



**ReConnect Rondo Input to *Rethinking I-94* Tier 1 EIS**  
*Purpose & Need Position Paper*

With the establishment of ReConnect Rondo, Inc. (RCR) in 2016, the Rondo community within St. Paul reinigorated work that was started in the 1980's to reconnect the Rondo Neighborhood and to reclaim a part of what was lost as a result of the Interstate 94 construction project back in the 1960s. This effort includes realizing more equitable outcomes for the neighborhood in terms of housing, business opportunities, wealth creation, health, wellness, environmental justice and social advancement, while at the same time preserving the heritage of Rondo.

In 2015, then under Governor Mark Dayton's administration, Minnesota Department of Transportation (MnDOT) Commissioner Charles Zelle issued a public apology to the Rondo community for damages caused to the neighborhood and committed to doing things differently as part of the Rethinking I-94 project and to develop a new vision for the corridor with the community. In 2016, the Phase I Study for the Rethinking I-94 corridor was launched with the intent "to reconnect neighborhoods, revitalize communities and ensure residents have a meaningful voice in transportation decisions that affect their lives."

Current Governor Tim Walz reiterated this commitment and emphasizing that state agencies should be working with citizens to improve communities throughout Minnesota in his inaugural speech comments in early 2019 by stating that "When Mankato thrives, Moorhead thrives. When Rondo thrives, the Range thrives."

This paper is RCR's formal response to MnDOT's draft Tier 1 Purpose and Need (P&N) Statement for Rethinking I-94 and request that MnDOT give further thought to the needs and desires of the communities surrounding the corridor, as identified in Phase I – not only those affected by the corridor day and night, but also the predominant users of the facility. RCR believes deeper consideration of social, economic and environmental needs in the Rethinking I-94 P&N will continue to lead to fulfilling the commitments made by then Commissioner Zelle to develop a new vision for the corridor while working hand-in-hand with the communities along it.

## **1. Introduction**

### ***1.1. Purpose for the Rethinking I-94 P&N Position Paper & Request for Inclusion of Social, Economic and Environmental Needs in the P&N***

The purpose of this Rethinking I-94 P&N Position Paper from RCR is to provide the MnDOT with formal recommendations on the Tier 1 Environmental Impact Statement (EIS) at the earliest possible stage of the process. The intent of this input is to provide insight from the community and guidance to MnDOT on the establishment of purpose and need, evaluation criteria, and alternatives development that includes the needs of the community and allows for consideration of infrastructure solutions to reestablish connectivity and more directly address the social, economic and environmental needs of the community.

With this Position Paper, RCR is providing to MnDOT and the Federal Highway Administration (FHWA) several elements which can be included in the P&N Statement that take into account the needs of the community in the development of the P&N, as identified in the Rethinking I-94 Phase I Study, and incorporate the additional needs and criteria discussed herein. Therefore, RCR respectfully requests that MnDOT and FHWA include the social, economic, and/or environmental needs identified within this document and during Phase I of Rethinking I-94 into the Tier 1 P&N Statement. The information below makes the case that there is precedent for this in projects, not only in Minnesota, but throughout the U.S.



### **1.2. Background of ReConnect Rondo's Ongoing Rethinking I-94 Involvement**

RCR has had ongoing dialogue with the MnDOT Metro District and its Rethinking I-94 Project and Community Connections Offices for approximately three years, and community members continue to meet regularly with MnDOT staff to coordinate activities of the non-profit organization involved with MnDOT's Rethinking I-94 project. This involvement in Rethinking I-94 has been both formal and informal in nature, and is anticipated to continue throughout the Tier 1 EIS process and likely portions of the Tier 2 environmental process. It is further anticipated that this coordination will continue through the tenets of partnership established between RCR, MnDOT and other local agencies.

### **1.3. ReConnect Rondo's Statement of Purpose**

ReConnectRondo is an umbrella advocacy organization dedicated to restoring equity and opportunity and to revitalize the African American cultural enterprise district of Rondo. An objective of the organization is to persuasively shape policy to create opportunities that uplift the public health, economic, housing, and social conditions of the Rondo communities.

To that end, RCR represents Rondo and the other communities of St. Paul in providing this input.

