Rush Line

B R T

FINDING OF NO SIGNIFICANT IMPACT

RUSH LINE BUS RAPID TRANSIT PROJECT ENVIRONMENTAL ASSESSMENT

SEPTEMBER 2021

RAMSEY COUNTY

FEDERAL TRANSIT ADMINISTRATION

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1. INTRODUCTION

This document provides the basis for a Finding of No Significant Impact determination by the Federal Transit Administration for the Rush Line Bus Rapid Transit (BRT) Project (the project). This determination is made in accordance with the provisions of the National Environmental Policy Act of 1969, as amended (42 U.S.C. § 4321, *et seq.*) and in compliance with the Council on Environmental Quality's implementing regulations (40 CFR Part 1500, *et seq.*) and the Federal Transit Administration's implementing procedures (23 CFR Part 771).

The Federal Transit Administration, as the federal lead agency, and Ramsey County, as the local lead agency, prepared an Environmental Assessment (EA) to satisfy both the National Environmental Policy Act and the Minnesota Environmental Policy Act (42 U.S.C. § 4321, *et seq.* and Minnesota Statutes, chapter 116D, respectively). The EA was prepared pursuant to 23 CFR § 771.119 and was published on May 11, 2021. This Finding of No Significant Impact was prepared pursuant to 23 CFR § 771.121 and incorporates, by reference, the EA and other cited information.

The Federal Highway Administration is a cooperating agency in the project's environmental review process pursuant to 40 CFR § 1501.8. The proposed crossing of I-694 requires an interstate right-of-way use agreement from the Federal Highway Administration, and the Federal Highway Administration must issue a National Environmental Policy Act determination prior to approving a right-of-way agreement. The Federal Highway Administration will issue its own Finding of No Significant Impact after the Federal Transit Administration completes its environmental review process.

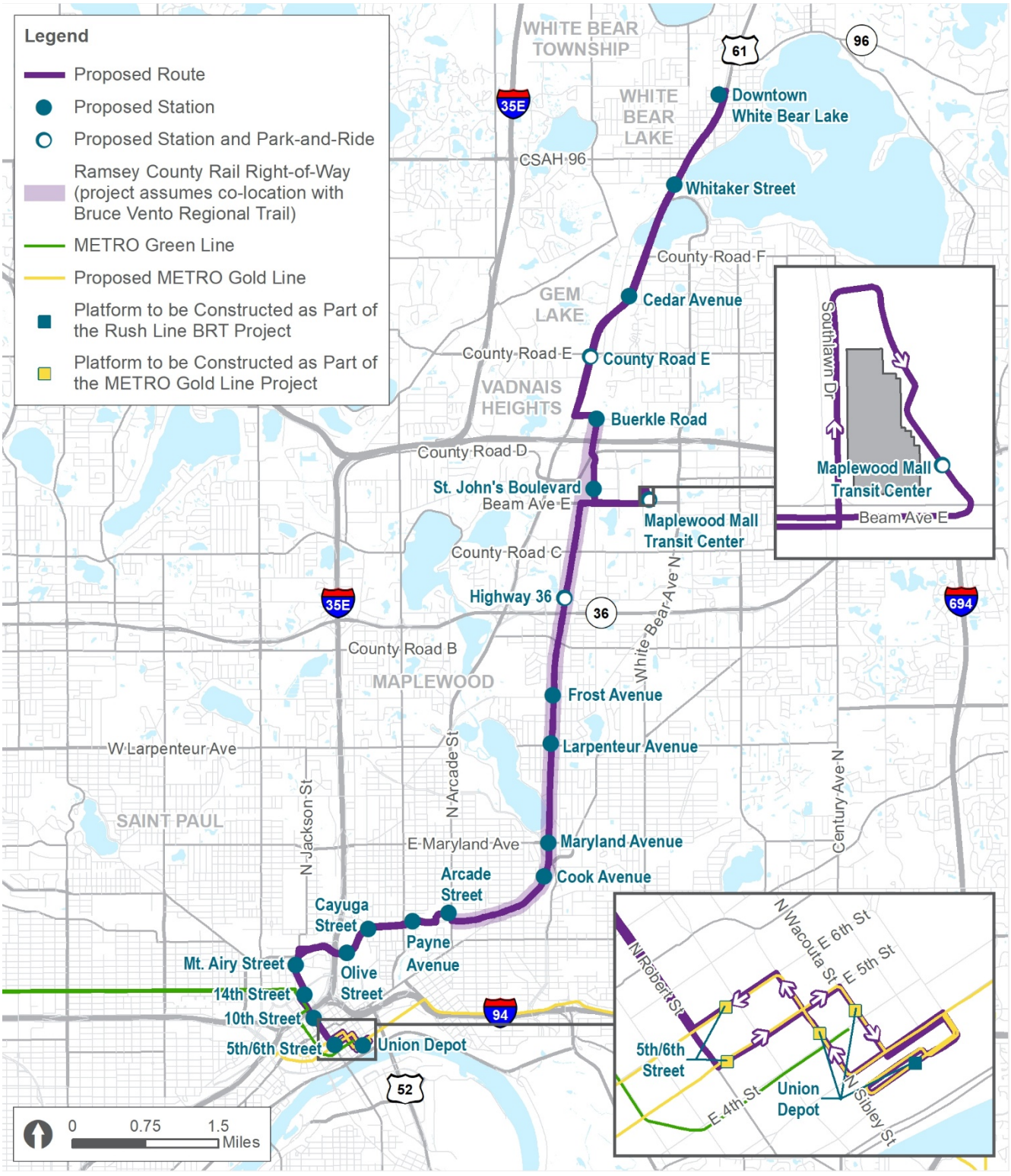
Upon completion of the environmental review process, Metropolitan Council will become the project sponsor and federal grantee and will lead the process for engineering and construction.

2. PROJECT DESCRIPTION

The Rush Line BRT Project[1] is a proposed 15-mile long BRT route connecting Saint Paul, Maplewood, White Bear Township, Vadnais Heights, Gem Lake and White Bear Lake. It would include 21 stations, and the route would generally run along Robert Street, Jackson Street, Phalen Boulevard, Ramsey County rail right-of-way and Highway 61 (see Figure 1).

[1] If the Rush Line BRT Project is constructed, the transitway will be known as the METRO Purple Line BRT and will be part of the Metropolitan Council's METRO system which is an interconnected regional system of light rail and bus rapid transit lines.

Figure 1: Rush Line BRT Project



3. PURPOSE AND NEED

3.1. PROJECT PURPOSE

The purpose of the Rush Line BRT Project is to provide transit service that satisfies the long-term regional mobility and accessibility needs for businesses and the traveling public and supports sustainable development within the study area.

3.2. PROJECT NEEDS

Four primary factors contribute to the need for the project, as discussed in the EA and summarized below.

- Serving the needs of people who rely on transit:
  - Transit-dependent populations generally include those with incomes at or below the poverty line, those who live in households without a car and the elderly. In the study area, the number of people who rely on transit is increasing.
- Meeting increasing demand for reliable, high-frequency[2] transit:
  - Demand for reliable, high-frequency transit service is increasing, and the existing high-frequency network does not currently serve the study area outside of Saint Paul. In recent years, Metro Transit[3] has seen an increase in ridership on high-frequency routes even as ridership on other routes has declined.
- Planning for sustainable growth and development:
  - Population and employment are forecast to grow in the study area. As concentrations of jobs and residents grow in different communities, the need to travel between these communities will increase. Employment in Maplewood, White Bear Township, Vadnais Heights and White Bear Lake is anticipated to grow at a faster rate than their respective populations.
- Expanding multimodal travel options:
  - State and regional transportation policies identify the need to provide multimodal transportation options. The Minnesota Department of Transportation's *Statewide Multimodal Transportation Plan*[4] and the Metropolitan Council's *2040 Transportation Policy Plan*[5] address the shift away from investment in a single mode of transportation (automobiles) to investing in multiple modes. The plans focus on the objective of maintaining and improving multimodal transportation connections essential for Minnesotans' prosperity and quality of life and the *2040 Transportation Policy Plan*'s

[2] Routes are considered high frequency if they have service every 15 minutes or less on weekdays from 6 a.m. to 7 p.m. and Saturdays from 9 a.m. to 6 p.m.
[3] The Metropolitan Council is responsible for operating the regional transit system and does so through Metro Transit, which is an operating division of the Metropolitan Council.
[4] Minnesota Department of Transportation. *Statewide Multimodal Transportation Plan*. January 2017. Available at http://www.minnesotago.org/final-plans/smtp-final-plan.
[5] Metropolitan Council. *2040 Transportation Policy Plan*. November 2020 Update. Available at https://metrocouncil.org/Transportation/Planning-2/Key-Transportation-Planning-Documents/Transportation-Policy-Plan.aspx.

goal of access to destinations and its associated objectives. The *2040 Transportation Policy Plan* includes the Rush Line BRT Project as one of six new or extended METRO lines to be built in the next decade under the current revenue scenario.[6]

4. ALTERNATIVES CONSIDERED

The following sections describe the alternatives evaluated in the EA.

4.1. NO BUILD ALTERNATIVE

The No Build Alternative is defined as the existing transportation system with planned and programmed improvements as presented in the Metropolitan Council's *2040 Transportation Policy Plan* but without the Rush Line BRT Project. The No Build Alternative provides a baseline for comparing the effects of implementing the Build Alternative.

Under the No Build Alternative, the Rush Line BRT Project would not be constructed or operated. The project's purpose and need would not be met, meaning that the No Build Alternative would not contribute to serving the needs of people who rely on transit; meeting increasing demand for reliable, high-frequency transit; planning for sustainable growth and development; or expanding multimodal travel options.

Since the project would not be constructed, there would be no temporary construction-related impacts, such as dust, noise or impacts to pedestrian, bicyclists and vehicular traffic. There would also be no long-term project-related impacts on the transportation, community and social, and physical and environmental resources within the study area.

4.2. BUILD ALTERNATIVE

The Build Alternative evaluated in the EA includes the proposed BRT route, stations and park-and-rides at Highway 36 and at County Road E.

An option under the Build Alternative that does not include the Highway 36 park-and-ride was also evaluated in the EA (the Build Alternative option without the Highway 36 park-and-ride) to provide Ramsey County, as the local lead agency, and the Metropolitan Council, as the future local project sponsor, flexibility to define required project facilities at this station location.

4.2.1. Route

The proposed 15-mile route would operate in both a dedicated guideway and in mixed traffic. Dedicated guideway is defined as the pavement area designed and designated for the exclusive use of transit vehicles and, if needed, emergency vehicles. In some areas, the dedicated guideway is a business access and transit lane, which non-transit vehicles can only use at intersections and driveways to make right turns.

[6] According to the *2040 Transportation Policy Plan* (October 2018 Update, page 6.59), the current revenue scenario includes "projects that have a locally preferred alternative with approved local resolutions of support and an identified reasonable funding plan (based on projections for existing revenues or past experience securing revenues for similar projects). The capital funding for transitway expansion other than arterial bus rapid transit is generally assumed to be 50% or less federal Capital Investment Grants (e.g., New Starts or Small Starts) and 50% or more county sales tax revenues and/or other local revenues."

In the northbound direction, 11.8 miles (78 percent) of the route would be in dedicated guideway. In the southbound direction, 11.2 miles (74 percent) of the route would be in dedicated guideway. Much of the route would be on, or parallel to, existing city, county and state roadways, except approximately 4 miles where a new dedicated guideway would be built adjacent to a reconstructed Bruce Vento Regional Trail in Ramsey County rail right-of-way (from Johnson Parkway to Beam Avenue and from County Road D to Buerkle Road). Ramsey County began purchasing the rail right-of-way in the early 1990s to reserve it for future transit use.

The project includes seven new dedicated guideway bridges along the route to facilitate operations:

- From the existing Arcade Street bridge to the Ramsey County rail right-of-way north of Phalen Boulevard,
- Over Johnson Parkway,
- Over the Gateway State Trail,
- Over the trail connection between English Street and Weaver Elementary School,
- Over Highway 36,
- Over the trail connection between Fitch Road and Barclay Street, and
- Over Interstate 694 (I-694).

4.2.2. Stations

The Build Alternative would include 21 stations (see Figure 1). Both platforms for the 5th/6th Street station and two of the platforms serving Union Depot (on Sibley and Wacouta Streets) in Saint Paul were evaluated in the METRO Gold Line BRT Environmental Assessment and will be constructed as part of that Project.[7] All stations would include shelters, ticket machines for off-board fare purchase, real-time bus schedule information, bicycle parking, on-demand heat, trash and recycling bins, emergency telephones, security cameras, energy-efficient LED station lighting, and information about the station, route, transit system and neighborhood.

Station platforms would generally be 10 inches tall. This platform height improves customer experience by reducing the step onto the bus and allows for a level boarding option at the front door if the bus kneels.[8] It also allows both BRT and local buses to use the same platforms. Typical platforms would be 60 to 80 feet long. At some stations, including southbound 10th Street, 14th Street and Mt. Airy Street in Saint Paul, Maplewood Mall Transit Center in Maplewood, and Downtown White Bear Lake, BRT platforms would be combined with local bus stops or extended to accommodate bus layovers, resulting in a total bus platform length of approximately 130 feet.

4.2.3. Park-and-Rides

The Build Alternative would serve one existing park-and-ride (the Maplewood Mall Transit Center) and two proposed park-and-rides (at Highway 36 and at County Road E).

[7] The METRO Gold Line is a proposed BRT project that will connect Saint Paul, Maplewood, Landfall, Oakdale and Woodbury generally along I-94. It is expected to begin service in 2024 (before Rush Line BRT). More information on the METRO Gold Line is available at https://www.metrotransit.org/gold-line-project.
[8] Kneeling is when the bus operator lowers the front end of the bus to assist passenger boarding.

Through 2019, the existing 1,000-space Maplewood Mall Transit Center operated at about 50 percent capacity.[9] Improvements would be made to the platforms and customer waiting area, but no new parking would be constructed.

The proposed Highway 36 park-and-ride would be an approximately 300-space structure located in the southwest corner of Harvest Park (north of Gervais Avenue and east of the Ramsey County rail right-of-way) adjacent to the Highway 36 station.[10] As the project advances, it is likely that the full build out of the park-and-ride would be phased over time, starting with an approximately 170-space surface lot that would be constructed within the same footprint. The EA evaluated the 300-space parking structure to reflect the proposed full build out at the station and, therefore, the most impactful environmental analysis.

The proposed County Road E park-and-ride would be a surface lot with up to 70 spaces designated for transit use. This park-and-ride would be located on Ramsey County property near the County Road E station in the existing TCO Sports Garden parking lot. A portion of the existing parking lot would be reconfigured to accommodate the park-and-ride.[11]

The Build Alternative option without the Highway 36 park-and-ride, which was also evaluated in the EA, would serve the existing Maplewood Mall Transit Center and the proposed County Road E park-and-ride. At the Highway 36 station, this option would include station platforms and a passenger drop-off area but no park-and-ride.

4.2.4. Operations

The project would operate from 5 a.m. to midnight on weekdays and Saturdays and from 6 a.m. to 10 p.m. on Sundays. Table 1 provides the assumed operating frequencies during these hours.

Table 1: Hours of Operation and Frequency

Day of Week	Start Time	End Time	Frequency (minutes)
Weekdays	5 a.m.	6 a.m.	15
	6 a.m.	9 a.m.	10
	9 a.m.	3 p.m.	15
	3 p.m.	6:30 p.m.	10
	6:30 p.m.	12 a.m.	15
Saturdays	5 a.m.	12 a.m.	15
Sundays	6 a.m.	10 p.m.	15

[9] Metro Transit. *2019 Annual Regional Park & Ride System Report*. January 2020. Available at https://metrocouncil.org/Transportation/Publications-And-Resources/Transit/2019-Park-and-Ride-Report.aspx.
[10] The Metropolitan Council is not the planned owner or manager of the proposed 300-space structured Highway 36 park-and-ride, and an alternative ownership commitment has not been made at this time.
[11] A parking study was conducted at the TCO Sports Garden in the spring of 2019, which found that parking demand for the sports center is highest during evenings and weekends. This usage would be complementary to park-and-ride demand, which would primarily occur between about 7 a.m. and 5 p.m.

The Build Alternative would use 13 new 60-foot articulated electric buses. A charging station[12] would be constructed at the Union Depot bus deck where buses would charge for about 10 minutes during layovers.

The project would not construct a new operations and maintenance facility. The buses would be serviced at the East Metro Garage, an existing Metro Transit operations and maintenance facility in Saint Paul. Electric charging stations would be added to the interior of the existing facility, which would not reduce the facility's current capacity of 214 buses. Some of the current buses assigned to this facility would be moved to other operating garages to provide space for Rush Line BRT vehicles.

4.2.5. Ridership

Under the Build Alternative, the Rush Line is forecast to carry 7,400 rides per day by 2040. Under the Build Alternative option without the Highway 36 park-and-ride, the Rush Line is forecast to carry 6,700 rides per day by 2040.

Overall, just over half of the Rush Line BRT ridership (54 percent) would be for work trip purposes, demonstrating the utility of the service for non-work travel as well. Reverse commuting, or travel that occurs in the direction opposite the traditional downtown orientation (both work and non-work trips), is forecast to be 26 percent of daily ridership. Roughly half of these reverse commute trips are work trips to employment opportunities outside of downtown Saint Paul.

Table 2 summarizes select ridership characteristics for the Build Alternative and the Build Alternative option without the Highway 36 park-and-ride to illustrate how the BRT service is expected to be used. The project would serve the overall mobility needs of people reliant on transit. Overall, 1,700 daily trips would be made by riders from zero-vehicle households in 2040, or about 23 percent of the total Rush Line ridership under the Build Alternative (25 percent under the Build Alternative option without the Highway 36 park-and-ride). Non-work trips would be 70 percent of the transit-reliant ridership on the Rush Line, compared to 45 percent for all Rush Line passengers.

Table 2: 2040 Rush Line BRT Ridership Characteristics

Characteristic	Build Alternative	Build Alternative Option without the Highway 36 Park-and-Ride
Total daily BRT trips	7,400	6,700
Trips for work	4,000	3,300
Trips by riders from no-car households	1,700	1,700
Access by walking	2,300	2,300
Access by driving	2,100	1,400
Access by drop-off	1,000	1,000
Access by transferring	2,000	2,000

4.2.6. Capital and Operating Costs

Capital costs are an estimation of the fixed costs needed to build the project and bring it into revenue service. Capital costs include construction of the dedicated guideway, stations and other project

[12] Energy sources for charging stations will be determined during final design and will follow any applicable Metro Transit guidance on incorporating renewable energy.

elements and factor in expenditures such as environmental mitigation, right-of-way acquisition, vehicle acquisition and professional services. The capital cost estimates include a 35 percent total contingency.

Operations and maintenance costs include estimates of the annual costs to operate, maintain and administer the transit service. These costs include the annual total of employee earnings and fringe benefits, contract services, materials and supplies, utilities and other day-to-day expenses.

Estimated project costs are provided in Table 3 and will be refined as the project advances.

Table 3: Capital and Operating Cost Estimates[13]

	Capital Cost (Year of Expenditure Dollars)[14]	Annual Operations and Maintenance Cost (2026 Dollars)[15]
Build Alternative	$473,670,000	$15,372,000
Build Alternative option without the Highway 36 park-and-ride	$456,878,000	$15,258,000

4.3. IDENTIFICATION OF THE PREFERRED ALTERNATIVE

Ramsey County identified the Build Alternative as the alternative that best meets the project's purpose and need. The Highway 36 park-and-ride would be phased over time, starting with an approximately 170-space surface lot within the footprint of the 300-space parking structure evaluated in the EA. This park-and-ride may be expanded to a 300-space structure in the future based on ridership demand and coordination amongst Ramsey County, the Metropolitan Council and the city of Maplewood.

5. MITIGATION MEASURES

The EA describes the Rush Line BRT Project, its likely impacts, and potential mitigation measures to avoid or minimize those impacts. Appendix A includes the mitigation commitments that the Federal Transit Administration requires as a condition of its finding that the project will have no significant impact. Satisfaction of the mitigation commitments will be a condition of any grant that the Federal Transit Administration may make for the project.

Ramsey County and the Metropolitan Council will implement all mitigation measures identified in Appendix A and in the Section 106 Memorandum of Agreement (included in Appendix B), and will coordinate with other agencies and stakeholders during the design and construction phases of the project as stipulated in both documents.

[13] These estimates are based on current design and are subject to change.
[14] Adjusted for inflation from 2019 to the expected year of expenditure.
[15] Adjusted for inflation from 2019 to 2026.

6. ENVIRONMENTAL DETERMINATIONS AND FINDINGS[16]

6.1. NATIONAL ENVIRONMENTAL POLICY ACT FINDING

The Rush Line BRT Project will be constructed in accordance with the design features and mitigation measures presented in the EA and this Finding of No Significant Impact. Ramsey County prepared the EA with Federal Transit Administration oversight in compliance with 42 U.S.C. § 4321, *et seq.,* and 23 CFR § 771.119.

After reviewing the EA and supporting documents, including public comments and responses, the Federal Transit Administration finds that the project will result in short-term and long-term impacts on resources, as identified in Table 4. Aviation, land use plan compatibility, environmental justice, energy, farmlands and Section 6(f) resources would have no, or negligible, adverse effects in the short-term or long-term. While no disproportionately high or adverse effects to minority and/or low-income populations were identified, the project is expected to benefit these populations by expanding the availability of safe, reliable and efficient transportation options, thereby providing better access to employment, healthcare, shopping and other destinations.

Table 4: Resource Areas With Potential Impacts

Resource Area	Short-Term Impacts	Long-Term Impacts
Freight rail	X	
Transit	X	X
Traffic	X	X
Pedestrian and bicycle facilities	X	X
Parking, driveways and loading zones	X	X
Neighborhoods and community resources	X	X
Land acquisitions and relocations	X	X
Economics	X	X
Visual resources	X	X
Cultural resources	X	X
Safety and security	X	
Utilities	X	X
Surface water		X
Water quality and stormwater	X	X
Geology, groundwater and soils	X	
Hazardous materials	X	X
Noise and vibration	X	

[16] An air quality conforming finding is not included because the project is not located within a National Ambient Air Quality Standards nonattainment or maintenance area.

Resource Area	Short-Term Impacts	Long-Term Impacts
Air quality	X	
Protected species and wildlife habitat	X	X
Section 4(f) resources	X	X

See Appendix A for mitigation commitments related to these impacts. Pursuant to 23 CFR § 771.121, the Federal Transit Administration finds that, with the mitigation commitments, the Rush Line BRT Project will have no significant impact on the environment. The record provides sufficient evidence and analysis for determining that an Environmental Impact Statement is not required.

6.2. SECTION 106 FINDING

Because federal funding from the Federal Transit Administration will be pursued for the Rush Line BRT Project, the project is considered a federal undertaking and must comply with Section 106 of the National Historic Preservation Act of 1966 (Section 106) (54 U.S.C. § 306108) and its implementing regulations (36 CFR Part 800).

The proposed crossing of I-694 requires an interstate right-of-way use agreement from the Federal Highway Administration, and the Federal Highway Administration must issue a National Environmental Policy Act determination prior to approving any right-of-way agreement. The Federal Transit Administration agreed to be the lead federal agency for the Section 106 process, per the Federal Highway Administration's request pursuant to 36 CFR § 800.2(a)(2).

The US Army Corps of Engineers may also issue a permit for the project in accordance with Section 404 of the Clean Water Act (33 U.S.C. § 1251, *et seq*.). Pursuant to 36 CFR § 800.2(a)(2), the US Army Corps of Engineers designated the Federal Transit Administration as the lead federal agency for the project to fulfill its responsibilities under Section 106.

Pursuant to 36 CFR § 800.2(a)(3), Ramsey County and the Minnesota Department of Transportation Cultural Resources Unit have been authorized to prepare Section 106 documentation, analyses and recommendations to inform the Federal Transit Administration determinations. Ramsey County and the Minnesota Department of Transportation Cultural Resources Unit are also authorized to consult directly with the State Historic Preservation Office on technical matters related to Section 106 documentation and analysis as well as to disseminate information to, and coordinate and schedule meetings with, consulting parties in coordination with the Federal Transit Administration.

In addition to the State Historic Preservation Office, Section 106 consulting parties for the project include the city of Saint Paul, Saint Paul Heritage Preservation Commission, city of Maplewood, Maplewood Heritage Preservation Commission, Maplewood Area Historical Society, city of Vadnais Heights, city of White Bear Lake, White Bear Lake Area Historical Society, city of Gem Lake, White Bear Township, Ramsey County, Metropolitan Council, US Army Corps of Engineers and Federal Highway Administration.

The Federal Transit Administration, in July 2018 and February 2021, also invited the following Minnesota tribes with an expressed interest in Ramsey County to participate in the Section 106 consultation: Lower Sioux Indian Community, Upper Sioux Community, Prairie Island Indian Community, Shakopee Mdewakanton Sioux Community, Turtle Mountain Band of Chippewa, Sisseton-Wahpeton Oyate, Santee Sioux Nation, and Fort Peck Assiniboine and Sioux Tribes. No tribes requested to participate in consultation for the project or in the development of the Memorandum of Agreement.

During the public comment period for the Rush Line BRT Project EA, the Federal Transit Administration received a comment from a non-tribal organization (the Payne-Phalen Community Council) recommending broader and deeper engagement with tribes, noting that not all federally recognized tribes in Minnesota were consulted as part of the project. The comment also requested recognition of Phalen Creek as a cultural, environmental and historic resource that may contribute to the Lake Superior & Mississippi (LS&M) Railroad Corridor Historic District. The Federal Transit Administration reinitiated consultation with tribes, including all federally recognized tribes in Minnesota, to assess whether Phalen Creek is a cultural resource of concern to them, as described below.

At the time of initial (July 2018) and subsequent (February 2021) engagement, FTA followed current protocol contacting tribes with an expressed interest in Ramsey County. In response to the Payne-Phalen Community Council comment, the Federal Transit Administration continued consultation with American Indian tribal nations to ensure all tribes who may have an interest in resources in the project Area of Potential Effect are consulted. On August 2, 2021 the Federal Transit Administration contacted all federally recognized tribes in Minnesota to provide a project update and request participation in consultation. In addition to the tribes originally contacted as noted above, the Federal Transit Administration also contacted the following tribes: Bois Forte Band of Chippewa Indians, Fond du lac Band of Lake Superior Chippewa, Grand Portage Band of Lake Superior Chippewa, Leech Lake Band of Ojibwe, Mille Lacs Band of Ojibwe, White Earth Nation of Minnesota Chippewa, and Red Lake Band of Chippewa Indians. The Federal Transit Administration also contacted the Mendota Mdewakanton Dakota Tribal Community, who has yet received federal recognition but may have an interest in the project area.

The request for participation invited tribes to help identify places that may have traditional religious and cultural importance to their tribe and whether Phalen Creek is a resource of concern. The Federal Transit Administration held an online consultation meeting on August 23, 2021 to present the project and information on Phalen Creek and request further input from tribes. The Shakopee Mdewakanton Sioux Community and White Earth Nation of Minnesota Chippewa participated in the meeting.

Following the consultation meeting, the Shakopee Mdewakanton Sioux Community commented that because they believe there are no cultural properties directly impacted by the project, they have no concerns. They also noted they would like to be kept informed of the project progress and future research studies. No other comments were received from tribes. Based on discussion during the consultation meeting and comments received from the tribes, the Federal Transit Administration determined additional cultural studies of Phalen Creek are not warranted as part of the project; however, the project Memorandum of Agreement, described below, allows for future surveys and evaluations.

The Federal Transit Administration has determined in consultation with the State Historic Preservation Office and other consulting parties that the project will have no adverse effect on 14 historic properties; no adverse effect, with conditions, on nine historic properties; and an adverse effect on five historic properties (the Lake Superior & Mississippi Railroad Corridor Historic District: Saint Paul to White Bear Lake Segment,[17] the Lake Superior & Mississippi Railroad Corridor Historic District: White Bear Lake to Hugo Segment[18] and three remnants of the 1868 Alignment of the Lake Superior & Mississippi Railroad).[19] In accordance with 36 CFR § 800.6(a)(1), the Federal Transit Administration

[17] State Historic Preservation Office inventory number XX-RRD-NPR001
[18] State Historic Preservation Office inventory number XX-RRD-NPR005
[19] State Historic Preservation Office inventory numbers XX-RRD-NPR002, XX-RRD-NPR003 and XX-RRD-NPR004

notified the Advisory Council on Historic Preservation of its adverse effect determination, and the Advisory Council has chosen not to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii).

The Federal Transit Administration and Minnesota Department of Transportation Cultural Resources Unit, in consultation with the State Historic Preservation Office and other consulting parties, have considered ways to avoid, minimize and/or mitigate adverse effects and have agreed upon measures for minimizing and mitigating the identified adverse effects as outlined in a Memorandum of Agreement. A draft of the Memorandum of Agreement was included in the EA for public review and comment. Three consulting parties (the Federal Highway Administration, US Army Corps of Engineers and State Historic Preservation Office) provided comments on the draft Section 106 Memorandum of Agreement, and revisions were made as appropriate based on the comments received. The final Memorandum of Agreement is included in Appendix B.

With the execution and implementation of the Memorandum of Agreement, the Federal Transit Administration finds in accordance with 36 CFR Part 800, that the Section 106 coordination and consultation requirements for the proposed project have been fulfilled.

6.3. SECTION 4(F) FINDING

Section 4(f) of the Department of Transportation Act of 1966, as amended, provides protection to parks and recreation areas, wildlife and waterfowl refuges, and historic sites. This law, commonly known as Section 4(f), is codified in 23 U.S.C. § 138 and 49 U.S.C. § 303 and is implemented by the Federal Transit Administration through the regulation in 23 CFR Part 774.

As documented in Appendix D of the EA, any properties within the study area protected by Section 4(f) were evaluated to determine if there would be a use of the property, as defined in 23 CFR § 774.17. Within the study area, there are no wildlife or waterfowl refuges; 18 parks, recreation areas and trails subject to Section 4(f); and 28 historic properties that are listed in, or eligible for listing in, the National Register of Historic Places.

Of the 18 parks and recreation areas evaluated, nine would not be impacted by the project, five would have temporary occupancies that would not constitute a use[20] and four (Eastside Heritage Park, Phalen Park, Harvest Park and Weaver Elementary School) would have a Section 4(f) use with a *de minimis* impact. Pursuant to 23 CFR § 774.5, the officials with jurisdiction over Eastside Heritage Park, Phalen Park, Harvest Park and Weaver Elementary School were notified that the Federal Transit Administration intended to make a *de minimis* determination. The Section 4(f) evaluation was available for public review as part of the EA, and after the public comment period, the officials with jurisdiction concurred that the project would not adversely affect the activities, features or attributes that make the properties eligible for Section 4(f) protection (see letters in Appendix C).

Of the 28 historic sites evaluated, 14 would not be impacted by the project, nine would have temporary occupancies that would not constitute a use and five would have a Section 4(f) use (one of which would be a *de minimis* impact).

Pursuant to 23 CFR § 774.5, the consulting parties identified in accordance with 36 CFR Part 800 were consulted, and the State Historic Preservation Office was informed of the intent to make a *de minimis* impact determination for Madeline L. Weaver Elementary School. The State Historic

[20] Documented agreement from the officials with jurisdiction was included as part of the EA and is also included in Appendix C of this Finding of No Significant Impact.

Preservation Office concurred with the finding of no adverse effect in accordance with 36 CFR Part 800.

The project would result in a Section 4(f) use of the Lake Superior & Mississippi Railroad Corridor Historic District: Saint Paul to White Bear Lake Segment and the three segments of the 1868 Alignment of the Lake Superior & Mississippi Railroad. Pursuant to 23 CFR § 774.5(a), the Section 4(f) evaluation was provided to the US Department of Interior and the State Historic Preservation Office for review and comment. The US Department of Interior concurred with the Federal Transit Administration's Section 4(f) determinations in a letter dated June 22, 2021. On July 6, 2021, the State Historic Preservation Office indicated it had no comments on the Section 4(f) evaluation. The correspondence from both agencies is included in Appendix C.

The Federal Transit Administration finds that the proposed project is in compliance with the Section 4(f) statute 49 U.S.C. § 303 and 23 U.S.C. § 138 and the implementing regulations under 23 CFR Part 774.

6.4. SECTION 7 FINDING

Section 7 of the Endangered Species Act of 1973 (16 U.S.C. §§ 1531-1544)[21] requires that all federal agencies consider and avoid, if possible, adverse impacts to federally-listed threatened or endangered species or their critical habitats that may result from their direct, regulatory or funding actions. Federally-listed species in Ramsey County include the following:[22]

- Threatened species:
  - Northern long-eared bat (*Myotis septentrionalis*).
- Endangered species:
  - Rusty patched bumble bee (*Bombus affinis*).
  - Snuffbox (*Epioblasma triquetra*).
  - Higgins eye pearlymussel (*Lampsilis higginsii*).
  - Winged mapleleaf (*Quadrula fragosa*).

The US Fish and Wildlife Service concurred with the Federal Transit Administration's determination of the following (see correspondence with the US Fish and Wildlife Service in Appendix B of the EA):

- The project would have no adverse impacts to the northern long-eared bat, snuffbox mussel, the Higgins eye pearlymussel or the winged mapleleaf mussel.
- The project may affect, but is not likely to adversely affect, the rusty patched bumble bee.

With US Fish and Wildlife Service concurrence, the Federal Transit Administration finds that the proposed project is in compliance with the Section 7 of the Endangered Species Act of 1973 (16 U.S.C. §§ 1531-1544).

[21] Available at http://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title16-section1531&num=0&edition=prelim.

[22] In December 2020, the US Fish and Wildlife Service determined that the monarch butterfly is a candidate species for listing as endangered or threatened under the Endangered Species Act. The US Fish and Wildlife Service will continue reviewing its status each year until a listing decision is made.

6.5. UNIFORM RELOCATION ACT COMPLIANCE

The Metropolitan Council will acquire property in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (Public Law 91-646; 49 CFR Part 24). Property acquisition for the project is also subject to Minnesota Statutes, chapter 117. The requirements of the Uniform Relocation Act and of Minnesota Statutes apply to full and partial acquisitions, displacements, and permanent and temporary easements.

The Build Alternative would require the permanent acquisition of 20.16 acres from 47 parcels. All acquisitions would be partial acquisitions that would not impede the primary use of the properties. No full acquisitions resulting in the displacement of buildings, businesses or residents would be needed. The Build Alternative would also require temporary easements from 80 parcels, totaling a combined area of 6.41 acres. Property acquisition requirements will be further refined as the project design advances, but will comply with the Uniform Relocation Act.

The Federal Transit Administration finds that the proposed project is in compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (Public Law 91-646; 49 CFR Part 24).

6.6. WETLAND FINDING

The Clean Water Act of 1972[23] established the basic structure for regulating discharges of pollutants into the waters of the United States[24] and for regulating quality standards for surface waters. The US Environmental Protection Agency oversees state implementation of the Clean Water Act, reviews and comments on individual permit applications, and can elevate specific permitting cases. Section 404 of the Clean Water Act is under the purview of the US Army Corps of Engineers and requires a federal permit to be issued prior to the placement of any dredged or fill material into any resources identified as a water of the United States. The Federal Transit Administration, as the lead federal agency, implements Executive Order 11990: Protection of Wetlands through US Department of Transportation Order 5660.1A.

The US Army Corps of Engineers reviewed the aquatic resources within the potential area of disturbance for jurisdiction under Section 404 of the Clean Water Act (33 U.S.C. § 1251, *et seq*.). In a letter dated February 11, 2021, the US Army Corps of Engineers determined that three of the 17 aquatic resources (W-40, W-92 and W-98) are jurisdictional (see correspondence in Appendix B of the EA). The project would impact 0.25 acres of jurisdictional wetlands.[25] The project is anticipated to qualify for a Section 404 Transportation Regional General Permit.

Mitigation will vary based on the regulatory nature of the individual wetlands impacted. The Capitol Region Watershed District and Ramsey-Washington Metro Watershed District require all impacts to be replaced at a minimum of a 1:1 replacement ratio within the same sub-watershed. Any remaining mitigation could be provided through the purchase of wetland mitigation bank credits based on Minnesota Wetland Conservation Act Replacement Standards. The Wetland Conservation Act and the US Army Corps of Engineers' current replacement ratio for wetland credits in the project area is

[23] 33 USC § 1251 *et seq.*

[24] "Waters of the United States" are waters that are under the jurisdiction of the Clean Water Act and include traditional navigable waters, interstate waters, the territorial seas, impoundments of jurisdictional waters and tributaries and adjacent wetlands of aforementioned waters. More information is available at https://www.epa.gov/nwpr/about-waters-united-states.

[25] Jurisdictional wetlands are those that are under the jurisdiction of the US Army Corps of Engineers under Section 404 of the Clean Water Act.

2.5:1; however, under certain conditions, including providing replacement within the same watershed or in advance of construction, the ratio may be reduced to 2:1.[26] The final amount, type and location of wetland replacement or bank credits will be determined during the permit review process, which will occur during final design.

