerbate these difficulties. Irvine Park neighborhood streets would have to bear most of the traffic headed to and from the Civic Center, both on a daily basis and when special events are scheduled.

In summary, we are quite satisfied with the exhaustive investigation of design alternatives which has been done by the Metropolitan Council and the Minnesota Department of Transportation. We are fully aware of the need to resolve the 4(f) and 106 issues as quickly as possible, and we recognize that some difficult tradeoffs must be made. Our evaluation of the three alternatives described in your June 28, 1982 letter has led us to conclude that the Draft EIS Design Concept is by far the most prudent in all aspects. Each of the three alternatives would cause great harm to the City's overall efforts to preserve our heritage and urban environment, to serve transportation needs, or to continue the economic growth of downtown St. Paul. Further, we do not see any prudent way to mitigate these impacts, so we must advise that the taking of the lower wall of the James J. Hill Mansion (including the appropriate mitigation measures) must proceed.

Again, thank you for consulting me on this matter. I will be glad to assist in whatever way possible to expedite the implementation of the St. Paul I-35E link.

Sincerely,

George Latimer

George Latimer
Mayor

cc: St. Paul Deputy Director for Planning Peggy A. Reichert
Minnesota Department of Transportation Commissioner Richard Braun
Federal Highway Administration Division Administrator William Lake
State Historic Preservation Officer Russell Fridley

GEORGE LATIMER
MAYOR

CITY OF SAINT PAUL
OFFICE OF THE MAYOR

347 CITY HALL
SAINT PAUL, MINNESOTA 55102
(612) 298-4323

September 17, 1982

Charles Weaver, Chairman
Metropolitan Council
300 Metro Square Building
St. Paul, Minnesota 55101

Dear Charlie,

I am very pleased with the results of our efforts to resolve the potential impacts of the I-35E Parkway Alignment on the lower wall of James J. Hill mansion as well as the development and traffic circulation pattern of the Downtown Area. We support the implementation of Layout 3D Study 4, which involves shifting Kellogg Boulevard to the northeast, and the memorandum of agreement signed by Russell W. Fridley, Richard Braun, and William Lake.

I commend everyone involved in reaching this point of resolution. I am encouraged by the recent progress towards completion of the final EIS.

Thank you for your cooperation.

Sincerely,

George Latimer
Mayor

GL/mb

One Appletree Square
Minneapolis MN 55420
612 853 2000 Telex 29 0814

September 28, 1982

Ghaleb Abdul-Rahman
1-35E Project Manager
Metropolitan Council
300 Metro Square Building
St. Paul, Minnesota 55101

Dear Mr. Abdul-Rahman:

Design Alternatives
Pleasant Avenue Corridor, 35-E

As planning consultants to United Hospitals, Inc., we were pleased to be involved in the design modifications to the Pleasant Avenue Corridor proposals which have evolved in recent weeks. The series of meetings which ocurred between August 23 and September 2, involving participants from The Minnesota State Historical Society, The Saint Paul Department of Planning and Economic Development, MNDOT Design Staff, The Metropolitan Council, United Hospitals, Inc. and other interested parties were, in our opinion, very productive, and at this point seem to lead the way to a workable solution for the design of this rather complicated parkway and its various connecting elements.

In our letter of December 22, 1981, we outlined several concerns and recommendations regarding the design of the 35-E parkway at the Pleasant Avenue Corridor; specifically, the conditions that impact United Hospitals most directly occur at the base of the Walnut Street steps and along the existing Pleasant Avenue roadway which services the Hospital complex. At that time, our recommendations were to construct a retaining wall close to the Hill House retaining to allow for the parkway r.o.w. to pass between the Hill House historic property and the Hospital's complex, including the service road.

On August 25, we met with St. Paul P.E.D. and reviewed revised designs which preserved the Hill House wall but eliminated a service road connection to Chestnut Street. This again seriously compromised several basic ideas in the Hospital's Master Plan and we voiced our objections.

A subsequent meeting and presentation by MNDOT design staff on August 26, including Commissioner Braun and Mayor Latimer, covered the outstanding issues, and assurances were given that a workable solution was forthcoming.

On September 2, a meeting was held at City Hall Annex (P.E.D.) and a revised layout was presented. The proposal, "Layout 3-D, Study 4, Preliminary," offers the following:

1. The Hill House wall is preserved "in situ" by a 550' long retaining wall which lies approximately 8' to its south. This allows for the parkway to be built close to the Hill House property at an approximate elevation of 94.0' or 6' below the assumed elevation of the Hill House wall footing or 22' below existing grade at the exposed face of the Hill House wall.

2. Layout 3-D, Study 4, shows a workable service road approximately 24' wide connecting Thompson Street with Chestnut Street without removing Hoikka House or eliminating the opportunity to vacate Walnut Street and develop a semi-public garden on the Walnut Street axis. It appears that this road encroaches slightly on the service dock area of the Hospitals. We are very concerned about and protective of the existing clearances in this area.

3. A relocated Kellogg Boulevard approximately 350' east of the existing Kellogg r.o.w. allows this layout to accomplish points 1 and 2 above; Kellogg will align with Concordia Avenue and existing Kellogg will be vacated between College Avenue and Smith Avenue.

4. Smith Avenue, where it intersects Kellogg will be a simple "right-in, right-out" connection with no crossing of the median.

We have been assured that the progress made to date on the refinement of this design represents only the beginning of continuing involvement between our interests and the MNDOT design staff as managed by your office of Transportation Planning, Metropolitan Council.

We are interested in carrying on a constructive dialogue on these issues, in our interest, and in a general public interest as it affects the urban planning of the immediate area. Please contact us immediately when you have any additional information or design studies for our review.

Sincerely,

Frank D. Nemeth

Frank D. Nemeth, AIA

cc: C. Jerome Jorgensen
Peggy Reichert
Roger R. Starn