## **2. Purpose & Need Input**

### **2.1. Basis for RCR Input**

As stated in their own Rethinking I-94 Tier 1 EIS documentation, MnDOT has indicated that it will solicit input on the Draft P&N Statement from a variety of sources – local governments, community organizations, and key stakeholders. As one of those community organizations, representing Rondo and other St. Paul neighborhoods, RCR is providing our input in the form of this formal position paper.

RCR firmly believes that the Rethinking I-94 project has a unique opportunity to not just address the infrastructure needs within the I-94 corridor through Minneapolis and St. Paul, but to also address needs within the community. There has been a substantial amount of energy focused on the impacts to the Rondo neighborhood when I-94 was originally constructed in the 1960s, but there continue to be impacts from the interstate highway today to the surrounding area that can be expressed as community needs. While much discussion was held during Phase I of Rethinking I-94 about these community considerations, it is unclear how these considerations and needs will be incorporated into the Tier 1 EIS within the "Livability Framework" component of the EIS and what weight those considerations and needs will carry in the evaluation of potential alternatives.

### **2.2. Background for Transportation Needs**

RCR is well aware of the transportation and infrastructure needs of the Rethinking I-94 corridor – infrastructure condition and deficiencies, traffic capacity and congestion, safety, accessibility, and other needs are important to the long-term sustainability of I-94. We also recognize from our prior discussions with MnDOT Metro District staff that these transportation and infrastructure needs are put forward as the primary needs of the Tier 1 EIS. That same staff shared with RCR, though, that there may be consideration of other needs and "secondary" needs identified as part of the Purpose and Need Statement, and have stated they are open to input from outside of the agency for these elements.

According to FHWA NEPA guidelines, consideration of social demands and economic development needs is allowed for in addition to the transportation and infrastructure needs. MnDOT staff confirmed this from a meeting that they had with FHWA Headquarters and Division staff, prior to when the Tier 1 EIS was initiated. Further, these needs have been included in the Purpose and Need Statement for similar projects in other parts of the country (including in Minnesota).



### 2.3. Examples of Projects in Other States That Identified Other Needs

RCR has an EIS subject matter expert under contract with specific experience in completing tiered EISs with P&N statements that incorporated social demands and economic development needs. From this specific experience, the following tiered EIS projects incorporated economic development needs into their P&N Statements.

- *I-69 Evansville to Indianapolis Tier 1 & 2 EISs (Indiana)* – Identified “Economic Development Needs in Southwest Indiana” as a primary need in their P&N Statement. This project was intended to complete a highway from Evansville to Indianapolis and it had long been associated with the objective of stimulating economic development in Southwest Indiana, in general, and in rural parts of the region that the interstate was passing, in particular. Promoting economic development is an important goal of the Indiana DOT when it invests in highway infrastructure, and their 2001 Statewide Transportation Plan placed special emphasis on Mobility Corridors, which are “vital for economic development.” Given this history and the statewide policies, the needs assessment for this project included a comprehensive analysis of economic conditions in Southwest Indiana and an assessment of the potential role of transportation improvements in creating or enhancing economic development opportunities in Southwest Indiana.
- *Illiana Corridor Tier 1 & 2 EISs (Illinois/Indiana)* – Identified “Provide for Efficient Movement of Freight” as a primary economic related need in their P&N Statement. The northeast Illinois and northwest Indiana Region serves as a freight transportation center for the country, with numerous freight intermodal transfer centers within the study area. The movement of freight is critical to both the national and regional economies, so to sustain its role as a vital national link for national commerce movement and address the growing travel demands of intermodal transfer activity, the transportation system of this corridor must meet the need for efficient movement of freight. “Provide for efficient movement of freight” focuses on the need to improve the accessibility of freight movement to and from its distribution points throughout the region, including providing more efficient freight movement on the roadway network. This is just one of several projects around the U.S. that identified economic need for moving freight as a part of their purpose and need statements.

Other projects that incorporated social demands and/or economic development needs into their P&N Statements included the following.