In accordance with Executive Order 11990, the Federal Transit Administration finds that, based upon the above considerations, there is no practicable alternative to the proposed construction in wetlands and that the project includes all practicable measures to minimize harm to wetlands which may result from such use.

6.7. FLOODPLAIN FINDING

Executive Order 11988: Floodplain Management[27] requires all federal agencies to evaluate and, to the extent possible, avoid adverse impacts to floodplain areas[28] that may result from actions they administer, regulate or fund. On behalf of the Federal Emergency Management Agency, the Minnesota Department of Natural Resources regulates activities that may impact floodplains, including activities such as construction, excavation or deposition of materials over or under waters that may affect flood stage or floodplain or floodway boundaries. The Minnesota Department of Natural Resources regulates floodplain management through its State Floodplain Management Program and provides guidance to local governments such as cities, counties and watershed districts.

The potential area of disturbance includes five floodplains, which are associated with the Mississippi River, Goose Lake (east and west) and two unnamed wetlands. No impacts are anticipated to the Mississippi River because this portion of the potential area of disturbance follows existing roadways. All other floodplain impacts would be due to the potential location of stormwater management features or modifications to existing roadway. As engineering advances, efforts to avoid floodplain impacts will be incorporated, which will involve modeling the project to determine established flood elevations and refinement of project elements like stormwater management features. If, after final design is completed, the project results in fill within identified floodplains, an analysis of the corresponding change in base flood elevation will be completed to determine if the fill results in adverse impacts that require additional mitigation. If mitigation is required, compensatory storage at a 1:1 replacement ratio within the same floodplain reach will be provided. Any unavoidable impacts will be coordinated with cities and watershed districts.

Consistent with Executive Order 11990, the Federal Transit Administration finds that the proposed project will minimize risks associated with unavoidable floodplain impacts to the greatest extent practicable.

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[26] More information regarding the US Army Corps of Engineers' wetland compensation policy can be found at https://www.mvp.usace.army.mil/Portals/57/docs/regulatory/MN-Special/Final%20St.%20Paul%20District%20Policy%20for%20Wetland%20Compensatory%20Mitigation%20in%20MNs.pdf.

[27] Executive Order 11988: Floodplain Management. Available at https://www.archives.gov/federal-register/codification/executive-order/11988.html (accessed October 2018).

[28] Floodplains are defined by Executive Order 11988 as "the lowland and relatively flat areas adjoining inland and coastal waters including flood-prone areas of offshore islands, including, at a minimum, that area subject to a one percent or greater chance of flooding in any given year." Available at http://www.fema.gov (accessed October 2018).

6.8. ENVIRONMENTAL JUSTICE FINDING

Executive Order 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations serves as the basis for the implementation of environmental justice strategies in all federal agencies within the executive branch. Each agency is required to identify and address "disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations[29] and low-income populations,"[30] and to include environmental justice analysis in the National Environmental Policy Act process. A "disproportionately high and adverse effect" is defined as an adverse impact that:

- Is predominantly borne by a minority population and/or low-income population, or
- Will be suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority population and/or low-income population.

A multi-step process was used to identify the potential for disproportionately high and adverse effects on minority and low-income populations. The *Environmental Justice Technical Report* in Appendix E of the EA provides the full analysis. The following categories with potential operating or construction phase effects were analyzed for potential environmental justice impacts:

- Parking, driveways and loading zones.
- Neighborhoods and community resources.
- Land acquisitions and relocations.
- Economics.
- Visual resources.
- Cultural resources.
- Noise and vibration.

No disproportionately high and adverse effects on minority and low-income populations in any municipality in the study area were identified. Other categories evaluated in the EA were not considered for potential environmental justice impacts because they either presented no impacts or because their effects would be experienced by all populations living in the study area, regardless of race, ethnicity or socioeconomic status.

Based on the analysis contained in the EA and the mitigation commitments, the project would not result in adverse environmental justice impacts. The Federal Transit Administration finds, in accordance with Executive Order 12898, that the Rush Line BRT Project will not have disproportionately high or adverse effects on minority or low-income populations.

[29] Minority populations are identified in census block groups based on the percentage of the population that self-identifies as a racial or ethnic minority (American Indian/Alaska Native, Asian, Black or African American, Hispanic or Latino, and/or Native Hawaiian/Pacific Islander).
[30] Low-income populations are identified in census block groups based on the percentage of the population below the US Census Bureau's 2018 poverty thresholds, which vary by household size, number of children and age of householder.

7. PUBLIC AND AGENCY OUTREACH AND OPPORTUNITY TO COMMENT

The Rush Line BRT Project EA, including the Section 4(f) evaluation and draft Section 106 Memorandum of Agreement, was made available for public comment from May 11, 2021 to June 25, 2021. On May 11, 2021, a notice of availability of the EA and information on the public meetings was published in the Minnesota Environmental Quality Board's *EQB Monitor*; a notice was emailed to agencies and organizations on the Minnesota Environmental Quality Board's distribution list, Section 106 consulting parties and project advisory committees; and a press release was issued. A legal notice was published in the *Vadnais Heights Press* on May 12, 2021. The public comment period and public meetings were also advertised through a notification letter to adjacent property owners in English, Spanish, Hmong and Karen, a project e-newsletter, social media posts and advertisements in cultural newspapers and publications including *Minnesota de Hoy*, *Vida y Sabor/La Prensa de MN*, *Somali American Newspaper*, *Hmong Times*, *Sahan Journal*, *The Circle* and *La Voz Latina*.

The EA and supporting documents were available on the project website at rushline.org. Hard copies were available at the following locations:

- Ramsey County Law Library, 15 West Kellogg Boulevard, Suite 1815 Courthouse, Saint Paul, MN 55102.
- East Side Enterprise Center, 804 Margaret Street, Saint Paul MN 55106.
- Ramsey County Library – Maplewood, 3025 Southlawn Drive, Maplewood, MN 55109.
- Vadnais Heights City Hall, 800 East County Road E, Vadnais Heights, MN 55127.
- Gem Lake City Office, 4200 Otter Lake Road, Gem Lake, MN 55110.
- Ramsey County Library – White Bear Lake, 2150 2nd Street, White Bear Lake, MN 55110.

Three public meetings were held during the comment period:

- Online Open House 1: June 2, 2021 from 12-1:30 p.m.
- Online Open House 2: June 3, 2021 from 5:30-7 p.m.
- In-Person Open House: June 17, 2021 from 4-7 p.m. at Union Depot (214 4th Street East, Saint Paul, MN 55101).

A total of 42 attendees signed into the online open houses (28 on June 2 and 14 on June 3). The online open houses included a presentation and a question and answer session with project staff. Closed captioning and Spanish, Hmong and Karen interpreters were available. At the in-person open house, 14 people signed in. American Sign Language, Spanish, Hmong and Karen interpreters were available, and a court reporter was present to record oral comments. The presentation and information boards from the online and in-person open houses are included in Appendix D, along with a summary of questions asked at the online open houses.

During the public comment period, 189 comments were received via email, mail, a comment form on the project website, and written and oral comments at the in-person open house. The following agencies provided comment letters:[31]

[31] Comments from consulting parties on the draft Section 106 Memorandum of Agreement are discussed in Section 6.2. Section 4(f) concurrence letters are discussed in Section 6.3.

- US Environmental Protection Agency.
- Minnesota Department of Natural Resources.
- Minnesota Department of Transportation.
- Minnesota Pollution Control Agency.
- Capitol Region Watershed District.

Appendix E and Appendix F include responses to agency comments and copies of the agency comment letters, respectively. Appendix G and H included responses to public comments and copies of the public comments received, respectively.

8. CONCLUSION

Based on the EA and its supporting documents, the Federal Transit Administration finds that pursuant to 23 CFR § 771.121, there are no significant impacts on the environment associated with the construction and operation of the Rush Line BRT project. Preparation of an Environmental Impact Statement is not warranted.

KELLEY BROOKINS

Digitally signed by KELLEY BROOKINS
Date: 2021.10.05 15:31:41 -05'00'

October 5, 2021

Kelley Brookins
Regional Administrator
Federal Transit Administration, Region V

Date of Approval

APPENDIX A

MITIGATION COMMITMENTS

MITIGATION COMMITMENTS

The mitigation measures and other features of the Rush Line BRT Project that avoid and minimize adverse impacts are summarized in Table A-1. Permits and approvals that have been obtained or may be required prior to project construction are listed in Table A-2. Implementation of these mitigation commitments is part of the approval and issuance of this Finding of No Significant Impact.

This summary is provided to facilitate monitoring the implementation of the mitigation commitments; however, the EA provides the context and full description of all mitigation commitments included in the project. The Metropolitan Council will lead the process for engineering and construction of the project and will establish a program for monitoring implementation of the mitigation commitments as part of its project management oversight. The Federal Transit Administration will oversee the Metropolitan Council's program for monitoring environmental compliance through quarterly review meetings, progress reports or other means specified by the Federal Transit Administration.

Table A-1: Summary of Commitments and Mitigation Measures

Resource Area	Phase	Commitments and Mitigation Measures	Responsible Party
Freight rail	Operating	None	Not applicable
	Construction	Construction activities that temporarily impact freight operations will be coordinated with affected railroad companies, and property impacted during construction will be restored to a condition that is comparable to its pre-construction use.	Metropolitan Council
Transit	Operating	None	Not applicable
	Construction	Before temporary stop closures and detours go into effect, riders will be informed about the temporary service changes by posting information at bus stops and publishing details on the service provider's website.	Metropolitan Council
Traffic	Operating	Recommended mitigation measures to alleviate identified queuing issues are included in Table 8 of the EA. These recommended mitigation measures will be incorporated into the final design of the project if they are approved by the appropriate roadway authority.	Metropolitan Council
	Construction	Maintenance of traffic plans will be developed prior to construction to address construction phasing, traffic signal operations, access through the work zone, road closures and motorized and non-motorized traffic detours. Trucks will be routed away from areas where children congregate, when possible.	Metropolitan Council

Resource Area	Phase	Commitments and Mitigation Measures	Responsible Party
Pedestrians and bicycles	Operating	The *Ramsey County Rail Right-of-Way Design Guide*[32] was created to develop a safe dedicated guideway and shared-use trail within the Ramsey County rail right-of-way that fits in with the surrounding landscape and reflects relevant user, stakeholder and public guidance. As engineering advances, the guiding principles from the *Ramsey County Rail Right-of-Way Design Guide* will be used to inform the design work and ensure the collective input received through public engagement activities is incorporated.	Metropolitan Council
	Construction	Where temporary closures of bicycle and pedestrian facilities are required, detours will be defined in construction phasing plans. Special facilities, such as handrails, fences, barriers, ramps and walkways, may be required at some locations to maintain bicyclist and pedestrian safety. If crosswalks are temporarily closed, pedestrians will be directed to use alternate crossings nearby. The closure of adjacent crosswalks will be avoided to allow for continued pedestrian movement across streets. All sidewalks and crosswalks will be required to meet minimum standards for accessibility and be free of slipping and tripping hazards.	Metropolitan Council
Parking, driveways and loading zones	Operating	As engineering advances, coordination with project area municipalities and impacted residents and businesses will continue to further minimize parking impacts.	Metropolitan Council
	Construction	A construction staging plan will be developed to minimize impacts to parking and driveways, signage will be provided to direct business patrons to streets where parking is available and ongoing public outreach will be conducted to communicate temporary closures.	Metropolitan Council

[32] Available in the project library at https://www.ramseycounty.us/residents/roads-transit/transit-corridors-studies/rush-line-brt-project/project-library.

Resource Area	Phase	Commitments and Mitigation Measures	Responsible Party
Neighborhoods and community resources	Operating	None	Not applicable
	Construction	Measures to mitigate temporary impacts will include installing signage and signal controls, providing alternate access when needed and providing adequate public notice about detours and closures. A communications plan for the project's construction phase will be developed as the project advances.	Metropolitan Council
Land acquisitions and relocations	Operating	The Metropolitan Council will acquire property in accordance with Minnesota Statutes, chapter 117, and the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (Public Law 91-646; 49 CFR Part 24).	Metropolitan Council
	Construction	Property impacted by temporary easements will be restored to a condition that is comparable to its pre-construction use.	Metropolitan Council
Economics	Operating	None	Not applicable
	Construction	Mitigation measures for construction-phase impacts will include outreach to businesses and providing maintenance of traffic; maintaining access for pedestrians, bicycles and motorists; providing business signage; and providing advance communication regarding construction activities.	Metropolitan Council
Visual resources	Operating	Visual impacts were considered as part of the project definition and are included in Table 16 of the EA. Design and construction best practices will be used to avoid, minimize and mitigate impacts of the project on neighboring properties and communities. As engineering advances, the guiding principles from the *Ramsey County Rail Right-of-Way Design Guide*[33] will be used to inform the design work and ensure input received through the public engagement activities is incorporated.	Metropolitan Council
	Construction	None	Not applicable

[33] Available in the project library at https://www.ramseycounty.us/residents/roads-transit/transit-corridors-studies/rush-line-brt-project/project-library.

Resource Area	Phase	Commitments and Mitigation Measures	Responsible Party
Cultural resources	Operating	Resolution of the adverse effects to the Lake Superior & Mississippi Railroad Corridor Historic District: Saint Paul to White Bear Lake Segment, the Lake Superior & Mississippi Railroad Corridor Historic District: White Bear Lake to Hugo Segment and the three remnants of the 1868 Alignment of the Lake Superior & Mississippi Railroad was coordinated with Section 106 consulting parties and is documented in a Memorandum of Agreement (see Appendix B).	Metropolitan Council
	Construction	A Construction Protection Plan for Historic Properties will be prepared for Phalen Park that will include measures recommended to minimize or avoid unintended damage to the historic property during construction. A consultation meeting will be held before the 60 percent plans are finalized to determine whether a Construction Protection Plan for Historic Properties is necessary for the other three historic properties that may be temporarily affected by construction (Westminster Junction, Madeline L. Weaver Elementary School and Saint Paul, Stillwater & Taylors Falls/Chicago, Saint Paul, Minneapolis & Omaha Railroad Corridor Historic District). These measures are included in the Section 106 Memorandum of Agreement (see Appendix B).	Metropolitan Council
Environmental justice	Operating	While the project will not have a disproportionately high or adverse effect on minority and low-income populations, the project is committed to minimizing or avoiding impacts to those populations. Project mitigation measures identified for parking, driveways and loading zones; neighborhoods and community resources; land acquisitions and relocations; economics; visual resources; and cultural resources support the goal of not impacting low-income and minority populations.	Metropolitan Council
	Construction	The project is committed to minimizing or avoiding impacts to environmental justice populations. Project mitigation measures identified for parking, driveways and loading zones; neighborhoods and community resources; land acquisitions and relocations; economics; visual resources; cultural resources; and noise and vibration support the goal of not impacting low-income and minority populations.	Metropolitan Council

Resource Area	Phase	Commitments and Mitigation Measures	Responsible Party
Safety and security	Operating	The stations will include components essential for traveler safety and security including wheelchair ramps, lighting, security systems and information displays. The level boarding platforms will have a 2-foot-long detectable warning strip at the edge of the platform to warn pedestrians about the grade change between the platform and the pavement. If stations have significant grade changes or retaining walls, station platforms will have fencing on the side not used to access the buses. Stations will also feature video monitoring and emergency telephones. A public-address system will convey information to people with impaired hearing, complying with federal Americans with Disabilities Act requirements. The Metro Transit Police Department and local law enforcement authorities will be jointly responsible for the safety and security of the project's facilities and environs. These agencies already have in place policies to protect and secure transit-users and the public. Metro Transit's licensed police force enforces public safety on the transit system, and it will routinely patrol and secure the project's stations, dedicated guideway and BRT vehicles, as well as bus routes and stops.	Metropolitan Council
	Construction	Coordination with local law enforcement and emergency response personnel will occur to develop a Safety and Security Management Plan and a Safety and Security Certification Plan, which will specify applicable safety and security precautions for the project. Detour routes will be identified for pedestrian, bicycle and vehicular traffic as necessary to safely reroute users around the construction zone.	Metropolitan Council
Utilities	Operating	The locations of existing utilities in the project area will be confirmed as engineering advances so that the design can be refined to best avoid utilities, where practicable. Where conflict is unavoidable, coordination with utility owners will identify project-related impacts and potential mitigation measures such as utility modification, relocation or replacement.	Metropolitan Council
	Construction	Service disruptions due to utility relocations are anticipated to be minimal, and providers will establish temporary connections for customers before permanently relocating utilities facilities.	Metropolitan Council

Resource Area	Phase	Commitments and Mitigation Measures	Responsible Party
Surface waters	Operating	If, after final design is completed, the project results in fill within identified floodplains, an analysis of the corresponding change in base flood elevation will be completed to determine if the fill results in adverse impacts that require additional mitigation. If mitigation is required, compensatory storage at a 1:1 replacement ratio within the same floodplain reach will be provided. Any unavoidable impacts will be coordinated with cities and watershed districts. It is anticipated that impacts to jurisdictional wetlands could be authorized by the Section 404 Transportation Regional General Permit. Additionally, Wetland Conservation Act approvals will be required for any impacts to wetlands within the regulatory boundaries of the city of Saint Paul, Ramsey-Washington Metro Watershed District, Vadnais Lake Area Watershed Management Organization and Minnesota Department of Transportation. Any impacts to aquatic resources on the Public Waters Inventory will require a public waters work permit from the Minnesota Department of Natural Resources. Mitigation will vary based on the regulatory nature of the individual wetlands impacted. The Capitol Region Watershed District and Ramsey-Washington Metro Watershed District require all impacts to be replaced at a minimum of a 1:1 replacement ratio within the same sub-watershed. Any remaining mitigation could be provided through the purchase of wetland mitigation bank credits based on Minnesota Wetland Conservation Act Replacement Standards. The US Army Corps of Engineers' current replacement ratio for wetland credits in the project area is 2.5:1; however, under certain conditions, including providing replacement within the same watershed or in advance of construction, the ratio may be reduced to 2:1. The final amount, type and location of wetland replacement or bank credits will be determined during the permit review process, which will occur during final design. Other permits related to stormwater management, erosion control or stream crossings may be required and will be determined as project design advances.	Metropolitan Council
	Construction	See operating phase mitigation measures. All anticipated aquatic resource impacts are considered permanent at this stage of design. If construction activities result in temporary aquatic resource impacts, the areas will be restored in accordance with the Section 404 Transportation Regional General Permit.	Metropolitan Council

Resource Area	Phase	Commitments and Mitigation Measures	Responsible Party
Water quality and stormwater	Operating	The project must meet the standards and requirements of and receive applicable approvals from the Capitol Region Watershed District, Ramsey-Washington Metro Watershed District, Vadnais Lake Area Water Management Organization and Rice Creek Watershed District. The project will also be required to receive a National Pollutant Discharge Elimination System permit from the Minnesota Pollution Control Agency. For potential stormwater management features within Minnesota Department of Transportation right-of-way, the approach will be to use surface practices and to avoid the use of underground systems or tree trenches. Any proposed locations within Minnesota Department of Transportation right-of-way will be further discussed with the Minnesota Department of Transportation as engineering advances.	Metropolitan Council
	Construction	In accordance with the National Pollutant Discharge Elimination System construction stormwater permit and, to the extent authorized or required by law, watershed district and municipality requirements, a Stormwater Pollution Prevention Plan will be developed for the construction phase of the project.	Metropolitan Council
Geology, groundwater and soils	Operating	None	Not applicable
	Construction	If dewatering is needed during construction, a water appropriation permit will be required from the Minnesota Department of Natural Resources to dewater in excess of 10,000 gallons a day. If poorly drained soils are removed, the excavated soils will need to be disposed of off-site or reused in areas that do not require consolidated soils. If needed, retaining walls and soil stabilization treatments will be utilized to mitigate the potential for erosion. All project-related construction activities will, to the extent authorized or required by law, adhere to appropriate standards for grading and erosion control and applicable permitting requirements of the Minnesota Pollution Control Agency, Minnesota Department of Transportation, watershed districts and the project area cities.	Metropolitan Council

Resource Area	Phase	Commitments and Mitigation Measures	Responsible Party
Hazardous materials	Operating	The Metropolitan Council will be responsible for performing site mitigation to achieve acceptable environmental conditions. If necessary, the Metropolitan Council will enroll in the Minnesota Pollution Control Agency's Brownfield Program to obtain assurances that contaminated site cleanup work and/or contaminated site acquisition will not associate the agency with long-term environmental liability for contamination and to obtain approvals for any contamination management and cleanup plans.	Metropolitan Council
	Construction	A Response Action Plan and Construction Contingency Plan will be developed to outline the methods for identifying, segregating and handling contaminated soil and/or groundwater that may be encountered during construction. These plans will be submitted to the Minnesota Pollution Control Agency for review and approval prior to construction. The Metropolitan Council will hire an environmental construction oversight contractor, if necessary, to help manage known and unknown contaminated and regulated materials and to make sure that these materials are handled in accordance with all appropriate federal, state and local regulations. Prior to the demolition of any structures, assessments for asbestos-containing materials, lead-based paint and other regulated materials/wastes will be performed. A demolition and disposal plan will be prepared for any identified contaminants that may be encountered during construction.	Metropolitan Council
Noise and vibration	Operating	None	Not applicable
	Construction	A detailed noise and vibration control plan will be prepared to mitigate short-term noise and vibration resulting from construction activities. A noise control engineer or acoustician will work with the contractor to prepare a noise and vibration control plan in conjunction with the contractor's specific equipment and methods of construction.	Metropolitan Council
Air quality	Operating	None	Not applicable
	Construction	Traffic mitigation measures will be developed before construction begins to establish detour routes and maintain traffic flow. Where applicable and prudent, measures recommended by the US Environmental Protection Agency to reduce short-term construction impacts to air quality will be implemented, and construction best management practices will be implemented to control dust.	Metropolitan Council

Resource Area	Phase	Commitments and Mitigation Measures	Responsible Party
Protected species and wildlife habitat	Operating	The *Ramsey County Rail Right-of-Way Design Guide*[34] includes provisions to preserve existing quality landscapes and enhance the corridor with ecologically beneficial, resilient and low-maintenance habitat. As engineering advances, the guiding principles from the *Ramsey County Rail Right-of-Way Design Guide* will be used to inform the design work and ensure the collective input received through public engagement activities is incorporated. If project design changes or new information reveals potential effects to proposed or listed species or critical habitat to an extent not covered in the initial Section 7 consultation, additional coordination with the US Fish and Wildlife Service will occur.	Metropolitan Council
	Construction	Wildlife-friendly erosion control methods will minimize impacts to wildlife. Areas disturbed by construction will be stabilized with interim and final erosion and sediment control measures, including the utilization of construction activity best management practices (e.g., cleaning all equipment before moving to another site) as well as seeding plans that will inhibit the spread of invasive species or noxious weeds. The number of active construction areas will be limited to the minimum number needed to construct the project as required by construction permits, and inactive disturbed areas will be stabilized with seeding and other forms of erosion control best management practices. To avoid incidental impacts to the Blanding's turtle, standard best management practices for construction established by the Minnesota Department of Natural Resources will be followed. To minimize and mitigate potential impacts to the northern long-eared bat, the project will minimize mature tree impact in densely forested areas and clear trees during winter months (defined as November 1 to March 31). To mitigate potential impacts to the rusty-patched bumble bee, initial disturbance of potential habitat areas will be limited to timeframes outside of the active season (April to October) and disturbed areas within the high potential zone will be reseeded with pollinator-friendly native seed mixes that benefit the species.	Metropolitan Council

[34] Available in the project library at https://www.ramseycounty.us/residents/roads-transit/transit-corridors-studies/rush-line-brt-project/project-library.

Resource Area	Phase	Commitments and Mitigation Measures	Responsible Party
Indirect and cumulative effects	Operating	The proposed crossings over Highway 36 and I-694 will provide adequate space to not preclude reasonably foreseeable future highway expansion.	Metropolitan Council
	Construction	No additional avoidance, minimization or mitigation measures beyond those identified for the above resource areas.	None

Table A-2: Permits and Approvals Required

Agency	Permit/Approval
Federal Approvals	
Federal Transit Administration	Environmental decision document
	Section 4(f) determination
	Section 106 Memorandum of Agreement
Federal Highway Administration	Right-of-way use agreement
	Environmental decision document
US Army Corps of Engineers	Section 404 permit
United States Fish and Wildlife Service	Section 7 concurrence
State Approvals	
Minnesota Department of Natural Resources	Water appropriation permit (if needed)
	Public waters work permit
State Historic Preservation Office	Section 106 Memorandum of Agreement
Minnesota Department of Transportation	Right-of-way permit
	Limited use permit (if needed)
	Application for drainage permit
	Application for utility accommodation on trunk highway right-of-way
	Application for miscellaneous work on trunk highway right-of-way
	Wetland Conservation Act Replacement Plan approval
Minnesota Pollution Control Agency	National Pollutant Discharge Elimination System permit
	Section 401 Water Quality Certification (anticipated to be authorized by a certification for the Section 404 permit)
	Industrial groundwater pump-out general permit (if needed)
Local Approvals (to the extent authorized or required by law)	
Ramsey County	Environmental decision document for the state environmental process
	Excavation and obstruction permit
City of Saint Paul	Road crossing/right-of-way permits
	Grading/building permits
	Wetland Conservation Act Replacement Plan approval
	Local parkland diversion review
	Heritage Preservation design review

Agency	Permit/Approval
City of Maplewood	Road crossing/right-of-way permits
	Grading/building permits
City of Vadnais Heights	Road crossing/right-of-way permits
	Grading/building permits
	Erosion/sediment control/stormwater permit
City of Gem Lake	Grading permit
	Tree alteration permit (if necessary)
	Erosion/sediment control/stormwater permit
City of White Bear Lake	Road crossing/right-of-way permits
	Grading/building permits
	Erosion/sediment control/stormwater permit
	Municipal consent for trunk highway work within the municipality (access change and acquisition of permanent right-of-way)[35]
Capitol Region Watershed District	Erosion/sediment control/stormwater permit
	Wetland Conservation Act Replacement Plan approval
Ramsey-Washington Metro Watershed District	Erosion/sediment control/stormwater/flood control permit
	Wetland Conservation Act Replacement Plan approval
Vadnais Lake Area Water Management Organization	Wetland Conservation Act Replacement Plan approval
Rice Creek Watershed District	Erosion/sediment control/stormwater permit
Metropolitan Council Environmental Services	Sanitary sewer discharge permit (if needed)

[35] Per Minnesota Statutes, sections 161.162 through 161.167, municipal approval is required for any Minnesota Department of Transportation trunk highway projects that alter access, increase or reduce highway traffic capacity, or require acquisition of permanent right-of-way. Acquisition of right-of-way for the Minnesota Department of Transportation will be required at the intersection of Highway 61 and White Bear Avenue and the intersection of Highway 61 and Whitaker Street. Additionally, a driveway off of Highway 61 north of Whitaker Street is proposed to be closed as part of the Rush Line BRT Project. Therefore, municipal consent will be needed from the city of White Bear Lake.

APPENDIX B

SECTION 106

MEMORANDUM OF AGREEMENT

MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL TRANSIT ADMINISTRATION
AND
THE MINNESOTA STATE HISTORIC PRESERVATION OFFICE
REGARDING
THE RUSH LINE BUS RAPID TRANSIT PROJECT,
RAMSEY COUNTY, MINNESOTA

WHEREAS, Ramsey County, Minnesota, on behalf of the Ramsey County Regional Railroad Authority (RCRRA) and in conjunction with the Metropolitan Council are proposing to construct the Rush Line Bus Rapid Transit Project (the "Project"), a fifteen (15)-mile long bus rapid transit (BRT) project with twenty-one (21) stations and three (3) park-and-ride facilities; four (4) of the twenty-one (21) stations are proposed to be constructed under the METRO Gold Line Bus Rapid Transit Project; two (2) of the park-and-ride facilities propose to use existing surface lots and/or parking structures and the other proposes the construction of a new parking structure; the Project extends along a northerly and easterly alignment in mixed traffic or in a dedicated guideway, connecting downtown Saint Paul with the suburban municipalities of Maplewood, Vadnais Heights, Gem Lake, White Bear Lake, and White Bear Township, Minnesota, as depicted in Attachment A;

WHEREAS, the United States Department of Transportation, Federal Transit Administration (FTA), may fund the Project and has determined it is an undertaking subject to the requirements of 36 Code of Federal Regulations [CFR] Part 800, the regulations implementing Section 106 of the National Historic Preservation Act (54 United States Code [USC] § 306108);

WHEREAS, although Ramsey County has served as the local lead agency for the purposes of compliance with the National Environmental Policy Act (NEPA) and, in conjunction with the FTA, prepared an Environmental Assessment to satisfy both NEPA and the Minnesota Environmental Policy Act, it is anticipated that the Metropolitan Council will serve as the Project sponsor and federal grantee, lead the process for engineering and construction, obtain the approvals and permits to undertake the Project as required by law, and operate the Project;

WHEREAS, the United States Army Corps of Engineers (USACE) may issue a Department of Army (DA) permit authorizing the discharge of dredged or fill material in conjunction with Project construction pursuant to 33 USC § 11 and Section 404 of the Clean Water Act (Section 404), 33 USC §§ 1251-1376, as amended, and has determined the issuance of a DA permit is an undertaking subject to the requirements of Section 106 and 36 CFR Part 800

and, pursuant to 36 CFR § 800.2(a)(2) on November 8, 2019, the USACE designated FTA as the lead Federal agency for the Project to fulfill their responsibilities under Section 106;

WHEREAS, the Federal Highway Administration (FHWA) may issue an approval for an interstate right-of-way use agreement between the Metropolitan Council and the State of Minnesota, acting through the Minnesota Department of Transportation (MnDOT), for a portion of the Project's preferred alternative pursuant to 23 CFR Part 810, Subpart C and 23 CFR Part 710, Subpart D § 710.405, and has determined this approval is an undertaking subject to the requirements of Section 106 and 36 CFR Part 800, and pursuant to 36 CFR § 800.2(a)(2) on September 15, 2020, FHWA requested FTA to be the lead Federal agency for the Project to fulfill their responsibilities under Section 106 and FTA agreed to be the lead Federal agency on September 25, 2020;

WHEREAS, FTA initiated Section 106 consultation with the Minnesota State Historic Preservation Office (MnSHPO) in a letter dated September 5, 2018, and shall continue to consult with MnSHPO under the terms of this Memorandum of Agreement (MOA);

WHEREAS, pursuant to 36 CFR § 800.2(a)(3) on September 5, 2018, FTA authorized RCRRA and the MnDOT Cultural Resources Unit (CRU) to work directly with MnSHPO on FTA's behalf, with FTA remaining responsible for designating consulting parties and making all findings and determinations pursuant to 36 CFR Part 800 and this MOA shall supersede that authorization with RCRRA and MnDOT CRU having no role in the implementation of the MOA;

WHEREAS, FTA recognizes it has a unique legal relationship with Federally recognized Indian tribes (Tribes) set forth in the Constitution of the United States, treaties, statutes, and court decisions, and that consultation with Tribes must, therefore, recognize the government-to-government relationship between the Federal government and the Tribes;

WHEREAS, pursuant to 36 CFR § 800.2(c)(2)(ii), upon initiation of the Section 106 consultation for the Project, FTA notified the following Tribes and invited their participation in consultation for the Project and, pursuant to 36 CFR § 800.14(b) and (f), invited these Tribes to participate in the development of this MOA: Lower Sioux Indian Community, Upper Sioux Community, Prairie Island Indian Community, Shakopee Mdewakanton Sioux Community, Turtle Mountain Band of Chippewa, Sisseton-Wahpeton Oyate, Santee Sioux Nation, and Fort Peck Assiniboine and Sioux Tribes, and no Tribes have requested to participate in consultation for the Project or in the development of this MOA;

WHEREAS, although no Tribes have requested to participate in the development of this MOA, FTA shall re-initiate consultation with Tribes that may attach religious and/or cultural

significance to historic properties that may be identified under the terms of this MOA, as appropriate;

WHEREAS, pursuant to 36 CFR § 800.4(a)(1), FTA and MnDOT CRU, in consultation with MnSHPO and other Consulting Parties, have defined an Area of Potential Effects (APE) for the Project as documented in Attachment B to this MOA, and FTA may need to revise the Project APE as design and construction advances and, if needed, shall do so in consultation per the terms of this MOA;

WHEREAS, FTA, in consultation with MnSHPO and other Consulting Parties, has undertaken surveys of portions of the Project APE to identify historic properties as defined by 36 CFR § 800.16(l) that are listed in, or eligible for inclusion in, the National Register of Historic Places (National Register); FTA has identified twenty-eight (28) historic properties either listed in, or eligible for inclusion in, the National Register, as noted in Attachment C; and as the design and construction advances, FTA may need to conduct additional survey to identify and evaluate historic properties that could be affected by the Project and, if needed, shall do so in consultation per the terms of this MOA;

WHEREAS, FTA has determined in consultation with MnSHPO and other Consulting Parties that Project construction will have no adverse effect on fourteen (14) historic properties; these properties are noted in Attachment C;

WHEREAS, FTA has determined in consultation with MnSHPO and other Consulting Parties that Project construction will have no adverse effect on nine (9) historic properties, provided measures identified in this MOA are implemented; these properties are noted in Attachment C;

WHEREAS, FTA has determined in consultation with MnSHPO and other Consulting Parties that the Project will have an adverse effect on five (5) historic properties: the Lake Superior & Mississippi (LS&M) Railroad Historic District: Saint Paul to White Bear Lake Segment (XX-RRD-NPR001), three (3) individually eligible 1868 Alignments of the LS&M Railroad (XX-RRD-NPR002, XX-RRD-NPR003, and XX-RRD-NPR004), and the LS&M Railroad Historic District: White Bear Lake to Hugo Segment (XX-RRD-NPR005), that the adverse effects cannot be avoided, and measures are included in this MOA to resolve these adverse effects;

WHEREAS, in accordance with 36 CFR § 800.6(a)(1) on January 19, 2021, FTA notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination with specified documentation and the ACHP has chosen not to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii);

WHEREAS, FTA and MnDOT CRU, in consultation with MnSHPO and other Consulting Parties, have assessed potential Project effects on historic properties and have considered ways to avoid, minimize and/or mitigate adverse effects, have agreed upon measures for minimizing and mitigating the identified adverse effects, as outlined in this MOA, and this MOA provides for additional consultation to assess effects and resolve adverse effects should the Project scope change;

WHEREAS, FTA has consulted with the municipalities of Saint Paul, Maplewood, Vadnais Heights, Gem Lake, and White Bear Lake, White Bear Township, and the Maplewood and Saint Paul Heritage Preservation Commissions (HPCs), and FTA has invited all of these entities to sign this MOA as Concurring Parties;

WHEREAS, FTA also invited the Maplewood Area Historical Society, White Bear Lake Area Historical Society, Ramsey County Historical Society, LS&M Railroad, Minnesota Transportation Museum, and Northern Pacific Historical Association to be consulting parties to the Project, and the Maplewood Area Historical Society and White Bear Lake Area Historical Society accepted and FTA has invited these entities to sign this MOA as Concurring Parties;

WHEREAS, FTA invited Ramsey County and MnDOT to be Concurring Parties to this MOA, and Ramsey County has accepted that invitation and participated in consultation to develop this MOA;

WHEREAS, FTA invited the Metropolitan Council, USACE, and FHWA to be Invited Signatories to this MOA, and all accepted that invitation and participated in consultation to develop this MOA;

WHEREAS, this MOA was developed with appropriate public involvement pursuant to 36 CFR § 800.2(d) and § 800.6(a)(4); the public involvement has been coordinated with the public review and comment conducted by FTA and Ramsey County to comply with NEPA, as amended, pursuant to 36 CFR § 800.8(a);

WHEREAS, there are provisions in this MOA for any subsequent public involvement in the Section 106 review process, including notification of the Project's adverse effects to historic properties pursuant to 36 CFR § 800.6(a)(3), following the publication of the NEPA Environmental Assessment and these provisions shall be coordinated through public communication methods in a way that is commensurate with the type and scale of public input being sought;

WHEREAS, the Signatories, Invited Signatories, and Concurring Parties, are all considered Consulting Parties pursuant to 36 CFR § 800.2(c) and their roles described herein are consistent with those described in 36 CFR § 800.6(c)(1), (2), and (3), respectively;

WHEREAS, the Metropolitan Council shall implement the Project and shall complete the stipulations of this MOA, and FTA shall be responsible for ensuring that implementation of the Project meets the terms of this MOA; and

NOW, THEREFORE, FTA and MnSHPO agree that the Project shall be implemented in accordance with the following stipulations in order to take into account the effects of the Project on historic properties.

Stipulations

The FTA, with the assistance of the Metropolitan Council, shall ensure that the following measures are carried out:

I. Applicability

A. If the Metropolitan Council applies for additional federal funding or approvals for the Project from a Federal agency that is not party to this MOA, the Federal agency may remain individually responsible for their undertaking under 36 CFR Part 800. Alternatively, if the undertaking as described herein remains unchanged, such funding or approving Federal agency may request in writing to FTA and MnSHPO of their desire to designate FTA as lead Federal agency for the undertaking pursuant to 36 CFR § 800.2(a)(2) and to become a Consulting Party to this MOA pursuant to Paragraph B of this Stipulation.

