



AYD MILL ROAD

Final Environmental Impact Statement

Executive Summary

**City of Saint Paul, Minnesota
Department of Public Works
Department of Planning & Economic Development**

January 2005

FINAL ENVIRONMENTAL IMPACT STATEMENT AYD MILL ROAD

Federal Project #FHWA-MN-EIS-98-01-F
State Project #62-195-EIS-015
From I-35E to St. Anthony Avenue (I-94) 1.6 miles
City: Saint Paul County: Ramsey Mn/DOT Metro Division

Submitted Pursuant to 42 USC 4332(2) (c), 49 USC 303, and Minn. Stat. Chap. 116D
by the

U.S. Department of Transportation,
Federal Highway Administration,
Minnesota Department of Transportation,
and the City of Saint Paul

Abstract: The primary purpose of this Final EIS is to document and evaluate the Preferred Alternative. The Preferred Alternative identified for Ayd Mill Road will maintain two lanes of traffic in each direction with a posted speed limit of 40 mph. The Preferred Alternative will result in an extension of Ayd Mill Road to St. Anthony (via the spur track alignment) on the north end and a permanent connection to I-35E on the south end. The Final EIS takes into consideration comments received as well as the field testing conducted by the City and any changes in the setting or technical analysis since the Draft EIS. This Final EIS also identifies mitigation measures for impact reduction and documents all comments and responses on the Draft EIS.

Contacts:

FHWA
Cheryl Martin
Galtier Plaza, Suite 500
380 Jackson Street
Saint Paul, MN 55101
(651) 291-6120

Mn/DOT
Dan Erickson, P.E.
Metro State Aid
Water's Edge
1500 West County Road B2
Roseville, MN 55113
(651) 582-1407

City of Saint Paul
Mike Klassen
Department of Public Works
Room 800, City Hall Annex
25 West Fourth Street
Saint Paul, Minnesota 55102
(651) 266-6209

REVIEWED AND RECOMMENDED:



Director of Public Works, City of Saint Paul

Dec 30 04

Date

REVIEWED AND RECOMMENDED:



Metro District State Aid Engineer, Mn/DOT

1-25-05

Date

APPROVED:



Director of State Aid, Mn/DOT

1-25-05

Date

APPROVED:



Division Administrator, FHWA

1/27/2005

Date

TABLE OF CONTENTS

	Page
Executive Summary	
ES.0 Introduction.....	ES-1
ES.1 Purpose and Need for Project.....	ES-1
ES.2 Project History	ES-4
ES.3 Alternatives not Identified as the Preferred Alternative	ES-5
ES.4 Preferred Alternative.....	ES-7
ES.5 Impacts and Mitigation	ES-9
ES.5.1 Transportaion Impacts	ES-9
ES.5.2 Social and Economic Impacts.....	ES-13
ES.5.3 Natural and Physical Impacts	ES-19
ES.5.4 Construction Impacts	ES-23
ES.5.5 Historic and Archaeological Resource Impacts.....	ES-24
ES.5.6 Summary of Impacts and Mitigation.....	ES-24
ES.6 Cumulative Impacts	ES-30
ES.7 Areas of Controversy	ES-32
ES.8 Unresolved Issues/Actions to be Addressed	ES-32
ES.9 Project Schedule, Costs, Funding	ES-33
ES.10 Coordination.....	ES-34
ES.11 Permits and Approvals.....	ES-34
ES.12 Summary of Responses to Draft EIS Comments	ES-35

LIST OF TABLES

	Page
ES-1 Summary of Impacts and Mitigation	ES-25
ES-2 Permits and Approvals	ES-35

LIST OF FIGURES

1-1 Project Location	
1-2 Study Area	
1-3 Estimated Origins/Destinations of Ayd Mill Road Users (P.M. Peak Hour) South of Grand	
1-4 1997 P.M. Peak Hour Traffic Volumes and 2004 Annualized ADT	
2-1A Ayd Mill Road - Preferred Alternative	
2-1B Ayd Mill Road - Preferred Alternative South Sub-Area	
2-1C Ayd Mill Road - Preferred Alternative North Sub-Area	
2-1D Ayd Mill Road Preferred Alternative	
4-1 2020 P.M. Peak Hour Traffic Volume Shifts	
5-1 Location of Block Groups	
5-2 Districts and Neighborhoods	
6-1 Cross Section (at Hamline)	
6-2 Cross Section (at St. Clair)	
6-3 Potential Visual Mitigation (at Portland)	
6-4 Potential Visual Mitigation (at Concordia)	
7-1 Right-of-Way Acquisition	
7-2 Land/Businesses to be Acquired for Right-of-Way	
8-1 Noise Modeling and Monitoring Receptors with Potential Noise Wall Locations	

Ayd Mill Road Final EIS

Executive Summary

ES.0 Introduction

Ayd Mill Road is a four-lane divided roadway located in the southwestern portion of Saint Paul, Ramsey County, Minnesota (see Figure 1-1). The existing roadway length is approximately 1.6 miles. The road runs in a northwesterly direction from Jefferson (about 600 feet east of Lexington, near Interstate Highway 35E (I-35E) on the southeast to Selby (about 300 feet east of Saratoga) on the northwest, south of Interstate Highway 94 (I-94) (see Figure 1-2). The proposed project is described in Section ES.4. The purpose of the project is to provide better transportation connections in southwest Saint Paul and relieve congestion and improve safety on nearby city streets. This Final Environmental Impact Statement (Final EIS) has been prepared pursuant to the National Environmental Policy Act of 1969 (NEPA), and in accordance with the Council on Environmental Quality regulations for Final EIS preparation. The document also meets the environmental documentation requirements of the Minnesota Environmental Policy Act (MEPA) and Rules adopted by the Minnesota Environmental Quality Board for preparation of a state Final EIS. The 1998 *Ayd Mill Road Draft Environmental Impact Statement* (Draft EIS) is incorporated by reference herein and made a part of the Final EIS.

ES.1 Purpose and Need for Project

ES.1.1 Transportation System Linkage

Ayd Mill Road (then Short Line Road) was planned in the 1950s to connect the planned interstate highways, I-94 and I-35E. Its purpose was to relieve congestion on parallel north-south streets such as Snelling, Hamline, and Lexington. Construction began in 1962, but controversy over both the alignment of the north end of Ayd Mill Road and the connection to I-35E delayed permanent connections to the interstates pending further study. This delay has left a gap in the system linkage leaving Ayd Mill Road as an underutilized fragment of roadway and burdening parallel streets with excess traffic that would be more safely and efficiently accommodated on a fully connected Ayd Mill Road.

ES.1.2 Need for the Proposed Project

The primary purpose of the proposed Ayd Mill Road project is to reduce transportation-related problems identified in southwestern Saint Paul, especially traffic congestion on study area streets and problems created by growing congestion. Related transportation issues include high accident rates, pedestrian and bicycle safety concerns, and difficulties in gaining access/egress to properties along busy residential streets. These issues are addressed below.

Regional vs. Local Traffic

Providing connections between Ayd Mill Road and the interstates would increase the number of local and through trips on Ayd Mill Road. Under the Preferred Alternative, Ayd Mill Road would carry approximately 70 percent local trips and 30 percent through trips (see Figure 1-3). Approximately half of the through trips would shift from parallel north-south streets in the study area, with the other half of the through trips attracted to Ayd Mill Road from outside the study area.

Transportation System Capacity and Traffic Flow

As traffic volumes have increased on arterials and collectors parallel to Ayd Mill Road, congestion and safety problems have worsened and need to be addressed (refer to Figure 1-4 and Section 4.1 of the Final EIS). Ayd Mill Road offers an alternative route that, with improvements to its existing four-lane roadway, could carry a larger number of trips and would relieve congestion and reduce safety problems in the study area. Connections of Ayd Mill Road to I-94 and I-35E are needed to accomplish this most effectively.

Traffic Safety

The streets that parallel Ayd Mill Road are all a part of a grid system, with cross streets at every block, and alleys or driveways in the middle of many blocks. The number of intersections, driveways, and alleys increases the opportunity for conflicts between vehicles, resulting in higher accident rates. Shifting through trips to Ayd Mill Road, which has very few intersections and no direct property access, could reduce the number of conflicts and result in a much lower number of accidents in the study area.

High levels of congestion at several intersections within the study area have led to unacceptable accident rates. Seven of the key intersections within the study area were within the top 25 of the City's worst intersection list for the three-year period between 1994 and 1997. Analysis indicates that extending Ayd Mill Road to the interstates will reduce accidents in the study area by as much as eight percent.

Property Access and Neighborhood Quality

As traffic volumes have grown and congestion problems have worsened, residential properties along the city streets that parallel Ayd Mill Road have suffered the consequences. Residents of these streets are experiencing increasing difficulty entering and exiting their driveways, alleys, and side streets. Higher traffic volumes on residential streets have compromised safe movement of vehicles, pedestrians, and bicycles.

Because the Ayd Mill Road corridor has no direct property access, it provides a safer and more efficient route for higher volumes of traffic. If interstate connections are made and adequate capacity is provided on Ayd Mill Road, it will effectively draw substantial volumes of traffic away from residential streets.

Pedestrian and Bicycle Facilities

Saint Paul residents primarily rely on local streets for safe pedestrian and bicycle accommodation. Shifting traffic away from these arterials and local streets would substantially improve safety for pedestrians and bicyclists.

From a system standpoint, most of Saint Paul's on-street bikeways in the study area run in an east/west direction with limited north/south connecting links. The Ayd Mill Road corridor provides an opportunity to provide a north/south link with bike lanes as part of the project with six foot shoulders designated on Ayd Mill Road from Selby to Jefferson and from Marshall to St. Anthony, and on St. Anthony from Pascal to Ayd Mill Road for bicycle use. In addition, as a separate City action, an off road bicycle/pedestrian trail east of the existing railroad track has received federal Transportation Enhancement (TEA-21) funding, dedicated for construction in year 2007. Bicycle and pedestrian facilities will not be provided on Ayd Mill Road between Selby and Marshall.

TSM, HOV, and Transit

An important part of the City's strategy to reduce congestion involves Transportation System Management (TSM) and Travel Demand Management (TDM). Based upon the level of congestion and unacceptable accident rates, many improvements to the existing system, as well as strategies to manage travel demand, are needed throughout the study area. While the City can control some TSM and TDM activities, many actions require coordination with other agencies including Minnesota Department of Transportation (Mn/DOT) and Metro Transit.

Examples of TSM measures include intersection improvements and modifying signal timing to enhance operations, actions which can be implemented by the City as part of the Preferred Alternative. Examples of TDM measures include ridesharing programs and parking incentives that encourage more people to rideshare or use transit, activities that are typically supported by Metro Transit.

High Occupancy Vehicle (HOV) sub-alternatives were also included as a sub-alternative to each of the four-lane build alternatives in the Draft EIS. HOV lanes could be created using one lane in each direction under either of the four-lane alternatives, with minimal effort, should there be a need for such facilities.

The existing HOV access lane to east bound I-94 located at Pascal (about 1,200 feet east of Snelling) would be more heavily used if it were located at Snelling, but the existing Pascal Street Bridge over I-94 originally prevented its construction at Snelling. However, the build alternatives for the Ayd Mill Road project would remove the Pascal bridge, replacing it with a bridge farther to the east, connecting Ayd Mill Road to St. Anthony. This would allow the HOV lane to shift to Snelling.

Transit improvements are not directly linked to the project. Early coordination with Metro Transit confirmed that they have no current plans to utilize Ayd Mill Road for bus service but will continue to utilize nearby streets where they can better serve riders.

Condition of Ayd Mill Road

Ayd Mill Road was constructed in the early 1960s according to the standards of that time. Even with its limited use, the street is in need of reconstruction after 40 years of service. The base is breaking down and most of the existing concrete panels shake when vehicles pass over them. To reduce noise, the City installed a bituminous overlay on Ayd Mill Road in the fall of 2003. Reconstruction of the existing facility will be necessary within the next 5-10 years.

ES.2 Project History

ES.2.1 Project Planning and Environmental Documentation

Ayd Mill Road was constructed as the Short Line Road by the City of Saint Paul between 1962 and 1966. The roadway was built to provide a convenient link between I-94 and I-35E, and to keep traffic in neighborhoods adjacent to the roadway to a minimum.

Although a connection between I-35E and the south end of Ayd Mill Road was considered in the *I-35E Environmental Impact Statement* (EIS), prepared in the early 1980s, this decision was postponed until further study of Ayd Mill Road. An Ayd Mill Road Citizen's Advisory Task Force (Task Force) was created in 1987 by the City of Saint Paul Planning Commission (Planning Commission) to assist City staff in studying traffic and traffic-related issues in the corridor. The result of this effort, *Ayd Mill Road Study: Phase I Report* (1988) convinced the Task Force and the Planning Commission that further study through an EIS was required. The City Council agreed, and in 1993, the City secured funding for the EIS process.