- *I-35E and Phalen Boulevard Project in St. Paul (Minnesota)* – While this project is a little older, with the Final EIS having been completed in 1999, the project is a local Minnesota example of where “Economic Growth” and “Brownfield Redevelopment” were both included in the needs to be addressed by the Phalen Boulevard portion of the overall project. The purpose of this portion of the project had numerous interlocking economic, social, and transportation goals, and was meant to support and enhance the Lower East Side neighborhood through which the roadway passes. The needs to be addressed focused on providing access to previously undeveloped properties, generating economic growth in the neighborhood, enhancing development potential of brownfield sites, and improving local and regional accessibility for residents and businesses.
- *US 27 to I-75 Connector (Kentucky)* – Identified “Economic Development” as a primary need for this connector project in southern Kentucky. The EIS states that “providing direct access between US 27 and I-75 may lead to economic development in the region, but not necessarily along a new route. Direct interstate access may provide the business community with quicker access to I-75, thereby both retaining current industry and attracting new industry to the area.



Economic development directly related to a new highway would be dependent on planning and zoning regulations in each local jurisdiction.”

- *I-11 Intermountain Corridor (Arizona/Nevada)* – Identified “Economics” as a secondary need for the project in their P&N Statement. Their EIS states that “economic growth is strongly and positively correlated with overall transportation demand, both for freight and personal vehicles. Development trends in Arizona and Nevada indicate that the economies of both states are expected to continue to outpace the U.S. average. To enhance the region’s competitiveness, a robust transportation system is needed to facilitate the growth of business and its attraction to the area and to offer a means to connect to other markets... Both states recognize that to be successful in their economic development endeavors, many simultaneous strategies – including developing the transportation systems that these industry clusters require—must be implemented.”
- *Aroostook County Transportation Tier 1 Study (ACTS) and Route 1/161 Connector Tier 2 EIS (Maine)* – Identified “Economic Growth” both as part of the purpose of the project and the needs to be addressed by the project. The purpose of the ACTS was to evaluate transportation alternatives that would improve the region’s economy by improving transportation mobility and the Route 1/161 Connector was one of the resulting transportation projects that satisfied that purpose and need and was advanced through the project development process.

These are just a few of the projects around the U.S. that have included **social demands and/or economic development needs** within their P&N Statement. There are numerous other projects that addressed social demands and/or economic development needs during development of the project, but where those needs arose through other means (i.e., as a result of settlement of a lawsuit). The Central 70 project in Denver, Colorado is an example of one such project, where social demands and/or economic development were not included as elements in the purpose and need statement of the EIS, but were instead primary elements of the lawsuit brought by several neighborhoods and public interest groups to force the Colorado DOT to address the needs of the surrounding neighborhoods. The settlement agreement included a community health study, air quality monitoring, landscaping, and communication resources, but the approved Record of Decision for the project also included over 150 community commitments as mitigation for construction of the project. These included relocation assistance for displaced homes, renters and businesses; home improvement assistance for those remaining in the adjacent neighborhoods; funding for a neighborhood housing collaborative; community assistance for access to fresh food; workforce development and assistance and on-the-job training in the Denver metro area; improvements to an adjacent elementary school that serves the low income population; and a freeway lid over the depressed section of I-70 reconnecting a neighborhood and providing needed park and open space.

While ReConnect Rondo’s team is still researching projects that have enhanced purpose and need statements addressing social demands and economic development needs, RCR believes that these examples provide ample precedents for including community needs into the Rethinking I-94 Purpose and Need as it progresses.

#### **2.4. Potential for Incorporating Other Areas of Need**

With the Rethinking I-94 project in mind, there are three subject areas where RCR believes community needs can be met as a part of the Rethinking I-94 project – **social, economic, and environmental** – and we request consideration be given to including them.

**Social** considerations can be defined as needs that effect the “fabric of community” by **engendering separation of individuals and families, presenting safety concerns for those people both in terms of**



crossing the interstate and providing safe housing, and introducing gentrification issues that further isolate those already living in the community. Economic considerations are defined as needs related to the economic prosperity of the neighborhood, whether positively affected or negatively impacted. These considerations could result in both equitable development within the neighborhood and individual wealth creation opportunities. Environmental considerations focus on the existing ecosystems that exist within the neighborhood – both from a human standpoint and natural resource considerations. These needs would include the necessity for assistance with historic and cultural resources in the neighborhoods, the susceptibility of public health and necessity for open space, and the sustainability of improvements within the neighborhoods.

These three subject areas are further discussed below.