B. If during the implementation of this MOA, FTA identifies other agencies, tribes, individuals, and organizations with a demonstrated interest in the undertaking due to the nature of their legal or economic relation to the Project or affected properties, or due to their concern with the Project's effects on historic properties, FTA may offer such entities Consulting Party status pursuant to 36 CFR § 800.2(c) and/or invite them to become party to this MOA, with notification to the other Consulting Parties.

i. If FTA invites an entity to become an Invited Signatory, the party may accept this status by agreeing in writing to the terms of this MOA and so notifying FTA. If the entity agrees to become an Invited Signatory and MnSHPO, USACE, FHWA, and the Metropolitan Council have no objections, FTA shall follow Stipulation XVII to amend this MOA.

ii. If FTA invites an entity to become a Concurring Party, the entity may accept this status by agreeing in writing to the terms of this MOA and so notifying FTA. Because Concurring Parties have no responsibility for implementation of this MOA, FTA may add such parties to the consultation process without formal amendment of this MOA. The FTA shall notify the Consulting Parties of any entities who agree to become a Concurring Party.

C. The Project is expected to have several construction contracts or bid packages that may be considered independently for the purposes of consultation pursuant to this MOA. In these instances, the Project status (e.g., design stage or construction) may be considered specific to the contract or element without applying to the entire Project.

D. For the purposes of this MOA, the use of the term "construction" includes major Project construction, as well as any advanced construction as described in Paragraph C of this Stipulation, and under any given construction contract or bid package is defined as demolition activities, earthwork, staging, and construction of Project infrastructure and related improvements.

II. Standards

A. All work carried out pursuant to this MOA shall meet the Secretary of the Interior's (SOI) Standards for Archaeology and Historic Preservation (48 FR § 44716) and/or the SOI's Standards for the Treatment of Historic Properties (36 CFR Part 68), as applicable (individually or collectively, SOI Standards). Documentation for determinations of eligibility and findings of effect shall meet 36 CFR § 800.11, the SOI Standards, the National Park Service's Bulletins, and MnSHPO survey and reporting guidance, as appropriate. Documentation of historic properties for the purposes of resolving adverse effects under Stipulation XII, may follow either the SOI Standards or another appropriate documentation standard that is agreed upon in writing by both FTA and MnSHPO.

B. The FTA shall ensure all activities carried out pursuant to this MOA are done by, or under the direct supervision of, historic preservation professional(s) who meet the SOI's Professional Qualification Standards (48 FR §§ 44738-44739) in the appropriate field(s) for the activity (SOI-Qualified Professionals).

i. The Metropolitan Council shall employ or contract with SOI-Qualified Professional(s) to advise the Metropolitan Council in implementing this MOA and to assist FTA as required (hereafter, referred to as the "Metropolitan Council's Preservation Lead"). The Metropolitan Council shall notify all parties to this MOA once an individual is selected to serve as its Preservation Lead. The notification shall include the Preservation Lead's contact information. If the

Metropolitan Council contracts with an individual, the notification shall also include the name and contact information for the Metropolitan Council staff member responsible for the contract. The reporting process outlined in Stipulation XV shall also document the name and contact information for the Preservation Lead.

ii. The FTA and the Metropolitan Council shall ensure that consultants retained for services pursuant to implementation of this MOA are SOI-Qualified Professionals, or in the instance of other allied professions not covered by the SOI's Professional Qualification Standards, they shall meet other nationally recognized standards or licensure/certification requirements for the profession, as applicable. Whenever possible, individuals in allied professions should have a minimum of five (5) years of experience working with historic properties.

C. The FTA acknowledges that Tribes possess special expertise in assessing the National Register eligibility of properties with religious and cultural significance to their Tribe(s). If a Tribe requests, or if FTA otherwise offers and the Tribe accepts, Consulting Party status under this MOA, FTA shall seek input from the Tribe to determine whether a SOI-Qualified Professional is qualified to assess a property's potential religious or cultural significance to the Tribe under National Register criteria.

III. Deliverables and Consulting Party Review Procedures

A. To facilitate review, submittals to Consulting Parties may be limited to the portions of the Project plans that illustrate the manner in which the Project may affect historic properties. Additional plans may be provided to Consulting Parties upon request.

B. The Consulting Parties shall be given an opportunity to review and provide comments on all findings, determinations, documents, and deliverables.

i. For all findings, determinations, documents, and deliverables that are directly related to construction activities and submitted for review during Project Construction, the Consulting Parties shall have fifteen (15) calendar days to review and provide comments, unless otherwise specified.

ii. For all findings, determinations, documents, and deliverables that are not related to construction activities or that are submitted for review prior to or after Project construction, the Consulting Parties shall have thirty (30) calendar days to review and provide comments, unless otherwise specified.

C. If the deliverable is a draft document, any written comments provided within the review and comment period shall be considered in the preparation of the final document. If there are any comments that are not feasible to incorporate into the final document, FTA shall provide an explanation to the Consulting Parties as part of issuing the final document. If no comments on a draft document are provided within the specified review timeframe, FTA, at its discretion, may consider the draft document final with notification to Consulting Parties.

D. Should FTA and MnSHPO be unable to reach agreement on eligibility determinations, findings of effect, or resolution of adverse effects, FTA shall consult with MnSHPO to resolve the disagreement in accordance with Stipulation XVI.

E. All review timeframes may be extended by mutual consent between FTA and MnSHPO in consultation with the Metropolitan Council and with notification to the other Consulting Parties. Failure of any Consulting Party to respond within the specified timeframe shall not preclude FTA from proceeding to the next step of any process under this MOA.

IV. FTA Review of Project Plans

A. The Project plans (drawings, specifications, special provisions, appendices, etc.), including plans for temporary construction-related work, shall effectively meet the Project purpose and need, while avoiding, minimizing, and/or mitigating adverse effects to historic properties. Throughout the Project design development process, the Metropolitan Council's Preservation Lead shall advise the Metropolitan Council in their efforts to meet this goal. The Project plans shall also follow Stipulations V and VI, when applicable.

B. At its own discretion, including in response to the request of any Consulting Party, FTA, with the assistance of the Metropolitan Council or their Preservation Lead, may convene a meeting(s) or use other appropriate means to obtain Consulting Party input on Project design development. At a minimum, a Consulting Party meeting(s) shall be held prior to the finalization of the 60% Project plans to discuss vegetative screening, as required in Stipulation V.B, and to facilitate Consulting Party review of certain Project elements, as required by Stipulation VI.B. That meeting may also include discussion of whether construction protection measures are required for certain historic properties, as outlined in Stipulation VII.A. If a meeting is held, FTA or the Metropolitan Council shall distribute meeting materials, as appropriate, in advance of the meeting. These meeting materials may include, but are not limited to, agendas and Project plans. The Consulting Parties may provide input in writing following the receipt of materials during the specified review time, during the meeting if one is held, or both. The FTA and the Metropolitan Council shall record and consider all

Consulting Party input received pursuant to this Stipulation as Project plans are further developed.

C. The Metropolitan Council's Preservation Lead shall review all Project plans at the 30, 60, 90, and 100 percent (%), or equivalent, design stages. The Metropolitan Council's Preservation Lead shall also review any modifications made to the 100% Project plans, whether those changes are made prior to, or during, Project construction.

i. At each stage of the review, the Metropolitan Council's Preservation Lead shall recommend to FTA whether revisions are necessary to the Project's APE, whether any Project design changes may result in a change to FTA's finding of effect, whether the design requirements of Stipulation V have been met, and whether the plans incorporate commitments made to the Consulting Parties through consultation under Stipulations VI and XII.

a. If FTA agrees revisions to the APE are necessary, they shall be completed pursuant to Stipulation IX.

b. If FTA agrees the previously made finding of effect remains valid, design-related requirements have been met, and all commitments reached during consultation have been incorporated into Project design, the FTA shall notify the Consulting Parties of its findings. Unless otherwise noted in Subparagraph C.ii of this Stipulation, notification may be completed through the reporting process outlined in Stipulation XV.

c. If FTA agrees that the previously made finding of effect is no longer valid, if design-related requirements have not been met, or if commitments reached during consultation are not incorporated into Project design, then FTA shall make a new finding of effect with the assistance of the Metropolitan Council's Preservation Lead pursuant to Stipulation XI.

ii. For Project elements requiring Consulting Party review under Stipulation VI, the 30% and 60% Project plans shall be submitted to Consulting Parties for review and comment pursuant to Stipulation III, along with FTA notification. The 90% and 100% Project plans and any modifications to the 100% Project plans do not need to be submitted to the Consulting Parties unless the Metropolitan Council or FTA is requesting additional feedback on the design of specific Project elements, or if a Consulting Party so requests.

iii. If Project construction has begun and a modification of the 100% Project plans is within 100 feet of a known historic property, the Metropolitan Council shall not

allow any destructive activities related to the Project modification to begin until FTA has completed their reviews under this Stipulation.

D. Project-induced transit-oriented development is anticipated near BRT station areas and has the potential to cause indirect effects to historic properties. The Metropolitan Council, with the assistance of the Metropolitan Council's Preservation Lead, shall participate in station area planning for stations located near certain historic properties to ensure the historic properties are incorporated into the station area planning process. If any of the station area plans are formally adopted by local municipalities prior to the start of revenue service, the Metropolitan Council shall notify the FTA and FTA shall assess the need to adjust the Project APE pursuant to Stipulation IX and/or revise the finding of effect for any historic properties pursuant to Stipulation XI. To minimize the potential for adverse indirect effects due to transit-oriented development, station area planning for the following stations shall consider nearby historic properties:

i. 10th Street Station: Foot, Schulze & Company Building, Produce Exchange Building

ii. Olive Street Station: Great Northern Railroad Corridor, Westminster Junction

iii. Cayuga Street Station: Great Northern Railroad Corridor, Westminster Junction, StPS&TF/Omaha Road Railroad Corridor Historic District

iv. Payne Avenue Station: StPS&TF/Omaha Road Railroad Corridor Historic District, Theodore Hamm Brewing Company Complex

v. Arcade Street Station: StPS&TF/Omaha Road Railroad Corridor Historic District, Theodore Hamm Brewing Company Complex; 3M Administration Building

vi. Cook Avenue Station: Johnson Parkway, LS&M Railroad Corridor Historic District

vii. Maryland Avenue Station: Phalen Park, Johnson Parkway, LS&M Railroad Corridor Historic District

viii. Larpenteur Avenue Station: LS&M Railroad Corridor Historic District

ix. Frost Avenue Station: LS&M Railroad Corridor Historic District, Site 21RA70, Moose Lodge 963

x. Highway 36 Station: LS&M Railroad Corridor Historic District

xi. Buerkle Road Station: LS&M Railroad Corridor Historic District

xii. Whitaker Street Station: LS&M Railroad Corridor Historic District

V. Design Requirements

A. In order to minimize and/or avoid adverse effects to the Lowertown Historic District, Saint Paul Union Depot, Great Northern Railroad Corridor Historic District, Westminster Junction, StPS&TF/Omaha Road Railroad Corridor Historic District, Johnson Parkway, Phalen Park, Moose Lodge 963, and Madeline L. Weaver Elementary School, the Metropolitan Council, with the assistance of the Metropolitan Council's Preservation Lead and input from Consulting Parties, as necessary, shall follow these design requirements to the extent feasible while still meeting the Project's purpose and needs:

i. Lowertown Historic District and Saint Paul Union Depot: Project elements at Union Depot Station shall be located within the portion of the train deck previously modified for existing modern bus infrastructure and shall be designed in conformance with the SOI Standards.

ii. Phalen Park and Johnson Parkway: The trail connection to the noncontributing Bruce Vento Regional Trail in Phalen Park shall be blended visually and materially by mimicking the profile and appearance of the existing trail.

iii. Moose Lodge 963: Project elements near Moose Lodge 963, including but not limited to the Frost Avenue Station and Gateway Trail Underpass, shall be designed in conformance with the SOI Standards.

iv. StPS&TF/Omaha Road Railroad Corridor Historic District, Johnson Parkway, and Phalen Park: Vegetative screening shall be preserved or reestablished between certain Project elements and the historic properties. Whenever possible, preservation of existing native vegetation in place is preferred. If the preservation of existing vegetation is not possible or does not provide adequate screening for structural Project elements, as determined by FTA with the assistance of the Metropolitan Council's Preservation Lead, then reestablishment of vegetation shall be considered. Reestablishment of vegetative screening shall consider existing vegetation conditions and proposed Project elements. The Metropolitan Council's Preservation Lead shall advise the Metropolitan Council throughout the design process. The following Project elements and historic properties are subject to this requirement:

a. Arcade Street Station in relation to the StPS&TF/Omaha Road Railroad Corridor Historic District.

b. Maryland Avenue Station and the Ramsey County rail right-of-way in relation to Johnson Parkway and Phalen Park.

c. Frost Street Station and Gateway Trail Underpass in relation to Moose Lodge 963.

B. If necessary during the course of design development, FTA, with the assistance of the Metropolitan Council's Preservation Lead, shall identify the method and appropriate points at which to gain input from MnSHPO, other Consulting Parties, and the property owner, when applicable, for determining the best approach(es) for meeting these design requirements. At a minimum, a Consulting Party meeting shall be held prior to the finalization of the 60% Project plans to discuss the locations and types of vegetative screening being considered.

C. The FTA, with the assistance of the Metropolitan Council's Preservation Lead, shall review the Project at each stage of design development outlined in Stipulation IV.C to ensure these design requirements have been met.

VI. Consulting Party Review of Certain Project Elements under the SOI Standards

A. In order to minimize and/or avoid adverse effects to Great Northern Railroad Corridor Historic District, Westminster Junction, StPS&TF/Omaha Road Railroad Corridor Historic District, Johnson Parkway, Phalen Park, and Madeline L. Weaver Elementary School, the Metropolitan Council shall, with the assistance of the Metropolitan Council's Preservation Lead and input from Consulting Parties, design the below-referenced Project elements in accordance with the SOI Standards to the extent feasible while still meeting the Project's purpose and need. If a City has officially designated the affected historic property for heritage preservation, the design shall also take into consideration, as feasible, any applicable design guidelines adopted by the City's HPC for the historic property.

i. Cayuga Street Station Area: The Cayuga Street Station, which abuts the StPS&TF/Omaha Road Railroad Corridor Historic District and is located near the Great Northern Railroad Corridor Historic District and Westminster Junction, including but not limited to Business Access and Transit (BAT) lanes, retaining walls, station platforms and amenities, trail connections, sidewalks, station vegetation, and stormwater Best Management Practices (BMPs). The Metropolitan Council should consider the mass, scale, and overall design of the Project elements. Vegetative screening shall be preserved or reestablished

between the Project elements and the historic property where possible. Consulting Parties shall review Project elements within an area that extends approximately 800 feet southwest and approximately 200 feet northeast of the centerline of Cayuga Street.

ii. Barriers at Forest Street Bridge: Physical barriers, if used, under or near the Forest Street Bridge (Bridge No. 5962), a contributing resource to the StPS&TF/Omaha Road Railroad Corridor Historic District. Consulting Parties shall review Project elements within an area that extends approximately 200 feet on either side of the point at which the dedicated guideway crosses the centerline of Forest Street North.

iii. Johnson Parkway Bridge Area: The Johnson Parkway Bridge, which passes over Johnson Parkway and is located near Phalen Park, and associated Project elements, including but not limited to retaining walls, trail connections, sidewalks, and BMPs. The Metropolitan Council should consider the mass, scale, and overall design of the bridge span, piers, railings, and abutments, and incorporate plantings in keeping with the park-like setting of the historic parkway and Saint Paul's Grand Round. Consulting Parties shall review Project elements within an area that extends approximately 700 feet south and approximately 500 feet north of the point at which the bridge crosses the centerline of Johnson Parkway.

iv. Weaver Trail Underpass Area: Project elements near Madeline L. Weaver Elementary School, including but not limited to the Weaver Trail Underpass, trails, vegetation, and stormwater BMPs. The Metropolitan Council should consider the structure's mass, scale, and overall design of the bridge span, piers, railings, and abutments, and its visibility within the historic property's viewshed. Vegetative screening shall be preserved or reestablished between the Project elements and historic properties where possible. Consulting Parties shall review Project elements within an area that extends approximately 400 feet south and approximately 800 feet north of the centerline of the proposed Weaver Trail Underpass.

v. Dedicated Guideway and Fitch/Barclay Trail Underpass: Project elements near the 1868 railroad roadway remnants between Kohlman Avenue and Beam Avenue (XX-RRD-NPR002) and/or between Gervais Avenue and County Road C (XX-RRD-NPR003), if it is determined through Stipulation VIII.A that it is prudent and feasible for the Project to avoid one or both of the historic properties. Consulting Parties shall review Project elements within an area that extends approximately 300 feet on either end of the 1868 railroad roadway remnant as

documented during the evaluation of the LS&M Railroad Corridor Historic District.

B. Depending on the significance, character, and use of the historic property and the nature and scale of the effect, FTA and the Metropolitan Council, with the assistance of the Metropolitan Council's Preservation Lead, shall identify the method and appropriate points at which to gain input from MnSHPO, other Consulting Parties, and the property owner, when applicable, for determining the best approach(es) for meeting the SOI Standards. At a minimum, a Consulting Party meeting shall be held prior to the finalization of the 60% Project plans.

C. At the 30% and 60%, or equivalent, design stages, MnSHPO and other Consulting Parties shall review and provide input on whether the Project elements meet the SOI Standards pursuant to Stipulation IV.C.ii. The Metropolitan Council shall consider all comments received as design progresses.

VII. Construction Protection Plan for Historic Properties (CPPHP)

A. In order to minimize and/or avoid adverse effects to East Shore Drive (a contributing resource in Phalen Park), and other historic properties as determined through the consultation described in Subparagraphs A.i and A.ii of this Stipulation, Stipulation XI, or Stipulation XII, the Metropolitan Council and the Metropolitan Council's Preservation Lead shall develop a CPPHP detailing the measures to be implemented prior to and during Project construction to avoid or minimize effects to historic properties. The CPPHP may be prepared for the Project as a whole, for individual construction bid packages, and/or for individual or groups of historic properties, as needed. At its own discretion, FTA may convene a meeting with Consulting Parties to facilitate discussion about protection measures.

i. Prior to the finalization of the 60% Project plans, FTA in consultation with MnSHPO and other Consulting Parties shall determine whether the CPPHP should include measures to be implemented prior to or during Project construction to avoid or minimize effects to the following historic properties: Great Northern Railroad Corridor Historic District, Westminster Junction, StPS&TF/Omaha Road Railroad Corridor Historic District, and Madeline L. Weaver Elementary School. The CPPHP described in this Stipulation shall include these historic properties following agreement in writing by both FTA and MnSHPO. If FTA and MnSHPO fail to agree, FTA shall consult with MnSHPO to resolve the disagreement in accordance with Stipulation XVI.

ii. The CPPHP shall incorporate construction protection measures to avoid or minimize effects to the 1868 railroad roadway remnants between Kohlman

Avenue and Beam Avenue (XX-RRD-NPR002) and/or between Gervais Avenue and County Road C (XX-RRD-NPR003), if it is determined through Stipulation VIII.A that it is prudent and feasible for the Project to avoid one or both of the historic properties.

iii. Depending on the type of historic property and the nature and scale of the anticipated effects, the Metropolitan Council may include the following measures in the CPPHP:

a. Construction Protection Measures (CPMs) detailing specific protection measures and procedures to be implemented during Project construction to protect historic properties.

b. Historic Property Inspections (pre-, during, and post-construction) that provide a baseline of existing structural and physical conditions to facilitate identification and documentation of any structural and/or cosmetic damage caused by Project construction. Inspections shall include, but are not limited to, building/structure foundations, exterior and interior elements, topography, landscaping, and any other historically significant or character defining features of the property to document any pre-existing defects or other damage. Inspection documentation shall include photographs and narrative to document the observed conditions before and after Project construction, and as needed during Project construction. Depending on the type and nature of the historic property and anticipated effects to it, photographic documentation should include, but is not limited to: ceilings, roofs, exterior and interior walls, windows, masonry, foundations, all sides of the exterior of the building, structure and bridge wingwalls, beams, substructures and superstructures, plumbing, equipment, fences and landscape walls, topography, vegetation, driveways and sidewalks, and any historically significant or character-defining features of the property. Photographs shall be razor sharp in focus, properly composed, and with adequate lighting to clearly show existing conditions such as deterioration and cracking that may be subject to dispute after initiation of Project construction.

c. When identified as appropriate for minimizing or avoiding adverse effects to historic properties, other types of potential measures may include, but are not limited to, maintenance of access, vibration management and remediation, and noise minimization and mitigation.

iv. To ensure adequate administration, the Metropolitan Council shall include the following management controls in any CPPHPs developed:

a. The CPPHP shall identify the entity(ies) responsible for carrying out the measures included in the CPPHP,

b. The CPPHP shall include a section for unexpected discoveries of historic properties, developed in accordance with Stipulation XIII,

c. The CPPHP shall include a section for unanticipated effects to historic properties, developed in accordance with Stipulation XIV, and

d. As appropriate, Consulting Party and property owner review of any documentation prepared under the CPPHP(s) adhering to the timelines outlined in Stipulation III, unless otherwise specified.

v. If, for any reason, the CPPHP requirements set forth in this Stipulation are not appropriate to a specific historic property or the nature and scale of an anticipated effect, the consultation process and the format of the CPPHP may be revised upon agreement by FTA and MnSHPO without amending this MOA.

B. The Metropolitan Council shall submit the draft and final CPPHP(s) to FTA for review and approval. Once FTA's comments are incorporated, FTA shall submit the draft and final CPPHP(s) to Consulting Parties for review and comment pursuant to Stipulation III. If the CPPHP includes any property-specific protection measures, FTA shall also submit the draft and final CPPHPs to the owner of the historic property. When necessary, amendments to the CPPHP shall follow the same process as its original development.

C. The Metropolitan Council shall include the agreed-upon CPPHP in construction contract packages to inform Project Construction Contractors of their responsibilities relative to historic properties. The CPPHP may be a separate document or combined with other Project construction monitoring plans, as appropriate. The Metropolitan Council shall incorporate any property-specific protection measures into the Project plans, ensure the terms of the CPPHP(s) are implemented during Project construction, and provide a record of monitoring activities in a quarterly report to FTA and in quarterly reports prepared pursuant to Stipulation XV.

D. Prior to commencing construction activities, the Metropolitan Council's Preservation Lead shall prepare Project-specific Historic Property Awareness and Sensitivity Training. The Metropolitan Council shall require Project Construction Contractor(s), including Site Supervision (Superintendents and Foremen) and their direct

supervisors, to complete the Project-specific Historic Property Awareness and Sensitivity Training prior to the commencement of construction activities. If a Construction Contractor hires or assigns any new Site Supervision and/or direct supervisor(s) to the Project during Project construction, the Metropolitan Council shall ensure that the new Site Supervision and/or direct supervisor(s) have completed the Historic Property Awareness and Sensitivity Training prior to being approved for supervising any construction activities. The Historic Property Awareness and Sensitivity Training shall include information on historic properties subject to the CPPHP, review requirements and processes for avoiding and minimizing effects to known historic properties, and procedures and protocols if unexpected discoveries are made.

VIII. Mitigation for Adverse Effects to the LS&M Railroad Corridor Historic District

A. Avoidance through Design. The 1868 railroad roadway remnants between Kohlman Avenue and Beam Avenue (XX-RRD-NPR002) and between Gervais Avenue and County Road C (XX-RRD-NPR003) are individually eligible for inclusion in the National Register and contribute to the LS&M Railroad Corridor Historic District. The Metropolitan Council, with the assistance of the Metropolitan Council's Preservation Lead, shall investigate whether it is feasible and prudent to avoid these two (2) historic properties while still meeting the Project's purpose and need. Avoidance through design is the preferred outcome of this Stipulation. The investigation shall be as thorough and creative as possible to identify engineering solutions that avoid adverse effects to the historic properties.

i. If the Metropolitan Council determines that avoidance of either or both historic properties is feasible and prudent, Project design in the vicinity of the avoided historic property shall be subject to the requirements of Stipulations VI and VII.

ii. If the Metropolitan Council determines that avoidance of either or both historic properties is not feasible and prudent, the Metropolitan Council shall notify the FTA. If FTA agrees, they shall submit the determination to MnSHPO and other Consulting Parties for review and comment pursuant to Stipulation III. The submittal shall include justification for the determination and confirmation that the Metropolitan Council shall instead complete a Phase III data recovery of the historic property that cannot be avoided, pursuant to Paragraph B of this Stipulation. At its own discretion, FTA may convene a meeting to facilitate discussion about potential avoidance. FTA shall resolve any disagreements about the feasibility of avoidance pursuant to Stipulation XVI.

B. Phase III Data Recovery. Prior to the start of Project construction within 100 feet of the recovery site, or as specified in the research design/data recovery plan, the

Metropolitan Council shall ensure a Phase III data recovery of the historic property(ies) is completed by SOI-Qualified Professionals as described below. The Metropolitan Council shall also ensure that information gained through the Phase III data recovery is shared with the public in a meaningful way to the extent reasonably possible; this may include incorporation into the interpretive plan described in Paragraph D of this Stipulation, taking into consideration the need to safeguard sensitive archaeological information.

i. Data recovery of the LS&M shall include the 1868 railroad roadway remnant between Eldridge Avenue East and County Road B East (XX-RRD-NPR004) and one portion of the property where the 1868 railroad roadway is concealed by the 1880s railroad roadway. It shall also include XX-RRD-NPR002 and/or XX-RRD-NPR003 if it is determined through Paragraph A of this Stipulation that it is not prudent or feasible for the Project to avoid them. The specific locations for data recovery work shall be determined in consultation with MnSHPO and other Consulting Parties and documented in the research design/data recovery plan developed pursuant to Subparagraph B.ii of this Stipulation.

ii. The preparation of the research design/data recovery plan, fieldwork, and preparation of the Phase III data recovery report shall be completed in accordance with Stipulation II.A of this MOA and shall be conducted under the direct supervision of SOI-Qualified Professionals who meet the qualifications for historic archaeology. In addition to meeting the SOI Standards, the work shall meet the SOI's Guidelines for Archaeological Documentation, the MnSHPO Manual for Archaeological Projects in Minnesota guidelines, and the terms and conditions of the field archaeology license issued by the Minnesota Office of the State Archeologist (OSA).The cost of curation, if necessary, shall be borne by the Project.

iii. The Metropolitan Council shall submit the draft and final research design/data recovery plan, draft and final Phase III data recovery report, and draft and final proposal for public education efforts to FTA for review and approval. Once FTA's comments are incorporated, FTA shall submit the draft and final documents to Consulting Parties for review and comment pursuant to Stipulation III.

iv. The final research design/data recovery plan shall be approved by MnSHPO prior to the start of field activities to complete the Phase III data recovery. The final Phase III Data Recovery report and a memo explaining how the information has been shared with the public shall be submitted to MnSHPO and other Consulting

Parties no later than one (1) year after the date the Project begins revenue service operations.

C. National Register Evaluation of the LS&M Railroad Corridor between Saint Paul and Duluth. The Metropolitan Council, in consultation with MnSHPO and other Consulting Parties, shall ensure a Phase II intensive survey and evaluation of the LS&M Railroad Corridor between Saint Paul and Duluth is completed by SOI-Qualified Professionals as described below. The purpose of the evaluation is to determine whether the railroad corridor historic district remains eligible for inclusion in the National Register under Criterion A after the completion of the Project and to determine whether any segments of the railroad corridor historic district are individually eligible for inclusion in the National Register. Associated properties, as described in Section F. Associated Property Types of the National Register Multiple Property Documentation Form, "Railroads in Minnesota, 1862–1956" (Railroad MPDF), shall also be documented at the level of a Phase I reconnaissance survey and, when appropriate, recommended for individual evaluation under appropriate National Register Criteria. Associated properties shall be classified as contributing or noncontributing to the railroad corridor historic district; however, individual evaluations of associated properties is not required under this Stipulation.

i. The survey and evaluation, including preparation of a research design, survey report, and inventory forms, shall be completed in accordance with Stipulation II of this MOA and shall be conducted under the direct supervision of SOI-Qualified Professionals who meet the qualifications for history and architectural history and who have successfully completed previous intensive level surveys of railroads. In addition to meeting the SOI Standards, the evaluation shall follow the guidance in the Railroad MPDF, MnSHPO's "Guidelines for Inventory and Evaluation of Railroads in Minnesota" (March 2019), and MnSHPO's "Railroad Company Information: General Information" (last updated December 31, 2018), as appropriate.

ii. The Metropolitan Council shall submit the draft and final versions of the research design, survey report, and inventory forms to FTA for review and approval. Once FTA's comments are incorporated, FTA shall submit the draft and final documents to Consulting Parties for review and comment pursuant to Stipulation III.

iii. The final survey report and inventory forms shall be submitted to MnSHPO and other Consulting Parties no later than two (2) years after the date the Project begins revenue service operations.

D. Incorporation of Interpretive Elements at BRT Stations. The Metropolitan Council in consultation with MnSHPO and other Consulting Parties shall ensure a plan for interpretation is completed as described below. During the development of the draft interpretative plan, the Metropolitan Council shall seek input from MnSHPO and other Consulting Parties to gain input on the type, number, and exact locations of the interpretation, as well as the themes, schematic plans, and draft text and graphics. The interpretation shall be based on the results of the Phase II evaluation completed for the historic property and shall be incorporated into the design of a minimum of three (3) BRT stations within or adjacent to the LS&M Railroad Corridor Historic District between Saint Paul and White Bear Lake. As part of preparing the interpretive plan, consideration shall be given to including interpretation at a minimum of one (1) BRT station in each of the following communities: Saint Paul, Maplewood, and White Bear Lake. Interpretive elements shall include a means to remotely access the webpage required by Subparagraph D.iii of this Stipulation.

i. The work shall be completed in accordance with Stipulation II.A of this MOA and shall be conducted under the direct supervision of an SOI-Qualified Professional who meets the qualifications for history and an interpretative planner either certified by the National Association for Interpretation (NAI) as a Certified Interpretive Planner or with comparable experience. In addition to meeting the SOI Standards, the work shall meet NAI's *Standards and Practices for Interpretive Planning* and the *Creating Outdoor Trail Signage* technical leaflets.[1]

ii. The Metropolitan Council shall submit the draft and final interpretive plan to FTA for review and approval. Once FTA's comments are incorporated, FTA shall submit the draft and final documents to Consulting Parties for review and comment pursuant to Stipulation III.

iii. The final interpretive plan shall be incorporated into the 100% Project plans. Interpretive elements shall be built as part of Project construction and maintained pursuant to Metropolitan Council protocols. No later than one (1) year after the date the Project begins revenue service operations, the content of the interpretation shall also be incorporated into the Metropolitan Council's webpage in order to make it accessible to the general public.

[1] "Creating Outdoor Trail Signage, Part 1: Planning and Design" in the *Minnesota History Interpreter*, May-June 2008, and "Creating Outdoor Trail Signage, Part 2: Fabrication and Installation" in the *Minnesota History Interpreter*, Summer 2008. Both leaflets were written by Ellen Miller and Aaron Novodorsky.

IX. Changes to the Area of Potential Effects (APE)

A. In accordance with 36 CFR § 800.4(a)(1) and in consultation with MnSHPO and other Consulting Parties, FTA has defined and documented an APE for the Project (Attachment B).

B. Throughout the Project design process, and as needed during Project construction, FTA, with the assistance of the Metropolitan Council's Preservation Lead, shall determine if revisions to the APE are necessary.

i. If FTA determines the APE requires revision, it shall submit the draft and final APE, along with any supporting documentation, to MnSHPO and other Consulting Parties for review and comment pursuant to Stipulation III. FTA's determination on the revised APE shall be final.

ii. Revisions to the APE do not require a formal amendment to this MOA. If revised and documented by FTA pursuant to Subparagraph B.i of this Stipulation, then the revised APE shall replace those found in Attachment A, distributed to all Consulting Parties, filed with the ACHP, and used throughout the remainder of the Project unless further revisions to the APE are necessary due to Project modifications.

C. If any new, previously unsurveyed, areas are added to the APE, the procedures in Stipulation X shall be followed to identify historic properties that may be affected by the Project.

X. Additional Survey and Evaluation

A. When necessary, FTA and the Metropolitan Council in consultation with MnSHPO and other Consulting Parties shall conduct surveys and evaluation of properties in the APE to account for any areas added to the APE through revisions made under Stipulation IX, the receipt of additional information about known or suspected historic properties in the APE, and when necessary due to delays in Project construction, as described in Subparagraph A.ii of this Stipulation.

i. The survey and evaluation shall be performed by SOI-Qualified Professionals appropriate to the resource type(s) being identified and evaluated and shall meet the requirements of Stipulation II.A.

ii. Identification efforts for architecture/history focused on properties built prior to 1979. If the beginning of Project construction is delayed beyond 2028, FTA in consultation with MnSHPO and other Consulting Parties shall determine whether

additional architecture/history survey is necessary, including additional consideration for properties built in 1979 or later.[2]

iii. In any instance where a property cannot be fully evaluated prior to the initiation of the Project's construction or the resumption of Project activities in the vicinity of the property when identified pursuant to Stipulation XIII, the property may be treated as though it is eligible for inclusion in the National Register for the purpose of the Section 106 review for this Project only. In these instances, and in addition to providing a justification for not performing a full evaluation, FTA shall document the National Register criterion or criteria, potential area(s) and period(s) of significance, and boundaries used to assume the property's eligibility so that this information can be used to assess effects of the Project on the historic property pursuant to Stipulation XI.

B. The Metropolitan Council's Preservation Lead shall review the survey results and make National Register-eligibility recommendations to FTA, which shall submit its National Register eligibility determinations to MnSHPO and other Consulting Parties for review and comment pursuant to Stipulation III. Subject to the confidentiality requirements in Section 304 of the National Historic Preservation Act (54 USC § 307103) and 36 CFR § 800.11(c), the Metropolitan Council shall post the survey results on the Project website, or other means as appropriate, in order to obtain public input and shall share any comments received from the public with the Consulting Parties.

i. If MnSHPO does not respond during the applicable review period or if MnSHPO concurs, FTA's eligibility determinations shall become final and effects to any historic properties identified shall be assessed pursuant to Stipulation XI.

ii. If FTA and MnSHPO do not agree on the National Register-eligibility of a property, or if FTA and a Tribe that attaches religious and cultural significance to a property do not agree on National Register-eligibility, FTA shall resolve the disagreement pursuant to Stipulation XVI.

XI. Additional Assessments of Effects

A. The FTA, with the assistance of the Metropolitan Council's Preservation Lead, shall make a finding of effect to account for any changes in Project design or the receipt of

[2] Properties 50 years of age or older are considered for National Register eligibility without the application of the National Register Criteria Considerations. The age of properties included in architecture/history survey was based on the anticipated start of Project construction in 2023 and included properties 45 years of age or older to allow for a delay of up to five (5) years in the start of Project construction.

additional information that may result in newly identified historic properties, changes in the finding of effect for a historic property, or unanticipated effects (e.g., damage) to historic properties. The Metropolitan Council's Preservation Lead shall assess effects of the Project on historic properties in accordance with the criteria of adverse effect as described in 36 CFR § 800.5(a)(1) and make a recommendation to FTA, supported by documentation that meets the requirements of Stipulation II.A. The Metropolitan Council's Preservation Lead shall also recommend to FTA potential measures for avoiding, minimizing, and/or mitigating any adverse effect(s).

i. As part of the assessment of effects, the Metropolitan Council's Preservation Lead may recommend, and FTA may impose, conditions on the Project to ensure an adverse effect to a historic property is avoided and/or minimized. In some instances, the conditions may be similar to those outlined in Stipulations V, VI, and VII.

ii. When effects are assessed following unanticipated effects to a known or newly identified historic property during Project construction (see Stipulations XIII and XIV), the Metropolitan Council's Preservation Lead shall use the following guidance, in addition to the criteria of adverse effect, when making a recommendation to FTA:

a. If the damage does not meet the threshold of an adverse effect, a finding of no adverse effect shall be recommended.

b. If the damage meets the threshold of an adverse effect, is repairable, and the property owner agrees to repairing the damage in accordance with the SOI Standards, a finding of adverse effect shall be recommended along with the Standard Mitigation Measure to Repair Unanticipated Damage to Historic Properties in Accordance with SOI Standards (Attachment D) to resolve the adverse effect.

c. If the damage meets the threshold of an adverse effect and any of the following are true, a finding of adverse effect requiring resolution under Stipulation XII shall be recommended:

1. The damage involves a National Historic Landmark;

2. The damage cannot be repaired;

3. The historic property must be demolished in whole or in part;

4. The property owner does not consent to repairing the damage in accordance with the SOI Standards;

5. Either the Project Construction Contractor or Contractor's insurer resolves the damage claim by monetary payment to the property owner in lieu of a repair; or

6. The repairs have the potential to cause additional adverse effects.

B. The FTA shall review the assessment of effects and recommendations, and if acceptable, submit a finding of effect that meets the requirements of Stipulation II.A to MnSHPO and other Consulting Parties for review and comment pursuant to Stipulation III. The FTA shall clearly state any condition(s) imposed on the Project as part of the finding. Subject to the confidentiality requirements in 54 USC § 307103 and 36 CFR § 800.11(c), the Metropolitan Council shall post the finding of effect on the Project website, or other means as appropriate, in order to obtain public input and shall share any comments received from the public with the Consulting Parties within the review timeframe.

i. If FTA makes a finding of no adverse effect and MnSHPO and other Consulting Parties agree, no further consultation is required pending implementation of any conditions upon which the finding is based. Implementation of conditions shall be tracked by the Metropolitan Council as part of quarterly reporting outlined in Stipulation XV.

ii. If FTA makes a finding of adverse effect and the Project is anticipated to have an adverse effect on a National Historic Landmark, FTA shall also notify and invite the ACHP and the SOI to participate in the consultation pursuant to 36 CFR § 800.10 and 54 USC § 306107.

iii. If MnSHPO objects to FTA's finding of effect or if other Consulting Parties do not agree with the finding, they shall provide comments to FTA specifying the reasons for their disagreement. The FTA shall consult with MnSHPO and other Consulting Parties to resolve the disagreement in accordance with Stipulation XVI.