Formal assessment of alternatives occurred with the preparation of the *Ayd Mill Road Scoping Decision Document*, completed and released for public review and comment in 1995. These alternatives were developed in conjunction with the Task Force to assist the City during the EIS process. The participants, process, and findings associated with this study are summarized in the *Ayd Mill Road Scoping Decision Document* (May 13, 1996) and Section 2.1 of the Draft EIS. Ten "Mainline" Alternatives were evaluated and four alternatives were eliminated from consideration (City Council Resolution 95-444). These alternatives were eliminated following evaluation of the alternatives during the scoping process, including careful consideration of the technical information presented by staff and consultants, discussions with groups represented by the Ayd Mill Road Task Force, the Planning Commission, the City Council Operations Committee, and the public.

During the initial phase of the Draft EIS, preliminary design concept studies were completed to refine and further define the alternatives. Based on the concept studies, the Task Force voted to remove two alternatives from further consideration. Based on these decisions, five conceptual "Mainline" alternatives were identified for consideration in the Draft EIS: No Build, Transportation System Management/Travel Demand Management (TSM/TDM), Linear Park, Two-Lane Extended, and Four-Lane Extended (with and without bridged ramps). HOV Sub-Alternatives for the Four-Lane Alternatives were also identified. Evaluation of these alternatives was discussed in Chapter 2 of the Draft EIS, and a description of public involvement, including development of the Task Force, is contained in Chapter 13 of the Draft EIS.

The Draft EIS was issued for public comment by the City Council on February 10, 1999, with the comment period ending on April 12, 1999. Over 150 comments, including both written and oral testimony, were received. The Task Force identified the Linear Park Alternative as its choice for the preferred alternative in August 1999. The Planning Commission identified the Four-Lane Extended Alternative with HOV Sub-Alternative as their choice for preferred alternative in October 1999. In April 2000, the City Council, in Resolution #00-347, identified the Two-Lane Extended Alternative as their choice for the preferred alternative. The City Council resolution also requested the additional consideration of various roadway options for the final design of Ayd Mill Road.

Under the City of Saint Paul's "Strong Mayor" form of government, the City Administration is responsible for identifying a Preferred Alternative. Given the diversity of preferred alternative choices, public comments, and the City Council's request for additional information, the Mayor directed City staff to conduct a series of monitored field tests to examine traffic patterns along Ayd Mill Road. Begun in 2002, these tests provided a "real world" assessment of potential traffic, safety, and noise impacts along the road under various lane and access configurations. Section 4.1.2 of the Final EIS provides detailed information on the field tests.

Because the Draft EIS was approved over three years ago, a Reevaluation of the Draft EIS was prepared and submitted to Mn/DOT and FHWA in the winter of 2004. In January 2005, Mn/DOT and FHWA reviewed the Reevaluation and concurred that a supplemental Draft EIS was not required.

ES.3 Alternatives not Identified as the Preferred Alternative

ES.3.1 Alternatives Dismissed Prior to the Draft EIS

Of ten "Mainline" alternatives identified in the *Ayd Mill Road Scoping Decision Document*, four alternatives were eliminated from further consideration:

- I-35E/I-94 Downtown Connection
- Replace Ayd Mill Road with Residential Development
- The Two-Lane City Street (without connections to I-35E and I-94)
- Limited Access Freeway with Freeway-to-Freeway Connection to I-94

Discussion of these alternatives was detailed in the *Ayd Mill Road Scoping Decision Document* (May 13, 1996) and in Chapter 2 of the Draft EIS.

ES.3.2 Alternatives Dismissed After the Draft EIS

Five alternatives were evaluated in the Draft EIS and dismissed including: No Build, TSM/TDM, Linear Park, Two-Lane Extended, and Four-Lane Extended with Bridged Ramps (with and without HOV Sub-Alternative). These alternatives, with the rationale of why each alternative was not identified as the Preferred Alternative, are described below.

The No Build Alternative was not identified as the Preferred Alternative because existing system deficiencies would continue and become more severe in the following ways:

- Ayd Mill Road would continue to be underutilized as an alternative route.
- Parallel streets would become more congested and traffic accidents, which are already unacceptably high, would continue to increase.
- Study area residents would continue to suffer the consequences of congested streets including traffic cutting through neighborhoods to avoid delays, difficulty accessing driveways/alleys on busy streets, and compromised safety for pedestrians and bicyclists on local streets.
- An opportunity would be lost to enhance the Ayd Mill Road corridor with bike lanes, landscaping, and open space.
- Traffic noise and emissions would remain close to residential receptors.
- Transportation costs would be higher due to a higher number of vehicle miles and hours traveled.

The TSM/TDM Alternative was not chosen as a separate alternative because:

- The capacity needed on study area streets would not be provided.
- Parallel streets would continue to experience congestion and high accident rates.
- Higher traffic volumes on parallel streets would result in decreased pedestrian/bicycle safety along streets with increased traffic.
- Traffic noise and emissions would remain close to residential receptors.
- There would not be an increase in the connectivity of open space in the Ayd Mill Road corridor.

The Linear Park Alternative did not meet the purpose and need of the study because:

- By removing Ayd Mill Road, traffic volumes and congestion would increase along parallel streets, with an especially high increase on Lexington.
- The number of traffic accidents on study area streets, which are already unacceptably high, would continue to increase.
- Higher traffic volumes on parallel streets would result in decreased pedestrian/bicycle safety along streets with increased traffic.
- Removal of Ayd Mill Road would reduce local and regional access to the area.
- Increased noise and emissions would be experienced along streets with increased traffic.
- While the Linear Park would provide much needed open space, it would exacerbate transportation system problems that the project was intended to resolve.

The Two-Lane Alternative was not identified as the Preferred Alternative because:

- Two lanes would not provide adequate capacity to meet projected traffic demand.
- Fewer trips would be shifted from parallel streets because of capacity constraints on Ayd Mill Road, therefore congestion relief on parallel streets would be less effective than the Preferred Alternative.
- Less accident reduction would be possible than with the Preferred Alternative.
- Less traffic noise and emissions would be shifted away from residential receptors than with the Preferred Alternative.
- The benefit/cost ratio in Chapter 3 of the Draft EIS shows slightly less benefit than for the Preferred Alternative. The four lanes provided with the Preferred Alternative provide much greater capacity with a slightly higher cost than the Two-Lane Alternative.
- While the Two-Lane Alternative would provide more open space than the Preferred Alternative, it would not be as effective in addressing current, as well as long term transportation needs.

The Four-Lane Extended with Bridged Ramps Alternative was not identified as the Preferred Alternative primarily because:

- The bridged ramps would be substantially more expensive to build.
- The connection of Ayd Mill Road to I-94 (utilizing the frontage roads) will operate at an acceptable LOS D or better without the added expense of bridged ramps within the planning horizon.
- The design of the Preferred Alternative will not preclude adding the bridged ramps in the future, if justified by traffic conditions and if funding were to become available.

ES.4 Preferred Alternative

Using the information provided in the Draft EIS, public input (at the public meeting following the field test, subsequent meetings, and official comments on the Draft EIS), and the field test information, the City considered both the purpose and objectives of the project (see Chapter 1) and examined the advantages and disadvantages of each alternative. The City concluded that the Four-Lane Extended Alternative would be most effective in resolving the transportation problems in the study area and identified it as the Preferred Alternative to be documented in the Final EIS (described below and in Section 2.3). While not proposed as part of the initial construction of the Preferred Alternative, the HOV sub-alternative could be implemented in the future, as could the construction of bridged ramps to I-94, if justified by future traffic conditions and if funding becomes available. The City's identification of the Preferred Alternative rested strongly on the transportation, safety, and access issues that are described in the Purpose and Need (Sections ES.1 and 1.3) of the Final EIS. The Preferred Alternative was identified based on the following primary considerations (described below and in Section 2.1):

Capacity

As study area traffic has grown on arterials and collectors parallel to Ayd Mill Road, congestion and safety problems have worsened and need to be addressed. The Preferred Alternative, which includes four traffic lanes, will provide the capacity needed to relieve congested parallel study area streets.

Shifting Traffic from Congested Parallel Routes

The Preferred Alternative will effectively shift traffic from parallel north-south streets, which are congested and have high accident rates, improving level of service and safety (refer to Chapter 4). Under the Preferred Alternative, approximately 8,000 cars per day will shift from parallel streets to use Ayd Mill Road by year 2020 (as shown in Figure 4-1).

Congestion Relief

Study area traffic continues to grow, worsening congestion and delays. By shifting traffic from parallel streets, The Preferred Alternative will provide improved traffic flow along parallel routes and at key intersections in the study area, including Snelling at Grand, Snelling at Selby, Lexington at Randolph and the I-35E ramps at Randolph.

Safety

The Preferred Alternative will improve traffic safety conditions in the study area by redistributing a higher proportion of trips to a roadway with a lower likelihood of accidents. In the Draft EIS, accident rates along Lexington ranged from 0.95 to 3.18 (per million vehicles entering the intersection), while accident rates for Ayd Mill Road ranged from 0.08 to 1.08. As a result, the predicted number of accidents for the Preferred Alternative is eight percent lower than the No Build, which translates to a reduction of more than 100 accidents in the year 2020. More data from the accident analysis is provided in the Draft EIS and in Sections ES.5.1 and 4.8 of the Final EIS.

Cost Effectiveness

The benefit/cost ratio for the Preferred Alternative is 9.2, which indicates that the transportation benefits of the project will far exceed the costs.

Description of the Preferred Alternative

The Preferred Alternative has the following characteristics (see Figures 2-1A through 2-1D):

- A four-lane, 68-foot wide roadway with a posted speed limit of 40 mph. Turn lanes will be constructed at intersections as necessary.
- Two lanes in each direction separated by a six-foot median.
- Direct connection to I-35E on the south and an extension to St. Anthony via the spur track alignment and a bridge over I-94 on the north.

- Alignment will follow the existing roadway alignment from Jefferson to Hague, except for some shifting east or west to provide increased contiguous open space and for efficient traffic operation.
- Roadway will include an urban roadway design with a “boulevard” setting that includes pedestrian-oriented “Saint Paul-style” lantern lighting and landscaping.
- Six foot shoulders will be designated on Ayd Mill Road from Selby to Jefferson and from Marshall to St. Anthony, and on St. Anthony from Pascal to Ayd Mill Road for bicycle use. Signage and the endpoints of the bike lane will ensure bicyclists do not enter onto the interstates.
- The Hamline bridge over Ayd Mill Road will be reconstructed and lengthened to allow the reconstructed Ayd Mill Road to pass beneath the bridge.
- Roadway elevation will be lowered to a maximum of 25 feet below existing grade between Summit and Marshall, allowing the road to pass beneath Selby and the rail line.
- A new bridge over I-94 and removal of the existing Pascal Street bridge. T-intersections will be created on Pascal at Concordia and St. Anthony.
- The westbound I-94 exit ramp to Snelling will be reconstructed to improve the merge between frontage road traffic and traffic exiting westbound I-94.
- The eastbound I-94 entrance ramp from Snelling will be reconstructed to incorporate an HOV bypass lane, which has not been possible at this location due to the existing Pascal Street bridge (to be removed).
- Ramps will be modified at Grand and St. Clair; all intersections will have traffic signals based on traffic and safety warrants.
- The east/west ramps from Hamline to Ayd Mill Road will be removed allowing for a continuous area of open space west of Ayd Mill Road between Hamline and Summit.
- New at-grade signalized intersections will be created at the intersection of Ayd Mill Road and Marshall, Concordia, and St. Anthony.

ES.5 Impacts and Mitigation Measures

ES.5.1 Transportation Impacts

Transportation impacts and mitigation are discussed in detail in Chapter 4 of this Final EIS and are summarized below.

Travel Forecasts

Year 2020 p.m. peak hour traffic volumes for Randolph, Jefferson, Selby, Edgcombe, Snelling, and Lexington will decrease under the Preferred Alternative when compared to the No Build. Traffic volumes on Hamline, Pascal, University, and Marshall will primarily decrease with slight increases at some intersections. Substantial increases in year 2020 p.m. peak hour traffic volumes will occur on Ayd Mill Road, Concordia, and St. Anthony with only slight increases occurring on Grand and St. Clair.

The Preferred Alternative will shift traffic from study area streets to Ayd Mill Road resulting in an overall decrease in p.m. peak hour traffic volumes on study area streets. Therefore no mitigation of traffic impacts will be necessary.

Functional Classification

With the Preferred Alternative, the functional classification of Ayd Mill Road will remain an “A” Minor Arterial under the jurisdiction of the City. “A” Minor Arterial roadways provide the main access routes to Principal Arterials for drivers beginning or ending their trip within Saint Paul. They also provide access to downtown and other regional business concentrations, and access to and from neighborhoods to Principal Arterials. The Preferred Alternative is consistent with this classification as the highest forecasted year 2020 ADT for Ayd Mill Road under the Preferred Alternative is less than 21,000, which is below the 30,000 vehicles per day that a Minor Arterial is capable of carrying. The Preferred Alternative will improve operations on the remainder of the street system within the study area and allow other roadways of lesser classification to function as they are intended.