### **3. Social Considerations**

#### **3.1. Neighborhood Reconnection**

Neighborhood reconnection is one of the community-based goals that RCR is pursuing, but this need is greater than just getting from one side of the interstate to the other and is broader in that it applies throughout the Rethinking I-94 corridor. While there are a variety of roadway and pedestrian crossings of existing I-94, neighborhood reconnection focuses on reestablishing community cohesion that was severed by the original construction of I-94. While this need is most easily described within the Rondo neighborhood, the need exists within several other neighborhoods throughout both Minneapolis and St. Paul. Further, it could be argued that the pedestrian crossings that have been built are inadequate on a human scale given the noise, pollution and personal safety concerns for those using these facilities.

This need for reconnection would require some community research into the make-up of the neighborhoods prior to the original construction of I-94 and how those neighborhoods have evolved since the 1960s. The criteria for measuring the effectiveness of alternatives meeting this need could be the number and type of “reconnections” – whether physically through bridges or through transit or other means. Or it could be means of measuring the “interactions” between the separated sides. Not only are the number of connections important, but the quality of those connections as well.

#### **3.2. Affordable Housing**

In addition to neighborhood reconnection, housing affordability is also one of the RCR’s objectives for the Rondo neighborhood, and again, is a need affecting more than just Rondo, but applying to the entire Rethinking I-94 corridor. This need is specifically addressed within the St. Paul 2040 Comprehensive Plan and is being pursued throughout the community. Many housing opportunities exist within the existing I-94 vicinity, but there is a need to supplement these with neighborhood level affordable housing. Since much of the surrounding land is already fully developed, it is logical that either new land needs to be created and/or existing land would need to be redeveloped.

This need would require housing research to be done within the study area of I-94 to establish the make-up of housing within the various neighborhoods along I-94 and how this housing has changed since its construction in the 1960s. The criteria for measuring the effectiveness of alternatives meeting this need might be a little more difficult, but could be the number and type of housing “opportunities” within the study area and how those change or are affected by the I-94 alternatives.

#### **3.3. Gentrification Concerns**

One of the most often heard concerns from residents of Rondo is that gentrification will occur because of construction along the I-94 Corridor and that those residents could no longer afford to live in their neighborhood. This concern is valid based on what has occurred with some of the redevelopment along both University Avenue and Selby Avenue. It is likely that similar concerns are shared by



residents in the neighborhoods all along existing I-94 when considering the improvements anticipated in Rethinking I-94.

This need would likely require a full scale gentrification study of the entire corridor or at least for specific neighborhoods along the route. The criteria for measuring the effectiveness of alternatives meeting could be very difficult and would most certainly require input from subject matter experts on gentrification.

#### **4. Economic Considerations**

##### ***4.1. Equitable Development***

A third community-based goal identified and being pursued by RCR is equitable development. This is different than simple economic redevelopment, and based on information from the U.S. Environmental Protection Agency (USEPA), it incorporates “an approach for meeting the needs of underserved communities through policies and programs that reduce disparities while fostering places that are healthy and vibrant”. This approach is a part of the Environmental Justice evaluation process and has been implemented in a variety of communities across the US. What makes this approach different is that the outcomes from development opportunities must be open and responsive to underserved and vulnerable populations.

This need was identified in the RLB Feasibility Study and an approach for Rondo laid out in that final report. A macroeconomic analysis of the entire Rethinking I-94 corridor would be necessary to identify these needs throughout its length. The criteria for measuring the effectiveness of alternatives meeting this need could be the potential population attracted, number of jobs created, tax revenue generated and other economic measures.

##### ***4.2. Neighborhood Wealth Creation***

RCR has recently incorporated neighborhood wealth creation as a foundational element of a number of our goals and is a key consideration as we pursue various development projects moving forward. Based on discussions with other community organizations in the Twin Cities, this need exists throughout the metro area and should be given consideration for the Rethinking I-94 project.

This need could be incorporated into the macroeconomic analysis of the corridor as a whole and specific needs established for different neighborhoods along the corridor. The criteria for measuring the effectiveness of alternatives meeting this need could be more difficult than just the standard economic measures of jobs and revenue, and may require evaluation of personal savings and underserved population investments in businesses and properties and the effect of Rethinking I-94 on those.

#### **5. Environmental Considerations**

##### ***5.1. Historic and Cultural Resources***

This category is most often associated with the “Affected Environment” and “Environmental Consequences” chapters of an EIS, but in this case, an economic need exists in the restoration and preservation of both historic and cultural resources in these neighborhoods. It is clear that there are numerous historic properties along I-94 in the Rondo neighborhood, and that is likely the case throughout the entire Rethinking I-94 corridor. In addition, there is a cultural history and fabric within these neighborhoods that needs to be preserved and curated, and it will take funding to do so.

