

May 7, 2024

Dear Commissioner Daubenberger,

This letter concerns the Rethinking I-94 project in Minneapolis and Saint Paul. As members of the project's Policy Advisory Committee (PAC) and elected officials in Minneapolis and Saint Paul, we are reaching out to share concerns about the process to date and request immediate action.

This project is a generational opportunity for MnDOT & local governments to work together to repair the highway's historic and ongoing harms and invest in reparative justice for our communities. Rethinking I-94 must prioritize a comprehensive approach to evaluating alternatives, one wholly different from the approach that justified the freeway's construction in the first place. The health and well-being of corridor residents must be the highest priority.

A recently released [report](#) highlights flaws with MnDOT's current evaluation process that must be addressed before the project advances.

These concerns include:

- 1. The travel demand model that is the basis for the evaluation is highly flawed** in its ability to analyze highway expansion or removal impacts and cannot provide reliable traffic impact results
- 2. The project area is unnecessarily constrained and limits the ability to truly reimagine the project corridor**
- 3. Community engagement has been limited in scope**
- 4. There has been no action to proactively plan for anti-displacement and community development policies to ensure that this project benefits those who have been most harmed**
- 5. The proposed evaluation criteria do not prioritize the well-being of impacted communities and accurately capture the benefits of highway removal**
 - a. The quantitative evaluation criteria are inherently biased toward a highway solution and may result in the highway removal options being dropped from the Tier I EIS despite numerous benefits for impacted neighborhoods
 - b. The qualitative measures are overly simplistic yes/no indicators that do not reflect the enormous benefits of highway removal

It is not too late to address these shortcomings. **We urge you to fix the Rethinking I-94 process by committing to the following actions:**

- 1. Create an intergovernmental workgroup to implement anti-displacement policies and study repurposing highway land for community benefit**

Intentional and proactive measures must be taken to ensure that the Rethinking I-94 project primarily benefits those who have been forced to bear the highway's harms and does not facilitate gentrification and displacement. This will require policies that extend beyond transportation and the scope of MnDOT. However, as the public agency leading the project, MnDOT must take an active role in convening this discussion with other government partners, including Hennepin and Ramsey County, the cities of Minneapolis and Saint Paul, the Metropolitan Council, the State of Minnesota and the federal government.

MnDOT should create a workgroup with public meetings specifically focused on evaluating and advancing such protections and reparations. This should be done in partnership with community members, organizations and institutions, prioritizing the voices of those who have been most impacted.

2. Fix inaccurate traffic models and incorporate land-use changes into modeling

The report outlines reasons why the regional model relied on by MnDOT cannot accurately forecast speed or traffic volume metrics. MnDOT should stop reporting them or using them in decision-making until changes are made.

MnDOT should make the following changes to modeling:

- **Enhance the model by including Dynamic Traffic Assignment (DTA).** An example of another agency that conducted a model enhancement to plan a freeway removal is the I-375 Reconnecting Communities 4 project in Detroit. In this case, the Southeast Michigan Council of Governments (SEMCOG), evaluated the traffic impacts of the proposed highway removal by adding a DTA. It was concluded that without DTA, the model results would be misleading.
- **Incorporate land use changes into transit and traffic modeling.** There is significant potential for new housing, jobs and other neighborhood amenities to be located in the I-94 right-of-way. The transit ridership potential of the boulevard options is significant, as they include dedicated transit lanes on much or all of their length and provide direct pedestrian connectivity to the surrounding neighborhoods in a way that is impossible with transit service on highway lanes. Despite this, MnDOT's transit ridership projections failed to consider the impact of land-use changes, ignoring a major source of potential ridership. This renders the transit ridership projections meaningless, and should be remedied before any decisions about project alternatives are made

3. Include a wide variety of highway removal options in the upcoming scoping decision document and add a "restored network" option with fewer lanes to the studied project alternatives to maximize repurposed land for new affordable housing, businesses and parks

MnDOT should add project options that restore the historic grid and replace the highway with a narrower, locally oriented street. A restored network option has a few key benefits. It maximizes the opportunity to repurpose land for new housing, businesses, parks and other neighborhood

amenities. It would also reduce the width of the new street, facilitating easier pedestrian crossing and north/south access.

4. Extend the project area to connect into the downtowns and add a portion of Highway 280 in Saint Paul

The Rethinking I-94 project boundaries are unnecessarily constrained and prevent a holistic reimagining of the corridor. The project limits should not end at the highway, because no trip begins or ends on a highway. Based on the analysis of trip origins and destinations, it is clear that access and connectivity into both downtown Minneapolis and downtown Saint Paul should be a priority. Additionally, changes to the Highway 280 corridor south of Energy Park Drive must be considered simultaneously with changes on I-94 in order to be accurate and comprehensive.

5. Improve transparency and community engagement, including visualizing what a boulevard conversion would look like in each neighborhood

It is imperative that the decision on the future of I-94 is made transparently and with comprehensive and accurate information. MnDOT and other government partners must prioritize input from the public, especially from those who are most affected, and from their representatives in local and state governments. MnDOT and the Rethinking I-94 project team have the opportunity to set a new standard for engagement that centers the voices of impacted communities, creating the potential for a truly reparative project.

This should begin with making the following changes:

- Create a wide variety of neighborhood specific concepts that show potential new connections, and opportunities for repurposing land, so that community members can fully understand the implications of each alternative
- Disclose the full range of social and environmental impacts of each project alternative
- Clearly define, in plain language, how MnDOT will be evaluating the various project alternatives, and provide clarity about how MnDOT is defining “fatal flaws”

6. Create a working group on highway conversion projects

MnDOT has convened a working group to explore issues with land bridges, freeway caps, and other similar concepts. In order to similarly inform and engage the agency on highway removal / boulevard conversion projects, a working group on highway removal projects must be created.