The Preferred Alternative is consistent with an “A” Minor Arterial classification; therefore, no mitigation measures are necessary.

Truck Traffic

With the implementation of the Preferred Alternative, Ayd Mill Road will connect to I-35E in the segment of I-35E designated as a parkway. The truck restriction on I-35E prevents large trucks from readily accessing Ayd Mill Road from the south and discourages their use of Ayd Mill Road. The Preferred Alternative may result in an increase in local delivery truck traffic utilizing Ayd Mill Road as a result of the extension to I-94.

Because truck traffic will be limited to shortest routes for local delivery only, no impacts are anticipated and no mitigation measures for truck traffic on Ayd Mill Road will be necessary.

Access

Access to Ayd Mill Road under the Preferred Alternative will be provided by full directional ramp access at Jefferson, St. Clair, Grand, and I-35E. Access to Selby will be provided similar to existing conditions. Access will be removed at Hamline. New at-grade access to extended Ayd Mill Road will be provided at Marshall, Concordia, and St. Anthony.

Construction of the Preferred Alternative will maintain or enhance access to/from businesses and neighborhoods in the study area by providing direct connections to I-94 and I-35E as well as through improved LOS and reduced congestion on study area streets. Under the Preferred Alternative, the ramp connection to I-35E will remain permanently opened. Removal of the Pascal bridge will make access between the Snelling Park Neighborhood (west of Pascal and south of Concordia) and the Midway commercial area more circuitous than at present.

Property access will be hindered or improved along study area streets where traffic volumes have been forecasted to increase or decrease. Bicycle access will be enhanced through an on-street bike lane from Selby to Jefferson and from Marshall to St. Anthony on Ayd Mill Road , and on St. Anthony from Pascal to Ayd Mill Road. Pedestrian and bicycle access would also be enhanced through a separate City trail project.

No mitigation measures, other than those incorporated into the design of the Preferred Alternative, are proposed for access.

Transit Services

The Preferred Alternative implements the TSM/TDM elements noted in Section 2.3.3. Daily transit ridership in year 2020 will increase by an additional 1,050 riders under the Preferred Alternative when compared to the year 2020 No Build. Projected ridership would not exceed projected seat capacity.

The Preferred Alternative will remove the Pascal Bridge over I-94 and relocate the HOV bypass to Snelling. This relocated facility is better located to attract HOV commuters and would not need to be gated.

Mitigation measures are not necessary with respect to the transit system. No adverse impacts are anticipated because of the benefits to the overall transportation system provided by the proposed transit improvements.

Impacts on other Streets

The operations analysis results indicate that all key intersections will operate at an acceptable LOS D or better in during the a.m. and p.m. peak hours under the Preferred Alternative. The most notable improvements in LOS under the Preferred Alternative are anticipated at the following intersections, where the No Build would result in a LOS F, while the Preferred Alternative will result in a LOS B or C:

- Snelling at Grand (p.m. peak)
- Snelling at Selby (a.m. peak)
- Lexington at Randolph (p.m. peak)
- I-35E ramps at Randolph (two intersections, p.m. peak)

The Preferred Alternative requires TSM improvements to allow intersections to operate at LOS D or better. Mitigation measures for traffic impacts include traffic control modifications such as left-turn signals, as well as geometric improvements such as lane usage modifications and the addition of exclusive turn lanes. These improvements will be carried out as part of the Preferred Alternative.

Regional Transportation System

As part of the Preferred Alternative, the westbound I-94 exit ramp to Snelling will be reconstructed to improve the merge between frontage road traffic and traffic exiting westbound I-94. Relocating the Snelling ramp will provide additional distance from the Snelling intersection to accommodate weaving operations. Additionally, the eastbound I-94 entrance ramp from Snelling will be reconstructed to incorporate an HOV bypass lane, which has not been possible at this location due to the location of the existing Pascal bridge (to be removed as part of the project). Reconstruction of these ramps is included in the cost of the Preferred Alternative.

FOAM (Freeway Operations Analysis Method) analysis completed for the Preferred Alternative indicates that the I-94 mainline will continue to operate similar to the No Build at LOS E or better during peak hours under year 2020 conditions. During the p.m. peak hour, the Preferred Alternative will operate at a slightly lower LOS than the No Build for the eastbound Lexington on-ramp merge, the westbound Snelling on-ramp merge, and the westbound Hamline off-ramp diverge. During the a.m. and p.m. peak hours, the Preferred Alternative will improve LOS at the eastbound Lexington off-ramp diverge, the eastbound Snelling on-ramp merge, and the westbound Snelling off-ramp diverge. No other differences in LOS were identified between the year 2020 No Build and the Preferred Alternative.

Under the Preferred Alternative, traffic on St. Anthony between Pascal and Snelling will increase. Currently, there is a heavy weave between westbound motorists on St. Anthony from Pascal and motorists entering St. Anthony from the Snelling exit ramp. Results of a Synchro analysis indicate that the intersections of St. Anthony at Snelling and Pascal are expected to operate at LOS C or better during the a.m. peak hour. Operations for vehicles exiting at the Snelling exit ramp are adequate. However, the westbound queue at the Pascal intersection will backup into the Ayd Mill Road intersection along St. Anthony. Refer to the freeway operations section of the *Ayd Mill Road Technical Memorandum* (December 1998) for additional information.

The City will complete an Access Modification Request (AMR) for the reconstruction of the I-94 ramps if conditions warrant and if requested by FHWA.

Accidents/Safety

The Preferred Alternative, when compared to the year 2020 No Build, will reduce the total number of accidents in the study area by 107 incidents. The greatest reduction in the number of accidents will occur along Snelling and Lexington. The number of accidents will increase slightly or remain the same along Pascal, Hamline, and Ayd Mill Road. No mitigation is needed as the Preferred Alternative will result in an overall decrease in the number of the accidents in the study area.

Bicycle/Pedestrian

The Preferred Alternative will provide shoulder lanes on Ayd Mill Road from Selby to Jefferson and from Marshall to St. Anthony, and on St. Anthony from Pascal to Ayd Mill Road for bicycle use; these lanes will not be intended for pedestrian use except in emergencies. The shoulder

lanes will add a link to proposed and existing bicycle trails in the study area. No new pedestrian trails will be added as part of the Preferred Alternative. Bicycle and pedestrian facilities will not be provided on Ayd Mill Road between Selby and Marshall.

The Preferred Alternative will accommodate a bicycle/pedestrian trail (a separate City project) along the Ayd Mill Road corridor that would be located along the east side of the Canadian Pacific (CP) Rail tracks.

Existing paths under the Hamline bridge will be made more walkable and will allow access to new open space areas where the Hamline ramps will be removed. The sidewalk crossing over Ayd Mill Road at Hamline will be improved through reconstruction of the Hamline bridge.

Railroad

Rail service on the CP Rail mainline will remain unchanged as a result of the Preferred Alternative, except during construction activities when temporary stoppages may be necessary. The removal of the railroad spur will be required prior to project construction.

In general, CP Rail prefers to minimize the opportunities for public access to the tracks. Measures to minimize risks will be explored as the final design for the Preferred Alternative is developed.

Energy

The Preferred Alternative is expected to consume less direct energy than the No Build due to improved traffic flow, reduced delays, and decreased travel times. Overall, direct operational energy savings for the Preferred Alternative are expected to offset the indirect energy requirements, generally resulting in long-term net energy savings when averaged over the lifetime of the project.

No mitigation measures are needed for impacts to energy because the Preferred Alternative is expected to result in a slight decrease in energy consumption.

ES.5.2 Social and Economic Impacts

Social and economic impacts and mitigation are discussed in detail in Chapters 5 and 7 of this Final EIS and are summarized below.

Population

No residential properties will be acquired and therefore no persons or housing will be displaced from the study area as a result of the project. No mitigation measures will be necessary as the population characteristics within the study area will not be changed as a result of the Preferred Alternative.

Environmental Justice

Based on 2000 Census data, block group 334.1 has had greater increases in low-income populations than either the city or the study area as a whole (see Figures 5-1 and 5-2). Additionally, this block group has a higher percentage of minority populations and renter occupied housing and a lower median income than either the city or the rest of the study area. Within the study area, 41 percent of minority and low-income populations reside in block group 334.1. The increase in minority populations in this block group of 18 percent is similar to the 14 percent increase experienced by the city as whole but disproportionate to the 8 percent increase within the study area in general. Furthermore, minorities comprise 67 percent of the population for this block group compared to 22 percent of the study area in general and 33 percent in the city as a whole. While this block group has experienced only a three percent increase in median household income, the city and the study area as a whole have both experienced a 46 percent increase in median household income. Minority and low-income populations within this block group are located primarily at Skyline Towers, located at 1247 St. Anthony.

Although a high percentage of low-income and minority populations are located at Skyline Towers, these populations will not be disproportionately impacted by the project because this apartment building is located to the north and east of where the Preferred Alternative will be constructed. The Hamline bridge currently provides and will continue to provide vehicular and pedestrian access across I-94 for Skyline Tower residents. Traffic volumes and associated noise levels in the vicinity of the apartment building are not anticipated to increase as a result of the Preferred Alternative and therefore impacts to building residents regarding traffic and noise are not anticipated. No other impacts are anticipated.

The proposed project will not cause disproportionately high and adverse impacts on low-income and/or minority populations. Therefore, the environmental justice finding indicates that no mitigation related to environmental justice is required.

Neighborhood Cohesion and Livability

The alignment of the Preferred Alternative is consistent with neighborhood boundaries and will not subdivide any neighborhoods or alter any known neighborhood boundaries.

The Preferred Alternative will decrease open space in the corridor by less than half an acre. However, the continuity of open space will increase in the study area, with a corridor of usable open space west of Ayd Mill Road between Hamline and Summit.

Neighborhood livability in the Snelling Park neighborhood is already compromised by its isolation from surrounding neighborhoods and existing impacts of street traffic, railroad traffic, and adjacent industrial land uses. The neighborhood livability and cohesion of this neighborhood will experience impacts (both negative and positive) by changes in noise, traffic, access, and the provision of pedestrian and bicycle facilities.

Neighborhood cohesion and livability, where possible, will be enhanced through the provision of trails, open space, landscaping, and urban design features. The Preferred Alternative will not adversely impact neighborhood cohesion within the study area because the alignment follows existing neighborhood boundaries and will not divide any existing or planned neighborhoods, therefore no mitigation is needed. Mitigation measures related to specific impacts such as traffic, air quality, noise, and visual changes are addressed throughout the Final EIS.

Community Facilities and Services

No community facilities will be acquired under the Preferred Alternative. Special consideration was given to locations and access routes to and from these facilities in the early stages of planning in an effort to avoid these features.

Access to the Industrial Station Post Office (1430 Concordia) may change slightly to provide adequate spacing between the access driveway and the extension of Ayd Mill Road. The Preferred Alternative will improve regional and local access to community facilities including the Post Office and Concordia University. Emergency services will benefit from the regional connection as well as from reduced congestion on study area streets.

A Concordia University maintenance building and parking lot will be acquired as part of the Preferred Alternative. A small portion, 0.32 acres, of the Concordia University athletic field will be acquired for right-of-way, but the function of the property as an athletic field will remain intact. This property does not require a Section 4(f) Evaluation as it is privately owned and used for Concordia University athletic activities.

No additional mitigation measures other than those incorporated into the design of the Preferred Alternative are needed because no other adverse impacts on community facilities are anticipated.

Businesses and Employment

Four businesses will be relocated due to right-of-way acquisition including Snelling Companies, Corning-Donohue Inc., SPS Companies, and Michel's Sales. An estimated 70 to 90 employees will be affected by these relocations. The relocation of these businesses will result in impacts on the businesses and the employees at these establishments, as well as the City's tax base. Acquisition of portions of land from two other businesses (AA Party Rental and Palda & Sons, Inc.) will also be required. Potential relocation impacts on businesses include a loss of employees if the workers choose not to "follow" their jobs, as well as the loss of potential or existing customers/business during relocation. The transition phase encountered during relocation could cause temporary shut down or loss of work days to accomplish the move. Re-establishment at a new location and potentially a new customer base could also impact relocated businesses.

Publicly available data on taxable business properties that may be removed from the local tax base was determined in the Draft EIS using 1998 tax assessments. This data has been updated using 2004 tax assessments. The "worst case" tax impact, assuming total loss of taxes due to full acquisition of the properties, would be a loss of approximately \$127,268 annually (2004 dollars).

If the fully-acquired businesses are relocated to a place within the study area or the city, impacts to the local tax base would be reduced, as the relocated properties would remain on the City's tax roll. The long-range impact could be a net increase in property tax base through the encouragement of redevelopment in the area north of Selby.