This need may be best handled as mitigation to the impacts on the historic and cultural resources present, but it shouldn’t be minimized if that’s the solution. The criteria for measuring the effectiveness of alternatives meeting this need would likely be best evaluated as impacts to these resources, but



consideration should still be given to how best to facilitate saving these neighborhoods and their respective histories.

### **5.2. Public Health & Open Space**

Public health is a relatively new category within the Environmental Consequences section of EIS preparation. For this project, public health and open spaces are a need that should be addressed by the Rethinking I-94 project. Besides the areas adjacent to the Mississippi River near both downtowns of St. Paul and Minneapolis, there is a lack of parks and open spaces in the neighborhoods along I-94. Inclusion of parks and open spaces that contribute to the overall public health of the community should be considered.

This need would require an inventory of the parks and open spaces within the study area of Rethinking I-94 and should be compared with that of the entire metropolitan area. The criteria for measuring the effectiveness of alternatives meeting this need could be tied to the need for accessibility of the neighborhood. Or, it could simply be related to opportunities to incorporate open space in the project. Or, it could be the distance that the population needs to travel to a park in comparison to similar populations in other parts of the two cities.

One other form of public health impact is the visual and sensory effect of the corridor on both the users of the corridor, as well as those immediately adjacent to it. The effect on the psyche of the frequent user of the corridor is real – the stress or joy felt by the driver and passengers within the corridor (as well as those crossing the corridor, no matter their mode, of travel and those adjacent the corridor) because of the appearance and condition of the facility, the level of congestion, and the amenities throughout the corridor are things that should be considered when evaluating the improvements to the corridor. The measure of these could be completed in a simulation of various alternatives (possibly even virtual reality research) to determine the expected effect on the individual users.

### **5.3. Sustainability**

Sustainability within a community or a neighborhood can take many forms – from specific pollution control measures and neighborhood initiatives all the way to neighborhood sustainability plans or programs. The Minnesota Pollution Control Agency has long had a Neighborhood Sustainability Indicators Guidebook (February 1999) which lays out a process and a series of indicators to be utilized to establish neighborhood plans. RCR worked with the Yorth Group to prepare a Past Prosperity Study to identify performance of the neighborhood in terms of sustainability and restorative measures. Reconnect Rondo is preparing to lead a sustainability demonstration project and design competition in the coming months to look for ways to create a project that has a “net zero” pollution footprint. It would be worthwhile to consider looking at this same situation in other neighborhoods along the corridor.

This may already be what is being considered for the Livability section of the Rethinking I-94, but this need would require a sustainability evaluation of various neighborhoods along the corridor. The criteria for measuring the effectiveness of alternatives meeting this need could be a sustainability index for each alternative or a performance assessment similar to the one Yorth Group used in the Past Prosperity Study that assessed the restorative development performance within 12 key areas, including water, energy, solid waste, information technology, economy, health and wellbeing, and culture/identity.

## **6. Conclusions**

Based on the information presented above, RCR believes there is a solid case and an established precedent for incorporating social, economic, and/or environmental needs into the P&N Statement for Rethinking I-94.



Our team understands that some of these needs may be identified within the Livability Framework. We are unclear, though, whether this framework is actually defining needs within the community or just another way to measure impacts and identify mitigation measures. Our opinion is that the latter is not what was concluded in the Phase I Study, nor what was committed to by policy makers.

With this in mind, RCR requests that MnDOT and FHWA incorporate these community needs within the P&N Statement as a part of the identified needs to be addressed by the alternatives for the overall project, and not simply as part of the evaluation of the impacts from the alternatives. In doing so, we believe taking that step is responsive to the community and can lead to fulfilling the commitments made by Commissioner Zelle and others and affirms the voice of and input from the community during Phase 1 work conducted by MnDOT.

Lastly, we request that a formal response be issued by MnDOT and FHWA regarding this request at your earliest convenience. In the spirit of partnership that we have with MnDOT, RCR is fully prepared to meet with MnDOT, FHWA, and any other agency partners to further discuss this request and provide our input and support in the ongoing Rethinking I-94 Tier 1 EIS process.