XII. Consultation to Resolve Additional Adverse Effects

A. If FTA makes a finding of adverse effect and it cannot be resolved through the Standard Mitigation Measure outlined in Attachment D, FTA shall consult with the MnSHPO, other Consulting Parties, and the owner of the historic property to seek and consider other measures to avoid, minimize, and/or mitigate the adverse effect. Consultation may take whatever form is appropriate based on the significance, character, and use of the historic property and the nature and scale of the Project elements causing the adverse effect. The consultation must include an opportunity for

the public to express their views in resolving the adverse effect(s). The FTA, at its discretion, may determine that public participation under this stipulation is met via public review and comment conducted under NEPA, as amended, and its implementing regulations.

i. If consultation identifies a way to avoid the adverse effect(s) entirely through redesign of a Project element or other means while still meeting the purpose and need of the Project, and the Metropolitan Council and FTA agree, the Metropolitan Council shall revise the Project plans and FTA, with the assistance of the Metropolitan Council's Preservation Lead, shall reassess effects and modify the finding of effect in accordance with Stipulation XI.

ii. If, through consultation, it is determined the adverse effect(s) cannot be avoided entirely, a Mitigation Plan shall be prepared under Paragraph B of this Stipulation.

B. The FTA, with the assistance of the Metropolitan Council's Preservation Lead, shall develop a Mitigation Plan(s) to document the measures identified through consultation under Paragraph A of this Stipulation to resolve the adverse effect(s). Mitigation Plan(s) may be prepared for the Project as a whole, for individual construction bid packages, and/or for individual or groups of historic properties, as needed.

i. A Mitigation Plan shall outline measures to avoid, minimize, and/or mitigate adverse effects to the historic property. Measures may include, but are not limited to, design requirements pursuant to Stipulation V, Consulting Party review of Project elements pursuant to Stipulation VI, protecting historic properties during Project construction pursuant to Stipulation VII, and mitigation similar to the measures found in Stipulation VIII. When applicable, deliverables required by a Mitigation Plan shall be prepared in accordance with the requirements of Stipulation II.A and shall be submitted and reviewed pursuant to the timeline(s) and process outlined in Stipulation III, or as otherwise specified in the Mitigation Plan.

ii. Upon completion of consultation, FTA shall submit a draft and final Mitigation Plan to the Consulting Parties and the property owner, if applicable, pursuant to Stipulation III. The Mitigation Plan shall be considered final following agreement in writing by both FTA and MnSHPO. In lieu of amending this MOA, FTA shall ensure that the final Mitigation Plan is attached to the MOA in the FTA Administrative Record, distributed to all Consulting Parties, and filed with the ACHP. FTA shall also ensure the Mitigation Plan provisions are carried out by the Metropolitan Council in order to resolve the adverse effect(s). Implementation

of the Mitigation Plan shall be tracked by the Metropolitan Council as part of quarterly reporting outlined in Stipulation XV.

C. If FTA and MnSHPO fail to agree on how to resolve the adverse effect, FTA shall consult with MnSHPO to resolve the disagreement in accordance with Stipulation XVI.

D. If required by a Mitigation Plan, construction activities may not begin or resume in the vicinity of the historic property until after the completion of the associated field work or implementation of protection measures outlined in the Mitigation Plan.

XIII. Unexpected Discoveries

A. If suspected historic properties, including sites that contain human remains, unidentified animal bone, or mortuary objects, are discovered during Project construction, all activities shall cease within one hundred (100) feet of the discovery to avoid and/or minimize harm to the property. The Metropolitan Council shall include in Project construction contracts a requirement for the Project Construction Contractor(s) to immediately notify the Metropolitan Council of the discovery and implement interim measures to protect the discovery from damage, looting, and vandalism. Measures may include, but are not limited to, protective fencing, covering of the discovery with appropriate materials, and/or posting of security personnel. The Metropolitan Council shall notify FTA within twenty-four (24) hours of the discovery. FTA shall then notify MnSHPO, other Consulting Parties, and the property owner. When appropriate, FTA shall notify any Tribes that may attach religious and cultural significance to the property. The Contractor shall provide access to Consulting Parties and law enforcement to the site and shall not resume work within the area until notified by the Metropolitan Council.

B. If any suspected human remains are encountered, the Metropolitan Council shall also follow the requirements of Minnesota Statutes (Minn. Stat.) § 307.08 and immediately notify local law enforcement and the OSA, the lead state agency for authentication of burial sites on non-federal lands. In accordance with Minn. Stat. § 307.08, the OSA has the final authority in determining if the remains are human and to ensure appropriate procedures are carried out in accordance with the statutes. Avoidance and preservation in place is the preferred option for the treatment of human remains. In accordance with Minn. Stat. § 307.08, subd. 3a, OSA is required to coordinate with the Minnesota Indian Affairs Council (MIAC) if the remains or associated burial items are thought to be American Indian. The Metropolitan Council shall work with OSA and MIAC to develop and implement a reburial plan, if that is the approach preferred as determined in accordance with Minn. Stat. § 307.08.

C. The Metropolitan Council shall contract with SOI-Qualified Professionals to evaluate the newly discovered property for eligibility for inclusion in the National Register. For properties with suspected human remains, the consulting archaeologist must coordinate their evaluation with the OSA's authentication of the burial. In lieu of a consultant's recommendation, FTA may assume a property is eligible for inclusion in the National Register following consultation with, or based on input from, MnSHPO and other Consulting Parties pursuant to Stipulation X.A.iii. If an evaluation is performed, the Metropolitan Council's Preservation Lead shall provide an eligibility recommendation to FTA within seventy-two (72) hours of receipt of the consultant's evaluation of the property. FTA shall make a determination of eligibility pursuant to Stipulation X within seventy-two (72) hours of receiving the recommendation from the Metropolitan Council's Preservation Lead. FTA shall submit its National Register eligibility determination to the Consulting Parties for review and comment pursuant to Stipulation III. When applicable, FTA shall also follow Stipulation II.C in relation to any properties that may have religious or cultural significance to a Tribe(s).

i. If FTA determines that the property does not meet National Register criteria, and MnSHPO concurs, construction activities can resume upon receipt of MnSHPO written concurrence with the eligibility determination and completion of activities required under Paragraph B of this Stipulation, if applicable.

ii. For all properties determined eligible for the National Register, FTA shall make a finding of effect pursuant to Stipulation XI and resolve any adverse effects pursuant to Stipulation XII. In addition to the requirements in those stipulations, construction activities may resume after completion of activities required under Paragraph B of this Stipulation, if applicable.

XIV. Unanticipated Effects to Historic Properties

A. If previously known historic properties are affected in an unanticipated, adverse manner during Project construction (e.g., damage), all activities shall cease within one hundred (100) feet of the discovery to avoid and/or minimize further harm to the property. The Metropolitan Council shall include in Project construction contracts a requirement for the Project Construction Contractor to immediately notify the Metropolitan Council of the effect and implement interim measures to protect the property from damage, looting, and vandalism. Measures may include, but are not limited to, protective fencing, covering of the property with appropriate materials, and/or posting of security personnel. The Metropolitan Council shall notify FTA within twenty-four (24) hours of receiving notification from the Construction Contractor. FTA shall then notify MnSHPO, other Consulting Parties, and the property owner. The Metropolitan Council shall ensure a historic property inspection

as described in Stipulation VII.A.iii.b is prepared as soon as practicable to document damage to the historic property.

B. If reasonably convenient and appropriate, the Metropolitan Council or their Preservation Lead, MnSHPO, other Consulting Parties, and the property owner, when applicable, shall confer at the site within seventy-two (72) hours of notice of discovery to assess the property, identify the known Project effects to the property, and to determine the most appropriate Course of Action to repair any damage, if feasible.

i. The Course of Action shall specify the type of repair, the review process for the scope of work, and the responsibilities for ensuring repairs are made appropriately, including preparation of a post-construction historic property inspection as described in Stipulation VII.A.iii.b. The Course of Action shall also outline where and when it may be safe to resume construction activities within and/or in the vicinity of the historic property. Whenever possible, measures to repair historic properties shall be developed so that they meet the SOI Standards and are carried out under the direct supervision of personnel that meet the requirements described in Stipulation II.B.

ii. Within seventy-two (72) hours of the meeting, the Metropolitan Council shall prepare draft meeting notes documenting the results of the onsite meeting and a draft of the proposed Course of Action and provide them, and the historic property inspection prepared under Paragraph A of this Stipulation, to FTA for review and approval. Upon approval, FTA shall submit the documents to Consulting Parties for review and comment. Consulting Parties have seventy-two (72) hours to review draft meeting notes and proposed Course of Action and provide comments to the FTA and the Metropolitan Council. The Metropolitan Council shall finalize the meeting notes and Course of Action within twenty-four (24) hours after receiving comments and provide the final documents to FTA, MnSHPO, and other Consulting Parties.

iii. Construction in the vicinity of the historic property may resume as outlined in the Course of Action while negotiations take place between the Project Construction Contractor and the property owner. The Construction Contractor shall not resume work until notified by the Metropolitan Council.

C. The FTA, with the assistance of the Metropolitan Council's Preservation Lead, shall assess effects pursuant to Stipulation XI and FTA shall resolve any adverse effects pursuant to Stipulation XII. The assessment of effects shall take into consideration whether the Project Construction Contractor and the property owner accept the Course of Action, including whether the owner agrees to the damage being repaired

in accordance with the SOI Standards, which would allow the use of the Standard Mitigation Measure to Repair Unanticipated Damage to Historic Properties in Accordance with SOI Standards (Attachment D).

XV. Reviewing and Reporting of Agreement Implementation

A. Every three (3) months following the execution of this MOA and until it expires or is terminated, the Metropolitan Council shall provide FTA and all the Consulting Parties a summary report detailing work undertaken pursuant to its terms. Subject to the confidentiality requirements in 54 USC § 307103 and 36 CFR § 800.11(c), each report shall include an itemized listing of all measures required to implement the terms of this MOA. For each action, the report shall identify what steps the Metropolitan Council has taken during the reporting period to implement those actions and identify any problems or unexpected issues encountered, any scheduling changes proposed, any disputes and objections submitted or resolved, and any changes recommended in implementation of this MOA and/or any Mitigation Plan(s) prepared under Stipulation XII. Each report shall also include name and contact information for the Metropolitan Council's Preservation Lead as noted in Stipulation II.B.i, a timetable of activities proposed for implementation within the following reporting period, and notices of the initiation of construction for individual construction bid packages, as applicable.

B. The Consulting Parties shall review the reports pursuant to the timelines established in Stipulation III. The Metropolitan Council shall post the reports on the Project website, or other means as appropriate, in order to obtain public input and shall share any comments received from the public with the Consulting Parties.

C. At its own discretion, or at the request of any Signatory, FTA may convene a meeting to facilitate review and comment on the reports, and to resolve any questions about their content and/or to resolve objections or concerns.

XVI. Dispute Resolution

A. Should any Consulting Party object at any time to any actions proposed or the manner in which the terms of this MOA are implemented, FTA shall consult with such party to resolve the objection for a period not to exceed fifteen (15) calendar days. This resolution timeframe may be extended by mutual consent between FTA and the Consulting Party, with notification to the other Consulting Parties.

B. If FTA and MnSHPO do not agree on the National Register eligibility of a property, or if FTA and a Tribe that attaches religious and cultural significance to a historic property do not agree on a property's National Register eligibility, FTA shall submit

documentation to the Keeper of the National Register and request a formal determination of eligibility pursuant to 36 CFR Part 63 and 36 CFR § 800.4(c)(2). The Keeper's eligibility determination shall be considered final.

C. If FTA, MnSHPO, and other Consulting Parties do not agree on findings of effect or resolutions of adverse effects, FTA shall forward all documentation relevant to the dispute, including FTA's proposed resolution, to all Consulting Parties and the ACHP.

i. The ACHP shall provide FTA with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, FTA shall prepare a written response that considers any timely advice or comments regarding the dispute from the ACHP and the Consulting Parties and provide them with a copy of this written response. FTA shall then proceed according to its final decision.

ii. If the ACHP does not provide its advice regarding the dispute within thirty (30) days, FTA may make a final decision on the dispute and proceed accordingly. Prior to reaching a final decision, FTA shall prepare a written response that considers any timely comments regarding the dispute from the Consulting Parties and provide the written response to the Consulting Parties and the ACHP.

D. The FTA's responsibility to carry out all other actions subject to the terms of this MOA that are not the subject of the dispute remains unchanged.

E. The FTA shall notify all parties to this MOA in writing of any written objections raised by a member of the public pertaining to implementation of this MOA. Any Consulting Party receiving a written objection directly from a member of the public shall notify FTA, who shall notify all parties to this MOA in writing. Unless otherwise agreed upon, Consulting Parties have fifteen (15) calendar days to review and provide written comments on the objection to all Consulting Parties. FTA shall consider the objection and take all comments from all Consulting Parties into consideration in reaching its decision on the objection. Within fifteen (15) calendar days following closure of the comment period, FTA shall render a decision regarding the objection, respond to the objecting party, and proceed according to its decision. FTA's decision regarding resolution of the objection shall be final.

XVII. Amendments

A. Any Signatory or Invited Signatory may request an amendment to this MOA. This MOA may be amended when such an amendment is agreed to in writing by all Signatories and Invited Signatories. The amendment shall be effective on the date of

the final signature by the Signatories and Invited Signatories. Copies of any amendments shall be provided to all the Consulting Parties and the ACHP.

XVIII. Duration

A. This MOA shall remain in effect from the date of execution for a period not to exceed ten (10) years. If FTA anticipates that the terms of this MOA cannot be completed within this timeframe, it shall notify the Consulting Parties in writing at least sixty (60) calendar days prior to the expiration date. This MOA may be extended by the written concurrence of the Signatories and Invited Signatories.

B. The FTA shall ensure the MOA is extended if all the Stipulations have not been completed. If this MOA expires and FTA elects to continue with the undertaking, FTA shall reinitiate Section 106 consultation in accordance with 36 CFR Part 800.

C. If, prior to the expiration date, FTA determines all the activities subject to this MOA are completed, then FTA may terminate this MOA pursuant to Stipulation XIX.

XIX. Termination

A. If all terms of this MOA have been completed prior to the expiration date, FTA may terminate the MOA with notification to Signatories, Invited Signatories, and Concurring Parties that the terms of the MOA have been completed. If a Consulting Party feels MOA termination is premature, or that the terms of the MOA have not been met, they shall respond within the timeframes outlined in Stipulation III.

B. Any Signatory or Invited Signatory may terminate this MOA by providing at least thirty (30) calendar days notice to all Consulting Parties. FTA shall consult with the Signatories and Invited Signatories during the thirty (30) calendar day notice period in an attempt to seek agreement on amendments or other actions that would avoid termination. In the event of termination, FTA, USACE, FHWA, and any other Federal agencies invited to be a Consulting Party under Stipulation I shall comply with 36 CFR §§ 800.3-800.13 with regard to the undertaking covered by this MOA.

XX. Execution

A. This MOA may be executed in counterparts, with a separate page for each Consulting Party. This MOA shall become effective on the date of the final signature by the Signatories and Invited Signatories. The refusal of any party invited to concur with this MOA does not invalidate this MOA. The FTA shall ensure each Consulting Party is provided with a fully executed copy of this MOA and that the final MOA, updates to appendices, and any amendments are filed with the ACHP.

B. Execution of this MOA by FTA and MnSHPO, and implementation of its terms is evidence that FTA has taken into account the effects of its undertaking on historic properties and has afforded the ACHP an opportunity to comment, pursuant to Section 106 of the National Historic Preservation Act.

SIGNATURE PAGE

MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL TRANSIT ADMINISTRATION
AND
THE MINNESOTA STATE HISTORIC PRESERVATION OFFICE
REGARDING
THE RUSH LINE BUS RAPID TRANSIT PROJECT,
RAMSEY COUNTY, MINNESOTA

SIGNATORY

FEDERAL TRANSIT ADMINISTRATION

By: KELLEY BROOKINS Digitally signed by KELLEY BROOKINS Date: 2021.09.20 07:37:15 -05'00' Date: September 20, 2021

Kelley Brookins, Region 5 Administrator

SIGNATURE PAGE

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BETWEEN
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REGARDING
THE RUSH LINE BUS RAPID TRANSIT PROJECT,
RAMSEY COUNTY, MINNESOTA

SIGNATORY

MINNESOTA STATE HISTORIC PRESERVATION OFFICE

By: _____ Date: 9/22/2021

Amy Spong, Deputy State Historic Preservation Officer

SIGNATURE PAGE

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RAMSEY COUNTY, MINNESOTA

INVITED SIGNATORY

UNITED STATES ARMY CORPS OF ENGINEERS

By: _____ Date: 20 SEP 2021

for Chad Konickson, Chief, Regulatory Division, St. Paul District

SIGNATURE PAGE

MEMORANDUM OF AGREEMENT
BETWEEN
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THE MINNESOTA STATE HISTORIC PRESERVATION OFFICE
REGARDING
THE RUSH LINE BUS RAPID TRANSIT PROJECT,
RAMSEY COUNTY, MINNESOTA

INVITED SIGNATORY

FEDERAL HIGHWAY ADMINISTRATION

By: _____ PHILIP J FORST 2021.09.16 10:42:06 -05'00' FHWA Date: 9/16/2021

for Wendall L. Meyer, Division Administrator (Minnesota)

SIGNATURE PAGE

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REGARDING
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RAMSEY COUNTY, MINNESOTA

INVITED SIGNATORY

METROPOLITAN COUNCIL

By: _____ Date: Sep 20, 2021

Mary Bogie, Regional Administrator

SIGNATURE PAGE

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THE RUSH LINE BUS RAPID TRANSIT PROJECT,
RAMSEY COUNTY, MINNESOTA

CONCURRING PARTY

CITY OF GEM LAKE

By: _____ Date: _____
Gretchen Artig-Swomley, Mayor

SIGNATURE PAGE

MEMORANDUM OF AGREEMENT
BETWEEN
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RAMSEY COUNTY, MINNESOTA

CONCURRING PARTY

CITY OF MAPLEWOOD

By: _____ Date: _____
Marylee Abrams, Mayor

SIGNATURE PAGE

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RAMSEY COUNTY, MINNESOTA

CONCURRING PARTY

MAPLEWOOD AREA HISTORICAL SOCIETY

By: Michael A. Ericson Date: 9/15/21

Michael A. Ericson, President

SIGNATURE PAGE

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RAMSEY COUNTY, MINNESOTA

CONCURRING PARTY

MAPLEWOOD HERITAGE PRESERVATION COMMISSION

By: _____ Date: _____
Bob Cardinal, Chair

SIGNATURE PAGE

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RAMSEY COUNTY, MINNESOTA

CONCURRING PARTY

RAMSEY COUNTY

By: Ted W Schoenecker Date: 09/21/2021

Ted Schoenecker, Public Works Director / County Engineer

SIGNATURE PAGE

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RAMSEY COUNTY, MINNESOTA

CONCURRING PARTY

CITY OF SAINT PAUL

By:  Date: September 30, 2021

Melvin Carter, Mayor

SIGNATURE PAGE

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REGARDING
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RAMSEY COUNTY, MINNESOTA

CONCURRING PARTY

SAINT PAUL HERITAGE PRESERVATION COMMISSION

By: George Gause for T. Kimker Date: September 14, 2021
Teresa Kimker, Chair

SIGNATURE PAGE

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RAMSEY COUNTY, MINNESOTA

CONCURRING PARTY

CITY OF VADNAIS HEIGHTS

By: _____ Date: 9/20/21

Heidi Gunderson, Mayor

SIGNATURE PAGE

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RAMSEY COUNTY, MINNESOTA

CONCURRING PARTY

CITY OF WHITE BEAR LAKE

By: Jo Emerson Date: September 21, 2021
Jo Emerson, Mayor

SIGNATURE PAGE

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RAMSEY COUNTY, MINNESOTA

CONCURRING PARTY

WHITE BEAR LAKE AREA HISTORICAL SOCIETY

By: _____ Date: 9/14/2021
Sara Hanson, Executive Director

SIGNATURE PAGE

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RAMSEY COUNTY, MINNESOTA

CONCURRING PARTY

WHITE BEAR TOWNSHIP

By: _____ Date: _____
Ed Prudhon, Chair

Attachment A
Project Overview



Attachment B
Area of Potential Effects

Rush Line BRT

Ramsey County, Minnesota

- Area of Potential Effect (2-3-2020)
- Limits of Disturbance (1-31-2020)
- Alignment (1-21-2020)
- Station Platforms (1-21-2020)
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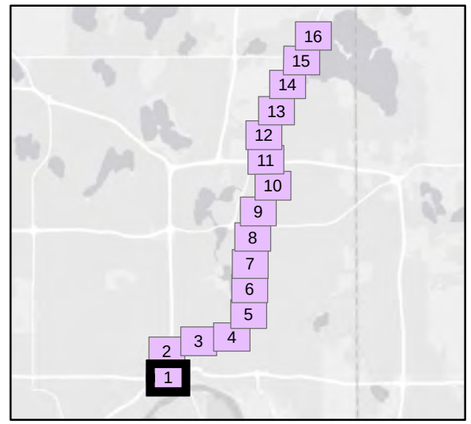

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DEPARTMENT OF TRANSPORTATION

Area of Potential Effect

As Revised on 2/3/2020

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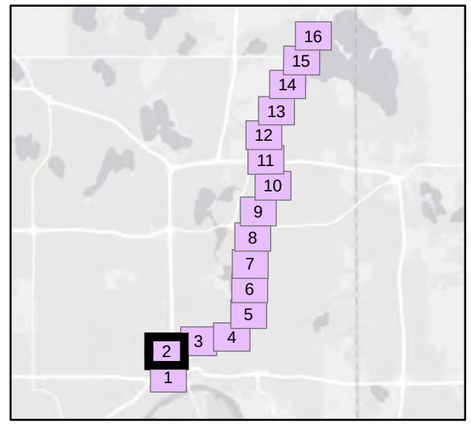

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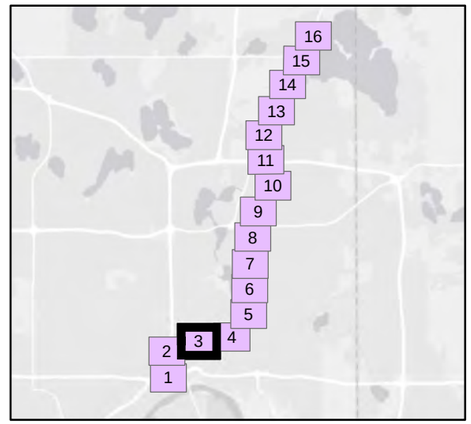

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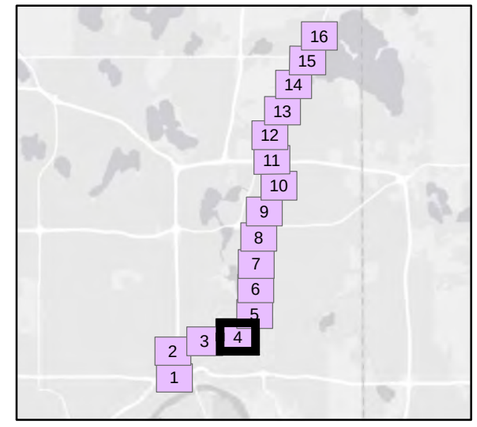

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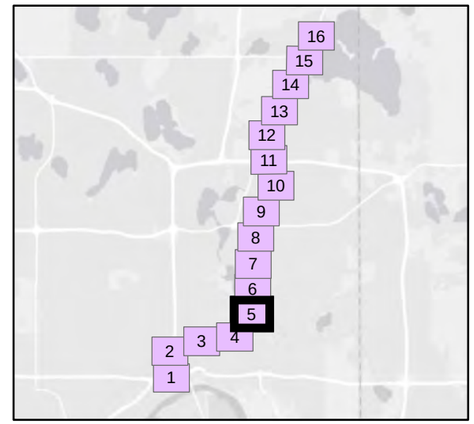

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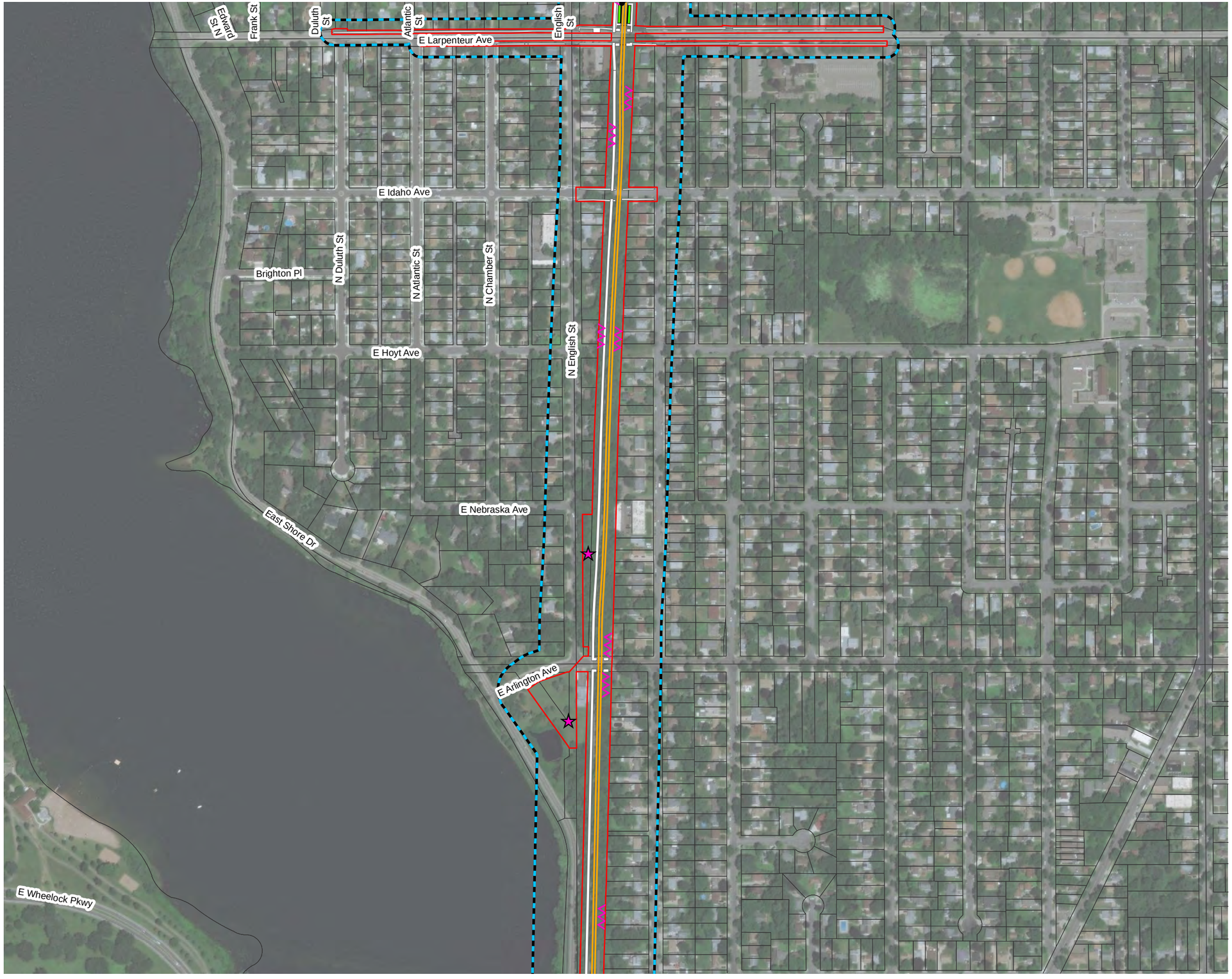

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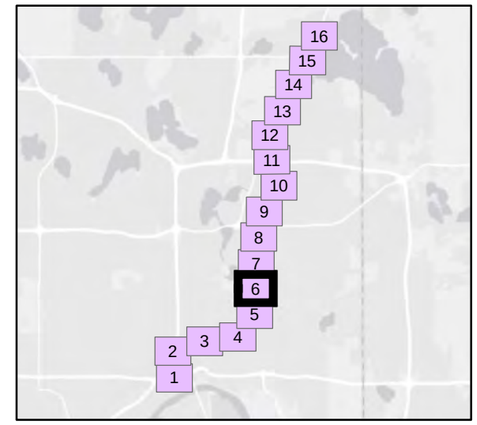

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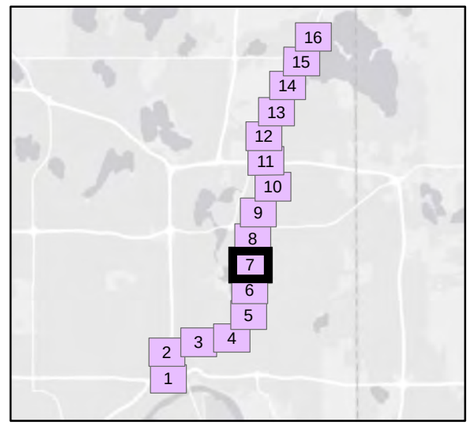

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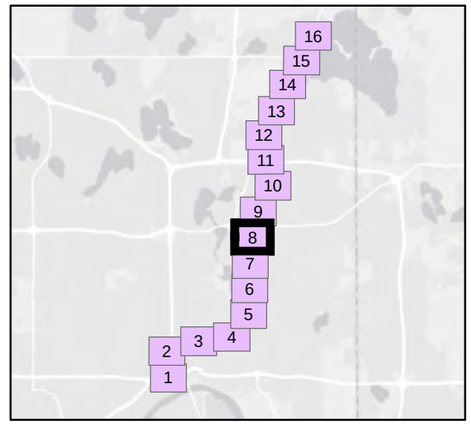

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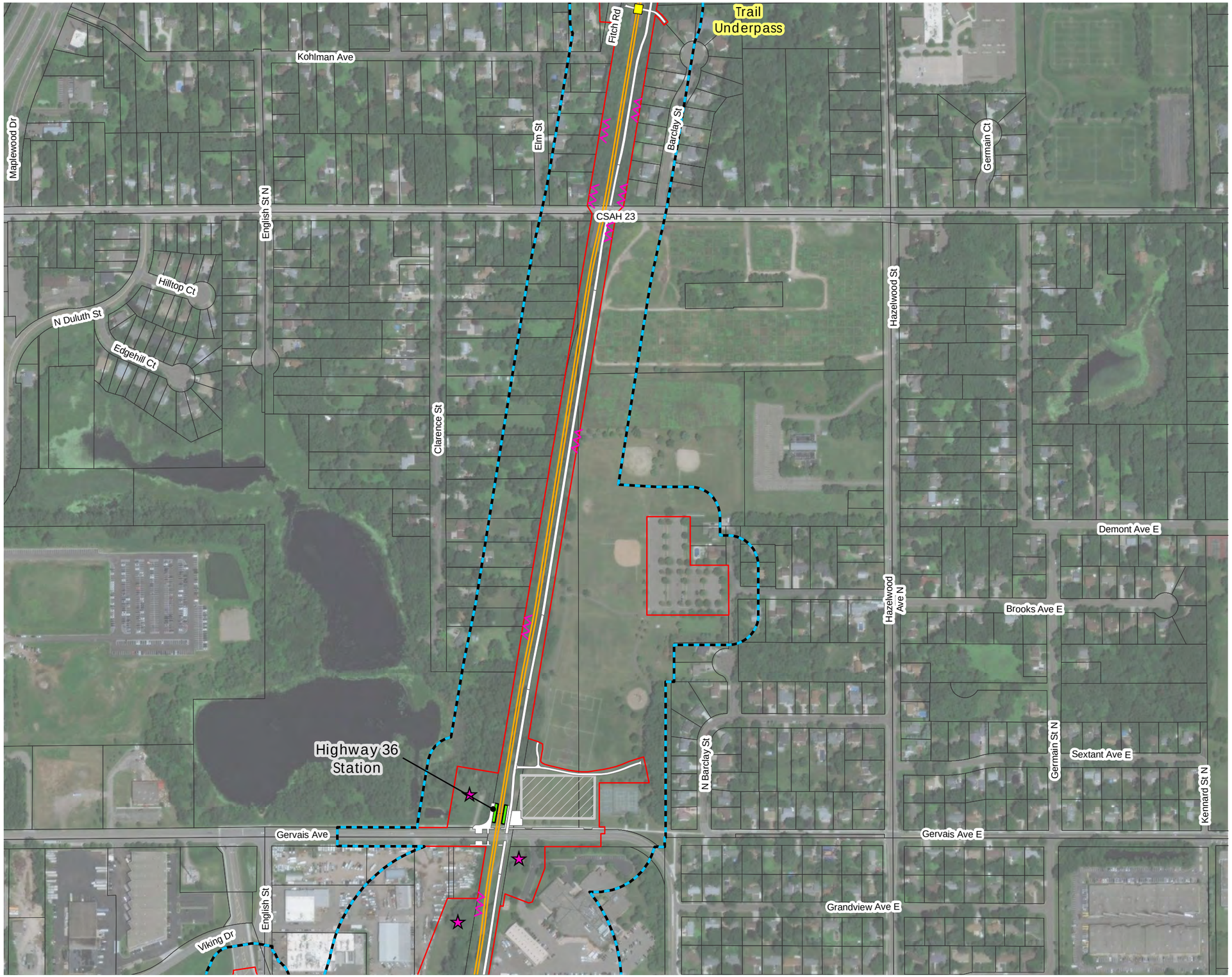

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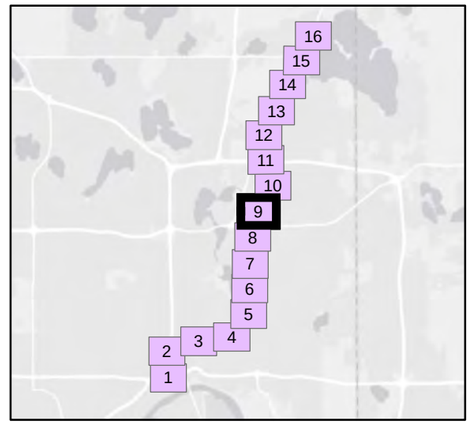

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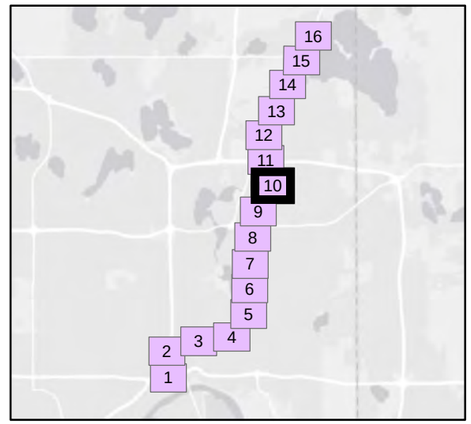