Property Value

The Task Force raised concerns that residential property values would be negatively impacted by an Ayd Mill Road connection to I-94 and I-35E. No methodology exists for proving or disproving these concerns. Considering the degree of expected traffic and noise increases and the property setbacks along Ayd Mill Road, no measurable impacts on residential or commercial/industrial property values are expected to occur as a direct result of the Preferred Alternative. Therefore, no mitigation is required.

Existing Land Uses

The Preferred Alternative will change land use where the roadway extension will be constructed, replacing the acquired industrial and commercial land with a landscaped urban street that includes boulevard tree plantings and sidewalks on both sides of the road. Removal of the rail spur removes some potential for further industrial development, as some industrial land uses would be precluded from locating in the north sub-area without available rail access. However, the addition of the new north-south roadway with at-grade access to Concordia, Marshall, and St. Anthony could provide incentive for additional commercial development in this area as well as in the Midway commercial area north of I-94. An urban street through this area would be conducive to a potential westward expansion of the Concordia University campus. If the campus were to expand westward, institutional land use in the north sub-area would increase. Additionally, the Preferred Alternative will decrease open space in the corridor by less than half an acre.

Changes to the existing land use, zoning, and development patterns in the study area south of Selby are not anticipated. Although ramps will be removed and the vacated land converted to open space, all other land uses would remain unchanged as a result of the Preferred Alternative.

Impacts on north sub-area land uses have been minimized by identifying an extension alignment that utilizes the existing railway spur rather than a new alignment that would require additional property acquisition. Other extension alignments that were considered were eliminated because of impacts on both commercial and residential properties. Impacts have been further avoided by designing the roadway to accommodate existing adjacent land uses. Any changes in land use that may occur would be implemented in accordance with local land use plans and zoning ordinances.

Regional Development Plans

Although regional development plans have been or are in the process of being updated, the Preferred Alternative is consistent with the proposed new regional plans, as the Preferred Alternative would increase transportation capacity, implement TSM/TDM elements, and improve the existing roadway system by providing more direct connections to I-94 and I-35E. Because no adverse impacts are anticipated, no mitigation is necessary.

Local Development Plans

The Preferred Alternative is consistent with the *City of Saint Paul Comprehensive Plan* as well as most district and local community plans. The Preferred Alternative is not consistent with the *Merriam Park Community Plan*. This document does not support a connection between Ayd Mill Road and I-94 because the community is concerned that a connection would negatively impact the Merriam Park and Snelling-Hamline neighborhoods. The City did not affirm this recommendation. The Area Plan Summary of the *Merriam Park Community Plan* that was amended to the City's *Comprehensive Plan*, notes that the City will implement the recommendations of the Ayd Mill Road EIS as stated in Policy 20 of the *Transportation Policy Plan*. The City goes on to note that "Adoption as a City policy of a recommendation against any connection or expansion of Ayd Mill Road is therefore premature".

Therefore, the Preferred Alternative is consistent with the amended Area Plan Summary and the City's *Comprehensive Plan* as a whole and no impacts on local development plans are anticipated.

Potential changes in local land uses in the northern part of the corridor due to the extension of Ayd Mill Road to I-94 may cause the City to amend the current comprehensive plan to land uses more compatible with the improvements in the Ayd Mill Road corridor.

Right-of-Way and Relocation

The Preferred Alternative was designed to minimize impacts by staying within the limits of the existing City right-of-way to the extent possible and through identification of an alignment that roughly follows the alignment of the railroad spur line. However, to meet the project safety and traffic capacity objectives, the acquisition of four commercial properties will be unavoidable.

Right-of-way acquisition for the proposed project impacts six business properties (Snelling Companies, Corning-Donohue Inc., SPS Companies, Michel's Sales, AA Party Rental, and Palda & Sons, Inc), Concordia University (parking lot, maintenance facility, and portion of athletic field), Metro Transit, Rein Midway Ltd. Partnership, and CP Rail. The relocation of businesses could result in impacts on the businesses, the employees at these establishments, as well as the City's tax base. The City will continue to coordinate with Concordia University to replace the maintenance facility after road construction is complete. The function of the Concordia University athletic field will not be impacted, as the acquisition is a narrow strip along the western edge of the property.

The right-of-way acquisition and relocation program will be conducted in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, by the Surface Transportation and Uniform Relocation Assistance Act of 1987 and 49 Code of Federal Regulation, Part 24, effective April 1989. Relocation resources are available to all parties being relocated without discrimination. The City of Saint Paul's Business Resource Center staff will provide relocation assistance to the four displaced businesses to identify potential relocation sites within the City of Saint Paul or within the metropolitan area. In addition to providing relocation advisory services, the City will also pay for certain expenses pertaining to:

- Actual, reasonable, and necessary moving costs;
- Certain re-establishment expenses (i.e., advertising, signage, utility hook-ups);
- Fixed payment in lieu of moving and re-establishment costs; and
- Loss of tangible personal property as a result of relocation or discontinuance of a business.

The existing ramp from northbound Ayd Mill Road to Selby will be retained under the Preferred Alternative and the two-way loop road proposed in the Draft EIS north of Selby has been eliminated. Elimination of this road will reduce the amount of right-of-way acquisition from Concordia University by 26,410 square feet (0.61 acres) and will allow the function of their athletic field to remain intact. However, approximately 8,500 square feet (0.20 acres) of right-of-way (currently vacant) along the north frontage road of I-94 and Pascal (owned by Metro Transit and Rein Midway Ltd. Partnership) will need to be acquired but was inadvertently omitted in the Draft EIS. Therefore, the Preferred Alternative will require a total right-of-way acquisition of approximately 403,073 square feet (9.25 acres) which is a reduction of 17,910 square feet (0.41 acres) of right-of-way acquisition compared to the original 420,983 square feet (9.66 acres) presented in the Draft EIS.

Redevelopment Potential

The Preferred Alternative was designed to minimize right-of-way acquisition and impacts on existing land uses but also recognizes redevelopment potential in areas that would gain accessibility or benefit from land use changes. The Preferred Alternative could enhance the opportunity for redevelopment in the north sub-area. Under the Preferred Alternative, Ayd Mill Road replaces the acquired industrial and commercial land with a landscaped urban street.

Concordia University could benefit from land use changes in the north sub-area with an opportunity to expand their campus westward. In the north sub-area Ayd Mill Road will have characteristics of a landscaped urban street that includes boulevard tree plantings and pedestrian-scale sidewalks that would be conducive to a potential westward expansion. The Preferred Alternative is aligned along Concordia University's western boundary, in what is now a parking lot. Under the Preferred Alternative, there will be a signalized, at-grade intersection at Ayd Mill Road and Marshall that will provide for pedestrian crossing. Therefore, Ayd Mill Road in the north sub-area should not present any barriers to campus expansion that would not be encountered with any other city street.

The Preferred Alternative would also enhance access to the Midway area north of I-94 and could support additional commercial development. Removal of the rail spur removes some potential for further industrial development, as some industrial land uses would be precluded from locating in the north sub-area without available rail access.

New transportation patterns, combined with the potential for the westward expansion of the Concordia University campus, could change land use in north sub-area from industrial-oriented to commercial- and institutional-oriented.

With input from the community, the City would determine whether to conduct a “40-acre study” to address zoning and land use issues to guide redevelopment in the north sub-area.

ES.5.3 Natural and Physical Impacts

Natural and physical impacts and mitigation are discussed in detail in Chapters 6, 8 and 9 of this Final EIS and are summarized subsequently.

Visual

Visual impacts resulting from lowering the elevation of Ayd Mill Road would be minimal for adjacent neighbors, but may benefit some adjacent neighborhoods by visually separating the roadway and adjacent properties. The increased elevation difference between the roadway and adjacent neighborhoods will limit the visual intrusion of the roadway on adjacent neighborhoods and improve the visual quality of distant views. Increased traffic will result in visual impacts on the Snelling Park neighborhood adjacent to Concordia.

If implemented, noise barriers will present changes to the visual environment that cannot be evaluated at this time. Consultation with residents will occur before any decisions are made regarding noise barriers.

The Preferred Alternative (see Figures 6-1 through 6-4) was developed with the preservation of visual elements as a primary goal. Mitigation measures have been incorporated into the design of the Preferred Alternative and include:

- Implementation of the urban design concept (“boulevard” setting with landscaping along both sides of the roadway and pedestrian-oriented “Saint Paul-style” lantern lighting within a central median, described in detail in Section 6.4.1 of the Draft EIS);
- Landscaped, urban, at-grade street in the north sub-area;
- Preservation of existing vegetation to the extent possible;
- Visual treatment and vegetative plantings on retaining walls;
- Increased connectivity of open space;
- Shifting of roadway to maximize open space;
- Scenic overlook at Portland;
- Landscaping and low decorative walls on Concordia;
- Extension of the urban design concept to Concordia;
- Removal of the Pascal bridge; and
- Reconstruction of the Hamline bridge.

Air Quality

Currently, there are no non-attainment areas in Minnesota. The Twin Cities Metropolitan Area was formerly a non-attainment area for carbon monoxide (CO) and was reclassified as an attainment area in 1999.

Worst case CO concentrations adjacent to thirteen intersections in the study area were predicted using micro-scale dispersion modeling. Results of this analysis showed that predicted CO concentrations at all of the modeled receptors will be below state standards for the Preferred Alternative. Predicted concentrations for the Preferred Alternative were lower than the No Build (as high as 6.5 ppm for the eight-hour standard or 72 percent of the standard).

The Ayd Mill Road main line/free flow analysis predicted that construction of the Preferred Alternative will increase CO concentrations adjacent to Ayd Mill Road. Eight-hour concentrations predicted at these receptors were as high as 1.7 ppm (19 percent of the standard) for the No Build Alternative and as high as 3.5 ppm (39 percent of the standard) for the Preferred Alternative. No specific long-range mitigation measures for this project are necessary to maintain air quality standards because projected CO levels for the Preferred Alternative are below state and federal standards.

A discussion of ozone, particulate matter (PM), nitrogen oxides (NO_x), sulfur dioxide (SO₂) and other sulfur oxide gases (SO_x), and air toxics is included in Chapter 8.

This project is not in the current Transportation Improvement Program (TIP) but, after funding is in place to build the project, it will be included in the regional air quality analysis performed by the Metropolitan Council to demonstrate that regional emissions are below the EPA-established emissions budget for the region.

This project does not interfere with implementation of any transportation control measures included in the State Implementation Plans (SIP) and it is not anticipated that the inclusion of this project will exceed CO standards.

Noise

The noise modeling analysis presented in the Draft EIS indicated that the year 2020 Preferred Alternative, when compared to existing (1997) conditions, will result in an increase in L₁₀ daytime and nighttime noise levels of three or fewer decibels [dB(A)] at the majority of receptors (noise levels increase by four decibels at four receptors). The L₅₀ daytime and nighttime noise levels will increase by four or fewer decibels at the majority of receptors (noise levels increase by five decibels at five receptors). The year 2020 Preferred Alternative, when compared to the year 2020 No Build, will result in an increase in L₁₀ daytime and nighttime noise levels of three or fewer decibels. The L₅₀ daytime and nighttime noise levels will increase by four or fewer decibels at the majority of receptors (nighttime noise levels increase by five decibels at two receptors).

Noise mitigation measures (noise walls) were studied where year 2020 Preferred Alternative noise levels are projected to exceed federal noise abatement criteria and/or state noise standards in residential areas. The analysis includes the evaluation of feasibility, noise reduction performance, and cost effectiveness, based on currently available project layouts. The most common traffic noise mitigation is construction of a barrier (“noise wall”) between the roadway and receiver. Other noise abatement measures such as traffic control devices and signing for prohibition of certain vehicle types, time-use restrictions for certain vehicle types, modified speed limits, exclusive land designations, etc. as listed in CFR 23, 772.13(c) were determined to be not feasible or practical for this project.

While engineering constraints were not studied in detail, it was assumed that construction of noise walls would be feasible at all locations that were found to be cost effective. Some of the modeled noise walls were at the top of slopes near residences and were not within the City right-of-way. The cost-effectiveness calculations **do not** include any additional cost for right-of-way acquisition. If the City decides to pursue noise mitigation in these areas, details such as distance from the railroad tracks, any existing or planned trails, and factoring in right-of-way costs would need to be considered during the feasibility analysis that will occur after final design is available.

Using Mn/DOT's cost effectiveness analysis methodology, noise barriers have been found to be cost effective along much of the corridor (Figure 8-1). Cost-effectiveness numbers are based on preliminary design information that could change as designs are finalized. Based on these results, the City will propose noise mitigation in areas where it has been found to be reasonable. In addition to cost effectiveness other factors including feasibility may influence the noise mitigation plan. Feasibility relates to physical and engineering constraints such as access to right-of-way, the presence of utilities, and soil conditions. Additionally, the effectiveness of reducing noise impacts and reducing the view of traffic will be evaluated against the potentially negative visual impacts of these barriers on the neighborhood. Consultation with residents will occur before any decisions are made regarding noise barriers. Noise walls were found to be reasonable within the vicinity of the West Summit Avenue Historic District. Should noise walls be considered, the SHPO will be included in discussions regarding noise mitigation.

