



January 15, 2025

Melvin Carter, Mayor, Saint Paul  
Anika Bowie, Council member, Ward 1, Saint Paul  
Mitra Jalali, Council president, Ward 4, Saint Paul  
Rena Moran, Commissioner, District 4, Ramsey County  
Erin Murphy, District 64 Minnesota State Senator  
Sandra Pappas, District 65 Minnesota State Senator  
Clare Oumou Verbeten, District 66 Minnesota State Senator  
Kaohly Vang Her, District 64A Minnesota State Representative  
Samakab Hussein, District 65A Minnesota State Representative  
Leigh Finke, District 66A Minnesota State Representative  
Toni Carter, Council member, Metropolitan Council  
Charlie Zelle, Chair, Metropolitan Council  
Tim Walz, Governor, State of Minnesota

Re: Union Park District Council opposes MnDOT's proposal to remove At-Grade and Local/Regional options from the Rethinking I-94 planning process

Dear Representatives of St. Paul, Ramsey County, and the State of Minnesota:

We are writing to you with grave concern regarding MnDOT's proposal to remove the At-Grade and Local/Regional options that received significant community support as part of the Rethinking I-94 planning process. Union Park District Council (UPDC) asks the elected and appointed officials who represent the residents of UPDC to engage with MnDOT in the Rethinking I-94 process and prevent them from removing the At-Grade and Local/Regional options from consideration without additional study.

We understand that at MnDOT's upcoming Policy Advisory Committee meeting on January 17, 2025, MnDOT is planning to recommend that several options, including the "Regional/Local" option and both "At-Grade" options, be removed from consideration as part of the Rethinking I-94 project. If MnDOT makes this decision, the only options that would remain under consideration would be slight variations on the status quo for I-94 between Minneapolis and St. Paul.

UPDC, along with many other neighborhood organizations that represent the urban core of the Twin Cities, has gone on record several times voicing a desire for a community-based and

environmentally focused plan for the generationally significant Rethinking I-94 project currently being undertaken by the MnDOT.

At its core, the Rethinking I-94 project must adequately and equitably address the highway's current and past harms — harms that directly impact residents within Union Park. While today's Union Park neighborhood did not suffer the level of harm experienced by the Rondo neighborhood to the east, Union Park was bisected and dramatically changed for the worse when I-94 was constructed. The resulting impacts to our health, the environment, and safety and mobility continue today.

In 2020, UPDC was one of 25 local organizations that sent a letter that included the following requests of MnDOT:

- Planning for this interstate highway corridor in the heart of the Twin Cities region should set a new standard for urban transportation projects. The community, not vehicles, should be the highest priority. We call for a greener, quieter, healthier corridor for the people who use it and live, work, and play nearby.
- New infrastructure should contribute to regenerative equitable economic development in communities where construction of the highway caused great harm and loss of community wealth. These communities should be consulted to co-create the vision for this corridor.

Knowing of the requirement of municipal consent and expecting to be consulted and heard during the process, in 2020 and 2021, respectively, the cities of Minneapolis and Saint Paul each passed resolutions outlining high-level goals for the Minnesota Department of Transportation's Rethinking I-94 project, including opposition to any options involving highway expansion.

In 2021, UPDC was one of 27 community organizations that sent a 50-page letter of comment on MnDOT'S draft Purpose and Need statement, and proposed the following as a community-preferred purpose and need for the I-94 corridor:

- To improve multimodal access while reducing vehicle miles traveled in the program area with infrastructure and facilities in good condition, and to reduce transportation-related fatalities and injuries, in a manner that reduces air and noise pollution in the surrounding communities, supports state, regional, and local climate goals and facilitates community cohesion and local economic prosperity without displacement.

Unfortunately, despite an outpouring of feedback and requests to modify the project goals at the outset, MnDOT's finalized Purpose and Need Statement for the project reflected neither city nor community preferences. Instead, mobility and safety for people in motorized vehicles remained the primary focus. As a result, MnDOT continues to study and favor options that would widen the highway and generally maintain the status quo — even as MnDOT's own survey results show that residents of both cities oppose expansion of the freeway and maintaining the status quo.

Removing the Regional/Local and At-Grade options without complete study would deny Minnesotans the opportunity to even assess the possibility of reconnecting neighborhoods and repairing the historic and ongoing harms imposed by the highway. The two At-Grade options scored highest in MnDOT's own community survey, and the At-Grade and Local/Regional options are where UPDC's own outreach has shown residents have the most interest.

The evaluation criteria used by MnDOT to make this recommendation to eliminate a wider diversity of project alternatives did not account for community impacts related to land use, density, and multimodal shifts; inadequately evaluated equity and air pollution impacts; and failed to take into account the Vehicle Miles Traveled (VMT) reduction and climate goals put in place by MnDOT, Minneapolis, Saint Paul, Hennepin County, and Ramsey County.

When a full dynamic and systemic evaluation has been done in other cities, including Syracuse in New York, at-grade options and highway removal have been found to be valid options for consideration when studied fully and implemented thoughtfully and based on community concerns and feedback.

Furthermore, the cities of Minneapolis and Saint Paul have stated that any options involving highway expansion are not acceptable; therefore MnDOT should remove all expansion options from consideration, including the "Reconfigure Freeway" option, which despite its name would actually expand the highway by adding lanes in many places along the corridor.

In conclusion, we are disappointed that MnDOT has not been responsive to our many previous letters, comments at open houses, and community survey responses, and that despite a stated desire to consider a wide range of options, MnDOT intends to prematurely remove three key alternatives that would give the chance to truly "rethink" I-94.

We therefore ask that MnDOT reverse its plan to remove the At-Grade and Local/Regional options from consideration before they are fully studied and to earnestly and fully engage with our Cities, elected and appointed officials, District Councils and Neighborhood groups, and highway-adjacent residents within the project corridor before making final decisions going forward.

Signed,

Union Park District Council