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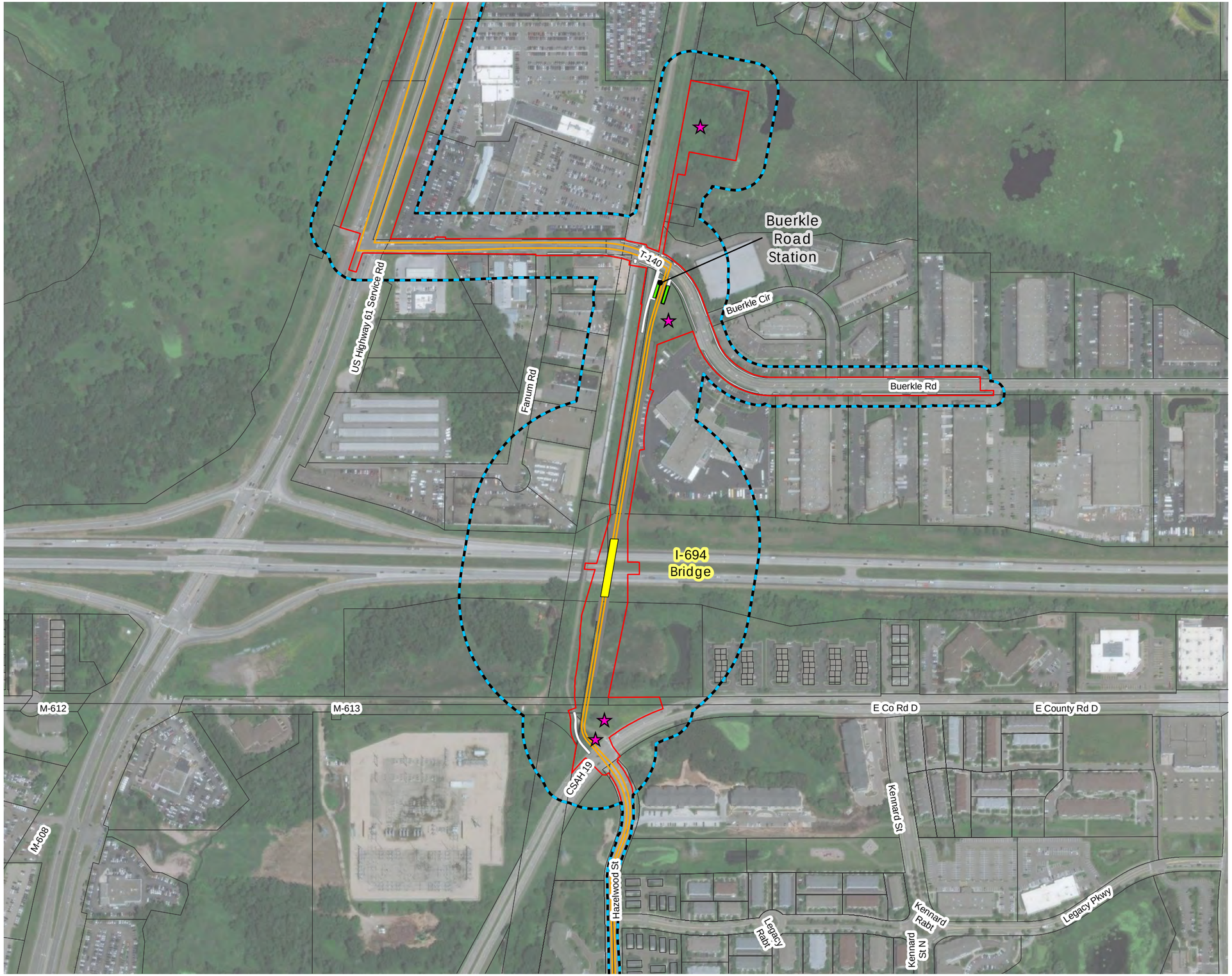

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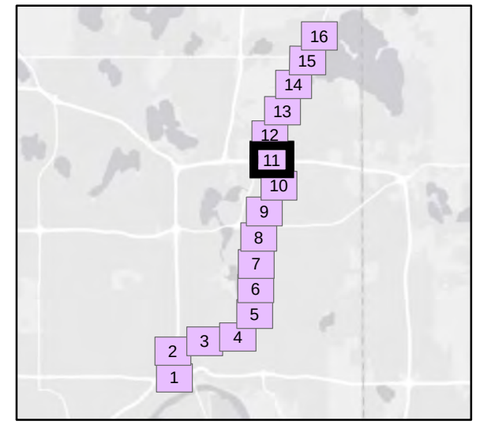

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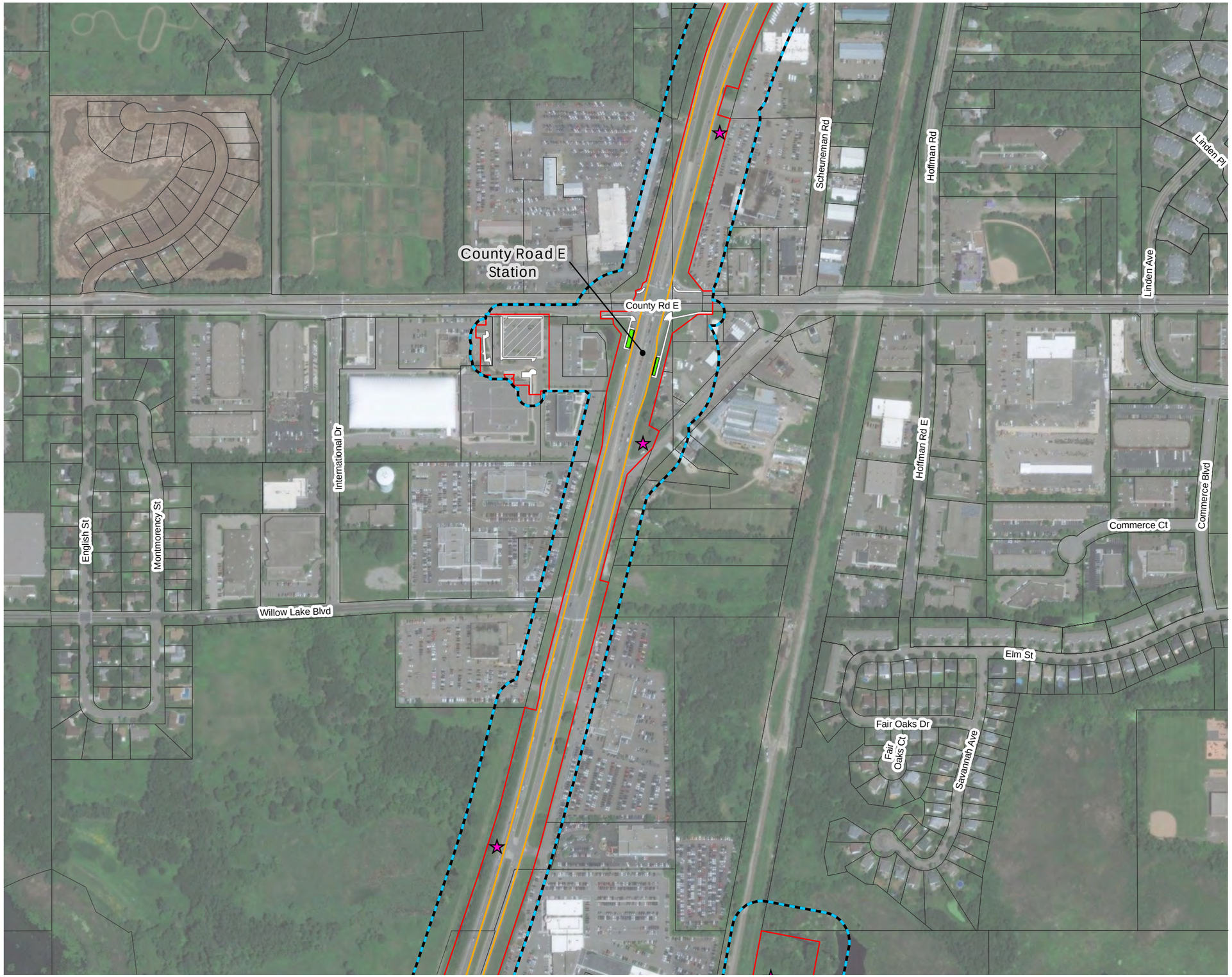

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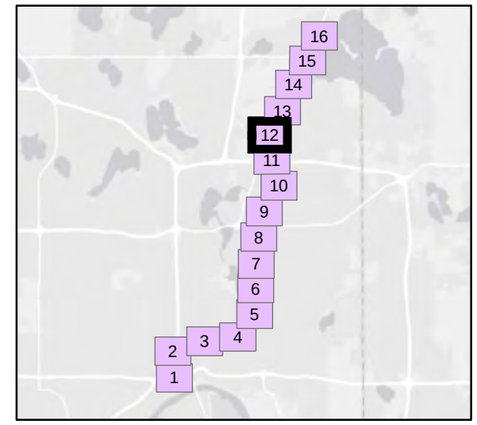

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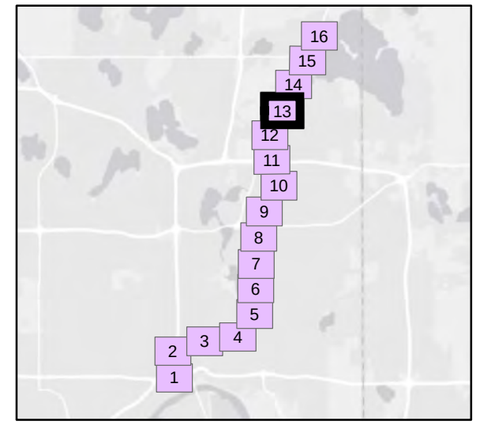

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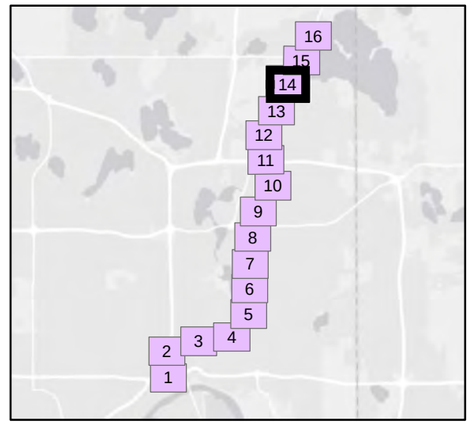

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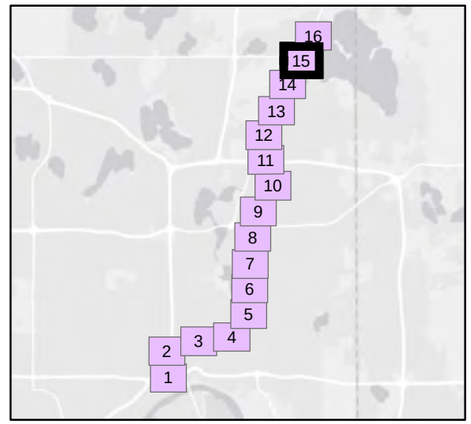

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DEPARTMENT OF TRANSPORTATION

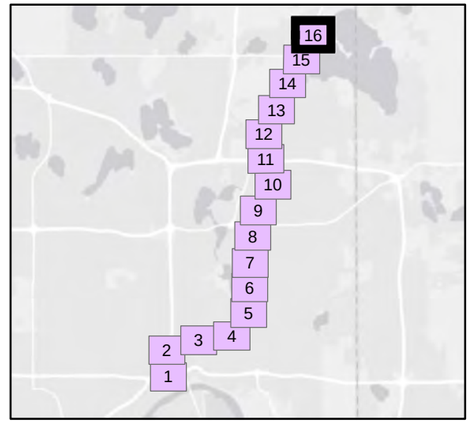
Area of Potential Effect

As Revised on 2/3/2020

Rush Line BRT

Ramsey County, Minnesota

- Area of Potential Effect (2-3-2020)
- Limits of Disturbance (1-31-2020)
- Alignment (1-21-2020)
- Station Platforms (1-21-2020)
- Bridges (1-27-2020)
- Sidewalks and Trails (1-31-2020)
- Park and Rides (1-31-2020)
- Retaining Walls (1-28-2020)
- Potential Stormwater (BMP) Points (9-20-2019)
- Potential Linear Stormwater (BMP) Sites (9-20-2019)



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DEPARTMENT OF TRANSPORTATION

Area of Potential Effect

As Revised on 2/3/2020

Attachment C
Historic Properties in the APE

Inventory or Site No.	Property Name	Address	City	Effect Finding
RA-SPC-4580	Lowertown Historic District	Roughly bounded by Shepard Road, Kellogg Boulevard, Broadway Street, 7th Street, and Sibley Street	Saint Paul	No Adverse Effect with Conditions
RA-SPC-5225, RA-SPC-6907	Saint Paul Union Depot	214 East 4th Street	Saint Paul	No Adverse Effect with Conditions
RA-SPC-5462	Finch, Van Slyck and McConville Dry Goods Company	360–366 Wacouta Street	Saint Paul	No Adverse Effect
RA-SPC-8364	Saint Paul Urban Renewal Historic District	Roughly between 6th Street, Kellogg Boulevard, Wabasha Street, and Jackson Street	Saint Paul	No Adverse Effect
RA-SPC-3168	First Farmers and Merchants National Bank Building	332 Minnesota Street	Saint Paul	No Adverse Effect
RA-SPC-4645	First National Bank of Saint Paul	332 Minnesota Street	Saint Paul	No Adverse Effect
RA-SPC-3167, RA-SPC-3169, RA-SPC-5223, RA-SPC-6903	Pioneer and Endicott Buildings	322–350 North Robert Street, 141 East 4th Street, 142 East 5th Street	Saint Paul	No Adverse Effect
RA-SPC-3170	Manhattan Building (aka Empire Building)	360 North Robert Street	Saint Paul	No Adverse Effect
RA-SPC-3171	Golden Rule Department Store Building	85–95 7th Place	Saint Paul	No Adverse Effect
RA-SPC-3174	Foot, Schulze & Company Building	500 North Robert Street	Saint Paul	No Adverse Effect
RA-SPC-6330	Produce Exchange Building	523 Jackson Street	Saint Paul	No Adverse Effect

Inventory or Site No.	Property Name	Address	City	Effect Finding
RA-SPC-5918	Great Northern Railroad Corridor Historic District	Saint Paul to Minneapolis	Saint Paul	No Adverse Effect with Conditions
RA-SPC-4582	StPM&M Railway Company Shops Historic District	Jackson Street and Pennsylvania Avenue	Saint Paul	No Adverse Effect
RA-SPC-5618	Westminster Junction	Roughly bounded by the Lafayette Road Bridge, I-35E, a line approximately 1,300 feet south of the Cayuga Street Bridge, and a line approximately 400 feet southwest of the Cayuga Street/Phalen Boulevard intersection	Saint Paul	No Adverse Effect with Conditions
XX-RRD-CNW001	StPS&TF/Omaha Road Railroad Corridor Historic District	Saint Paul to Stillwater Junction Segment	Saint Paul	No Adverse Effect with Conditions
XX-RRD-NPR001	LS&M Railroad Corridor Historic District	Saint Paul to White Bear Lake Segment	Saint Paul, Maplewood, Vadnais Heights and White Bear Lake	Adverse Effect
XX-RRD-NPR004	1868 Alignment of the LS&M Railroad	Between Eldridge Avenue East and County Road B East	Maplewood	Adverse Effect
XX-RRD-NPR003	1868 Alignment of the LS&M Railroad	Between Gervais Avenue and County Road C	Maplewood	Adverse Effect
XX-RRD-NPR002	1868 Alignment of the LS&M Railroad	Between Kohlman and Beam Avenues	Maplewood	Adverse Effect
XX-RRD-NPR005	LS&M Railroad Corridor Historic District	White Bear Lake to Hugo Segment	White Bear Lake	Adverse Effect
RA-SPC-2926	Theodore Hamm Brewing Company Complex	Minnehaha Avenue East between Payne Avenue & Stroh Drive	Saint Paul	No Adverse Effect

Inventory or Site No.	Property Name	Address	City	Effect Finding
RA-SPC-0455	3M Administration Building (3M Main Plant, Building 21)	777 Forest Street	Saint Paul	No Adverse Effect
RA-SPC-10850	Phalen Park	1600 Phalen Drive	Saint Paul	No Adverse Effect with Conditions
RA-SPC-8497, RA-SPC-5685	Johnson Parkway	Johnson Parkway from Indian Mounds Park to Lake Phalen	Saint Paul	No Adverse Effect with Conditions
Site 21RA70	Gladstone Shops (Gladstone Savanna Neighborhood Preserve)	Southwest corner of Frost Avenue and English Street	Maplewood	No Adverse Effect
RA-MWC-0134	Moose Lodge 963	1946 English Street North	Maplewood	No Adverse Effect with Conditions[3]
RA-MWC-0106	Madeline L. Weaver Elementary School	2135 Binghamton Street	Maplewood	No Adverse Effect with Conditions
RA-WBC-0031	Polar Chevrolet Bear/Paul R. Bear	1801 County Road F East	White Bear Lake	No Adverse Effect

[3] FTA originally found that the Project would have No Adverse Effect to Moose Lodge 963; MnSHPO did not concur. FTA in consultation with MnSHPO and other Consulting Parties developed conditions to ensure the Project would avoid adverse effects to the historic property. Those conditions are reflected in this MOA.

Attachment D
Standard Mitigation Measure to Repair Unanticipated Damage to Historic Properties in Accordance with SOI Standards

APPLICABILITY

This measure may be implemented either during or after the completion of PROJECT construction to resolve, or resolve in part, an adverse effect identified under MOA Stipulation XIV.

In addition to meeting the Secretary of the Interior's (SOI) Standards for the Treatment of Historic Properties (36 CFR Part 68), as applicable (SOI Standards), repairs to the historic property shall also follow the guidance provided within National Park Service's Preservation Briefs (https://www.nps.gov/tps/how-to-preserve/briefs.htm) to the greatest extent possible.

The Metropolitan Council is responsible for ensuring that the deliverables outlined below are submitted and reviewed as described.

DELIVERABLES:

- Scope of Work, including plans, specifications, and/or other documentation necessary to ensure work is carried out pursuant to the SOI Standards.

- If applicable, a description of new construction protection measures (CPMs) required to avoid additional effects on the historic property

- Historic property inspections as described in MOA Stipulation VII.A.iii.b. As noted in MOA Stipulation XIV, one inspection is required to document the damage to the historic property immediately following discovery of the damage. A post construction historic property inspection is also required to document that the repairs were carried out as planned and that no additional harm was done to the historic property.

Deliverables shall be submitted and reviewed as documented in the Course of Action prepared under Stipulation XIV and as specified during consultation. Unless otherwise specified during consultation, and agreed to in writing, all repairs and deliverables shall be completed no later than one (1) year following the date the Project initiates revenue service operations.

APPENDIX C

SECTION 4(F) CONCURRENCE LETTERS

As the official with jurisdiction over Pedro Park, I concur that the Rush Line Bus Rapid Transit (BRT) Project would not adversely affect the activities, features and attributes that qualify Pedro Park for protection under Section 4(f) and that the temporary occupancy of Pedro Park would not constitute a Section 4(f) use because:

- The duration of use would be temporary (i.e., less than the time needed for construction of the project), and there would be no change in ownership of land.
- The scope of work would be minor (i.e., both the nature and magnitude of the changes to the Section 4(f) resource would be minimal).
- There would be no anticipated permanent adverse physical impacts, nor would there be interference with the protected activities, features or attributes of the resource, on either a temporary or permanent basis.
- The land being used would be fully restored to a condition that is at least as good as that which existed before the project.

I understand that concurrence with the above will result in the Federal Transit Administration making a determination that the Rush Line BRT Project would not result in a Section 4(f) use of Pedro Park.



8/28/2020

Michael Hahm
Director of Parks and Recreation
City of Saint Paul

Date

As the official with jurisdiction over Phalen Regional Park, I concur that the Rush Line Bus Rapid Transit (BRT) Project would not adversely affect the activities, features and attributes that qualify Phalen Regional Park for protection under Section 4(f) and that the temporary occupancy of Phalen Regional Park would not constitute a Section 4(f) use because:

- The duration of use would be temporary (i.e., less than the time needed for construction of the project), and there would be no change in ownership of land.
- The scope of work would be minor (i.e., both the nature and magnitude of the changes to the Section 4(f) resource would be minimal).
- There would be no anticipated permanent adverse physical impacts, nor would there be interference with the protected activities, features or attributes of the resource, on either a temporary or permanent basis.
- The land being used would be fully restored to a condition that is at least as good as that which existed before the project.

I understand that concurrence with the above will result in the Federal Transit Administration making a determination that the Rush Line BRT Project would not result in a Section 4(f) use of Phalen Regional Park.



8/28/2020

Michael Hahm
Director of Parks and Recreation
City of Saint Paul

Date

As the official with jurisdiction over the Bruce Vento Trail access from English Street, I concur that the Rush Line Bus Rapid Transit (BRT) Project would not adversely affect the activities, features and attributes that qualify the Bruce Vento Trail access from English Street for protection under Section 4(f) and that the temporary occupancy of the Bruce Vento Trail access from English Street would not constitute a Section 4(f) use because:

- The duration of use would be temporary (i.e., less than the time needed for construction of the project), and there would be no change in ownership of land.
- The scope of work would be minor (i.e., both the nature and magnitude of the changes to the Section 4(f) resource would be minimal).
- There would be no anticipated permanent adverse physical impacts, nor would there be interference with the protected activities, features or attributes of the resource, on either a temporary or permanent basis.
- The land being used would be fully restored to a condition that is at least as good as that which existed before the project.

I understand that concurrence with the above will result in the Federal Transit Administration making a determination that the Rush Line BRT Project would not result in a Section 4(f) use of the Bruce Vento Trail access from English Street.

Steve Love Public Works Director/City Engineer

Name

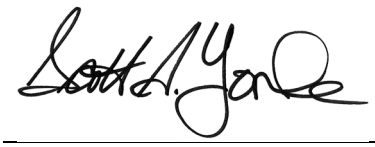
11/30/2020

Date

As the official with jurisdiction over the TCO Sports Garden, I concur that the Rush Line Bus Rapid Transit (BRT) Project would not adversely affect the activities, features and attributes that qualify the TCO Sports Garden for protection under Section 4(f) and that the temporary occupancy of the TCO Sports Garden would not constitute a Section 4(f) use because:

- The duration of use would be temporary (i.e., less than the time needed for construction of the project), and there would be no change in ownership of land.
- The scope of work would be minor (i.e., both the nature and magnitude of the changes to the Section 4(f) resource would be minimal).
- There would be no anticipated permanent adverse physical impacts, nor would there be interference with the protected activities, features or attributes of the resource, on either a temporary or permanent basis.
- The land being used would be fully restored to a condition that is at least as good as that which existed before the project.

I understand that concurrence with the above will result in the Federal Transit Administration making a determination that the Rush Line BRT Project would not result in a Section 4(f) use of the TCO Sports Garden.



9-28-2020

Name – Scott Yonke
Title – Director of Planning and Development
Ramsey County Parks and Recreation Department

Date

As the official with jurisdiction over the Gateway State Trail, I concur that the Rush Line Bus Rapid Transit (BRT) Project would not adversely affect the activities, features and attributes that qualify the Gateway State Trail for protection under Section 4(f) and that the temporary occupancy of the Gateway State Trail would not constitute a Section 4(f) use because:

- The duration of use would be temporary (i.e., less than the time needed for construction of the project), and there would be no change in ownership of land.
- The scope of work would be minor (i.e., both the nature and magnitude of the changes to the Section 4(f) resource would be minimal).
- There would be no anticipated permanent adverse physical impacts, nor would there be interference with the protected activities, features or attributes of the resource, on either a temporary or permanent basis.
- The land being used would be fully restored to a condition that is at least as good as that which existed before the project.

I understand that concurrence with the above will result in the Federal Transit Administration making a determination that the Rush Line BRT Project would not result in a Section 4(f) use of the Gateway State Trail.

Kent Skaar Digitally signed by Kent Skaar
Date: 2021.01.11 06:53:51 -06'00'

1/11/2021

Kent Skaar
Senior Project Manager
Parks and Trails Division
Minnesota Department of Natural Resources
500 Lafayette Road
St. Paul, MN 55155

Date

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Custom House, Room 244
200 Chestnut Street
Philadelphia, Pennsylvania 19106-2904

IN REPLY REFER TO:

June 22, 2021

9043.1
ER21/0180

Mr. William Wheeler
U.S. Department of Transportation
Federal Transportation Administration
200 West Adams Street Suite 320
Chicago, IL 60606

RE: Section 4 (f) Evaluation, FTA Metro Transit Rush Line Bus Rapid Transit (Rush Line BRT) Project, Ramsey County, Minnesota

Dear Mr. Wheeler:

The Department of the Interior (Department) has reviewed the draft Section 4(f) evaluation for construction of a new Bus Rapid Transit (BRT) route in Minnesota. The document considers effects under Section 4(f) of the Department of Transportation Act of 1966 (codified at 49 U.S.C. 303) associated with the project.

Background Information
The U.S. Department of Transportation's Federal Transit Administration (FTA) is proposing construction of a new BRT route connecting Saint Paul, Maplewood, White Bear Township, Vadnais Heights, Gem Lake, and White Bear Lake in Minnesota. The route would add 21 stations and would primarily run along existing roads and rail rights-of-way. An environmental assessment (EA) is being prepared for this project by Ramsey County, on behalf of the Ramsey County Regional Railroad Authority.

Section 4(f) Comments
Section 4(f) applies to both historic and recreational resources impacted by the project. There are 18 public parks and recreation areas within the project area, and 28 historic properties in the project area that are listed in, or eligible for listing in, the National Register of Historic Places.

Historic Properties

The 28 historic properties in the project area include historic structures, railroad depots and alignments, and roadways. The proposed alternative would require temporary occupancy of nine historic properties. The Department concurs with FTA's determination that the temporary occupancy of these sites does not constitute a Section 4(f) use because it would meet the conditions outlined in 23 CFR § 774.13.

Section 4(f) use of five sites is anticipated:

- Madeline L. Weaver Elementary School (*de minimis* impact)
- Lake Superior & Mississippi Railroad Corridor Historic District: Saint Paul to White Bear Lake Segment
- 1868 Alignment of the Lake Superior & Mississippi Railroad between Eldridge Avenue East and County Road B East
- 1868 Alignment of the Lake Superior & Mississippi Railroad between Gervais Avenue and County Road C
- 1868 Alignment of the Lake Superior & Mississippi Railroad between Kohlman Avenue and Beam Avenue

The proposed alternative would result in potential *de minimis* impact under Section 4(f) to the Madeline L. Weaver Elementary School. According to the draft Section 4(f) evaluation, FTA has determined that the project would have no adverse effect to this historic property if certain conditions are met, including reestablishing vegetative screening between the school and project elements, and completing a design review process. The Minnesota State Historic Preservation Office (SHPO) concurred with this determination on January 8, 2021.

The draft Section 4(f) evaluation indicates that all adverse effects to resources associated with the Lake Superior & Mississippi Railroad will be mitigated through continued consultation under Section 106 of the National Historic Preservation Act, including consultation with the Minnesota SHPO. A draft Memorandum of Agreement (MOA) between the FTA and SHPO is included in Appendix C of the EA, which includes several mitigating measures.

The Department concurs with the FTA's determination that there is no reasonable or prudent avoidance alternative to the Section 4(f) use of these properties. The Department also concurs with the determination that the proposed alternative would constitute an adverse effect to these historic properties under Section 106 of the National Historic Preservation Act, and that adverse effects to the Madeline L. Weaver Elementary School could be avoided if vegetative screening and design review are implemented.

The Department has a continuing interest in working with the FTA to ensure impacts to resources of concern are adequately addressed. Final concurrence for this project is contingent on successful mitigation of adverse effects to 4(f) properties through a finalized MOA
For issues concerning Section 4(f) resources, please contact James Lange, Planning and Compliance Program Manager, Regions 3, 4, and 5, National Park Service, 601 Riverfront Drive, Omaha, Nebraska 68102, or by email at James_Lange@nps.gov.

We appreciate the opportunity to provide these comments.

Sincerely,

John V. Nelson
Regional Environmental Officer

Haase, Rachel

From: Beimers, Sarah (ADM) <sarah.beimers@state.mn.us>
Sent: Tuesday, July 6, 2021 5:11 PM
To: Breiseth, Elizabeth (FTA) <elizabeth.breiseth@dot.gov>
Subject: RE: Rush Line Bus Rapid Transit Project, Ramsey County - Draft Environmental Assessment and Section 4(f) Evaluation, SHPO Project# 2019-0985

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Elizabeth,
Thank you for checking in. No, our office does not have any additional comments on the Draft EA and Section 4(f) evaluation.
Sarah

Sarah Beimers (she/her*) **| Environmental Review Program Manager**
State Historic Preservation Office
Minnesota Department of Administration
50 Sherburne Avenue, Suite 203
Saint Paul, Minnesota 55155
(651) 201-3290 | sarah.beimers@state.mn.us

*Why this matters.

The SHPO office is closed to visitors and unable to accommodate in-person research and deliveries. Mail is being delivered to the office via USPS, FedEx and UPS. Our office will continue to take file search requests via DataRequestSHPO@state.mn.us. Check SHPO's webpage for the latest updates and we thank you for your continued patience.

From: Breiseth, Elizabeth (FTA) <elizabeth.breiseth@dot.gov>
Sent: Tuesday, July 6, 2021 6:11 AM
To: Beimers, Sarah (ADM) <sarah.beimers@state.mn.us>
Subject: RE: Rush Line Bus Rapid Transit Project, Ramsey County - Draft Environmental Assessment and Section 4(f) Evaluation, SHPO Project# 2019-0985

This message may be from an external email source.
Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Morning Sarah,

I hope you had a nice holiday weekend. The 45-day public comment period for the Rush Line BRT EA and Section 4(f) evaluation ended on June 25th. I'm checking in to see if your office had any comments outside of those you provided for the MOA.

Thanks, Elizabeth

From: Wheeler, William (FTA) <William.Wheeler@dot.gov>
Sent: Tuesday, May 11, 2021 2:28 PM
To: Beimers, Sarah (ADM) <sarah.beimers@state.mn.us>
Cc: Breiseth, Elizabeth (FTA) <elizabeth.breiseth@dot.gov>; Gitzlaff, Andrew J <andrew.gitzlaff@CO.RAMSEY.MN.US>; Rogers, Michael <Michael.Rogers@CO.RAMSEY.MN.US>; Carlson, Charles (Charles.Carlson@metrotransit.org) <Charles.Carlson@metrotransit.org>; 'Johnson, Chelsa' <Chelsa.Johnson@metrotransit.org>; Jessica.Laabs@kimley-horn.com; Jeanne Witzig (jeanne.witzig@kimley-horn.com) <jeanne.witzig@kimley-horn.com>
Subject: Rush Line Bus Rapid Transit Project, Ramsey County - Draft Environmental Assessment and Section 4(f) Evaluation, SHPO Project# 2019-0985

Sarah,

Attached is notification of the availability of the Draft Environmental Assessment and Section 4(f) Evaluation for the Rush Line Bus Rapid Transit Project. FTA is requesting concurrence on temporary occupancy of nine Section 4(f) Historic Sites, informing the MnSHPO of FTA's intention to make a *de minimus* impact determination for one historic site, and providing for your review and comment of the draft Section 4(f) Evaluation.

A copy of the Draft Environmental Assessment and Section 4(f) Evaluation is available online at: www.rushline.org. Please contact me if you have any questions.

Thank you!

Bill Wheeler
Community Planner
Federal Transit Administration
200 W. Adams Street, Suite 320
Chicago, IL 60606
Phone: 312.353.2639
Fax: 312.886.0351
Email: William.Wheeler@dot.gov

As the official with jurisdiction over Harvest Park, I concur that the use and impacts of the Rush Line Bus Rapid Transit (BRT) Project, combined with the identified avoidance, minimization, and mitigation measures, will not adversely affect the activities, features and attributes that qualify Harvest Park for protection under Section 4(f). I understand that concurrence with the Federal Transit Administration's assessment of the impact will result in the Federal Transit Administration making a Section 4(f) *de minimis* determination for the impacts to Harvest Park.

Marylee Abrams

Marylee Abrams
Mayor
City of Maplewood

July 22, 2021

Date

As the official with jurisdiction over Eastside Heritage Park, I concur that the use and impacts of the Rush Line Bus Rapid Transit (BRT) Project, combined with the identified avoidance, minimization, and mitigation measures, will not adversely affect the activities, features and attributes that qualify Eastside Heritage Park for protection under Section 4(f). I understand that concurrence with the Federal Transit Administration's assessment of the impact will result in the Federal Transit Administration making a Section 4(f) *de minimis* determination for the impacts to Eastside Heritage Park. The permanent project impacts need to go through Saint Paul Parks & Recreation Parkland Diversion process.

michael hahm (Jul 28, 2021 16:18 CDT)

Michael Hahm
Director of Parks and Recreation
City of Saint Paul

Jul 28, 2021

Date

As the official with jurisdiction over Weaver Elementary School, I concur that the use and impacts of the Rush Line Bus Rapid Transit (BRT) Project, combined with the identified avoidance, minimization, and mitigation measures, will not adversely affect the activities, features and attributes that qualify Weaver Elementary School for protection under Section 4(f). The District has identified a need to review fencing and other safety considerations, which will be further examined and agreed upon between the District and the Project during the design process. I understand that concurrence with the Federal Transit Administration's assessment of the impact will result in the Federal Transit Administration making a Section 4(f) *de minimis* determination for the impacts to Weaver Elementary School.

Benjamin Jarman
ISD 622 School Board Clerk

8/19/2021
Date

APPENDIX D

OPEN HOUSE EXHIBITS



WELCOME

RUSH LINE ENVIRONMENTAL ASSESSMENT
VIRTUAL OPEN HOUSE

We will begin shortly.



ENVIRONMENTAL ASSESSMENT

VIRTUAL OPEN HOUSE

JUNE 2 AND 3, 2021

Land Acknowledgement

Every community owes its existence and vitality to generations from around the world who contributed their hopes, dreams, and energy to making the history that led to this moment. Some were brought here against their will, some were drawn to leave their distant homes in hope of a better life, and some have lived on this land since time immemorial. Truth and acknowledgment are critical to building mutual respect and connection across all barriers of heritage and difference.

We are standing on the ancestral lands of the Dakota People. We want to acknowledge the Ojibwe, the Ho Chunk and the other nations of people who also called this place home. We pay respects to their elders past and present. Please take a moment to consider the treaties made by the tribal nations that entitle non-Native people to live and work on traditional Native lands. Consider the many legacies of violence, displacement, migration, and settlement that bring us together here today. And please join us in uncovering such truths at any and all public events.

The acknowledgment given in the USDAC Honor Native Land Guide - edited to reflect Minnesota tribes. In review with SIA and endorsed by Shannon Geshick, Executive Director Minnesota Indian Affairs Council.

Topics

- Virtual meeting procedures.
- Where to view the Environmental Assessment and how to comment.
- Project background and overview.
- Environmental Assessment overview.
  - Purpose.
  - Topics covered.
- Next steps.
- Recorded question and answer with project staff.

Virtual Meeting Procedures

- Attendees may ask questions by using the Q&A or the “raise hand” feature only during the discussion period. The host will unmute you in order of hands raised.
- This open house is being recorded and a summary of the Q&A will be provided in the environmental decision document.
- Email avalenti@srfconsulting.com if you are having issues connecting.
- Closed captions and interpretation services are available for this meeting. Select your preferred language by clicking the globe icon at the bottom of the screen.



Where to View the EA

- rushline.org.
- Ramsey County Law Library, 15 West Kellogg Boulevard, Suite 1815 Courthouse, Saint Paul, MN 55102.
- East Side Enterprise Center, 804 Margaret Street, Saint Paul, MN 55106.
- Ramsey County Library – Maplewood, 3025 Southlawn Drive, Maplewood, MN 55109.
- Vadnais Heights City Hall, 800 East County Road E, Vadnais Heights, MN 55127.
- Gem Lake City Hall, 4200 Otter Lake Road, White Bear Lake, MN 55110.
- Ramsey County Library – White Bear Lake, 2150 2nd Street, White Bear Lake, MN 55110.

How to Comment

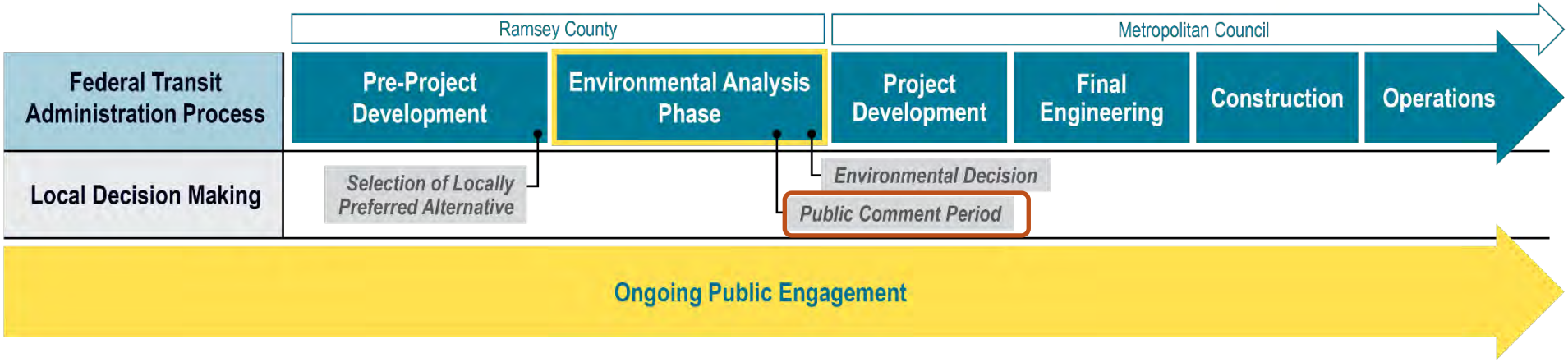
- Submit official comments via:
  - Email to info@rushline.org.
  - Environmental Process page comment form on rushline.org.
  - Via mail to:

    Andy Gitzlaff, Senior Transportation Planner
    Ramsey County
    15 W Kellogg Boulevard, Suite 210 Courthouse
    Saint Paul, MN 55102
- Substantive comments will be responded to in the environmental decision document, which will be published later this year.