Roadway Drainage

Increased impervious surface is anticipated with the Preferred Alternative, which will create an increase in stormwater flowing from the project area. Existing impervious surface area is 17.9 acres and the Preferred Alternative proposes a finished impervious surface area of 19.8 acres. Stormwater runoff following construction will continue to flow into the Mississippi River via the City's storm sewer system. Considering the relatively large flow of the Mississippi River, the volume of roadway stormwater discharged to the Mississippi River throughout the Twin Cities metropolitan area, and the relatively minor contribution of the Preferred Alternative, no impact to the Mississippi River is anticipated. No impacts on groundwater are anticipated for the Preferred Alternative.

Further analysis of drainage impacts and stormwater design needs will be completed during final design of the Preferred Alternative.

Potentially Contaminated Sites

Within the corridor of the Preferred Alternative, there are a total of eleven potentially contaminated sites identified in the *Phase I Environmental Site Assessment* (Phase I) report. Eight of the sites are located in the northern portion of the proposed corridor, two of which exist on the outer fringe of the corridor and may or may not be directly impacted by the proposed project. The remaining three sites lie within the existing Ayd Mill Road right-of-way south of Selby. Each of these sites was rated as having High, Medium, or Low Potential to impact subsurface conditions in the project area. Table 8-3 defines the rating criteria. Further information on potentially contaminated sites affected by the Preferred Alternative will be obtained during final design, prior to the acquisition of right-of-way.

Any contamination encountered during construction will be handled appropriately and any additional properties found to be contaminated will be reported to the MPCA.

Terrain and Climate

As part of the Preferred Alternative, excavation will be necessary to lower the roadway elevation to a maximum of 25 feet below the existing grade between Summit and Marshall. The lower elevation will allow Ayd Mill Road to pass beneath Selby and the at-grade railroad. Retaining wall construction will be necessary to provide slope stability and increase the amount of usable space in the boulevard area. Ayd Mill Road will bend northward as it passes under Selby.

Best management practices will be employed to minimize erosion in construction areas. Mitigation measures for impacts on terrain will consist of slope stabilization along roadway embankments. While construction of a depressed roadway will alter the terrain in the roadway corridor, a depressed roadway will also visually isolate the roadway and screen roadway noise from adjacent neighborhoods.

Water Resources

Increased impervious surface is anticipated with the Preferred Alternative, which will create an increase in stormwater flowing from the project area. Existing impervious surface area is 17.9 acres and the Preferred Alternative proposes a finished impervious surface area of 19.8 acres. Stormwater runoff will flow into the Mississippi River via the City's storm sewer system. Considering the relatively large flow of the Mississippi River, the volume of roadway stormwater discharged to the Mississippi River throughout the Twin Cities metropolitan area, and the relatively minor contribution of the Preferred Alternative, no impact to the Mississippi River is anticipated.

Erosion prevention and sedimentation measures will be implemented during the construction process to minimize potential water quality impacts from construction activities. Final design of stormwater systems for improvements to Ayd Mill Road will include any necessary consideration of 'upstream' or upslope discharges to the road right-of-way. Further analysis of drainage requirements will be completed with final design.

No impacts on groundwater are anticipated.

Fish and Wildlife

It is anticipated that the Preferred Alternative will have minor impacts on wildlife due to the urban nature of the study area and the linear nature of the project. Landscaping and the use of native plant materials will be implemented wherever feasible for the Preferred Alternative.

Threatened and Endangered Species

The most recent Minnesota Department of Natural Resources (DNR) Natural Heritage database review (December 2004) indicates no current, known occurrences of rare species or natural communities in the study area. A copy of correspondence with the DNR is included in

Appendix C. Due to the urban nature of the study area and the lack of known occurrences of threatened or endangered species, it is not anticipated that the Preferred Alternative will have any impacts upon any of these species and therefore, no mitigation measures are proposed

Vegetation

Some potential impacts on vegetation may be associated with the reconstruction of access ramps and retaining walls. To the extent possible, the mature oaks and the forested and shrubby areas will be preserved. In the north sub-area, the Preferred Alternative will be constructed through a developed commercial/industrial area which is mostly devoid of vegetation. Therefore, no adverse impacts on vegetation are anticipated in this area.

Vegetation impacts will be mitigated through landscaping treatment and creation of open space in the areas of ramp removal. Landscape (boulevard tree) plantings will be included with the implementation of the Preferred Alternative, resulting in some additional trees.

ES.5.4 Construction Impacts

Construction impacts and mitigation are discussed in detail in Chapter 10 of this Final EIS and are summarized below.

Temporary environmental impacts related to air quality, dust generation, noise, vibration, aesthetic character, traffic, and roadway access will result from construction. Although some impacts will be unavoidable, most impacts will be short in duration.

The extent of potential disruption on soils and slope stability will be determined in the final design phase. Adverse soil conditions will be accommodated through engineering and stabilization practices to minimize impacts where necessary.

Lowering the elevation of Ayd Mill Road between Summit and Marshall will require slope stabilization and standard erosion control practices to stabilize newly formed side-slopes. Retaining walls will also be used to control erosion, secure slope stability, and increase the amount of useable space within the road right-of-way. The total amount of soil removed and dewatering required as a result of excavation will be calculated during the final design according to the provisions of Mn/DOT Standard Specifications 2105.3.

Existing pavement and bridge materials will be salvaged and recycled whenever possible or will be disposed of according to Mn/DOT Standard Specifications 2104.3.

Disturbance of groundcover from construction activities could result in some increases in sediment loading in stormwater runoff. Standard construction practices will be followed to avoid erosion that could lead to slope failure, disturbance of steep slopes, and/or unstable soils. The contractor will be required to submit an approved erosion control plan meeting the requirements of the watershed district and other appropriate agencies and in accordance with Mn/DOT Standard Specification 1803.5. In addition, a National Pollutant Discharge Elimination-State Disposal System (NPDES-SDS) Construction Permit will be required ensuring that appropriate erosion control devices be utilized.

The railroad tracks and steam line adjacent to the Ayd Mill Road mainline will be disturbed during construction. A bypass railroad track will be installed to allow rail services to continue during construction. The steam line will also be temporarily rerouted adjacent to the railroad bypass during construction. Appropriate measures will be taken to protect these structures.

ES.5.5 Historic and Archaeological Resource Impacts

Historic and archaeological resource impacts are discussed in detail in Chapter 11 of this Final EIS and are summarized below.

Working with the Mn/DOT Cultural Resources Unit (CRU) and in consultation with the Minnesota State Historic Preservation Office (SHPO), FHWA coordinated NEPA and Section 106 reviews throughout the EIS process. Public involvement activities have informed the decision-making process and were used by FHWA in Section 106 deliberations.

Identification of the Area of Potential Effect (APE) was determined by FHWA in consultation with the SHPO for the Ayd Mill Road study. Questions regarding the APE were reviewed by FHWA, Mn/DOT, the Mn/SHPO and the City of Saint Paul again on September 1, 1998. FHWA determined that the APE was adequate and no adjustments were made.

The Mn/DOT CRU, on behalf of FHWA, reviewed the technical reports prepared for architectural and archaeological properties in the Ayd Mill corridor. No properties were listed on the National Register or determined eligible for the National Register as a result of the surveys. The West Summit Avenue Historic District is listed on the National Register, but is not connected to Ayd Mill Road. The SHPO concurred in the determination of no properties affected by the undertaking. The SHPO noted that their concurrence assumed no changes to the Summit Avenue bridge. In addition, because noise walls were found to be reasonable within the vicinity of the West Summit Avenue Historic District (Sections ES.5.3 and 8.2.4), should noise walls be built, additional consultation will occur (letter of November 29, 1999, Appendix C).

ES.5.6 Summary of Impacts and Mitigation

Table ES-1 provides a summary of the impacts of the Preferred Alternative and the proposed mitigation discussed throughout the Final EIS and summarized in Sections ES.5.1 through ES.5.5.

TABLE ES-1 SUMMARY OF IMPACTS AND MITIGATION

Chapter	Impact	Mitigation
3	The benefit/cost ratio for the Preferred Alternative is 9.2.	Mitigation measures are not required as the benefit/cost ratio is favorable.
4	Year 2020 p.m. peak hour traffic volumes for Randolph, Jefferson, Selby, Edgcumbe, Snelling, and Lexington will decrease. Traffic volumes on Hamline, Pascal, University, and Marshall will mostly decrease. Substantial increases will occur on Ayd Mill Road, Concordia, and St. Anthony with slight increases on Grand and St. Clair.	The Preferred Alternative will shift trips from study area streets to Ayd Mill Road resulting in an overall decrease in p.m. peak traffic volumes on study area streets. Therefore no additional mitigation of traffic impacts will be needed.
4	The functional classification of Ayd Mill Road will remain an “A” Minor Arterial under the jurisdiction of the City.	The Preferred Alternative is consistent with an “A” Minor Arterial classification therefore, no mitigation measures are necessary.
4	The Preferred Alternative will maintain or enhance access to/from the study area by providing direct connections to I-94 and I-35E as well as through improved LOS and reduced congestion on study area streets.	No mitigation measures, other than those incorporated into the design of the Preferred Alternative, are proposed for access.
4	Year 2020 projected daily ridership under the Preferred Alternative would not exceed projected seat capacity.	Because of the benefits to the overall transportation system provided by the proposed transit improvements, no mitigation measures are necessary.
4	The operations analysis results indicate that all key intersections will operate at an acceptable LOS D or better in during the a.m. and p.m. peak hours.	The Preferred Alternative requires TSM intersection improvements to allow the intersections to operate at LOS D or better.
4	The westbound I-94 exit ramp to Snelling will be reconstructed to accommodate weaving operations. Additionally, the eastbound I-94 entrance ramp from Snelling will be reconstructed to incorporate an HOV bypass lane. FOAM results indicate that the I-94 mainline will continue to operate similar to the No Build at LOS E or better during peak hours under year 2020 conditions. The intersections of St. Anthony at Snelling and Pascal are expected to operate at LOS C or better during the a.m. peak.	The City will complete an Access Modification Request (AMR) for the reconstruction of the I-94 ramps if conditions warrant and if requested by FHWA.
4	The Preferred Alternative will reduce the total number of accidents in the study area by 107.	No mitigation is needed as accidents in the study area will decrease overall.

Chapter	Impact	Mitigation
4	Shoulder lanes will be provided on Ayd Mill Road from Selby to Jefferson and from Marshall to St. Anthony, and on St. Anthony from Pascal to Ayd Mill Road for bicycle use. No new pedestrian trails will be added. The decrease in traffic on streets within the study area may create a more desirable setting for bicyclists and pedestrians on these streets, which may improve pedestrian/bicycle safety. Bicycle and pedestrian facilities will not be provided on Ayd Mill Road between Selby and Marshall.	Existing paths under the Hamline bridge will be made more walkable and will allow access to new open space areas. The sidewalk crossing over Ayd Mill Road at Hamline will be improved through reconstruction of the Hamline bridge.
4	Rail service on the CP Rail mainline will remain unchanged, except during construction activities when temporary stoppages may be necessary. The railroad spur will be removed.	Measures to minimize safety risks will be explored during final design.
4	The Preferred Alternative is expected to consume less direct energy than the No Build due to improved traffic flow, reduced delays, and decreased travel times.	No mitigation measures are needed because of the slight decrease in energy consumption.
5	The Preferred Alternative will decrease open space in the corridor by less than half an acre.	Continuity of open space will be enhanced with a corridor of usable open space west of Ayd Mill Road between Hamline and Summit.
5	No residential properties will be acquired and therefore no persons or housing will be displaced from the study area as a result of the project.	No mitigation measures will be necessary as the population and housing characteristics within the study area will not be changed.
5	Although a high percentage of low income and minority populations are located at Skyline Towers, these populations will not be disproportionately impacted by the project because this apartment building is located to the north and east of project construction.	The proposed project will not cause disproportionately high and adverse impacts on low-income and/or minority populations. Therefore, no mitigation related to environmental justice is required.
5	The increase in the continuity of open space and improved sidewalks and bicycle/pedestrian accommodation may increase neighborhood cohesion and livability.	Where possible, livability and cohesion will be improved through the provision of trails, open space, and landscaping and urban design features
5	Access to the Post Office on Concordia may change slightly to provide adequate spacing between the access driveway and Ayd Mill Road.	No additional mitigation measures other than those incorporated into the design of the Preferred Alternative are needed for community facilities.

