December 4, 2019

Michael Barnes and Jerome Adams
Minnesota Department of Transportation
1500 County Road B2
Roseville, MN 55113

Dear Mr. Barnes and Mr. Adams:

We are writing to share our concerns about the planned Highway 252/I-94 expansion project in Brooklyn Park, Brooklyn Center, and North Minneapolis.

Friends of the Mississippi River (FMR) is a non-profit organization with a mission to engage community members and other stakeholders to protect, restore and enhance the Mississippi River and its watershed in the Twin Cities Region. We represent thousands of people in the metropolitan area who care deeply about the river, including a growing membership of over 2,700 people and more than 3,200 volunteers and 2,000 advocates engaged each year.

FMR takes an active interest in working with municipalities, counties, state government, and other stakeholders to help shape and influence decisions that impact the health of the river. FMR was founded and continues to play a leadership role in ensuring that the public resources of our national park—the Mississippi National River and Recreation Area (MNRRA), are preserved for current and future generations to benefit from.

We believe that the Mississippi River belongs to all of us and that public access to and enjoyment of the river should be continually enhanced.

Some portions of MnDOT’s proposed project are within the boundary of the Mississippi River Corridor Critical Area and the national park. Given this, the project requires careful consideration as to its impacts on the park, the environment, and on area residents.

**Environmental Assessment**

The proposed new ramps and street connections on the eastern side of Highway 252 at 66th Avenue fall within the Critical Area and national park boundaries.
Given this, a thorough environmental assessment is needed. The assessment should consider the proposed project's impacts on the Mississippi River and on the people, plants, and animals who depend on the river's health and vitality. Areas of study should include air quality, water quality and stormwater management, wildlife impacts, traffic noise, and views from the river. Strong mitigation strategies should be implemented for any negative impacts to the Mississippi River or the Critical Area.

MnDOT should also reconsider locating this interchange further north on Highway 252, where it would not be within the Critical Area and national park boundaries.

**Bike and Pedestrian Accessibility**

The national park also offers important recreational opportunities. Any transportation infrastructure project within or near its boundaries should enhance safe bicycle and pedestrian access to the river and the Mississippi River Trail.

Important amenities include safe intersection crossings that prioritize cyclists and pedestrians, off-street paths, comprehensive wayfinding, enhanced river views, and rest areas.

**High-Frequency Transit**

We also ask that high-frequency transit service, including bus rapid transit (BRT), be included in the project planning and construction.

High-quality transit is critical to combatting climate change. In addition, high-quality transit provides mobility and economic opportunity, which is especially critical in lower-income communities such as North Minneapolis and Brooklyn Center.

Upper Harbor Terminal, a major redevelopment site that does not currently have a transit service plan in place, could also be served by BRT on I-94. This would improve affordability and economic opportunity at Upper Harbor Terminal.

BRT on this segment of I-94 has already been studied and deemed as having high potential to provide mobility benefits to residents of color and a transit-reliant population, as well as access to forecasted development and employment growth.

To ignore this need is to ignore MnDOT’s stated commitment to transportation equity. It does not make sense for MnDOT to proceed with this project without further consideration of improved transit on both Highway 252 and I-94.

Public infrastructure projects should advance access and equity for all members of the public, not just those who drive on highways. Area residents who rely on any and all modes of travel, a clean and healthy environment, and access to opportunity should always be considered.
Thank you for your attention to our concerns. We look forward to further engagement on this project.

Sincerely,

Colleen O’Connor Toberman
River Corridor Program Director

CC:
Senator Bobby Jo Champion
Senator Chris Eaton
Representative Ray Dehn
Representative Fue Lee
Representative Michael Nelson
Representative Samantha Vang
Metropolitan Council Members Reva Chamblis and Robert Lilligren
Hennepin County Commissioners Mike Opat and Irene Fernando
Mayor Mike Elliott and Brooklyn Center City Council Members
Mayor Jacob Frey and Minneapolis City Council Members
Mayor Jeffrey Lunde and Brooklyn Park City Council Members