Project Background and Overview

Transitway Development Process



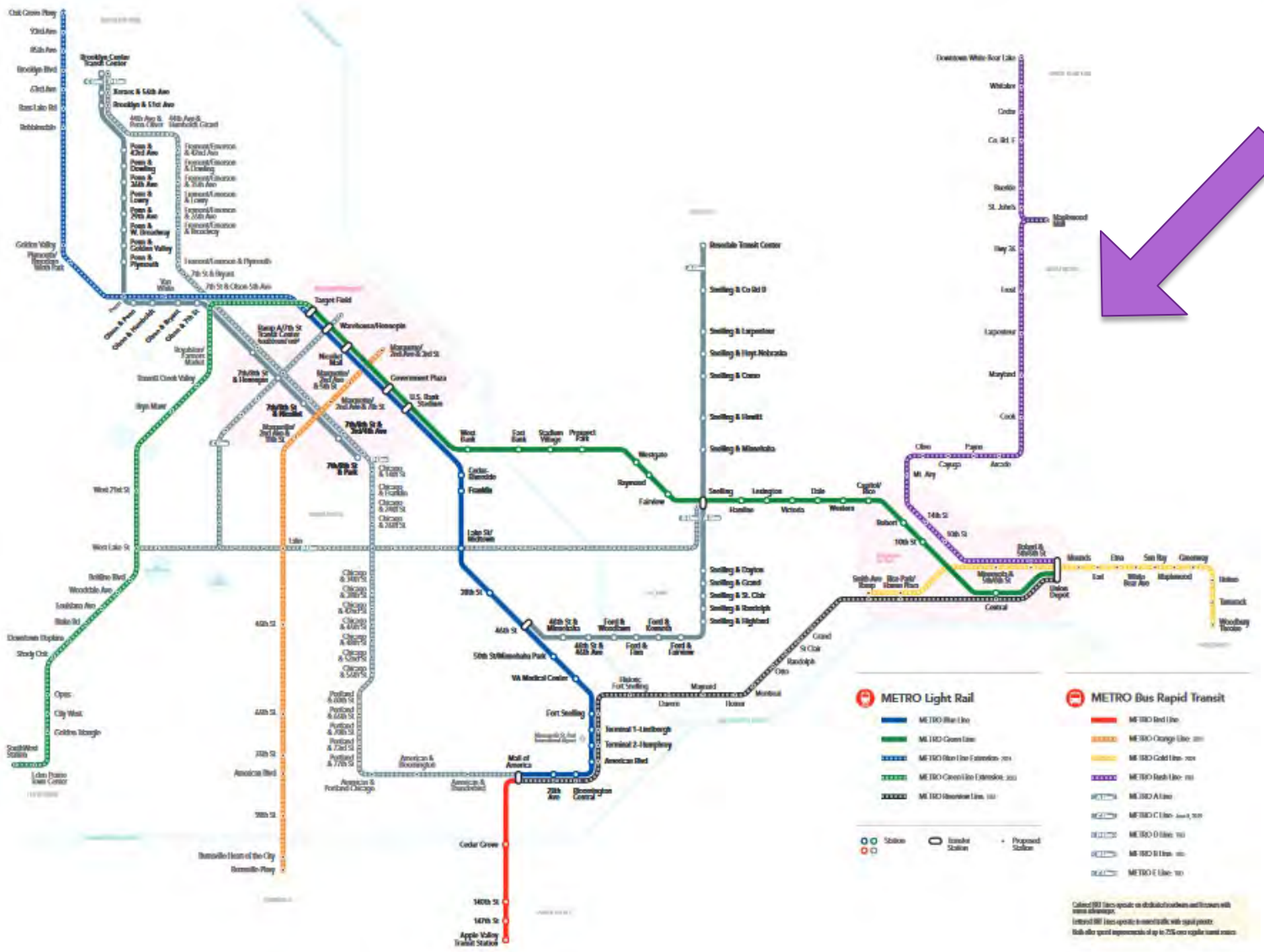
- 2014-2017: Pre-Project Development Study.
  - Evaluated 55 route segments and 7 transit modes to identify Locally Preferred Alternative.
- Environmental analysis phase key tasks:
  - Environmental Assessment.
  - Engineering.
  - Station area planning.
  - Public engagement.
- Construction expected 2024-2026.

Locally Preferred Alternative

- Dedicated guideway BRT.
- Frequent, all day service.
- Phalen Boulevard and Robert Street into downtown Saint Paul.
- Ramsey County rail right-of-way (shared with Bruce Vento Trail).
- Highway 61 north of I-694 into White Bear Lake.
- Explore future connections to Hugo and Forest Lake and other system improvements.



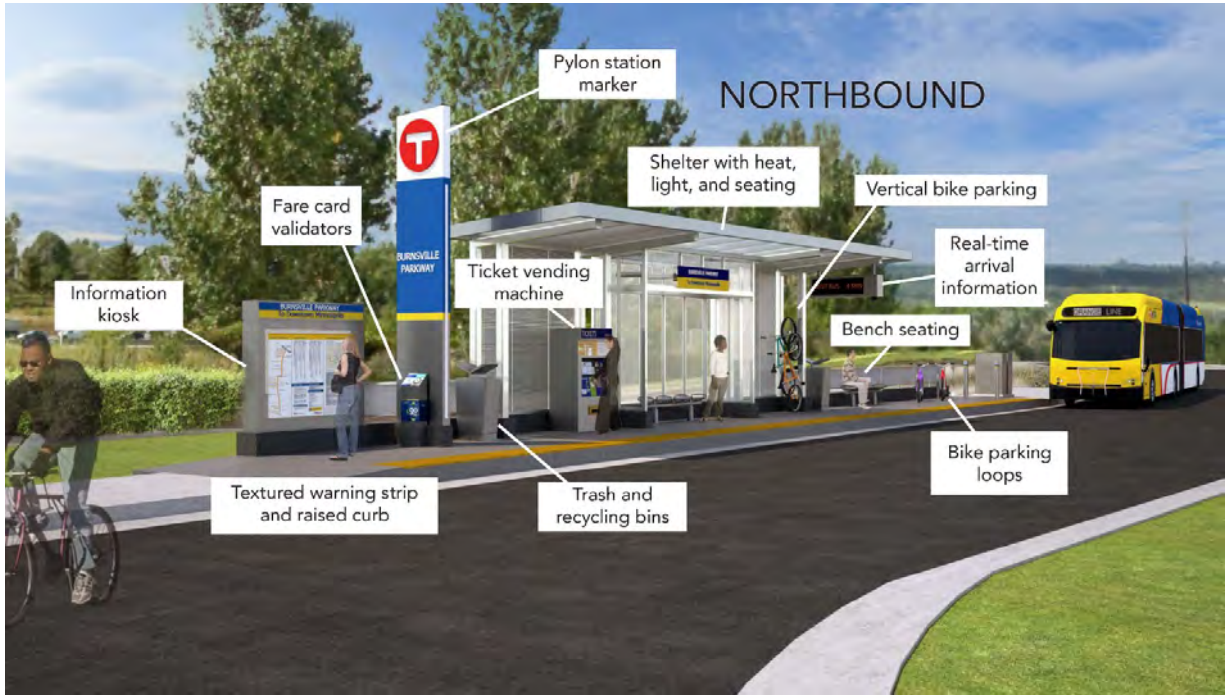
Future Rapid Transit Network



What is Bus Rapid Transit (BRT)

- **High-quality service.**
  - Operates mostly in own lane.
  - Frequent and reliable.
  - Serves different market than express service.

- **Modern buses.**
  - Easy boarding at all doors.
  - Electric, quiet and low-emissions.



METRO Orange Line BRT I-35W & Burnsville Parkway station

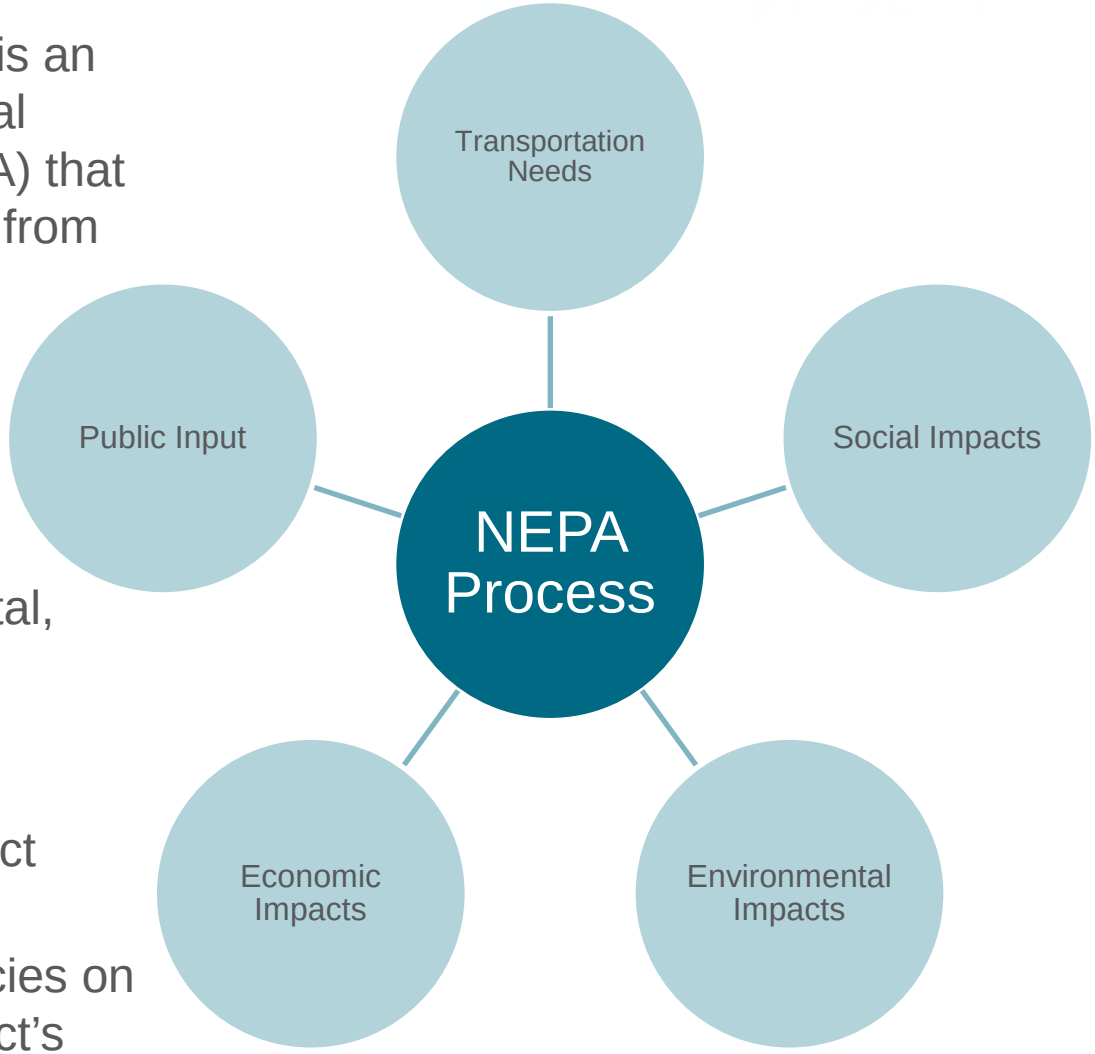
- **Upgraded stations.**
  - Ticket machines, heat, lighting, bike storage, real-time departure signs, raised platforms, maps, benches, and trash and recycling receptacles.



Environmental Assessment Overview

What is an Environmental Assessment?

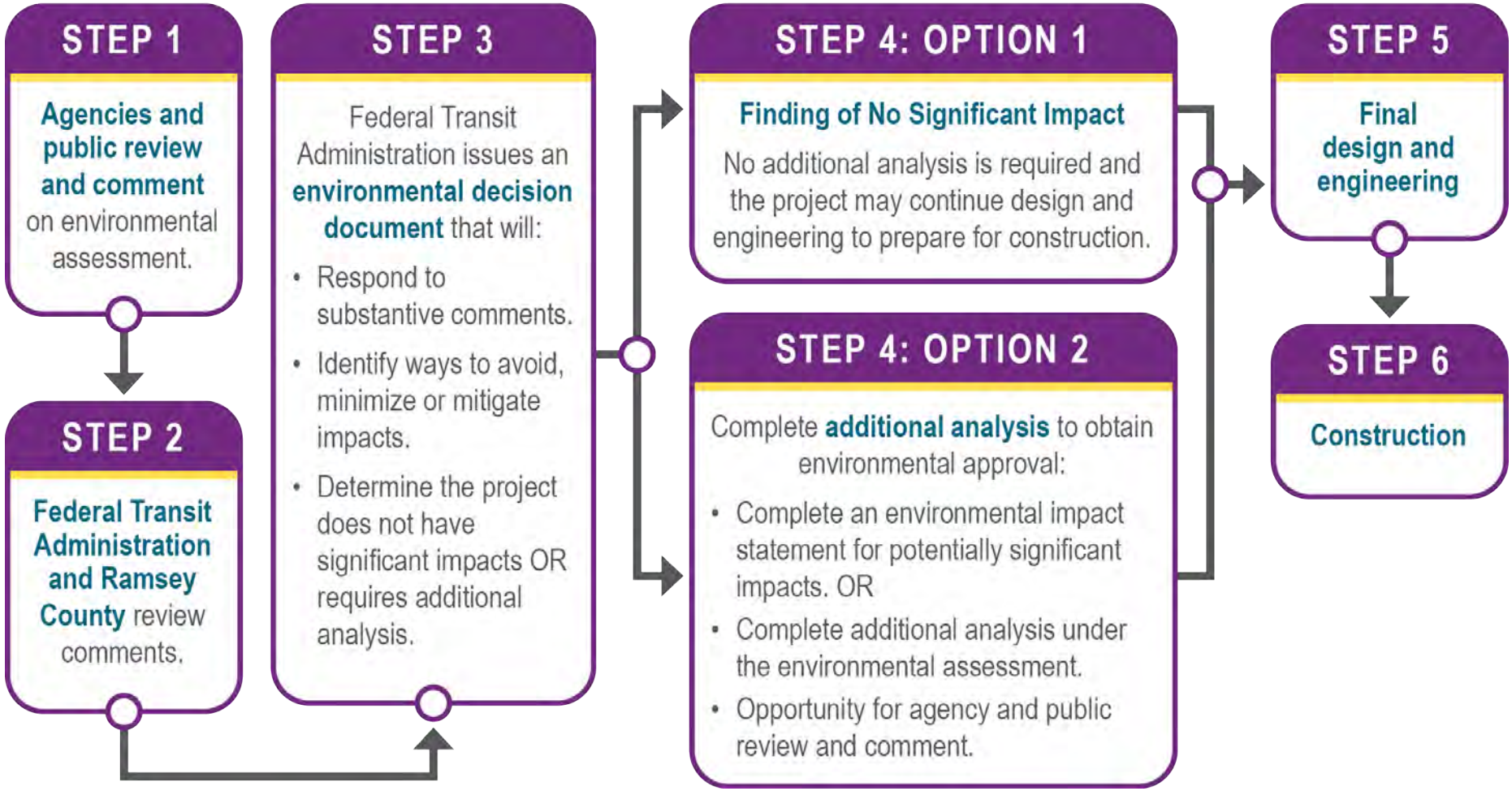
- An Environmental Assessment is an analysis required by the National Environmental Policy Act (NEPA) that evaluates impacts and benefits from proposed projects.
- Purpose:
  - Ensure project compliance with environmental laws.
  - Evaluate project benefits and impacts to environmental, social, economic and transportation resources.
  - Identify solutions to avoid, minimize and mitigate project impacts.
  - Inform the public and agencies on impacts as part of the project's decision-making process.



Who Is Involved?

- Federal Transit Administration (FTA).
  - Lead governmental agency.
  - Ramsey County and Metropolitan Council will pursue project funding through FTA's Capital Investment Grants Program.
- Ramsey County.
  - Project sponsor and Responsible Governmental Unit for state environmental review process.
- Cooperating agency: Federal Highway Administration.
  - Provide input on project's purpose and need, impacts and alternative definition, and resource analyses.

Decision-Making Process



Topics in the Environmental Assessment

- Purpose and need.
- Public and agency coordination.
- Alternatives.
- Transportation resources.
- Community and social resources.
- Physical and environmental resources.
- Section 4(f) resources (parks, recreation areas, wildlife refuges and historic sites).
- Indirect effects and cumulative impacts.
- Section 106 resources (historic and cultural resources).

Purpose and Need

- Purpose: to provide transit service that satisfies the long-term regional mobility and accessibility needs for businesses and the traveling public and supports sustainable development within the study area.
- Needs:



Serving the needs of people who rely on transit



Meeting increasing demand for reliable, high-frequency transit



Planning for sustainable growth and development



Expanding multimodal travel options

Public and Agency Coordination

- Public engagement:
  - Spoke with more than 3,400 people at more than 160 public engagement events to share project information and gather input.
- Agency coordination:
  - Project advisory committees.
  - Resource-specific agencies (e.g., US Army Corps of Engineers, Minnesota Department of Natural Resources).



CLUES Fiesta Latina, August 2019

Alternatives

- Build Alternative.
  - With Highway 36 station park-and-ride.
  - Without Highway 36 station park-and-ride.
- No Build Alternative.



Transportation Resources

RESOURCE AREA	POTENTIAL IMPACTS		
	NO CONCERN	SHORT-TERM	LONG-TERM
Traffic		X	X
Transit		X	X
Parking, driveways and loading zones		X	X
Pedestrian and bicycle facilities		X	X
Freight rail		X	
Aviation	X		

Transportation Resources

- **Traffic:**
  - Queuing issues addressed by adjusting turn lanes, transit signal priority and traffic signal phases.
- **Transit:**
  - Expected to attract new riders; potential temporary stop relocations, closures or route detours would be communicated in advance.
- **Parking, driveways and loading zones:**
  - Build Alternative: net gain of parking spaces.
  - Build Alternative without Highway 36 park-and-ride: net loss of parking spaces.
  - Other permanent impacts: no loading zones affected; loss of one driveway in a commercial area.
  - Construction staging plan would minimize temporary impacts.

Transportation Resources

- **Pedestrian and bicycle facilities:**
  - New connections and upgrades to existing facilities.
  - Reconstruction of segments of the Bruce Vento Regional Trail.
  - Planned in-street bike lane on Phalen Boulevard would not be built; adjacent Bruce Vento Regional Trail is available to bicyclists.
- **Freight rail:**
  - No permanent impacts.
  - Temporary construction easements would affect small portions of three railroad properties.

Community and Social Resources

RESOURCE AREA	POTENTIAL IMPACTS		
	NO CONCERN	SHORT-TERM	LONG-TERM
Land use plan compatibility	X		
Neighborhoods and community resources		X	X
Land acquisitions and relocations		X	X
Visual resources		X	X
Economics		X	X
Safety and security		X	
Environmental justice	X		

Community and Social Resources

- **Neighborhoods and community resources:**
  - Improve access to many community facilities.
  - Minor partial acquisitions along the edge of community facility properties would not include any buildings or impede any property's primary use.
  - Traffic detours, sidewalk closures and construction noise and dust may temporarily affect traffic patterns and neighborhood character.
- **Land acquisitions and relocations:**
  - No full acquisitions would be required.
  - All acquisitions (temporary construction easements and permanent acquisitions) would be partial acquisitions that would not include any buildings or impede any property's primary use.

Community and Social Resources

- **Visual resources:**
  - Construction of guideway and stations would create moderate to high visual contrast in some locations in the short and long term.
  - Mitigation measures include change in station locations and creation of the Ramsey County Rail Right-of-Way Design Guide.
- **Economics:**
  - No full commercial property acquisitions or business displacements would be required; some partial temporary construction easements and permanent acquisitions would be needed.
  - Temporary and permanent loss of on- and off-street parking spaces not anticipated to have adverse impacts.
  - Potential short-term construction impacts to businesses.

Community and Social Resources

- **Safety and security:**
  - Safety programs, public information efforts and other protective measures would be implemented to mitigate potential safety risks posed by construction activity.
  - Safety and Security Plans for Rush Line BRT operation would be created in coordination with local law enforcement and emergency response personnel.
  - Where short-term closures are needed, detour routes would be created for pedestrian, bicycle and vehicular traffic.
- **Environmental justice:**
  - No disproportionately high and adverse effects on minority and low-income populations identified in the study area.
  - Anticipated benefits include improved access to community facilities and overall economic benefits.

Physical and Environmental Resources

RESOURCE AREA	POTENTIAL IMPACTS		
	NO CONCERN	SHORT-TERM	LONG-TERM
Utilities		X	X
Surface water			X
Water quality and stormwater		X	X
Geology, groundwater and soils		X	
Hazardous materials		X	X
Noise and vibration		X	
Protected species and wildlife habitat		X	X
Air quality		X	
Energy	X		
Farmlands	X		

Physical and Environmental Resources

- **Utilities:**
  - Permanent impacts avoided, minimized and mitigated with input from owners.
  - Minimal service disruptions would occur during construction; utility owners would decide whether and when these occur.
- **Surface water:**
  - Floodplain impacts resulting from stormwater management features or roadway modifications; mitigation coordinated with watershed districts and other appropriate agencies.
  - The project is anticipated to impact 1.02 acres of five wetlands, which would be regulated under the Minnesota Wetland Conservation Act. Of these impacts, 0.25 acres of three wetlands are under the jurisdiction of the US Army Corps of Engineers under Section 404 of the Clean Water Act.

Physical and Environmental Resources

- **Water quality and stormwater:**
  - Approximately 27 acres of new impervious surface and 26 acres of reconstructed impervious surfaces.
  - Mitigation coordinated with watershed districts, Minnesota Department of Transportation and Minnesota Pollution Control Agency; potential locations for stormwater management features included in project.
  - Construction would disturb paved and vegetated areas, necessitating temporary stormwater management.
- **Geology, groundwater and soils:**
  - No permanent impacts; dewatering would be coordinated with Minnesota Department of Natural Resources during construction if needed.
  - Erosion control measures will be used as needed during construction and if any soils are removed they will be disposed of or reused in accordance with local ordinances.

Physical and Environmental Resources

- **Hazardous materials:**
  - Site mitigation and management of contaminated and regulated materials would occur as needed.
  - No hazardous or regulated materials would be produced; oils, grease and other waste from vehicle upkeep would be performed in accordance with industry standards.
- **Noise and vibration:**
  - No long-term impacts anticipated.
  - Temporary noise impacts may result from construction; a noise and vibration control plan would mitigate these impacts.

Physical and Environmental Resources

- **Air quality:**
  - No long-term impacts anticipated.
  - Temporary road closures or capacity reductions may result in traffic detouring to parallel roadways, increasing emissions and air pollutants. These are not anticipated to generate concentrations exceeding air quality standards.
  - US Environmental Protection Agency recommended measures would be used to reduce short-term impacts.

Physical and Environmental Resources

- **Protected species and wildlife habitat:**
  - No adverse impacts expected to protected species in project area.
  - Potential impacts to rusty-patched bumble bee and monarch butterfly habitat mitigated by commitment to reseed disturbed areas with native seed mixes.
  - Potential to encounter Blanding's turtle during construction; Minnesota Department of Natural Resources best practices will be followed for work within or near Blanding's turtle habitat.
  - Short-term impacts mitigated through erosion control, stabilization and other best management practice measures.

Section 4(f), Section 6(f) and Section 106

RESOURCE AREA	POTENTIAL IMPACTS		
	NO CONCERN	SHORT-TERM	LONG-TERM
Section 4(f)		X	X
Section 6(f)	X		
Historic properties		X	X

Section 4(f) of the Transportation Act of 1966

- Section 4(f) is federal law that protects publicly owned parks, recreation areas and wildlife and/or waterfowl refuges and publicly or privately owned significant historic sites.
- The evaluation of impacts considers if a project would:
  - Permanently incorporate or temporarily occupy land.
  - Substantially impair protected features due to proximity.
- A project cannot use a Section 4(f) resource unless FTA determines that:
  - The project would have a *de minimis* impact.
  - There is no feasible and prudent avoidance alternative, and the project includes all possible planning to minimize harm to the property.

Section 4(f) of the Transportation Act of 1966

- FTA has complied with Section 4(f) by:
  - Identifying protected properties within the project area.
  - Consulting with officials with jurisdiction of protected properties.
  - Assessing potential impacts and examining ways to avoid impacts.
  - Identifying potential minimization and mitigation strategies.
- *De minimis* impacts:
  - Eastside Heritage Park.
  - Phalen Park.
  - Harvest Park.
  - Weaver Elementary School.
- Section 4(f) use of historic sites.
  - Lake Superior & Mississippi Railroad Corridor Historic District: Saint Paul to White Bear Lake Segment.
  - 1868 Alignment of the Lake Superior & Mississippi Railroad between:
    - Eldridge Avenue and County Road B East.
    - Gervais Avenue and County Road C
    - Kohlman Avenue and Beam Avenue.

Section 106: Historic Properties

- Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their undertakings on historic properties.
- A historic property is any prehistoric or historic district, site, building, structure or object included in or eligible for inclusion in the National Register of Historic Places.



Union Depot, Saint Paul

National Register of Historic Places

- Official list of properties recognized for their significance in American history, architecture, archaeology, engineering and culture.
- A property must retain sufficient integrity to convey its significance and meet one or more of the following criteria:

Criterion A: Association with events, activities or broad patterns of history.

Criterion B: Association with persons significant in the past.

Criterion C: Characteristics of a type, period or method of construction.

Criterion D: Potential to yield information.

Section 106 Process

Step 1

Initiate the process by inviting the State Historic Preservation Office, Tribal Historic Preservation Offices, and other interested parties into consultation.

Step 2

Identify historic properties within a defined Area of Potential Effects.

Step 3

Assess how those historic properties might be affected by the project.

Step 4

Resolve adverse effects, if any, through reaching agreement with consulting parties on measures to avoid, minimize or mitigate the effects.

Assessment of Effects

- FTA has determined that the Rush Line BRT Project will have an **Adverse Effect** on historic properties.

- In particular, the project will have:
  - No Adverse Effect on 14 historic properties.
  - No Adverse Effect, with conditions, on 9 historic properties.
  - Adverse Effect on 5 historic properties.

Section 106 Memorandum of Agreement

- Outlines the measures identified to avoid, minimize or mitigate any adverse effects to historic properties.
- Identifies design development and review processes that will be followed before and during construction.
- The Memorandum of Agreement is available for public review and comment during the Environmental Assessment public comment period.
- Public comments will be considered by the Federal Transit Administration in consultation with the Minnesota State Historic Preservation Office and consulting parties prior to the finalization of the Memorandum of Agreement. The final document and associated reporting will be available at rushline.org.



Next Steps

Environmental Assessment/Environmental Assessment Worksheet Schedule

Timeframe	Activity
May 11 – June 25, 2021	45-day public comment period
June 2, 3 and 17, 2021	Open houses
Summer 2021	• Concurrence from officials with jurisdiction on *de minimis* impacts to Section 4(f) resources. • Finalize Section 106 Memorandum of Agreement.

Environmental Assessment/Environmental Assessment Worksheet Schedule

Timeframe	Activity
October 2021	• Federal Transit Administration issues environmental decision document (includes final Section 4(f) determination). • Ramsey County issues state environmental decision document. • Federal Highway Administration issues environmental decision document as cooperating agency (needed for interstate right-of-way use approval).
Fall/winter 2021	• Rush Line BRT Project transitions to the Metropolitan Council after environmental decision.



Discussion

How to Comment

- Submit official comments via:
  - Email to info@rushline.org.
  - Environmental Assessment comment form on rushline.org.
  - Via mail to:

    Andy Gitzlaff, Senior Transportation Planner
    Ramsey County
    15 W Kellogg Boulevard, Suite 210 Courthouse
    Saint Paul, MN 55102
- Substantive comments will be responded to in the environmental decision document, which will be published in fall 2021.

Questions?

- Please stay on topic and be respectful.
- Attendees may ask questions by using the Q&A or the “raise hand” feature only during the discussion period. The host will unmute you in order of hands raised.
- Panelists:
  - Andy Gitzlaff, Ramsey County Project Manager.
  - Frank Alarcon, Ramsey County Deputy Project Manager.
  - Barbara Howard, Minnesota Department of Transportation historian.
  - Jeanne Witzig, Consultant Team Project Manager.
  - Jessica Laabs, Consultant Team Environmental Lead.
  - Jim Gersema, Consultant Team Design Lead.
- A summary of the Q&A will be provided in the final environmental document.



Thank you!

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ENVIRONMENTAL ASSESSMENT VIRTUAL OPEN HOUSE

Q&A SESSION SUMMARY

On June 2 and 3, 2021, Rush Line Bus Rapid Transit (BRT) Project staff held a set of virtual open houses to provide information about the Environmental Assessment prepared for the Rush Line BRT Project. Recordings of the virtual open houses are available online:

- June 2.
- June 3.

A summary of the questions asked by attendees and the answers provided by project staff is below. In some cases, links have been included to share additional information.

PROJECT OVERVIEW

Locally Preferred Alternative

Question: **How was BRT chosen as the mode of transit instead of light rail?**

Answer: The Pre-Project Development Study (2014-2017) examined 55 route segments and several types of transit through an extensive public engagement and technical evaluation process to determine which route and type of transit would best meet the project's overall purpose and need. Light rail, commuter rail, modern streetcar, bus rapid transit (BRT) and local bus service were all evaluated in the Pre-Project Development Study, and BRT proved to be the best transit mode. BRT provides a similar quality of service to light rail at roughly half of the cost and does not have the potential noise and vibration impacts of light rail. It is faster than local bus service and offers high quality amenities such as improved stations, off-board fare payment and more.

The route and BRT alternative selected serves the highest number of riders, including people who rely on transit, and provides the greatest potential for economic development while maximizing cost effectiveness.

Question: **How long will it take to travel from Saint Paul to White Bear Lake?**

Answer: The travel time from Union Depot in Saint Paul to the Downtown White Bear Lake station is estimated to be approximately 45 to 50 minutes. The travel time estimate will be refined as the project design is advanced.

Vehicle Selection

Question: **Metro Transit recently decided to purchase biodiesel buses instead of electric buses. Would Rush Line BRT also use biodiesel buses?**

Answer: The Environmental Assessment prepared for the Rush Line BRT project assumes the use of an electric vehicle fleet.

Metro Transit has tested electric buses on the METRO C Line. These buses have not performed as well as anticipated on measures including range and charging infrastructure. Over the next few years, Metro Transit will evaluate improvements to battery technology and other electric bus components to determine whether it will be feasible to purchase electric buses to use when Rush Line BRT begins operations in 2026.

Question: **If batteries do not provide enough electricity for buses to operate, will overhead wires be used to power buses?**

Answer: The project does not intend to use overhead wires. Buses will be charged overnight in Metro Transit garage facilities. Battery range may be extended by on-route chargers at one or both ends of the route.

Question: **Will Rush Line BRT buses have bike racks?**

Answer: Yes, Rush Line BRT buses will have bike racks on the front bumper. Rush Line BRT stations will also have bike racks.

Ridership and Cost

Question: **What percent of the project capital cost is expected to be funded federally?**

Answer: Projects such as Rush Line BRT can apply for funding through the Federal Transit Administration's Capital Investment Grants program. To qualify, the project must meet several criteria including ridership, cost effectiveness, environmental benefits and congestion relief as well as land use and economic development. Based on the current program guidelines, the project can receive up to half its funding through this program. The Rush Line BRT Project will apply for this program in fall 2021.

Ramsey County will provide the remainder of funding for the project's capital cost from the Ramsey County Regional Railroad Authority levy and the Ramsey County transit sales tax, which is a 0.75 percent sales tax that is used to pay for the Ramsey County share of METRO Green Line operations costs as well as transit capital projects. The project will also seek state funding, though it has not been committed yet. Operations costs will be funded by the Ramsey County sales tax and state funds provided through the Metropolitan Council.

Question: **Has the project been adjusted to reflect ridership changes resulting from the COVID-19 pandemic?**

Answer: Ridership forecasts were completed based on data collected before the pandemic began. These forecasts used several inputs including current transit system ridership, changes in ridership over time, travel patterns, population and employment densities, and an on-board transit survey that was completed in 2018.

While transit ridership declined during the COVID-19 pandemic not only in the Twin Cities region but throughout the country, the Rush Line BRT Project remains a long-term investment in the region's transportation system. People will continue to count on transit to meet their transportation needs. Thus, planning for Rush Line BRT is continuing during the COVID-19 pandemic. In fact, the pandemic has underscored the importance of transit in providing essential workers with a means to get to work and to provide essential services. During the pandemic, existing BRT service had some of the highest numbers of rides by essential workers even as service was limited. Pandemic protocols were also put in place to help keep customers and staff safe, including asking customers to not take transit unless it was an essential trip. As these protocols are lifted, transit ridership is beginning to rebound.

After the pandemic, ridership projections suggest that people will return to transit and will seek high-quality options with frequent service. While many employers have

transitioned to remote work during the pandemic, studies have found that less than 40 percent of jobs can be done from home; the remaining 60 percent cannot be done remotely. Today, as restrictions are slowly relaxing and as we navigate our new normal, Ramsey County and its partners continue to look beyond the pandemic to build the transportation system of the future and be a part of our economic recovery. The Rush Line BRT project is a part of transit's future, providing a frequent, all-day service.

After the pandemic, even more people will need to get to work, education opportunities, daily errands and appointments, as well as recreation. As residents adjust to new working styles, commuting patterns are likely to look different. The fast, frequent, and all-day service of the Rush Line BRT will provide residents the flexibility to ride anytime, without a schedule. As Rush Line BRT planning continues, Ramsey County and its partners will continue to monitor and account for trends in travel patterns, including those related to COVID-19, to assess whether any adjustments may be needed.

Question: **How did you obtain rider preferences from prospective riders, especially in light of travel behavior changes and increased levels of remote work resulting from the COVID-19 pandemic?**

Answer: Metro Transit conducts an on-board ridership survey every few years. The most recent ridership survey was completed in 2018 and the next survey is scheduled to be conducted in 2022. This survey will provide a better understanding of how travel behaviors have changed as a result of COVID-19. The Rush Line BRT Project will continue to make adjustments to reflect new data.

Studies have found that only about 40 percent of jobs can be done fully remotely; the remaining 60 percent require commuting to a work site. With the high number of healthcare facilities, restaurants, retail stores and other locations that require employees to be on-site, it is expected that demand for transit service to these areas will continue during and after the COVID-19 pandemic.

Route and Stations

Question: **Why is a dedicated guideway bridge being built over I-694 when Rush Line BRT could have used County Road D to connect to Highway 61?**

Answer: Several route options were evaluated, including using County Road D to connect to Highway 61. The bridge over I-694 was selected because it has a significant travel time savings compared to using County Road D. These travel time savings are beneficial because they make the service more attractive to transit users and because they reduce operation times, therefore reducing operation costs.

Question: **Will Highway 61 be reduced to one lane in each direction from County Road F to Whitaker Street?**

Answer: No, the Rush Line BRT Project will not reduce Highway 61 to one lane in each direction at any point along the route. Shoulder space on Highway 61 will be converted to business access and transit (BAT) lanes from Buerkle Road to approximately Whitaker Street. The Rush Line would operate in mixed traffic from Whitaker Street to the end of the route at the Downtown White Bear Lake station and new lanes will not be constructed in this area.

Question: **Where will stations be located in Vadnais Heights and White Bear Lake?**

Answer: The County Road E station is located in Vadnais Heights. Stations will be located at Buerkle Road, Cedar Avenue, Whitaker Street and 8th Street in White Bear Lake as shown on the map found on the project fact sheet.

Operations and Maintenance

Question: **How would snow removal along the Bruce Vento Regional Trail be managed?**

Answer: A maintenance plan, addressing topics including snow removal, will be created for the portion of the route that will be co-located with the Bruce Vento Regional Trail in the Ramsey County rail right-of-way. The Ramsey County rail right-of-way is 100 feet wide in this area, providing sufficient space to remove snow from the guideway and the trail and store it beyond the curb line. The project stormwater management plan will account for drainage as the snow melts in the spring.

Question: **There has been a nationwide increase in hate crimes over the past few years. How would the project ensure safety for riders?**

Answer: Transit facilities in the Twin Cities follow best practices for safety and security with multiple security cameras, emergency call buttons, and open layouts that are well-covered with lighting for high visibility. Rush Line BRT stations and park-and-ride lots will have these same safety features. Uniformed and plainclothes Metro Transit Police continually patrol transit routes, vehicles and stations. Like other METRO lines, transit police officers will inspect fares on board Rush Line BRT vehicles. Buses are each equipped with multiple security cameras. Bus drivers continually serve as "eyes on the street" and have instant radio and silent communications capability with police dispatch.

Other Questions

Question: **Will there be improvements for pedestrians crossing Highway 61 to access the Whitaker Street station?**

Answer: Yes. The Rush Line BRT Project proposes a new traffic signal at the intersection of Highway 61 and Whitaker Street. Improvements will be made to enhance pedestrian safety and allow time to cross Highway 61.