Chapter	Impact	Mitigation
5	<p>Four businesses will be relocated. An estimated 70 to 90 employees will be affected. Acquisition of portions of land from two other businesses will also occur.</p> <p>The “worst case” tax impact, assuming total loss of taxes due to full acquisition of the properties, would be a loss of approximately \$127,268 annually (2004 dollars). If the fully-acquired businesses are relocated to a place within the study area or the city, impacts to the local tax base would be reduced, as the relocated properties would remain on the City’s tax roll. The long-range impact would be a net increase in property tax base through the encouragement of redevelopment in the area north of Selby.</p>	<p>The City of Saint Paul’s Business Resource Center staff will provide relocation assistance to the four displaced businesses to identify potential relocation sites within the City of Saint Paul or within the metropolitan area. In addition to providing relocation advisory services, the City would also pay for certain expenses pertaining to:</p> <ul style="list-style-type: none"> ▪ Actual, reasonable, and necessary moving costs; ▪ Certain re-establishment expenses (i.e., advertising, signage, utility hook-ups); ▪ Fixed payment in lieu of moving and re-establishment costs; and ▪ Loss of tangible personal property as a result of relocation or discontinuance of a business.
5	<p>For those properties already abutting Ayd Mill Road, traffic and noise will increase. Abutting property values are not expected to change as most residences along Ayd Mill Road are set back from the roadway.</p>	<p>No mitigation is required as no measurable impacts on residential or commercial/industrial property values are expected to occur.</p>
6	<p>Visual impacts resulting from lowering the elevation of Ayd Mill Road would be minimal for adjacent neighbors, but may benefit some adjacent neighborhoods by visually separating the roadway and adjacent properties. The increased elevation difference between the roadway and adjacent neighborhoods will limit the visual intrusion of the roadway on adjacent neighborhoods and improve the visual quality of distant views.</p> <p>Increased traffic will result in visual impacts on the Snelling Park neighborhood adjacent to Concordia.</p> <p>If implemented, noise barriers will present changes to the visual environment that cannot be evaluated at this time. Consultation with residents will occur before any decisions are made regarding noise barriers.</p>	<p>Mitigation measures have been incorporated into the design of the Preferred Alternative and include:</p> <ul style="list-style-type: none"> ▪ Implementation of the urban design concept; ▪ Landscaped, urban, at-grade street in the north sub-area; ▪ Preservation of existing vegetation to the extent possible; ▪ Visual treatment and vegetative plantings on retaining walls; ▪ Increased connectivity of open space; ▪ Shifting of roadway to maximize open space; ▪ Scenic overlook at Portland; ▪ Landscaping and low decorative walls on Concordia; ▪ Extension of the urban design concept to Concordia; ▪ Removal of the Pascal bridge; and ▪ Reconstruction of the Hamline bridge.

Chapter	Impact	Mitigation
7	The Preferred Alternative will change land use in the north sub-area, replacing acquired industrial and commercial land with a landscaped urban street.	With input from the community, the City would determine whether to conduct a “40-acre study” to address zoning and land use issues to guide redevelopment in the north sub-area.
7	<p>The Preferred Alternative was designed to minimize impacts by staying within the limits of the existing City right-of-way to the extent possible and through identification of an alignment that roughly follows the alignment of the railroad spur line. However, to meet the project safety and traffic capacity objectives, the acquisition of four commercial properties will be unavoidable.</p> <p>Right-of-way acquisition for the proposed project impacts six business properties (Snelling Companies, Corning-Donohue Inc., SPS Companies, Michel’s Sales, AA Party Rental, and Palda & Sons, Inc), Concordia University (maintenance facility, parking lot, and portion of athletic field), Metro Transit, Rein Midway Ltd. Partnership, and CP Rail.</p>	The right-of-way acquisition and relocation program will be conducted in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, by the Surface Transportation and Uniform Relocation Assistance Act of 1987 and 49 Code of Federal Regulation, Part 24, effective April 1989. Relocation resources are available to all parties being relocated without discrimination. The City of Saint Paul’s Business Resource Center staff will provide relocation assistance to the four displaced businesses.
7	A Concordia University maintenance facility, parking lot, and portion of athletic field will be acquired (no impact on function of athletic field).	The City will continue to coordinate with Concordia University to replace the maintenance facility.
8	Results of air quality analysis showed that predicted CO concentrations at all of the modeled receptors would be below state standards. Predicted concentrations for the Preferred Alternative were lower than the No Build.	No specific long-range mitigation measures for this project are necessary to maintain air quality standards because projected CO levels are below state and federal standards.
8	Noise barriers have been found to be cost effective along much of the corridor (see Table 8-2 and Figure 8-1). Noise walls were found to be reasonable within the vicinity of the West Summit Avenue Historic District.	Consultation with residents will occur before any decisions are made regarding noise barriers. Should noise walls be considered in the vicinity of the West Summit Avenue Historic District, the SHPO will be included in discussions regarding noise mitigation.
8	Impervious surface will increase from existing impervious surface area of 17.9 acres to 19.8 acres. No impacts on groundwater are anticipated.	Further analysis of drainage impacts and stormwater design needs will be completed during final design.

Chapter	Impact	Mitigation
8	Within the corridor, there are a total of eleven potentially contaminated sites. Eight of the sites are located in the northern portion of the proposed corridor, two of which exist on the outer fringe of the corridor and may or may not be directly impacted by the proposed project. The remaining three sites lie within the existing Ayd Mill Road right-of-way south of Selby.	Further information on potentially contaminated sites affected by the project will be obtained during final design, prior to the acquisition of right-of-way. Any contamination encountered during construction will be handled appropriately and any additional properties found to be contaminated will be reported to the MPCA.
9	To the extent possible, the mature oaks and the forested and shrubby areas will be preserved.	Vegetation impacts will be mitigated through landscaping treatment and enhancement of open space areas.
10	Air quality will be temporarily impacted during construction, resulting from the increases in dust, particulates, and emissions from equipment, demolition of buildings, and removal of pavement.	Standard construction practices including application of water to exposed soils, limiting vehicle operation on unpaved surfaces, and limiting the extent and duration of exposed areas will be employed to mitigate impacts.
10	Construction/demolition equipment will create a temporary visual disturbance.	To minimize impacts, stockpiled materials, spoil piles, equipment and other construction-related items will be kept on-site for the shortest duration possible.
10	The operation of heavy construction equipment and structure demolition will result in temporary earth-borne vibrations.	Appropriate precautions to avoid vibration impacts and slope failure will be implemented.
10	Noise impacts related to the operation of construction equipment and increased traffic congestion will occur during construction.	Construction activity will be restricted to the hours of 7:00 a.m. to 10:00 p.m. and will comply with any applicable city noise ordinances.
10	The railroad tracks and steam line adjacent to the Ayd Mill Road mainline will be disturbed during construction.	A bypass railroad track will be installed to allow rail services to continue during construction. The steam line will also be temporarily rerouted. Appropriate measures will be taken to protect these structures.
10	Disruption of roadway traffic will occur during construction.	Standard traffic control measures will be used and specific design details will include traffic flow management techniques.
10	The lower elevation between Summit and Marshall may impact slope stability.	Retaining walls will be used to control erosion and stabilize slopes.

Chapter	Impact	Mitigation
10	Disturbance of groundcover could result in some increases in sediment loading in stormwater runoff.	Best Management Practices will be employed to minimize erosion. An erosion control plan and a NPDES-SDS Construction Permit will be acquired.
11	No properties were listed on the National Register or determined eligible for the National Register as a result of the surveys. Mn/DOT concurred in the determination of no properties affected by the undertaking.	Because no historic resources will be affected by the project, no mitigation measures are required.

ES.6 Cumulative Impacts

Cumulative impacts were not addressed in the Draft EIS but were included in this Final Chapter 12. An analysis has been prepared to assess the proposed project’s potential for cumulative impacts consistent with the guidance issued by the Council on Environmental Quality (CEQ) in 1997.

The cumulative impacts of the project and development and transportation improvements to date and planned within the foreseeable future are addressed below for the impact areas of traffic, business/employment, visual quality, right-of-way, noise, storm water quantity and quality, vegetation and wildlife.

Traffic. Traffic levels in the project area have increased over several years, as the region has developed, transportation facilities have been constructed and auto use has grown. The traffic projections presented in the Draft EIS assume planned regional development and transportation improvements; therefore the potential for cumulative traffic impacts is already represented in these projections. There is sufficient capacity for projected increases.

Businesses/employment. Four businesses will be relocated due to right-of-way acquisition, affecting an estimated 70 to 90 employees. Two other businesses will be affected by partial land acquisition (see Figures 7-1 and 7-2). Any cumulative business acquisition, relocation, or employment impact due to other development projects, past or future, is offset by ongoing business growth in the East Metro area and specific business retention/development activities conducted by the City of Saint Paul and local business groups.

Visual quality. Increased traffic associated with the Preferred Alternative will result in visual impacts on the Snelling Park neighborhood adjacent to Concordia. The traffic projections assume planned regional development and transportation improvements; therefore, no additional traffic-related visual impacts are anticipated.

Right-of-way. Right-of-way acquisition for the proposed project affects six business properties (noted above), Concordia University (maintenance facility, parking lot, and portion of athletic field), Metro Transit, Rein Midway Ltd. Partnership, and CP Rail (see Figures 7-1 and 7-2).

There are no additional sizable right-of-way impacts expected in the area due to other proposed projects.

Noise. The properties abutting Ayd Mill Road will experience increases in noise of five or fewer dB(A) compared to 1997 conditions. Documented noise levels along Ayd Mill Road prior to preparation of the Draft EIS are not available, but can be expected to have increased along with traffic levels over several years. The traffic projections presented in the Draft EIS assume planned regional development and transportation improvements; therefore the potential for cumulative traffic noise impacts is already represented in the noise impacts presented in Chapter 8.

Stormwater quantity and quality. Increased impervious surface from 17.9 acres to 19.8 acres (approximately two acres) is anticipated with the Preferred Alternative. This will create an increase in stormwater flowing from the project area into the Mississippi River. Past and planned development within the Mississippi River drainage area also has increased/will increase impervious surface, and potentially, the pollutant load in surface water runoff. These increases add to the impacts of the increased impervious surface area for the Ayd Mill Road Preferred Alternative. However, federal, state, and local regulations require implementation of mitigation, including detention and treatment ponds and other Best Management Practices in conjunction with development project implementation.

Vegetation. Reconstruction of access ramps and retaining walls in the south sub-area has the potential to reduce open space by up to one-half acre. Recent in-fill development has also impacted vegetation within the project area, however the overall effect has not been substantial and has been mitigated by addition of landscaping. The construction of I-35E converted a vegetated corridor to roadway use, however substantial landscaping was incorporated into the project. It is not anticipated that future development in the corridor will result in a significant cumulative impact to vegetation.

Wildlife. It is anticipated that the Preferred Alternative will have minor impacts on wildlife due to the urban nature of the study area and the linear nature of the project. As with vegetation noted above, additive impacts on urban-adapted wildlife due to past and planned development and transportation improvements are not substantial.

The assessment of potential impacts above included some discussion of mitigation. While mitigation of cumulative impacts is not the responsibility of the proposed project, the summary below is proposed to review the mitigation measures that are in place for each issue for which a potential cumulative impact was identified.

Businesses/employment/right-of-way. Any cumulative impacts on businesses/employment due to acquisition/relocation is offset by on-going business growth in the East Metro area and specific business retention/development activities conducted by the City of Saint Paul and local business groups.

Noise. Noise mitigation measures will be implemented consistent with state and federal requirements.

Stormwater quantity and quality. Federal, state, and local regulations require mitigation, including detention and treatment ponds and other Best Management Practices in conjunction with development project implementation.

ES.7 Areas of Controversy

As stated in Section ES.2, after completion of the public comment period on the Draft EIS, the Task Force, Planning Commission, and Saint Paul City Council identified differing preferred alternatives. In order to identify the Preferred Alternative for the Final EIS, the City examined the analysis in the Draft EIS, additional field testing, and public input and discussion completed since the Draft EIS and concluded that the Four-Lane Extended Alternative would best resolve the transportation, safety and access issues described in the Purpose and Need for the project (Sections ES.1 and 1.3).

There are no areas of controversy that have not been resolved among the public agencies reviewing this Final EIS. Correspondence documenting environmental reviews by agencies was included in the Draft EIS and additional correspondence received since the Draft EIS is included in Appendix C.

ES.8 Unresolved Issues/Actions to be Addressed

There are no unresolved issues that must be addressed prior to final design. There are some aspects of the project that are typically addressed prior to, or in conjunction with, final design, as noted below.

- The City will complete an Access Modification Request (AMR) for the reconstruction of the I-94 ramps if conditions warrant and if requested by FHWA.
- The City will assist four businesses that must be acquired and relocated from the project right-of-way. All right-of-way acquisition and relocation will be conducted in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (as amended). The City of Saint Paul's Business Resource Center staff will provide relocation assistance.
- With input from the community, the City would determine whether to conduct a "40 acre study" to address zoning and land use issues to guide redevelopment in the north sub-area.
- The City will consult with residents to determine whether noise barriers should be added in areas where they are found to be feasible and cost effective.
- Further analysis of drainage impacts and stormwater design needs will be completed during final design of the Preferred Alternative.
- Further information on potentially contaminated sites affected by the Preferred Alternative will be obtained during final design, prior to right-of-way acquisition.
- All appropriate measures will be carried out to address construction impacts.
- All required environmental clearances and permits will be obtained prior to construction.