7. Revise the project’s evaluation criteria to better measure the impacts on adjacent neighborhoods

The following changes should be made to the project’s “mobility” and “health and quality of life” measures:

Mobility

In evaluating mobility, the fact that I-94 serves primarily local trips, and that the majority of trips use I-94 for only a short distance, should inform the future mobility needs. The measures proposed by MnDOT for corridor throughput, mainline speed, and travel time reliability reinforce highway travel to provide high speeds for short trips, which is not cost effective, inefficient, and harmful to the adjacent communities. Short neighborhood trips can be accommodated more efficiently and with less harm on the urban street network, as in the highway removal alternatives. Local access and mobility is best served by an efficient, connected, well-designed urban street network that provides efficient routing and multiple options.

- **Amended mobility metrics:**

- The current proposed measure for corridor mobility is “mainline speed (average over corridor).” **Mainline speed is highly problematic for several reasons and should not be used to evaluate project alternatives. This measure should be replaced by average volume-to-capacity ratio (V/C) for the overall area.**
- **The corridor throughput measure should be replaced by network capacity, or screenline capacity,** which considers the total vehicle capacity in the area where the majority of the trip origins and destinations occur. Vehicle mobility will be accommodated with the street network, and while some trips may take a bit longer, overall access, resiliency and multimodal options will be improved.
- **The proposed evaluation metrics of vehicle-hours-traveled (VHT) or person-hours traveled (PHT) should be replaced with vehicle-miles-traveled (VMT).** VMT measures transportation network efficiency and is proportional to greenhouse gas emissions. A goal of the Rethinking I-94 project should be to minimize VMT, while accommodating the same number of trips. To accurately model the highway removal alternatives, the future land use scenarios must include the redistribution of future housing and jobs. The land use changes enabled by highway removal will bring people and jobs to highly accessible, location-efficient places, which will increase mobility and access while minimizing VMT.

Health & Quality of Life Measures

The current health/quality of life metrics are qualitative yes/no scores, which erases the enormous differences in outcomes between the highway options and boulevard options. For a truly reparative project, social and environmental harms must be most measured with more precision, and should take precedence over vehicle speed and travel times. Furthermore, we are concerned that beneficial impacts from project alternatives are not proposed to be quantified until the Tier 1 EIS stage. The at-grade alternatives have enormous quality of life and economic benefits, but these benefits will not be evaluated. This could potentially lead to their elimination despite these significant potential for positive outcomes.

We support the following changes to the project’s health & quality of life measures:

Air Quality

- **Current air quality metric:** *Qualitative Assessment - is the project considered regionally significant for air quality concerns or will the project have a meaningful impact on traffic volumes or vehicle mix? (Yes/No)*
- **Amended air quality metric: Regional VMT**, which is directly tied to emissions and is consistent with state and local transportation goals

The air quality measure is confusing and seems to imply that the status quo – where thousands of residents along the corridor are exposed to traffic emissions – is desirable, and any change from that is undesirable. Highway removal alternatives will have a positive impact on air quality as it eliminates the concentration of traffic that currently exists on I-94 and reduces overall VMT.

Sense of Place

- **Current sense of place metric:** *Qualitative Assessment - does the project have the potential to create features or amenities in partnership with communities to enhance sense of place (Yes/No)*
- **Amended sense of place metric: A rubric where the degree of placemaking options are considered, such as ranking on a scale of 1 through 5 based on land area that could be devoted to parks and gathering places.** This would provide a meaningful measure to evaluate impacts on sense of place and community.

The current sense of place metric is vague and makes it likely that all alternatives would receive the same sense of place score, as there is likely at least some opportunity for amenities in each of the alternatives. A rubric would more accurately capture the full scale of impacts on sense of place from each project alternative.

Equity

- **Current equity metric:** *Qualitative Assessment - does the alternative have the potential to enhance transportation choices for individuals (Yes/No)*
- **Proposed equity metric: The proposed equity measure should be replaced with a more comprehensive rubric where the degree of benefits for marginalized communities are ranked on a scale of 1 through 5**, to show the variations between the alternatives.

The current measure of equity is inadequate to create a truly reparative project. It does not address how alternatives will reverse environmental racism, the racist routing of I-94, stolen generational wealth, nor numerous other harms over the past fifty years that have disproportionately impacted BIPOC communities. A more comprehensive evaluation of equity is required for this project to meet the goals of our community.

Furthermore, similar to the other metrics, it is likely that all of the alternatives could receive the same score, as each alternative is likely to provide some potential for greater transportation choices. The wide range of impacts will not be reflected in a vague yes/no score.

Connectivity

- **Current connectivity metric:** *Qualitative Assessment - facilitates or does not eliminate opportunities to implement planned non motorized facilities (Yes/No)*
- **Amended connectivity metric:** **This measure should be replaced with a set of metrics that consider the scale of reconnection and new non-driving transportation infrastructure proposed in the alternative.** Examples include new bicycle lane miles, the # of reconnected streets, and/or the relative cross section of the study area that is dedicated to walking, biking and public transit.

The connectivity score is vaguely defined and it is highly likely that all of the alternatives would receive the same score. This negates the fact that neighborhood connectivity is a key benefit of the boulevard options, and a key drawback of the highway. This is not a meaningful measure to compare the different alternatives.

Please make a public commitment to the outlined actions before the Rethinking I-94 project advances. We look forward to working with you on their implementation.

Signed,



Minneapolis Council Member Robin Wonsley, Ward 2



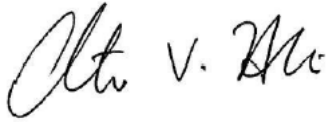
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State Representative Esther Agbaje, District 59B



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