Question: **Have you considered running 30- to 60-minute transit service on an existing road like Arcade Street or Highway 61 before building this project?**

Answer: Low-frequency service tends to have low ridership because it is not as convenient to use. The Pre-Project Development Study showed demand for high-frequency transit service, and low-frequency service would not meet the project's purpose and need and is therefore not under consideration.

Question: **Instead of building the Rush Line, have you considered implementing service directly to special events such as sporting events and concerts?**

Answer: The purpose of the Rush Line BRT Project is to provide transit service that satisfies the long-term regional mobility and accessibility needs for businesses and the traveling public and supports sustainable development within the study area. The Rush Line BRT Project need is to serve the needs of people who rely on transit; meet increasing

demand for reliable, high-frequency transit; plan for sustainable growth and development; and expand multimodal travel options. Frequent, all-day service is necessary to help people get to school, work, medical appointments and other destinations. Running a charter service to sporting events and concerts would not meet the purpose and need of the project and is therefore not under consideration.

Question: **Could the Rush Line BRT guideway and dedicated lanes be used for autonomous vehicles in the future?**

Answer: Possibly. As technology evolves, dedicated transit lanes could potentially be used for other transportation services such as autonomous vehicles.

Question: **How many people attended each virtual open house?**

Answer: Approximately 30 members of the public attended the virtual open house held on Wednesday, June 2. 10 members of the public attended the virtual open house held on Thursday, June 3.

Question: **Will additional events be scheduled because of the low turnout by the public at these sessions?**

Answer: An in-person open house is scheduled for June 17, 2021. After the conclusion of the environmental process, public engagement will continue as the design is advanced over the next three years.

ENVIRONMENTAL PROCESS AND IMPACTS

Question: **Where is the project in the environmental decision-making process?**

Answer: The project is in step one of the environmental decision-making process, during which agencies and the public review and comment on the Environmental Assessment, as described in the Environmental Assessment overview handout.

Question: **Would there be impacts to the property at 4648 Highway 61?**

Answer: No, there would not be any short- or long-term property impacts at this location. Rush Line BRT would operate in mixed traffic from Whitaker Street to the end of the route at the Downtown White Bear Lake station and new lanes will not be constructed in this area.

From Buerkle Road to approximately Whitaker Street, shoulder space on Highway 61 will be converted to business access and transit (BAT) lanes.. Private vehicles will be able to use these BAT lanes to turn right at intersections and to access businesses. Some typical roadway construction impacts would occur near Whitaker, 7th and 8th Streets in White Bear Lake. A traffic management plan will be created to direct traffic around and through construction zones while maintaining access to all nearby properties.

Question: **What is a permanent acquisition?**

Answer: A permanent acquisition is one that the project needs to acquire to construct and operate the project. While there will be permanent acquisitions, no residents or businesses will be displaced, and no buildings or other structures will be acquired. No permanent acquisitions will impede the primary use of the property. Additional detail is provided in Table 9 of the Environmental Assessment.

Question: **Will any part of Railroad Park in White Bear Lake be used for Rush Line BRT?**

Answer: No. Rush Line BRT will operate in existing travel lanes on Highway 61 north of Whitaker Street; thus, no changes are needed near the intersection of Highway 61 and 4th Street, and there would be no impacts to Railroad Park.

Question: **Will the Lower Phalen Creek Daylighting Project be addressed as part of the project?**

Answer: The Lower Phalen Creek Project is an organization based on the east side of Saint Paul that is advocating for daylighting Lower Phalen Creek, which once ran between Lake Phalen and the Mississippi River and was moved underground approximately 100 years ago. The Lower Phalen Creek Project is looking for opportunities to bring this creek to the surface. Ramsey County has been collaborating with the Lower Phalen Creek Project to explore opportunities to incorporate elements of the creek daylighting vision into the Rush Line BRT Project design and specifically the stormwater design for the project.

Ramsey County has also worked with the City of Saint Paul and the local watershed district to identify locations along the Rush Line BRT route where aspects of the daylighting project can be incorporated. This work has identified two locations along Phalen Boulevard where Rush Line BRT stormwater design brings water to the surface in a way that reflects the creek daylighting project: near the intersection of Arcade Street and Neid Lane and the intersection of Frank and Earl Streets.

As the project design is advanced over the next three years, the project will continue to collaborate with Lower Phalen Creek Project. Coordination that has occurred to date is documented in the Environmental Assessment and its appendices.

Question: **Would the Rush Line BRT Project impact surface water or water quality? Would there be salt runoff from the guideway into Lake Phalen?**

Answer: The Rush Line BRT Project is not anticipated to negatively impact surface water or water quality. New impervious surface will be constructed as part of the project, which could result in runoff to nearby bodies of water. The Environmental Assessment identifies ways to control and treat runoff and protect nearby water features such as Lake Phalen during construction and operation of the project. These treatments include vegetation and stormwater ponds.

Question: **Why is a new park-and-ride being considered at the Highway 36 station when one already exists at Maplewood Mall? How would this affect Harvest Park?**

Answer: Approximately half of the Maplewood Mall Transit Center park-and-ride capacity was used on a typical weekday before the COVID-19 pandemic began. Ridership projections, detailed in the Environmental Assessment and appendices, show that the available capacity of the Maplewood Mall Transit Center park-and-ride would not be sufficient to capture all of the potential demand of the project. One of the key project goals is to serve as many riders as possible and the Highway 36 park-and-ride provides the advantage of serving additional riders, particularly those who may be coming from the east rather than from the north.

The Environmental Assessment also evaluates the Build Alternative without the Highway 36 park-and-ride to better inform decision-making. Including the park-and-ride

in the project is expected to generate greater ridership overall. The project's operations and maintenance plan will identify which agencies are responsible for each aspect of the project, including the park-and-ride facility and park features.

Question: **How will wildlife habitat in the Ramsey County rail right-of-way, particularly rusty patched bumble bee habitat, be affected by the Rush Line BRT Project?**

Answer: Ramsey County has consulted with the US Fish and Wildlife Service, the governing authority on wildlife habitat, regarding potential impacts to this resource. Based on this consultation, the Rush Line BRT Project is not expected to adversely affect the rusty patched bumble bee, though it may have some effect on the grassland habitat within the potential area of disturbance. Additional information is included in the Natural Resources Technical Report, found in Appendix E of the Environmental Assessment. Habitat disturbance would occur outside of the active season for the rusty patched bumble bee, and any area disturbed would be reseeded with pollinator-friendly native seed mixes that would benefit bees and other pollinators.

Question: **Did the Tribal Historic Preservation Office have any input on project impacts?**

Answer: The Rush Line BRT Project does not use any land under the direct jurisdiction of the Tribal Historic Preservation Office. The Federal Transit Administration, as part of its governmental relationship with Native American tribes, invited all tribes that have an interest in the project area to be part of the consultation under Section 106 of the National Historic Preservation Act. None of the tribes invited chose to participate in consultation, though tribes can choose to join the consultation process at any time.

Question: **What measures will be implemented to mitigate noise from buses in areas that currently do not have much transit service, such as in downtown White Bear Lake?**

Answer: The Environmental Assessment determined that there would not be long-term noise impacts as a result of the Rush Line BRT Project because buses in White Bear Lake would primarily operate on Highway 61, which already serves a high volume of traffic, and because the project will use rubber-tired buses, which do not generate enough noise to create an impact.

Question: **How will Rush Line BRT impact traffic around the new White Bear Lake Area High School?**

Answer: Ramsey County has been coordinating with the White Bear Lake School District to address questions about traffic and other changes resulting from the high school and Rush Line BRT projects. During peak times, six Rush Line BRT buses will travel in each direction on Highway 61 in an hour. Highway 61 serves approximately 25,000 vehicles per day, so the addition of these buses is not anticipated to affect traffic.

To improve traffic operations around the Downtown White Bear Lake station and the White Bear Lake Area High School, a new traffic signal will be added at the intersection of Highway 61 and 8th Street as part of the Rush Line BRT Project. The Rush Line BRT Project is also proposing pedestrian improvements along 7th and 8th Streets to increase accessibility for the Downtown White Bear Lake station as well as the new high school. Additionally, students, faculty and staff may use the Rush Line to get to the school, further mitigating congestion. The Rush Line BRT Project will continue coordinating

with the School District regarding traffic mitigation as plans are advanced for the Rush Line and the new high school.

Question: **How many trees are expected to be removed and what species are those trees?**

Answer: There is not yet an estimate for how many trees would be removed as part of the project. Most trees that would be removed are invasive species and have diameters of less than two inches. New trees will be planted and vegetation will be restored as construction progresses. Additional information about landscape restoration can be found in the Ramsey County Rail Right-of-Way Design Guide.

Question: **What is considered a significant number of trees to be removed?**

Answer: The Environmental Assessment does not include a specific threshold for significance of tree removal. As indicated in the Environmental Assessment, construction and operation of the Rush Line BRT Project would require removal of some vegetation, particularly within the Ramsey County rail right-of-way. As the project design is advanced, the project is working to minimize impacts to vegetation, and preserve to the extent possible trees of high value. High value trees are defined as durable, slow growth, hard-wooded trees that may provide seasonal interest and that are in good health with a diameter at breast height of at least six inches. The project will also undertake mitigation measures including planting new vegetation in compliance with local, regional and state requirements.

Question: **Can federal funds be used to remove and replant trees?**

Answer: Yes, federal funds can be used to remove and replant trees.

Question: **The Economics section (Section 3.2.8.) of the *Environmental Assessment* (page 31) asserts that the Rush Line BRT Project will "pay for itself" by 2033. How many riders would have to use Rush Line BRT to achieve this?**

Answer: This calculation is based on the cumulative economic impact of the project through 2040 rather than its ridership. A public sector project is said to pay for itself in economic terms when the cumulative economic activity impact of the project surpasses the public cost from all sources. The Metropolitan Council's REMI-PI model was used to estimate the project's future economic impacts. The Rush Line BRT Project is expected to add $96 million to the gross state product and 124 new jobs from the start of operations through 2040. Of the 124 new jobs, 50 would be directly created by the transit industry and 74 would be jobs in other industries.

Question: **It looks like 48 parking spaces would be removed in downtown White Bear Lake. Would those be replaced?**

Answer: No. The 48 parking spaces that would be removed in White Bear Lake are located in public right-of-way adjacent to the White Bear Shopping Center off Highway 61.

RAMSEY COUNTY RAIL RIGHT-OF-WAY AND BRUCE VENTO REGIONAL TRAIL

Question: **Has Ramsey County polled users of the Bruce Vento Regional Trail and adjacent residents about the Rush Line BRT Project? Have you met with owners of the adjacent properties to discuss changes affecting their property?**

Answer: Ramsey County has conducted extensive public engagement within the Ramsey County rail right-of-way. In 2019, Ramsey County sent a mailing to property owners and residents adjacent to the trail and one to two blocks away from the trail. Ramsey County also organized a series of four pop-up events that were held at different points along the trail in June 2019. At these events, Ramsey County sought input about preferred characteristics and features for the reconstructed trail such as buffers between trail users and the BRT guideway. This input was used in the creation of the Ramsey County Rail Right-of-Way Design Guide, which will be used in developing a safe dedicated guideway and shared-use trail. This document also includes a summary of the public engagement that was conducted in the area. If any residents or property owners are interested in discussing specific questions, Ramsey County would be happy to schedule a meeting after the environmental decision document is published in fall 2021. Contact information is available at rushline.org.

Question: **How will safety be maintained for wildlife crossing the guideway in the Ramsey County rail right-of-way?**

Answer: The Ramsey County Rail Right-of-Way Design Guide includes information about safety measures for wildlife such as fencing, which can prevent crossings and reroute wildlife to safer locations, and culverts, which smaller animals and reptiles can use to cross under the guideway and trail. Additional safety measures will be developed as design progresses.

Question: **Will trees be clear-cut along the Bruce Vento Regional Trail for Rush Line BRT construction?**

Answer: There will be tree removal within the Ramsey County rail right-of-way as part of construction activities. Tree removal will primarily occur within Ramsey County rail right-of-way. Removal of trees on private property is not anticipated.

The Ramsey County Rail Right-of-Way Design Guide includes details about revegetation of the Bruce Vento Regional Trail and introduction of new trees in the area following construction of Rush Line BRT.

Question: **Has the plan for the reconstructed Bruce Vento Regional Trail been created? Will there be improvements to the trail along Phalen Boulevard?**

Answer: The project's 15% concept plans show the location of the reconstructed Bruce Vento Regional Trail. The Ramsey County Rail Right-of-Way Design Guide outlines recommendations for pedestrian facilities, vegetation, landscaping and other trail amenities along different segments of the trail including the portion along Phalen Boulevard. This document also shows how the trail, guideway and stations will interact with each other.

Question: **How will the Bruce Vento Regional Trail fit with the Rush Line BRT guideway?**

Answer: The Ramsey County rail right-of-way is approximately 100 feet wide. The Bruce Vento Regional Trail will be 12 feet wide and the guideway will be 26 feet wide in this segment of the route. The remaining space in the right-of-way will include vegetation, landscaping, stormwater facilities and buffer space separating the guideway, trail and adjacent properties. The Ramsey County Rail Right-of-Way Design Guide includes preliminary renderings showing where the trail and guideway will each be located as well as some landscaping and vegetation concepts.

Question: **How will stormwater and runoff be managed in the Ramsey County rail right-of-way?**

Answer: The stormwater management plan created for the project will address collection and treatment of runoff from the guideway and trail. The project will continue to coordinate with watershed districts and it will comply with watershed district regulations.

Question: **What measures will be used to visually separate homes along the Bruce Vento Regional Trail from the BRT guideway and block bus noise from traveling to these homes?**

Answer: There are no plans to construct noise walls or other similar visual barriers between the Ramsey County rail right-of-way and adjacent properties, though vegetation and landscaping will be used to create a visual screen and maintain privacy where applicable. A maximum of six buses would use the guideway in each direction per hour, and buses do not generate significant noise. The noise analysis conducted for the Environmental Assessment indicates that there would not be noise impacts above acceptable levels associated with the Rush Line BRT Project.

Question: **Will project staff conduct walk-throughs to share information about changes to the Ramsey County rail right-of-way and Bruce Vento Regional Trail?**

Answer: As the design of the project advances over the next few years, there will be additional public engagement, including along the Bruce Vento Regional Trail.

Question: **How will safety be maintained for Bruce Vento Regional Trail users, especially children? Will there be gate arms where the guideway intersects with local streets?**

Answer: Safety is a priority of the Rush Line BRT Project. A maximum of six buses per hour in each direction will use the guideway, and buses will be operated by professional drivers, creating a safe travel environment for all users. Landscaping and vegetation will be used to help guide trail users to stay on the trail and away from the guideway, further enhancing safety in the area.

Where the guideway and trail intersect with local streets, there will be enhanced crossing treatments including traffic signals or other devices to make it clear that it is an intersection with vehicle traffic, but there will not be gate arms, bells or other warnings typically implemented with light rail transit.

Question: **Page 20 of the Ramsey County Rail Right-of-Way Design Guide shows a rendering in which the Bruce Vento Regional Trail and Rush Line BRT guideway seem to be raised above the surrounding area. Would that be the case along the full trail?**

Answer: No, conditions vary throughout the Ramsey County rail right-of-way. The Rush Line BRT guideway and Bruce Vento Regional Trail will remain at approximately the same elevation that exist in the area today, whether that is at-grade with, raised or lowered compared to the surrounding topography.



Rush Line

B R T

Rush Line Bus Rapid Transit

OPEN HOUSE

June 2021



At today's open house you can review, ask questions about and provide input on the Environmental Assessment.

Open house format:

- View boards and map.
- Review Environmental Assessment.
- No formal presentation.
- Talk with project staff.
- Provide comments.

Provide your comments May 11 – June 25, 2021:

Today's Meeting:

- Verbally to court reporter (comments to staff will ***not*** be part of the record).
- Written comment form.

After Today's Meeting:

- Online via the project website or email.

COVID-19 Safety Guidelines:

- See registration table for most up-to-date guidance.
- Masks required.
- Free masks available at registration table.
- Maintain 6 feet of distance from other attendees.

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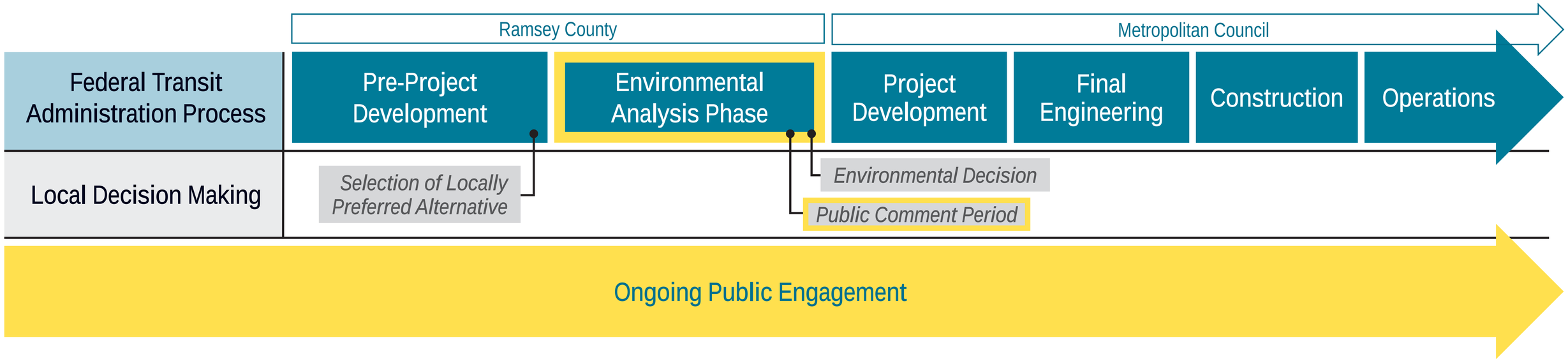
Project Background



2014-2017: Pre-Project Development Study.

- Evaluated 55 route segments and 7 transit modes to identify Locally Preferred Alternative.

Environmental analysis phase key tasks:

- Environmental Assessment.
- Engineering.
- Station area planning.
- Public engagement.

Construction expected 2024-2026.

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Locally Preferred Alternative

Project Evaluated in the Environmental Assessment

Build Alternative (Locally Preferred Alternative)**:**

- Includes proposed route, stations and park-and-rides (shown to the right).
- An option under the Build Alternative that does not include the Highway 36 park-and-ride is also evaluated.

No Build Alternative:

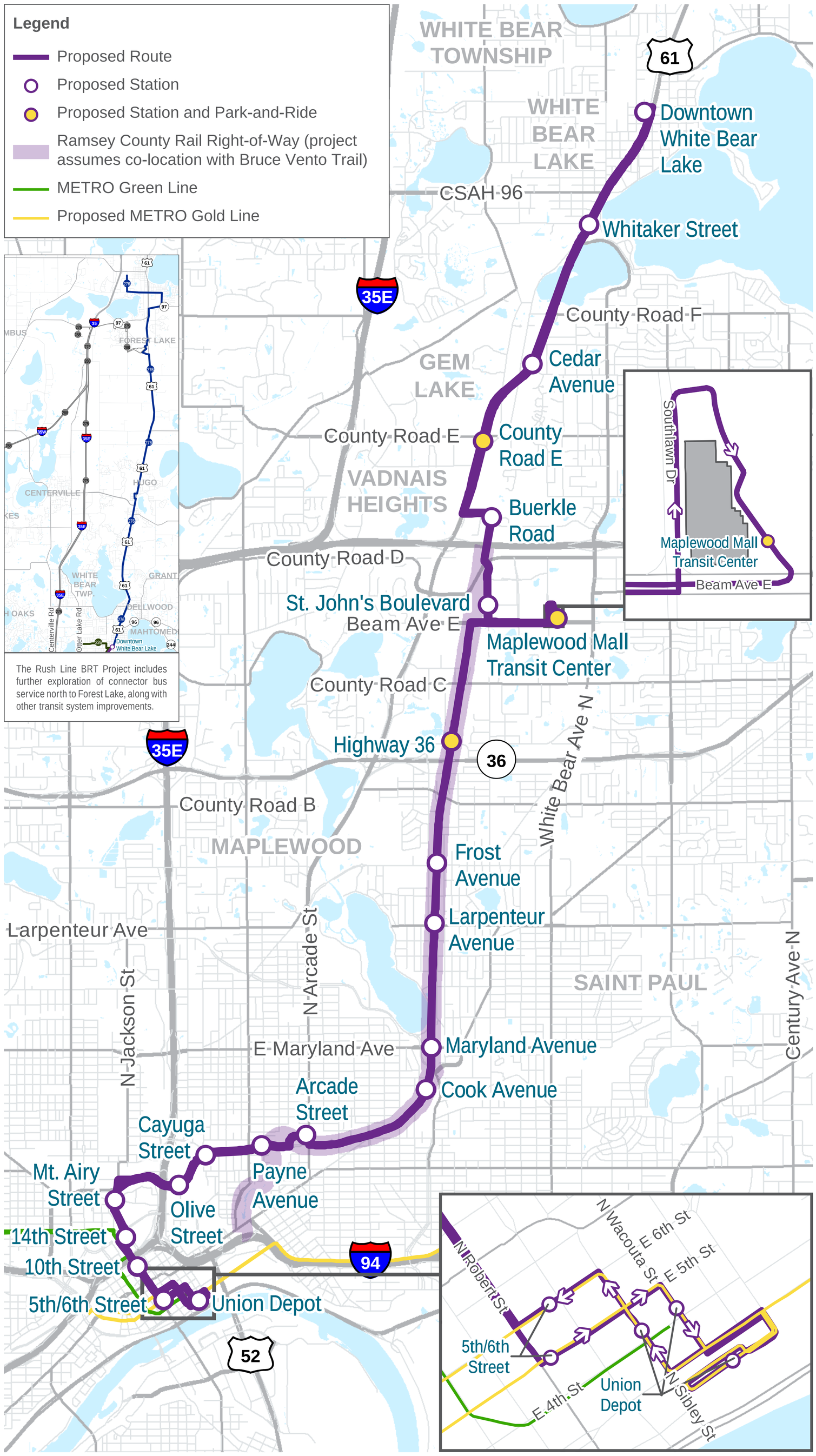
- Existing transportation system as represented in the Metropolitan Council 2040 Transportation Policy Plan without the project.

21

Stations between Saint Paul and White Bear Lake

Proposed operating schedule

- Early morning to late at night, 7 days a week
- Buses every 10 minutes during rush hour
- Buses every 15 minutes other times



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Environmental Assessment

WHAT IS AN ENVIRONMENTAL ASSESSMENT?

An Environmental Assessment is an analysis required by the National Environmental Policy Act that evaluates impacts and benefits from a proposed project.

WHAT IS THE PURPOSE OF THE ANALYSIS?

- Ensure compliance with environmental laws.
- Evaluate benefits and impacts to environmental, social, economic and transportation resources.
- Identify solutions to avoid, minimize and mitigate impacts.
- Inform the public and agencies on impacts as part of the decision-making process.

Topics in the Environmental Assessment



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Environmental Assessment

Rush Line BRT

WHO IS INVOLVED IN THE ENVIRONMENTAL ASSESSMENT?

Federal Transit Administration

Serves as the lead federal agency. Funding is being pursued through Federal Transit Administration's Capital Investment Grants Program.

Ramsey County

Serves as the project sponsor and Responsible Governmental Unit for the state environmental review process.

Cooperating agencies

Government agencies that have jurisdiction or special expertise on issues to be addressed, and intend to cooperate on the Environmental Assessment. The Federal Highway Administration is a cooperating agency on the Rush Line BRT Project.

Cooperating agencies provide input on the project's purpose and need, impacts and alternatives evaluations and resource analyses' level of detail.

Decision-Making Process

STEP 1

Agencies and public review and comment on environmental assessment.

STEP 2

Federal Transit Administration and Ramsey County review comments.

STEP 3

Federal Transit Administration issues an environmental decision document that will:

- Respond to substantive comments.
- Identify ways to avoid, minimize or mitigate impacts.
- Determine the project does not have significant impacts OR requires additional analysis.

STEP 4: OPTION 1

Finding of No Significant Impact

No additional analysis is required and the project may continue design and engineering to prepare for construction.

STEP 4: OPTION 2

Complete additional analysis to obtain environmental approval:

- Complete an environmental impact statement for potentially significant impacts. OR
- Complete additional analysis under the environmental assessment.
- Opportunity for agency and public review and comment.

STEP 5

Final design and engineering

STEP 6

Construction

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Purpose and Need

Rush Line BRT

WHAT IS THE PURPOSE AND NEED OF THE RUSH LINE BRT PROJECT?

To provide transit service that satisfies the long-term regional mobility and accessibility needs for businesses and the traveling public and supports sustainable development within the study area.

Serving the needs of people who rely on transit.

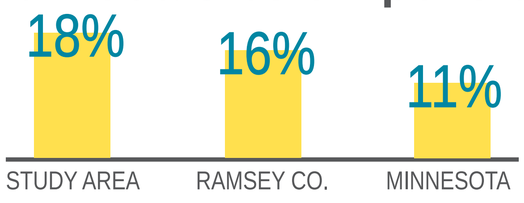
Transit-dependent populations

AGE:

65+ *fastest growing* AGE GROUP

INCOME:

Individuals below poverty



VEHICLE AVAILABILITY:

2014 → 2040

HOUSEHOLDS WITHOUT A VEHICLE ↑27%

TOTAL NUMBER OF HOUSEHOLDS ↑20%

Meeting increasing demand for reliable, high-frequency transit.

3 EXISTING HIGH FREQUENCY ROUTES

41



Metro Transit A line RIDERSHIP ↑30% *since 2016 opening*

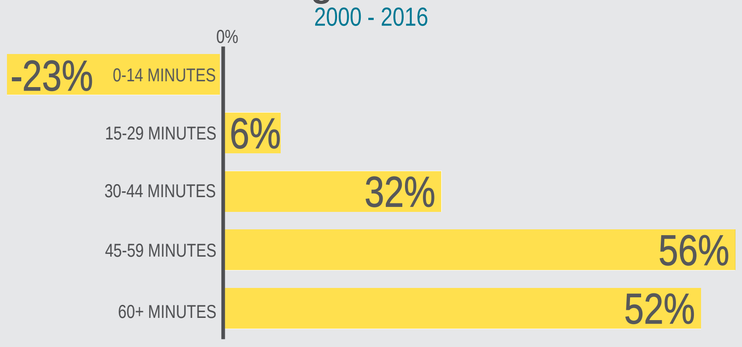
Planning for sustainable growth and development.

2010 → 2040

POPULATION	EMPLOYMENT
20% INCREASE	24% INCREASE

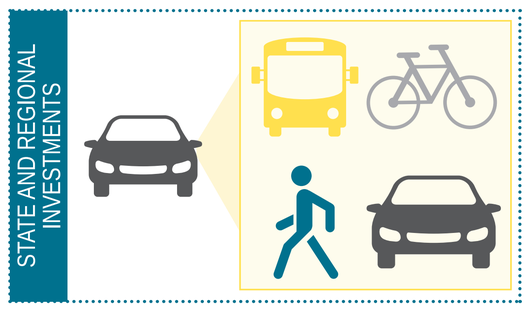
Percent Change in Commute Time

2000 - 2016

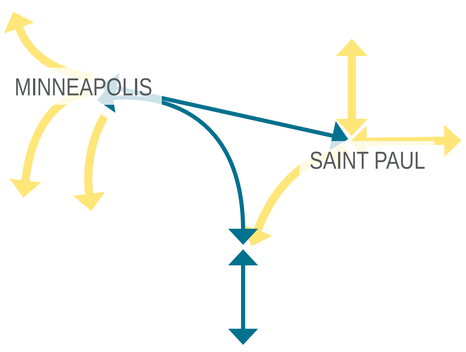


Expanding multimodal travel options.

The State of Minnesota and the Twin Cities region are shifting away from investing in cars only to investing in multiple modes including cars, transit, walking, biking and more.



Regional transportation plans include the Rush Line BRT Project as one of multiple METRO lines to be built in the next decade.



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BRT Operating Environment

The Rush Line BRT would operate in:

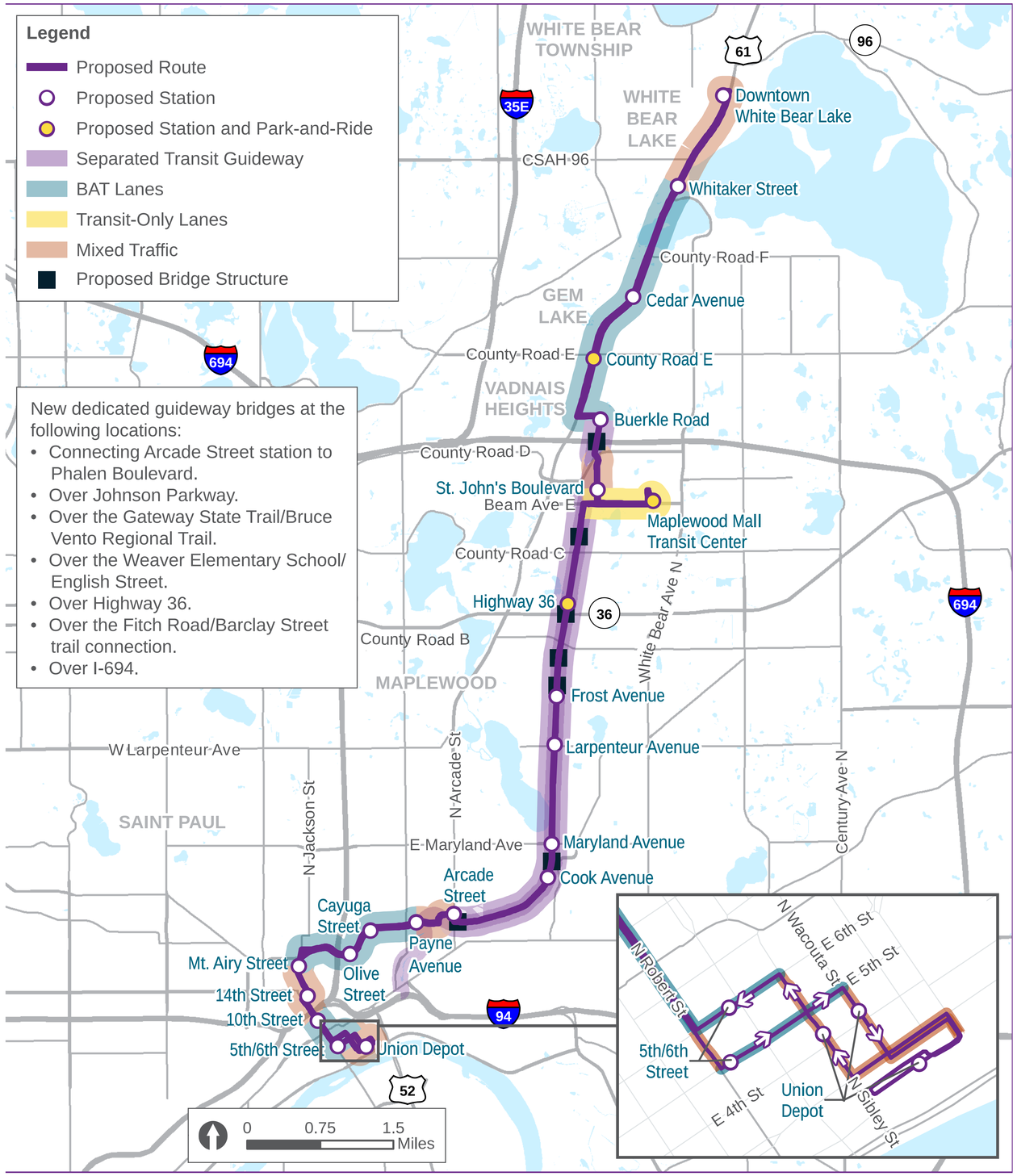
- Dedicated guideway (BRT-only lanes).
- Business access and transit (BAT) lanes (bus lanes that allow private vehicles to make right turns).
- Mixed traffic (regular traffic lanes).



Larpenteur Avenue station concept showing separated transit guideway



County Road E station concept showing BAT lanes



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Resource Areas

TOPIC	RESOURCE AREA	POTENTIAL IMPACTS	
		SHORT-TERM	LONG-TERM
Transportation	Traffic	■	■
	Transit	■	■
	Parking, driveways and loading zones	■	■
	Pedestrian and bicycle facilities	■	■
	Freight rail	■	
Community and Social	Neighborhoods and community resources	■	■
	Land acquisitions and relocations	■	■
	Visual resources	■	■
	Economics	■	■
	Safety and security	■	
Physical and Environmental	Utilities	■	■
	Surface water		■
	Water quality and stormwater	■	■
	Geology, groundwater and soils	■	
	Hazardous materials and contamination	■	■
	Noise and vibration	■	
	Protected species and wildlife habitat	■	■
	Air quality	■	
Section 4(f) and Section 106 resources	Section 4(f) - Parks, recreation areas, etc.	■	■
	Section 106 - Historic properties	■	■

Short-term impacts would occur during construction of the project and long-term impacts would result from operation of the project.

Aviation, land use plan compatibility, environmental justice, energy, farmlands and Section 6(f) public recreational lands are resources that have no or negligible adverse effects in the short term or long term.

While no disproportionately high or adverse effects to environmental justice communities were identified, the EA includes a discussion of environmental justice to describe the communities near the Rush Line BRT route. The project is expected to benefit environmental justice populations by expanding the availability of safe, reliable and efficient transportation options, thereby providing better access to employment, healthcare, shopping and other destinations.

Section 4(f) Resources

SECTION 4(F) OF THE DEPARTMENT OF TRANSPORTATION ACT OF 1966

Section 4(f) is federal law that protects publicly owned parks, recreation areas and wildlife and/or waterfowl refuges and publicly or privately owned significant historic sites. An impact to a Section 4(f) property occurs when land is permanently incorporated, temporarily occupied or the proximity of the project would substantially impair protected features. Federal Transit Administration may not approve the use of Section 4(f) property unless a determination is made that:

1) Federal Transit Administration determines the use will have a de minimis impact.

or

2) There is no feasible and prudent avoidance alternative, and the project includes all possible planning to minimize harm to the property.

Federal Transit Administration has complied with Section 4(f) by:

- Identifying protected properties within the project area.
- Consulting with owners with jurisdiction of protected properties.
- Assessing potential impacts and examining ways to avoid impacts.
- Identifying potential minimization and mitigation strategies.

De minimis impacts:

- Phalen Park.
- Harvest Park.
- Eastside Heritage Park.
- Weaver Elementary School.

You are invited to review and comment on the project's impacts to these parks, recreation areas and historic sites protected under Section 4(f).

Section 4(f) use of historic sites:

- Lake Superior & Mississippi Railroad Corridor Historic District: Saint Paul to White Bear Lake Segment.
- 1868 Alignment of the Lake Superior & Mississippi Railroad between:
  - Eldridge Avenue and County Road B East.
  - Gervais Avenue and County Road C.
  - Kohlman Avenue and Beam Avenue.



Historic Properties (Section 106)

WHAT IS SECTION 106?

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their undertakings on historic properties.

WHAT ARE HISTORIC PROPERTIES?

Any prehistoric or historic district, site, building, structure or object included in or eligible for inclusion in the National Register of Historic Places.

WHAT IS THE NATIONAL REGISTER OF HISTORIC PLACES?

The National Register of Historic Places is the nation's official list of properties recognized for their significance in American history, architecture, archaeology, engineering and culture.

A historic property must meet one or more of the following criteria:

- **Criterion A:** Association with events, activities or broad patterns of history.
- **Criterion B:** Association with persons significant in the past.
- **Criterion C:** Characteristic of a type, period or method of construction.
- **Criterion D:** Potential to yield information.

In addition to meeting at least one of the above criteria, a property must generally be at least 50 years of age and retain sufficient integrity to convey its significance.



NP track looking south toward Gloster Junction, 1963 (Lake Superior and Mississippi Railroad Historic District)



Union Depot in downtown Saint Paul – Avoidance of adverse effects described in Memorandum of Agreement.

Historic Properties (Section 106)

WHAT IS THE PROCESS FOR COMPLETING A SECTION 106 REVIEW?

1. Initiate the process by inviting the State Historic Preservation Office, Tribal Historic Preservation Offices and other interested parties into consultation.

2. Identify historic properties within a defined Area of Potential Effects.

3. Assess how those historic properties might be affected by the project.

The project will have:

- No Adverse Effect on 14 historic properties.
- No Adverse Effect, with conditions, on 9 historic properties.
- Adverse Effect on 5 historic properties.

4. Resolve adverse effects, if any, through reaching agreement with consulting parties on measures to avoid, minimize or mitigate the effects.

WHAT IS A MEMORANDUM OF AGREEMENT?

- Outlines the measures identified to avoid, minimize or mitigate any adverse effects to historic properties.
- Identifies design development and review processes that will be followed before and during construction.