ES.9 Project Schedule, Costs, Funding

The current cost for the Preferred Alternative with the minor design changes is \$44 million (2004 dollars) as compared to \$36.5 million (1998 dollars) in the Draft EIS. The difference in cost since that time is attributed to the increased cost of real estate acquisition since the Draft EIS; the acquisition of 8,500 square feet of right-of-way along the north side of I-94 (inadvertently omitted in 1998 calculations); and the increase in the Construction Cost Index since completion of the Draft EIS.

Several potential funding sources for improvements to Ayd Mill Road exist; however, specific funding has not yet been determined. FHWA typically only approves documents that are within a fiscally constrained plan such as the Metropolitan Council Transportation Improvement Plan (TIP). However, this is a local City project and funding for transportation projects at a City level is accomplished annually by the adoption of the City's Capital Improvement Budget (CIB). The CIB funds projects that are listed in or accomplish the policies of the *Saint Paul Transportation Policy Plan* and utilizes a community input process to set priorities. Past CIBs have approved funding to complete the Ayd Mill Road EIS. Other funding sources such as federal, state, or county funds that may be approved or allocated to a project are also adopted as part of the City's annual CIB.

The City plans to use a variety of funding sources to fund the necessary property acquisition and construction of the Preferred Alternative. The implementation of these improvements, however, must follow the completion of the environmental process. In order to compete for funding for a project of this size and to best utilize the City's limited resources, the environmental process must be completed before the City begins funding the implementation of the Preferred Alternative.

The project will occur in stages, with funding allocation occurring over multiple years. City funding for the Preferred Alternative will include the use of Capital Improvement Bonds and Municipal State Aid funds. The City will investigate all other possible funding sources including county, state, and federal funds.

Although the sources of funding have not yet been assigned, the potential funding sources that may be applicable to Ayd Mill Road are included below. Potential funding sources for the Preferred Alternative include the following:

Surface Transportation Program (STP)

STP funds are federal funds administered by the Metropolitan Council under the Transportation Equity Act for the 21st Century (TEA-21). Currently, STP funds are allocated for use on transportation projects on any road not functionally classified as a local or rural minor collector, therefore, as an "A" Minor Arterial, the Preferred Alternative will qualify for STP Funds. Up to 80 percent of the project construction cost may be funded with STP funds. Regulations require that the City apply for STP funds when construction is scheduled, rather than far in advance. Therefore, the City will request multi-year funding to coincide with the planned staged construction during the next Metropolitan Council solicitation.

Municipal State Aid Streets (MSAS)

Municipal State Aid Streets are eligible for funding assistance with revenue from the state Highway User Tax Distribution fund. The City has designated Ayd Mill Road as an MSAS and could utilize those funds.

Capital Improvement Bonds (CIB)

Capital Improvement Bonds are part of the City budgeting process and are based on revenues received through property taxes. Capital improvement budgets and associated bonding levels are determined annually as part of the City budget, and may be expected to contribute to Ayd Mill Road funding for the Preferred Alternative.

Special State or Federal Grants

Special grants from the Minnesota legislature or special federal funds require legislative action and can be difficult to obtain.

ES.10 Coordination

The Responsible Governmental Unit (RGU) for the Ayd Mill Road Final EIS is the City of Saint Paul. The Federal Highway Administration (FHWA) and the Minnesota Department of Transportation (Mn/DOT) are joint lead agencies.

Mn/DOT and FHWA were sent copies of a preliminary Final EIS for review and comment in August 2004. This Final EIS document reflects input received from these agencies.

The Project Management Team (PMT) was an integral element of agency coordination in the EIS process. The PMT included staff from the following agencies: FHWA, Mn/DOT, the Metropolitan Council, Ramsey County, Dakota County, the Saint Paul Department of Public Works, the Saint Paul Department of Planning and Economic Development, the Saint Paul Division of Parks and Recreation, and the Saint Paul Planning Commission member who also served as Chair of the Task Force. In July 2004, the PMT reconvened to advise the City during the Final EIS process.

Because the Draft EIS was approved over three years ago, a Reevaluation of the Draft EIS was prepared and submitted to Mn/DOT and FHWA in the winter of 2004. In January 2005, Mn/DOT and FHWA reviewed the Reevaluation and concurred that a supplemental Draft EIS was not required.

ES.11 Permits and Approvals

The following table identifies permits or approvals that must be considered or obtained in order to implement the Preferred Alternative for the Ayd Mill Road corridor.

TABLE ES-2 PERMITS AND APPROVALS

GOVERNMENTAL AGENCY	TYPE OF PERMIT OR APPROVAL
FEDERAL:	
Federal Highway Administration	EIS Record of Decision I-94 Access Modification Request
STATE:	
MN Department of Transportation	I-94 Access Modification Request State Aid Design Approval
MN Pollution Control Agency	National Pollutant Discharge Elimination System- State Disposal System (NPDES-SDS) Construction Permit
MN Department of Natural Resources	Water Appropriation Permit (if necessary)
REGIONAL:	
Metropolitan Council	Transportation Improvement Plan
LOCAL:	
City of Saint Paul	EIS Adequacy Determination
Capitol Region Watershed District	Erosion Control Plan

ES.12 Summary of Responses to Draft EIS Comments

The following is a summary of responses to recurrent comments regarding specific topics. A synopsis of the content of the comment is provided, followed by the response. Responses to all written and oral comments received within the comment period are provided in Appendix D.

Open Space

Several commenters expressed concern regarding the lack of open space in the study area and requested clarification of the amount of open space that would be available for uses other than road right-of-way.

Maintaining or adding open space is acknowledged as a desired outcome of any project in an urban area. While overall the Preferred Alternative will decrease the amount of open space by less than a half an acre, the amount and continuity of available open space south of Selby will increase due to the elimination of both access ramps from Ayd Mill Road to Hamline and consolidation of the access to Grand and St. Clair with a two-way ramp at each location. The Preferred Alternative allows for a continuous area of open space west of Ayd Mill Road between Hamline and Summit.

Regional vs. Local Trips

Many commenters expressed concern that the connection of Ayd Mill Road to the interstates would cause the road to degenerate into an express way of suburban traffic.

Section 4.1.3.2 of the Draft EIS provides a discussion of regional vs. local trips and the proportionate changes for the various alternatives. The changes in an individual transportation corridor will not affect overall population and employment growth of the metropolitan area (in-migration, out-migration, and birth and death rates). However, such changes may have some limited effect on the locations of population or employment growth and the relationship between the two (that is, where people live in relation to where they work). The short length of Ayd Mill Road (actual capacity improvements of about 1/3 mile plus improved connections to I-35E and I-94) makes it unlikely that the Preferred Alternative will have a substantial impact on population or employment location. Transportation corridor changes do not affect the number of trips that people make but they may affect the routes and modes people use to travel from place to place. These “path” and “mode” choices are typically based on travel time, travel cost and mode accessibility. The model takes all of these factors into account.

“Induced” trips generally refer to new trips (i.e., trips a person would not otherwise have taken) or trips resulting from geographic changes in population or employment. The research cited, as well as subsequent research by the EPA (*Induced Travel: A Review of Recent Literature with a Discussion of Policy Issues*, 2004), acknowledges that roadway capacity improvements induce regional trips to a degree that travel time is affected relative to the entire trip length. The short length of Ayd Mill Road and potential modest time savings will not impact regional trips where time savings constitute a small proportion of overall trip length. Therefore, a few regional trips will use this corridor due to time savings and convenience. Since most trips attracted to Ayd Mill Road would be local, traffic shifts will likely relieve local street traffic.

“Diverted” trips generally refer to additional trips on a particular corridor that previously were made on a different roadway or transit route. These are not new trips, but are trips that have shifted from one location to another. Trips shift primarily because the route provides a decrease in travel time. This may be due to a decrease in travel distance, a decrease in congestion or an improvement in operations. Most of the increases in trips seen under the Preferred Alternative are trips diverted from other parallel streets in the study area.

For purposes of safety and traffic flow, signalization will be installed where warranted at Ayd Mill Road intersections. Intersections that may meet warrants for signalization include; on Ayd Mill Road at Marshall, Concordia, St. Anthony, and the St. Clair and Grand ramps, and on St. Anthony at Pascal. The safety of the Ayd Mill Road intersections in terms of number of accidents was discussed in Section 4.8 of the Draft EIS.

Bicycle/Pedestrian Facilities

Several commenters requested clarification of the provision of bicycle/pedestrian facilities.

As part of the Preferred Alternative, six-foot shoulders will be designated on Ayd Mill Road from Selby to Jefferson for bicycle use. Signage and the endpoints of the bike path will ensure bicyclists do not enter onto the interstates. On-street bicycle lanes will extend the bicycle connection to existing on-street bicycle lanes at both the north and south ends of the trail. A separate project from the Ayd Mill Road project is planned to construct an off road bicycle/pedestrian trail east of the existing railroad track. The pedestrian trail will connect to the City's sidewalk system at both the north and south ends of the new trail. Federal Transportation Enhancement (TEA-21) funding has been approved for this separate City project, dedicated for construction in 2007.

Truck Route

Many commenters expressed concern that truck traffic would be allowed on Ayd Mill Road in the future and several requested assurances of the continued restriction of trucks from I-35E.

As stated in Chapter 4 of the Draft EIS, Ayd Mill Road is not a designated truck route; however, trucks under 15,000 pounds may travel on this and other city streets (except designated parkways). Because Ayd Mill Road is not a designated truck route, trucks over 15,000 pounds will be limited to shortest routes from designated truck routes to local deliveries and industrial areas. Trucks are allowed to operate on streets located within an industrial zoned area. The major existing truck route adjoining this corridor will remain on Snelling, Montreal and I-94. The Preferred Alternative will not change any of these existing conditions.

Trucks are restricted on the I-35E Parkway from north of West Seventh Street to I-94. The Preferred Alternative connects Ayd Mill Road to I-35E within this truck restricted segment and prevents truck access between Ayd Mill Road and I-35E. This prevents the use of Ayd Mill as a through truck route between I-94 and I-35E. As referenced in Chapter 4 of the Draft EIS, several actions would be required to change the truck prohibition on I-35E including: overturning of the 1980s court settlement; revision of the I-35E EIS; revision of the agreement between Mn/DOT, Saint Paul and FHWA; state legislative action; and revision of City ordinances and completion of a public comment and review process. The City, Mn/DOT, and FHWA are committed to continuing the I-35E truck prohibition.

Property Values

Several commenters stated that the impacts on property values could be substantial and should have been analyzed in more detail.

The Draft EIS acknowledges that there may be marginal impacts on property values (both positive and negative) for properties along affected streets such as Ayd Mill Road, Lexington, Jefferson, etc. A detailed literature review was completed, city/county assessors and other experts were consulted, and other studies were reviewed. The most consistent finding was that there are a large number of variables that affect residential property values. Impacts related to traffic are generally lumped together with other qualitative factors that contribute to the attractiveness of a particular area. For this reason, the direct effects of traffic on property value are difficult to measure and typically require sophisticated regression modeling that can incorporate a large number of variables to address long-term changes over time. In several studies, regression techniques were used 10 to 20 years after the completion of projects to determine the effects of transportation-related factors (including accessibility as well as noise) on property values. Results varied widely, included both positive and negative effects, and were highly situation-specific. Thus, no study was found to be a reliable predictor of effects on property values. Based on this research, it was concluded that the assessment of property value impacts could not be quantifiably predicted for the Ayd Mill Road project. Thus, qualitative statements regarding impacts on property values have been provided in the Draft EIS.

The results of studies to date have varied considerably but tend to suggest that substantially increased roadway noise may have an impact on residential property value over time if the properties are in close proximity to a busy roadway. This would likely be evidenced in a slower property appreciation rate rather than a decrease in value. These types of impacts are more likely to occur when a completely new road is constructed or when a major increase in capacity of an existing road occurs. When feasible, and following consultation with the community, noise may be mitigated by the provision of noise walls.

Existing Ayd Mill Road is a four-lane roadway with traffic. The Preferred Alternative will be constructed primarily within the existing right-of-way south of Selby where residential properties are located. Thus, there would be minimal increases or decreases between the residences and the street. The increases in noise are small (less than four decibel increase in L₁₀ daytime and nighttime noise levels which is barely perceptible) and the majority of homes adjacent to Ayd Mill Road have large setbacks and are elevated above the roadway. Noise impacts on city streets cannot be mitigated with noise abatement.

Although the changes in property values are not quantified, the Draft EIS appropriately concludes that property values for properties adjacent to Ayd Mill Road, Lexington and other streets are not expected to change due to the small incremental increases and decreases in noise resulting from the Preferred Alternative.

Speed and Enforcement on Ayd Mill Road and Lexington

Many commenters expressed a fear that speeds on Ayd Mill Road would increase if the road is connected to the interstates.

The Preferred Alternative will be designed for and posted at 40 mph. This is consistent with the functional classification of Ayd Mill Road as an “A” Minor Arterial under the Preferred Alternative. The City actively enforces traffic laws to reduce speeding on city streets.

Traffic Analysis

A number of comments and questions were received regarding the travel forecasting process and results including questions about: differences between the Draft EIS and previous documentation; the forecasting models, related assumptions and modeling accuracy; and capacity and LOS calculations.

At least three forecasts have been prepared for the Ayd Mill Road corridor in the past ten years. Most recently, the regional model was run during preparation of the *Scoping Document* and then again during preparation of the Draft EIS. Due to slower historic growth in traffic on parallel streets than assumed in the *Scoping Document* forecasts, the assumed “background traffic” growth rate was reduced for the Draft EIS forecasts. This resulted in lower forecasts for Ayd Mill Road and other streets in the study area. Each document represents further updating, verification, and corrections of the information in previous documents.

The adopted Twin Cities regional travel forecasting model was used to develop travel forecasts for the Ayd Mill Road Draft EIS. The application of the model for this study was reviewed and approved by the Metropolitan Council, Metro Transit, and Mn/DOT. The model was validated by forecasting existing traffic and comparing the results to existing conditions. The methodology and assumptions are documented in technical memoranda for this project and in materials prepared by the Metropolitan Council for the regional model. Traffic forecasts throughout the study area, in general, were confirmed during the City’s field test in which the connection between Ayd Mill Road and I-35E was temporarily opened (refer to Section 4.1). No other model is accepted for travel forecasting in this metropolitan area.

The capacity analyses were derived from the Transportation Research Board’s 1994 *Highway Capacity Manual, Special Report 209, Third Edition*. (The Transportation Research Board is a unit of the National Research Council, and this manual is accepted nationally by federal, state, and local agencies.) Assumptions used in the capacity analyses of the regional travel forecast model are based on typical lane and intersection capacities, defined by Mn/DOT and Metropolitan Council. Level of Service calculations were completed using Synchro, a computerized model based on the 1994 *Highway Capacity Manual* that takes into account intersection geometrics, signalization characteristics and traffic volumes. This model is widely accepted by the industry. Level of Service is defined in the 1994 *Highway Capacity Manual*.

Impacts on Lexington

Many doubts were raised regarding the forecasted decrease of traffic on Lexington with a connection between Ayd Mill Road and the interstates.

Accepted traffic modeling methodology indicated that traffic would be reduced on Lexington with the opening of the connection between Ayd Mill Road and I-35E. During the City’s field test, traffic on Lexington decreased as forecasted, allowing for a test lane reconfiguration. The current configuration of Lexington south of Grand at the time of this Final EIS includes one through lane in each direction with designated turn lanes.

Noise Walls

Several commenters were concerned that the location of noise walls was not presented in the Draft EIS and were uncertain of the impact noise walls would have on the visual setting.

Sections 6.3.1 and 6.3.2 of the Draft EIS state that noise mitigation methods such as noise walls would be considered if a Build Alternative was identified as the preferred alternative. Following the identification of the Preferred Alternative, noise mitigation methods were considered as discussed in Section 8.2 of the Final EIS. Barriers such as noise walls, if implemented, will present changes to the visual environment. The effectiveness of reducing noise impacts and reducing the view of traffic will be evaluated against the potentially negative visual impacts of these barriers on the neighborhood. Consultation with residents will occur before any decisions are made regarding noise barriers.

Potential Restoration of Historic Creek

Many commenters disagreed with the Draft EIS assessment of the feasibility of restoring the historic creek that once ran through the ravine in which Ayd Mill Road is located.

Section 8.3.1 of the Draft EIS states that the creek cannot be restored due to extensive urban development that has disturbed the hydrology in the creek's former watershed. Storm water runoff that once served as source water to the creek is now captured by the Saint Paul sewer system and discharged into the Mississippi River.

Transit Service

Some commenters felt that greater transit service should have been assumed and that alternative modes of travel should have been addressed in greater detail.

The transit service assumed in the Draft EIS was based on several discussions with Metro Transit, the transit provider for Saint Paul and the metropolitan area. The Draft EIS assumes more transit service than is included in Metro Transit's service plans for this area. While, in theory, one could assume any level of service, the levels assumed in the Draft EIS are considered reasonable for the next twenty years given the population and employment in this corridor and relative transit service needs in other parts of the city and region. The travel forecasts for all of the alternatives, including No Build, assume an increased level of transit service. The TSM/TDM, which the City considers as the base (minimal) alternative, reflects the combined impacts of higher congestion and increased transit service.

Other alternative methods of travel are not precluded by the Preferred Alternative, but as discussed in Section 4.5 of the Final EIS, LRT is not currently being considered for this corridor. Other corridors are being considered and studied for LRT in the Twin Cities. The *Twin Cities Metropolitan Commuter Rail Study: Phase I Summary Report* (1998) presents the most recent status of consideration of commuter rail in the Twin Cities. The Ramsey County Regional Rail Authority is not currently considering use of the existing train system for the potential development of commuter rail.

TSM/TDM

There were several comments about the TSM/TDM Alternative. Some thought the TSM/TDM strategies should have been more specific. Some thought that TSM/TDM should be a first step to all alternatives and should not have been a separate alternative. Some questioned whether specific actions such as speed enforcement, street re-striping, etc. had been included. Some felt the alternative was not expansive enough.

The TSM/TDM alternative described in Chapter 2 of the Draft EIS assumed feasible elements of alternative methods of travel that are likely to be implementable within the time frame of the project. The City is committed to implementing the TSM/TDM elements. The transit service assumed in the Draft EIS was based on several discussions with Metro Transit, the transit provider for Saint Paul and the metropolitan area. The Draft EIS assumes more transit service than is included in Metro Transit's service plans for this area. While, in theory, one could assume any level of service, the levels assumed in the Draft EIS are considered reasonable given the population and employment in this corridor and relative transit service needs in other parts of the city and region. It is assumed that all of these strategies could be implemented regardless of the Ayd Mill Road Preferred Alternative as they provide area-wide benefits. All elements considered likely to be implementable by year 2020 were included. The TSM/TDM elements include:

- Incorporating all proposed regional activities such as ramp metering, Intelligent Transportation Systems, HOV lanes, bus bypass lanes, etc.
- Evaluating the street system in the study area to determine where on-street parking could be removed, intersection operations or geometrics could be improved, etc.
- Working with Metro Transit to determine additional transit service and transit facilities that could be assumed, even if not in Metro Transit's current transit service plan. Adding routes is at the discretion of Metro Transit.
- Assuming a broad array of carpool and transit marketing activities and related educational programs (however, the effect of these types of strategies cannot be readily measured and are assumed to be needed to ensure desired modal changes).

The trip reduction for the TSM/TDM was assumed to be a four percent average as illustrated in Table 4-3 of the Draft EIS. Section 3.2 of the travel forecasting section of the *Ayd Mill Road Technical Memorandum* provides additional discussion of the development of this average. The same transit ridership was assumed for all alternatives excluding the No Build so that traffic impacts among alternatives would not be biased.

The TSM/TDM Alternative was developed and is defined as a genuine alternative. It is assumed that all of the strategies of the TSM/TDM alternative could be implemented as they provide area-wide benefits. The City is committed to implementing the TSM/TDM elements. The No Build was included as the baseline for comparison against other alternatives in accordance with NEPA regulations.

Vehicle Miles of Travel (VMT)

A number of comments and questions were received regarding the impacts on vehicle miles of travel.

Vehicle Miles of Travel (VMT) represents the total number of miles traveled in the study area under a particular alternative. When travel paths are more direct, VMT decrease, and when paths become more circuitous, VMT increases. These changes may be somewhat increased or decreased by modal shifts among auto, carpool, and transit. The primary reason that VMT increases with the Linear Park Alternative is that the removal of Ayd Mill Road increases the distance between origin and destination for many travelers. That is, the route they must travel is longer than it would be if they were able to use Ayd Mill Road. This results in an increase in the total VMT for the study area. Conversely, the Preferred Alternative provides more direct travel paths for many travelers, thus reducing total VMT in the study area.

Business Survey

Several commenters inquired as to why a business survey was conducted and a neighborhood survey was not.

The business survey was performed to identify specific types, characteristics, and needs of businesses to determine the potential impacts of the alternatives to these businesses. It was not an opinion survey regarding the proposed alternatives for Ayd Mill Road. Public input from residents as well as businesses was solicited through the Task Force (all meetings were open to the public and time was set aside for audience comments and questions). In addition, City staff met with many individuals and neighborhood groups throughout the environmental review process. Public meetings and public hearings were also held.

4(f)/6(f) Evaluation

Several commenters requested additional information clarifying why a Section 4(f)/6(f) Evaluation was not completed for the Draft EIS.

A Section 4(f) Evaluation is required in a federal EIS if a historic site or public park, recreation area or wildlife/waterfowl refuge will be impacted by the proposed action.

No historic sites or public park lands, recreation areas, or wildlife/waterfowl refuges will be directly impacted by the Ayd Mill Road Preferred Alternative. The open space to the north of Summit and west of Ayd Mill Road, the Community Gardens and the “tot lot” located near Hamline and Hague east of Ayd Mill Road are all located on land that is excess right-of-way from the original construction of Ayd Mill Road. The Community Gardens are operated under an annual lease agreement with the City of Saint Paul Public Works. This area is designated as open space in the Preferred Alternative. Task Force members have expressed a strong desire for this area to be a local community park. The City, with community input, will determine the next use of this land when it is no longer needed for Ayd Mill Road. As stated in Section 2.3.3 of the

Draft EIS, the Preferred Alternative will connect the tot lot to the Summit open space area, creating an opportunity for a future park. Although used for recreation, none of these lands qualify as 4(f) lands. A letter from FHWA on this matter is included in the Appendix of the Draft EIS.

Following the release of the Draft EIS, the State Historic Preservation Office (SHPO) concurred that the project would have no effect on historic properties, therefore a Section 4(f) Evaluation does not apply. Correspondence with SHPO is included in Appendix C of the Final EIS.

A 6(f) Evaluation is required when a public park is acquired or improved using federal Land and Water Conservation (LAWCON) funds. LAWCON funds were not used for any of the open space areas in the study area. Therefore, Section 6(f) does not apply to this project.

Access to Snelling-Selby Area Business Association and Impacts to Concordia University

Concerns were expressed about the loop road at Selby and how this design feature impacted Concordia University and access to businesses in the Snelling-Selby area.

The Draft EIS build options provided access to Selby via a loop road. Following the Draft EIS and consultation with the Snelling-Selby Area Business Association and Concordia University, the design of the Preferred Alternative was revised to eliminate the loop road and maintain the existing north and south ramps at Selby. These ramps will continue to provide direct access to area businesses while minimizing right-of-way impacts to Concordia University.

Benefit/Cost Analysis

Some commenters felt that the benefit/cost analysis should have included non-transportation benefits.

The purpose of the Draft EIS is to provide information on the benefits and/or impacts of a wide range of alternatives. The benefit/cost analysis and discussion of possible funding sources was included to address federal Major Investment Study requirements to consider cost-effectiveness and financial feasibility of proposed transportation improvements. This is not the only factor considered, but financial feasibility is an important consideration for determining realistic solutions. Only transportation benefits are included because the benefit/cost analysis is a test of transportation value received for the expenditure of transportation funds. The identification of the Preferred Alternative was based on the alternative that best addressed the project purpose and need and was not based on the funding source or the current availability of funds.

Several commenters indicated concern that the economic benefits of parks was not included in the benefit/cost analysis.

As stated in Section 1.5 of the Draft EIS, the primary purpose of the Ayd Mill Road project is to reduce transportation-related problems identified in the study area. However, open space is acknowledged as a desired outcome of any project in an urbanized area, because of the benefits it brings. The potential economic benefits of parks were not included in the benefit/cost analysis because the benefit/cost analysis is a test of transportation value received for the expenditure of transportation funds.

Jurisdiction and Functional Classification

Some commenters requested clarification of the functional classification of Ayd Mill Road and how the significance of this classification would impact Ayd Mill Road in regards to jurisdiction of the road and identification of the Preferred Alternative.

This Final EIS, in Section 4.2, classifies Ayd Mill Road as an “A” Minor Arterial. The City will maintain jurisdiction of Ayd Mill Road under the Preferred Alternative. Jurisdiction did not influence the design of the roadway, which was determined by the EIS process. Section 3.2 of the Final EIS specifies what funding sources would be likely for the Preferred Alternative. The identification of the Preferred Alternative was based on the alternative that best addressed the project purpose and need and was not based on the funding source or the current availability of funds.