PUBLIC REVIEW AND COMMENT

- Opportunity for public review and comment on the identification results, the assessment of effects and the Memorandum of Agreement for the Rush Line BRT Project is satisfied in part through this open house and the Environmental Assessment public comment period.
- Public comments will be considered by the Federal Transit Administration in consultation with the Minnesota State Historic Preservation Office and consulting parties prior to the finalization of the Memorandum of Agreement. The final document and associated reporting will be available at *rushline.org*.

Rush Line BRT

Environmental Assessment Next Steps

WE ARE HERE

1 PUBLIC COMMENT PERIOD ON THE ENVIRONMENTAL ASSESSMENT

May 11 to June 25, 2021

Comment Responses

All substantive comments and formal responses to comments will be included in the Environmental Decision Document. Comments that raise specific issues or concerns regarding the project or the study process, suggest new alternatives, or question or raise concern over new impacts not previously addressed in the Environmental Assessment are considered substantive comments.

2 COMMENT CONSIDERATIONS

The Environmental Decision Document will take into consideration all of the comments received from the public, agencies, tribes and stakeholders.

3 FEDERAL TRANSIT ADMINISTRATION ENVIRONMENTAL DECISION DOCUMENT

After public comment, if there are no significant impacts, the Federal Transit Administration will issue a Finding of No Significant Impact. If there are significant impacts, the Federal Transit Administration will direct Ramsey County to prepare an Environmental Impact Statement. Ramsey County will issue the state environmental decision document after the Federal Transit Administration has issued its environmental decision document.

4 FEDERAL HIGHWAY ADMINISTRATION ENVIRONMENTAL DECISION DOCUMENT

If the Federal Transit Administration issues a Finding of No Significant Impact, the Federal Highway Administration in its role as a cooperating agency will review the Environmental Assessment. If determined to be adequate, it will be adopted and the agency will also issue a Finding of No Significant Impact.

How to Comment

PUBLIC COMMENT PERIOD

The public comment period for the Environmental Assessment is May 11 to June 25, 2021.

Review the Environmental Assessment:

- Electronically:
  - *rushline.org*
- Hard Copy:
  - Ramsey County Law Library
    15 West Kellogg Boulevard, Suite 1815 Courthouse, Saint Paul, MN 55102
  - East Side Enterprise Center
    804 Margaret Street, Saint Paul, MN 55106
  - Ramsey County Library – Maplewood
    3025 Southlawn Drive, Maplewood, MN 55109
  - Vadnais Heights City Hall
    800 East County Road E, Vadnais Heights, MN 55127
  - Gem Lake City Hall
    4200 Otter Lake Road, White Bear Lake, MN 55110
  - Ramsey County Library – White Bear Lake
    2150 2nd Street, White Bear Lake, MN 55110

COMMENT SUBMITTAL METHODS

All comment submittal methods are considered equal. Verbal comments to staff will not be part of the record.

COMMENT RESPONSES

The Federal Transit Administration and Ramsey County will consider all comments submitted and will provide responses to substantive comments in the Federal Transit Administration's Environmental Decision Document.

SUBMIT COMMENTS

Throughout the public comment period, anyone can submit comments through the following methods:

- **Email:** info@rushline.org
- **Online:** *rushline.org*
- **Mail:** Andy Gitzlaff, Senior Transportation Planner

  Ramsey County
  15 West Kellogg Boulevard, Suite 210 Courthouse
  Saint Paul, MN 55102

- **Verbally via court reporter at Environmental Assessment open house**
- **Written comment forms at Environmental Assessment open house**



Concept Only

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APPENDIX E

RESPONSES TO AGENCY COMMENTS

RESPONSES TO AGENCY COMMENTS

INTRODUCTION

The Rush Line Bus Rapid Transit (BRT) Project Environmental Assessment (EA) was made available for public comment from May 11, 2021 to June 25, 2021. During the comment period, five comment letters on the EA were received from government agencies. Responses to those comments are included in the following sections, and copies of the comment letters are included in Appendix F.

Comments from consulting parties on the draft Section 106 Memorandum of Agreement were also received and are discussed in Section 6.2 of the Finding of No Significant Impact. Concurrence letters from Section 4(f) officials with jurisdiction are discussed in Section 6.3.

US ENVIRONMENTAL PROTECTION AGENCY

Comment	Response
The proposed project is a 15-mile Bus Rapid Transit (BRT) route connecting Saint Paul, Maplewood, White Bear Township, Vadnais Heights, Gem Lake, and White Bear Lake with 21 stations. The EA finds that project operations would reduce vehicle-miles-traveled by automobiles, benefitting air quality. Increased access to employment and services from the project would also benefit communities with environmental justice concerns. EPA appreciates the environmental commitments and best practices incorporated into the EA. We particularly applaud the project team for conducting extensive community engagement, including hosting or attending 197 events, talking to approximately 3,400 people, and making targeted efforts to include low-income and minority residents. The examples listed within the EA of ways stakeholder input has influenced project decisions demonstrates the significance of these engagement efforts. In addition, to help protect all who live the project area, and particularly children, we appreciate seeing commitments to test for and address lead and asbestos for all structures that would be demolished. EPA commented on the administrative draft version of this EA in December 2020. We appreciate content in the EA that addresses our recommendations on use of EPA's Construction Emission Control Checklist and plans for addressing soil and groundwater contamination. We continue to recommend that the project team specifically consider children's health and safety in traffic management plans by routing trucks away from areas where children congregate, such as schools, daycares and parks, when possible and using crossing guards when such areas cannot be avoided.	Thank you for your review and comment. Maintenance of traffic plans will be developed prior to construction. The mitigation commitment in Appendix A of the Finding of No Significant Impact was updated to specify that trucks will be routed away from areas where children congregate, when possible.

MINNESOTA DEPARTMENT OF NATURAL RESOURCES

Comment	Response
Page 14, Routes and Stations. If permanent dewatering that requires the use of a sump and pump is necessary for the proposed stations in volumes that exceed 10,000 gallons per day, or 1.0 million gallons per year, an individual DNR Water Appropriation Permit would be required.	A water appropriation permit, if needed, is included in Appendix A of the Finding of No Significant Impact as a mitigation commitment.
Page 55, Stormwater. Please note that Minnesota Statutes exempt the re-use of stormwater from the requirement to have a DNR Water Appropriation Permit if the stormwater facility is created in an upland area, and the use of the water is intended to reduce flows downstream, improve water quality, or reduce the need to use groundwater.	Comment noted.
Page 56, Hazardous Materials. A DNR Water Appropriation Permit will be required for pollution containment if the amount of water that is pumped exceeds 10,000 gallons per day, or one million gallons per year.	A water appropriation permit, if needed, is included in Appendix A of the Finding of No Significant Impact as a mitigation commitment.
Section 3.3.20 Protected Species and Wildlife Habitat; Appendix E Natural Resources Technical Report, Section 4 Protected Species and Wildlife Habitat: • The DNR appreciates the measures that will be taken to avoid impacting the state-threatened Blanding's turtle. • In addition to short-term impacts related to the construction of the project, the proposer should consider long-term impacts to wildlife as a result of the constructed project and ways to reduce those impacts. The Bruce Vento Regional Trail in particular has the potential to act as a wildlife corridor. Though wildlife in the area have generally adapted to urban environments, the speed and frequency of traffic within the Bus Rapid Transit route has the potential to	Design features to reduce impacts to wildlife will considered as the project advances. The *Ramsey County Rail Right-of-Way Design Guide* includes recommendations to provide for and minimize wildlife crossings and interactions, which will be used to inform project design as engineering advances.

Comment	Response
increase wildlife road mortalities. There are a number of design features that could mitigate or reduce these potential effects: • If the project includes any in-water construction containment measures, such as silt curtain, these practices shall only be utilized during times of actual in-water work and removed during non-active times to allow for species movement within the river. In addition, inspectors should be also looking for the presence of turtles when erosion control inspections occur. Further details for turtle protection may be provided by the DNR to the winning bidder and workers on site. • Roads should be ditched, not curbed or below grade. If curbs must be used, 4" curbs at a 3:1 slope are preferred (Type D, R, or S) in order to also allow animals to exit the roadway should they attempt to cross the road. • Culverts between wetlands and on streams should be oversized (min 36") and without a safety grate to allow small animals the opportunity to utilize these structures for safe passage under the road. • Should segments of the road include concrete median barriers, these areas should also have right of way fence that has been modified to prevent small animals from entering the area. This 'small animal fencing' is a modification of the typical chain link right of way fencing, though it is buried a foot, and has turn-arounds at the endpoints. Small animals can get trapped in the center lanes where this barriers are placed, thus becomes a safety hazard themselves. • Project development should include DNR Regional Nongame Specialist, Erica Hoaglund (erica.hoaglund@state.mn.us or 651-259-5772), for identifying areas or measures to reduce road mortality (fencing, culverts, etc).	

MINNESOTA DEPARTMENT OF TRANSPORTATION

Comment	Response
Multimodal[1]	
Sheet 9: • Ensure wayfinding signage is included in the plan to direct people walking and biking down to the Bruce Vento Regional Trail. • Ensure wayfinding signage is included to direct people walking and biking to the Arcade St. Station. • Coordinate improvements on TH 5 (Arcade) with ADA improvements being made for SP 6221-107 in FY 24.	Wayfinding signage will be determined as design progresses. Project staff will continue to coordinate with the Minnesota Department of Transportation on SP 6221-107 as design advances.
Sheet 11: • Recommend making this crossing wide enough for both pedestrians and cyclists.	The crossing width will be evaluated as engineering advances.
Sheet 12: • Recommend working with City to construct a trail facility from Maryland Ave Station to trail along Johnson Pkwy. • Curious as to what the reasoning is for including the south leg crossing here.	Project staff will continue to coordinate with the city of Saint Paul on pedestrian improvements and opportunities for local work. The city of Saint Paul purchased the property at 1298 Arlington Avenue SE (in the southwest quadrant of Arlington Avenue and the dedicated guideway). Coordination with the city on the design of this intersection will continue as engineering advances.
Sheet 14: • May be wise to include an RRFB here to help bikes and peds cross Frost Ave. Motorists exiting the roundabout may not yield to people at the crosswalk.	A full signal is proposed at this location and is anticipated to have an accessible pedestrian signal. Signal design will be determined as engineering advances.

[1] The Minnesota Department of Transportation's multimodal comments were provided on the Rush Line BRT Project's concept plans. The plan sheet number and the corresponding comments are included in this summary.

Comment	Response
Sheet 15: • Plan for wayfinding here where the two trails meet.	Wayfinding signage will be determined as design progresses.
Sheet 17A: • Consider including a connection here from the sidewalk. There already appears to be a desire path worn into the ground.	The noted location is on private property. Project staff will work with adjacent property owners and the city of Maplewood on local pedestrian connections as engineering advances.
Sheet 20: • Can this driveway be narrowed since it appears to be exit only?	The driveway width needs to accommodate various transit vehicle turning requirements at the Maplewood Mall Transit Center. This will be evaluated further as engineering advances.
Sheet 21: • Consider ped refuge in between traffic lane and dedicated bus lane.	Right-of-way and design vehicle turning movement constraints limit the space available in this location and do not allow for a pedestrian refuge.
Sheet 27: • A signal replacement project (6222-120) for FY 26 will replace all signals at this intersection as well as make ADA and pedestrian and bike facility improvements. All 4 legs will include crossings and the connection between Bruce Vento Trail and Mark Sather Trail is being planned for. Discussions are currently underway to potentially shift the N-S crossing of the west leg to west of the RR tracks to reduce conflicts with the trains and provide a more direct N-S connection.	Project staff will coordinate with the Minnesota Department of Transportation on SP 6222-120 as engineering advances.
Water Resources	
Appendix F – Other Supporting Technical Information, Utilities Memorandum, Existing Conditions should also mention the Minnesota Department of Transportation as owning and maintaining Storm Sewer. The current writeup appears to miss this, despite noting that we did provide storm sewer information for their use for the EAW.	Comment noted. It is acknowledged that the Minnesota Department of Transportation also owns and maintains storm sewer within the study area. Project staff will coordinate with the Minnesota Department of Transportation regarding potential impacts to existing facilities as engineering advances.

MINNESOTA POLLUTION CONTROL AGENCY

Comment	Response
Surface Waters 3.2.13 Please note that the 401 certification becomes an enforceable component of the associated federal license or permit – issued under either Section 404 of the Clean Water Act or Section 10 of the Rivers and Harbors Act. The scope of a Clean Water Act section 401 certification is limited to assuring that a discharge from a federally licensed or permitted activity will comply with water quality requirements. Revisions to the 401 rule became effective in September 2020, and now require applicants to request a pre-filing meeting from the certifying agency at least 30 days prior to submitting a 401 water quality certification request. The MPCA is the certifying authority in the State of Minnesota. Also, please keep in mind that in accordance with Minnesota Statutes, the Rush Line Bus Rapid Transit project should include the MPCA as a regulator of all surface waters as defined by MN Stat. § 115.01 subd. 22. Waters of the state. "Waters of the state" means all streams, lakes, ponds, marshes, watercourses, waterways, wells, springs, reservoirs, aquifers, irrigation systems, drainage systems and all other bodies or accumulations of water, surface or underground, natural or artificial, public or private, which are contained within, flow through, or border upon the state or any portion thereof. Even though there maybe surface waters that are determined to be United States Amy Corps of Engineers non-jurisdictional, or exempt from Wetlands Conservation Act, all surface waters are regulated by the MPCA and any surface water impact needs to be described in the application, may require mitigation.	A Section 401 Water Quality certification is included in Appendix A of the Finding of No Significant Impact as a mitigation commitment. Any surface water impacts will be coordinated with the Minnesota Pollution Control Agency and other applicable regulatory agencies.

Comment	Response
Water Quality and Stormwater 3.2.14 The methods of permanent stormwater management for the Project have not yet been determined. The MPCA strongly recommends implementation of a variety of volume reduction methods to improve existing runoff conditions; including pervious pavements, tree trenches, bioretention and reuse, as mentioned in the EA, to retain stormwater on site that is not discharged to area waters. Due to the presence of multiple water bodies, including impaired waters, the Project will be required to implement additional Best Management Practices to control sediment as required by the National Pollutant Discharge Elimination System/State Disposal System General Construction Stormwater permit (CSW Permit). In addition, any encroachment within 50 feet of a surface water or wetland will require use of redundant downgradient sediment controls during construction.	Methods of stormwater management will be further refined as engineering advances and use of redundant downgradient sediment controls will be implemented during construction. A National Pollutant Discharge Elimination System permit is included in Appendix A of the Finding of No Significant Impact as a mitigation commitment.

CAPITOL REGION WATERSHED DISTRICT

Comment	Response
We are grateful to have been included in the early planning conversations for the Rush Line BRT project and are excited about the potential to take advantage of some design, construction, and stormwater efficiencies along the route. Our involvement in a Phalen Creek daylighting effort began in 2010 and most recently included funding a 2020 study to explore the intersection of stormwater and daylighting options with the Rush Line BRT project through the corridor, to which Ramsey County/Rush Line Team was a coordinating partner. CRWD is committed to the advancement of stormwater improvements in tandem with this exciting transportation project. As such, we request Ramsey County incorporate and synthesize the analysis and findings of *The Phalen Creek Daylighting Improvements - Detailed Feasibility and Design Recommendations Technical Memorandum* (Prepared for Capitol Region Watershed District, by HTPO, dated December 21, 2020) into the Environmental Assessment Worksheet for the Rush Line Bus Rapid Transit Project. CRWD fully supports both projects, and we ask for continued and increased coordination with and between the Rush Line Project, Ramsey County, the City of St. Paul, the Ramsey-Washington Metro Watershed District, Metropolitan Council Environmental Services the Lower Phalen Creek Project (LPCP), and the Payne-Phalen Community Council to pursue daylighting of Phalen Creek.	As noted in Section 3.2.14 of the EA, where runoff and stormwater management features from the Rush Line BRT Project may contribute flow to the proposed Phalen Creek daylighting system and/or where there is potential for a combined conveyance system, consideration of options will be coordinated with representatives of the Capitol Region Watershed District and Lower Phalen Creek Project. Project staff will incorporate the findings of the *Phalen Creek Daylighting Improvements - Detailed Feasibility and Design Recommendations Technical Memorandum* into project design where possible and will continue to coordinate with the Capitol Region Watershed District and Lower Phalen Creek project as design of the Rush Line BRT Project advances.
On a more specific note, CRWD requires wetland approvals for any impacted wetlands as well as the other agencies mentioned on pages 53, 80, 85: “In accordance with the Minnesota Wetland Conservation Act, approvals would be required for any impacts to wetlands within the regulatory boundaries of the city of Saint Paul, Ramsey-Washington Metro Watershed District, Minnesota Department of Transportation, *Capitol Region Watershed District*, and Vadnais Lake Area Watershed Management Organization.”	Wetland Conservation Act Replacement Plan approval by the Capitol Region Watershed District has been added to the table of permits and approvals required for the project in Appendix A of the Finding of No Significant Impact.

Comment	Response
Page 53: “The Capitol Region Watershed District and Ramsey-Washington Metro Watershed District require all impacts to be replaced at a minimum of a 1:1 replacement ratio within the same sub-watershed.” Please note that impacted wetlands must be replaced at a 2:1 ratio within CRWD.	Comment noted. The final amount, type and location of wetland replacement or bank credits will be determined during the permit review process, which will occur during final design, in accordance with watershed district rules.

APPENDIX F

AGENCY COMMENT LETTERS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON
BOULEVARD CHICAGO, IL
60604-3590

June 23, 2021

REPLY TO THE ATTENTION OF:
Mail Code RM-19J

Elizabeth Breiseth
Environmental Protection Specialist
U.S. Department of Transportation
Federal Transit Administration, Region 5
200 West Adams Street, Suite 320
Chicago, Illinois 60606

Re: Draft Environmental Assessment for the Rush Line Bus Rapid Transit Project, Ramsey County, Minnesota

Dear Ms. Breiseth:

The U.S. Environmental Protection Agency is commenting on the Draft Environmental Assessment (EA) referenced above pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. The Federal Transit Administration (FTA) is the lead agency under NEPA, and the Metropolitan Council is the project sponsor.

The proposed project is a 15-mile Bus Rapid Transit (BRT) route connecting Saint Paul, Maplewood, White Bear Township, Vadnais Heights, Gem Lake, and White Bear Lake with 21 stations. The EA finds that project operations would reduce vehicle-miles-traveled by automobiles, benefitting air quality. Increased access to employment and services from the project would also benefit communities with environmental justice concerns. EPA appreciates the environmental commitments and best practices incorporated into the EA. We particularly applaud the project team for conducting extensive community engagement, including hosting or attending 197 events, talking to approximately 3,400 people, and making targeted efforts to include low-income and minority residents. The examples listed within the EA of ways stakeholder input has influenced project decisions demonstrates the significance of these engagement efforts. In addition, to help protect all who live the project area, and particularly children, we appreciate seeing commitments to test for and address lead and asbestos for all structures that would be demolished.

EPA commented on the administrative draft version of this EA in December 2020. We appreciate content in the EA that addresses our recommendations on use of EPA's Construction Emision Control Checklist and plans for addressing soil and groundwater contamination. We

continue to recommend that the project team specifically consider children's health and safety in traffic management plans by routing trucks away from areas where children congregate, such as schools, daycares and parks, when possible and using crossing guards when such areas cannot be avoided.

Thank you for the opportunity to review this project. Please provide all subsequent NEPA documents electronically to Jen Blonn Tyler, the lead reviewer for this project, at tyler.jennifer@epa.gov. Ms. Tyler can be reached at 312-886-6394.

Sincerely,

KENNETH WESTLAKE Digitally signed by KENNETH WESTLAKE
Date: 2021.06.23 16:19:58 -05'00'

Kenneth A. Westlake
Deputy Director
Office of Tribal and Multi-Media Program

DEPARTMENT OF NATURAL RESOURCES

Division of Ecological and Water Resources
Region 3 Headquarters
1200 Warner Road
Saint Paul, MN 55106

Transmitted by Email

June 25, 2021

Andy Gitzlaff
Senior Transportation Planner
Ramsey County
15 West Kellogg Blvd., Suite 210
Saint Paul, MN 55102

Dear Andy Gitzlaff,

Thank you for the opportunity to review the Rush Line Bus Rapid Transit (BRT) combined EA/EAW and supporting documents. The DNR respectfully submits the following comments for your consideration:

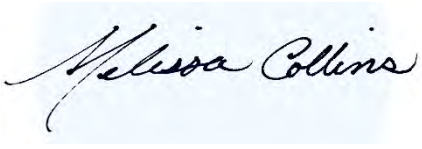
1. Page 14, Routes and Stations. If permanent dewatering that requires the use of a sump and pump is necessary for the proposed stations in volumes that exceed 10,000 gallons per day, or 1.0 million gallons per year, an individual DNR Water Appropriation Permit would be required.
2. Page 55, Stormwater. Please note that Minnesota Statutes exempt the re-use of stormwater from the requirement to have a DNR Water Appropriation Permit if the stormwater facility is created in an upland area, and the use of the water is intended to reduce flows downstream, improve water quality, or reduce the need to use groundwater.
3. Page 56, Hazardous Materials. A DNR Water Appropriation Permit will be required for pollution containment if the amount of water that is pumped exceeds 10,000 gallons per day, or one million gallons per year.
4. Section 3.3.20 Protected Species and Wildlife Habitat; Appendix E Natural Resources Technical Report, Section 4 Protected Species and Wildlife Habitat:
    - The DNR appreciates the measures that will be taken to avoid impacting the state-threatened Blanding's turtle.
    - In addition to short-term impacts related to the construction of the project, the proposer should consider long-term impacts to wildlife as a result of the constructed project and ways to reduce those impacts. The Bruce Vento Regional Trail in particular has the potential to act as a wildlife corridor. Though wildlife in the area have generally adapted to urban environments, the speed and frequency of traffic within the Bus Rapid

Transit route has the potential to increase wildlife road mortalities. There are a number of design features that could mitigate or reduce these potential effects:

- If the project includes any in-water construction containment measures, such as silt curtain, these practices shall only be utilized during times of actual in-water work and removed during non-active times to allow for species movement within the river. In addition, inspectors should be also looking for the presence of turtles when erosion control inspections occur. Further details for turtle protection may be provided by the DNR to the winning bidder and workers on site.
- Roads should be ditched, not curbed or below grade. If curbs must be used, 4" curbs at a 3:1 slope are preferred (Type D, R, or S) in order to also allow animals to exit the roadway should they attempt to cross the road.
- Culverts between wetlands and on streams should be oversized (min 36") and without a safety grate to allow small animals the opportunity to utilize these structures for safe passage under the road.
- Should segments of the road include concrete median barriers, these areas should also have right of way fence that has been modified to prevent small animals from entering the area. This 'small animal fencing' is a modification of the typical chain link right of way fencing, though it is buried a foot, and has turn-arounds at the endpoints. Small animals can get trapped in the center lanes where this barriers are placed, thus becomes a safety hazard themselves.
- Project development should include DNR Regional Nongame Specialist, Erica Hoaglund (erica.hoaglund@state.mn.us or 651-259-5772), for identifying areas or measures to reduce road mortality (fencing, culverts, etc).

Thank you again for the opportunity to comment on this document. Please let me know if you have any questions.

Sincerely,



Melissa Collins
Regional Environmental Assessment Ecologist | Ecological and Water Resources
Minnesota Department of Natural Resources
1200 Warner Road
St. Paul, MN 55106
Phone: 651-259-5755

Email: melissa.collins@state.mn.us

CC:

Equal Opportunity Employer

DEPARTMENT OF TRANSPORTATION

Metropolitan District
Waters Edge Building
1500 County Road B2 West
Roseville, MN 55113

June 23, 2021

Andy Gitzlaff
Senior Transportation Planner
Ramsey County
15 West Kellogg Boulevard, Suite 270
Saint Paul, MN 55102

SUBJECT: MnDOT Review #**EAW21-008**
Rush Line BRT EAW
Mostly adjacent to Bruce Vento Trail and US 62
Ramsey County

Dear Mr. Gitzlaff:

Thank you for the opportunity to review the **Rush Line BRT EAW**. MnDOT has reviewed the documents and has the following comments:

Multimodal:
MnDOT 's Multimodal comments are included in the attachment above as METRO_BIKEPED RushLine Comments.

For questions regards these comments, contact Jesse Thornsen, Metro Multimodal, at 651-234-7788 or Jesse.Thornsen@state.mn.us.

Water Resources:
Appendix F – Other Supporting Technical Information, Utilities Memorandum, Existing Conditions should also mention the Minnesota Department of Transportation as owning and maintaining Storm Sewer. The current writeup appears to miss this, despite noting that we did provide storm sewer information for their use for the EAW.

Please direct questions concerning drainage issues to Jason Swenson (651-234-7539) or Jason.Swenson@state.mn.us of MnDOT's Water Resources section.

Review Submittal Options
MnDOT's goal is to complete reviews within 30 calendar days. Review materials received electronically can be processed more rapidly. Do not submit files via a cloud service or SharePoint link. In order of preference, review materials may be submitted as:

1. Email documents and plans in PDF format to metrodevreviews.dot@state.mn us. Attachments may not exceed 20 megabytes per email. Documents can be zipped as well. If multiple emails are necessary, number each message.

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2. PDF file(s) uploaded to MnDOT's external shared internet workspace site at: https://mft.dot.state.mn.usmetrodevreviews.dot@state.mn.us. Contact MnDOT Planning development review staff at for uploading instructions, and send an email listing the file name(s) after the document(s) has/have been uploaded.

If you have any questions concerning this review, please contact me at (651) 234-7797.

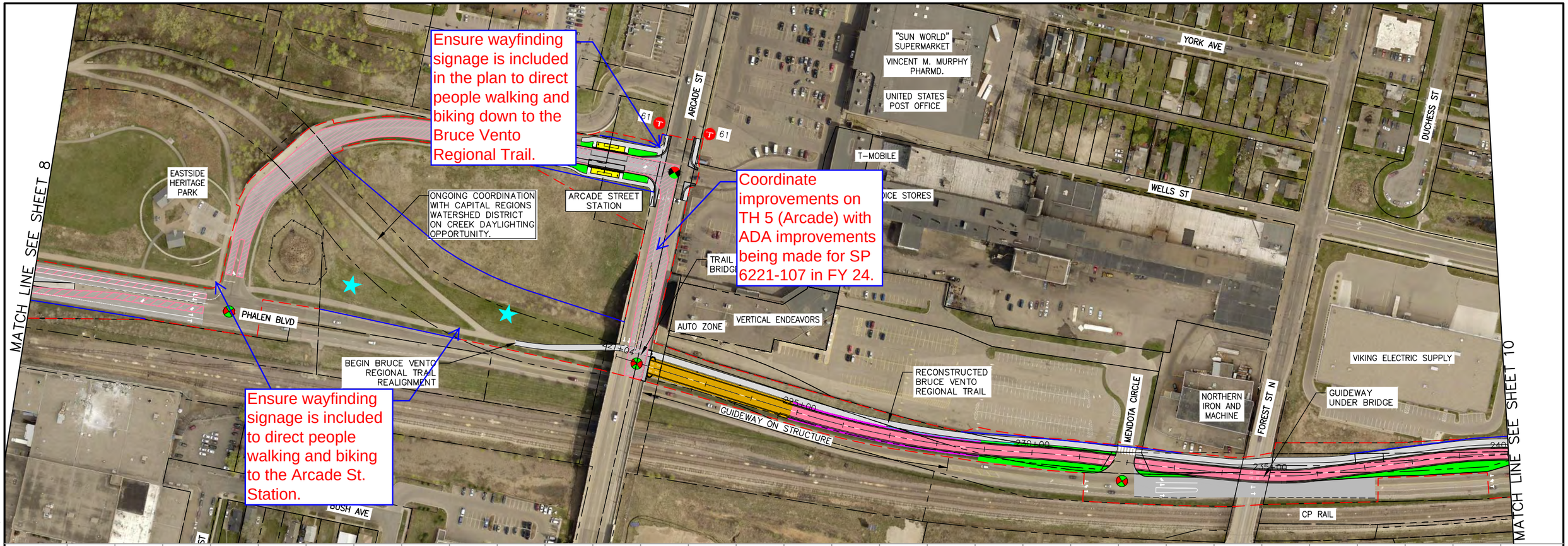
Sincerely,

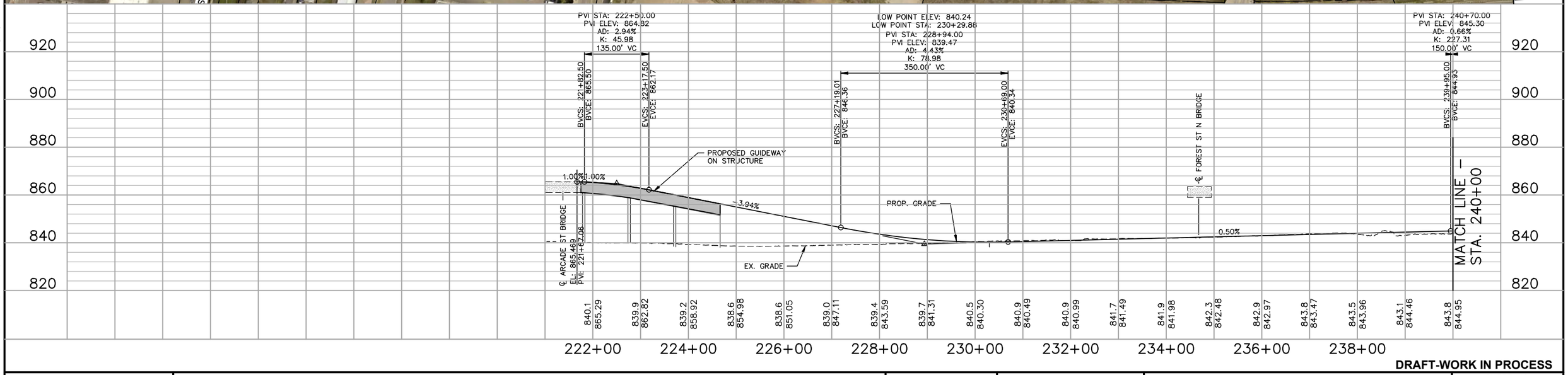


Cameron Muhic
Senior Planner

Copy sent via E-Mail:

Buck Craig, Permits
Jason Swenson, Water Resources
Ben Klismith, Right-of-Way
Fay Simer, Area Coordinator
Mackenzie Turner Bargen, Multimodal
Jason Junge, Transit
Lance Schowalter, Design
Ashley Roup, Traffic
Nick Olson, Area Engineer
Jennifer Wiltgen, Area Coordinator
Jesse Thornsen, Multimodal
Russell Owen, Metropolitan Council





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Rush Line

RUSH LINE BRT PROJECT

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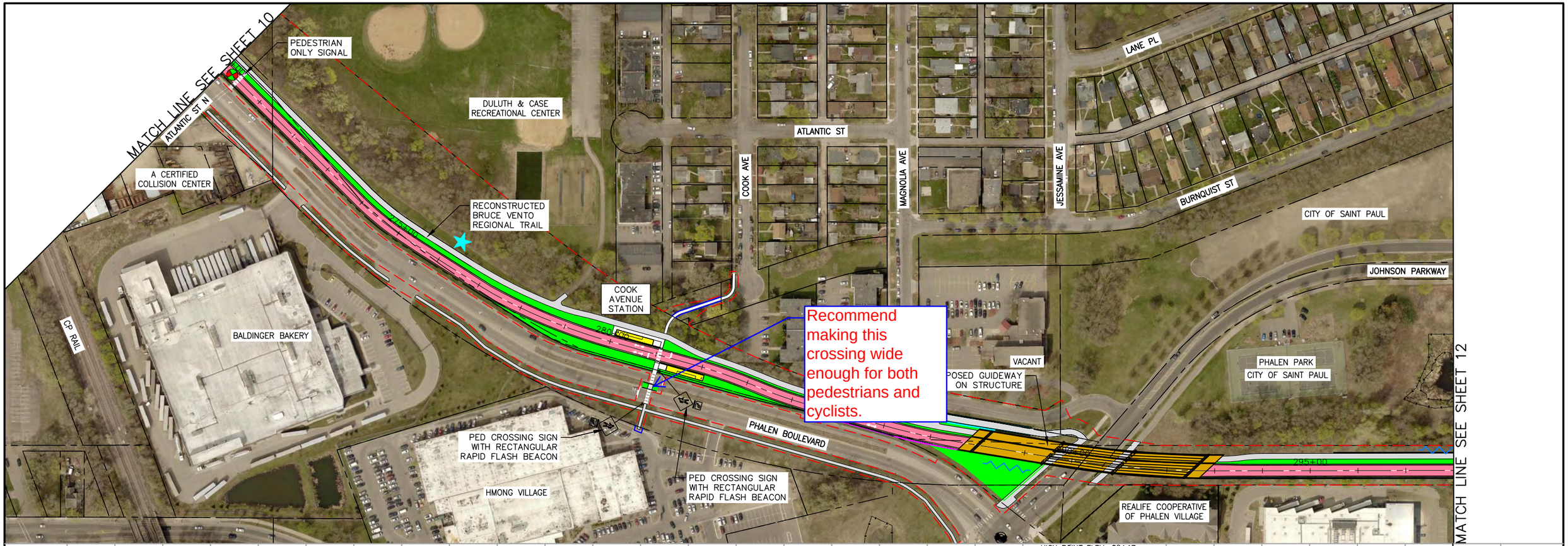

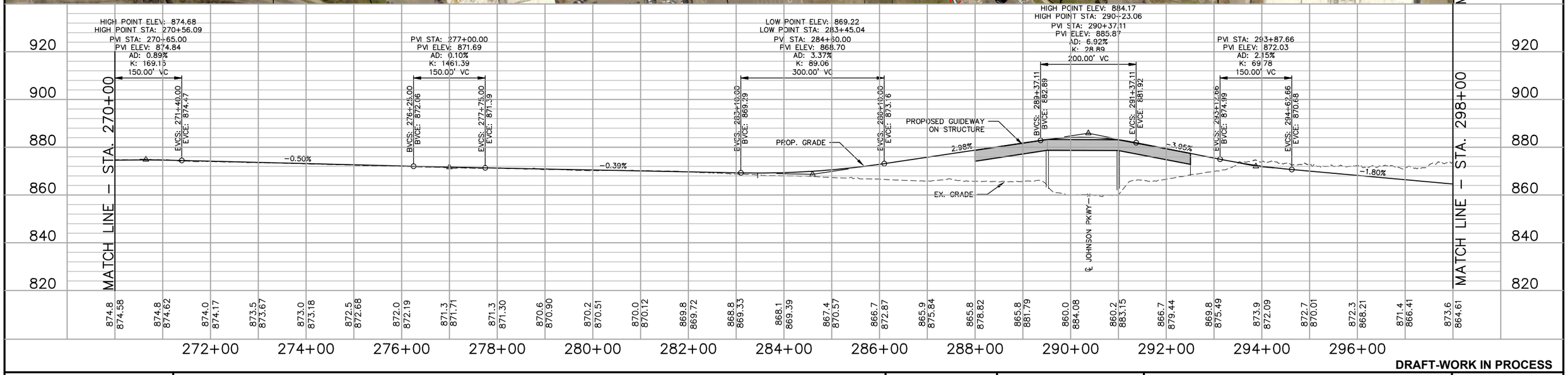

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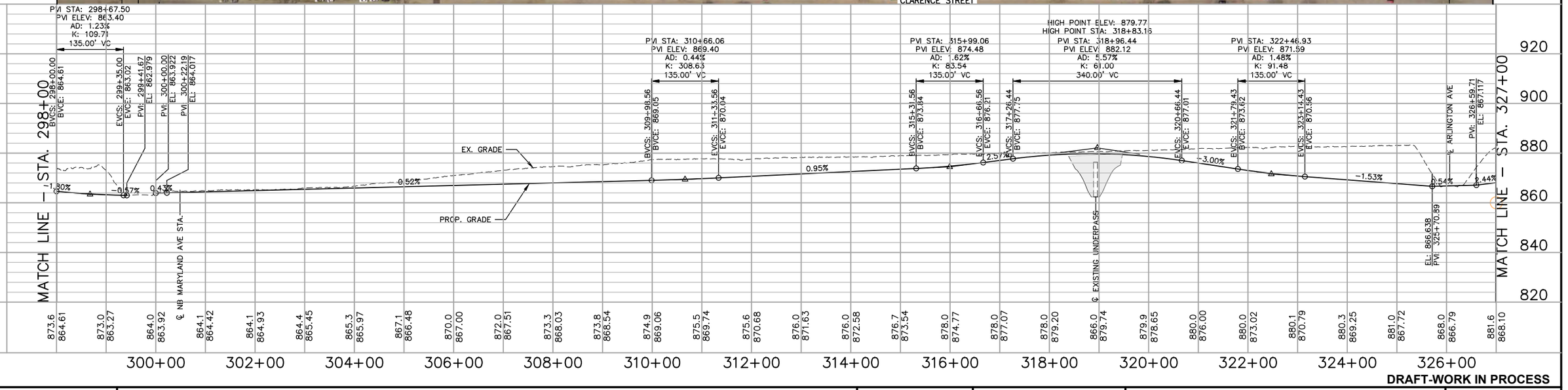

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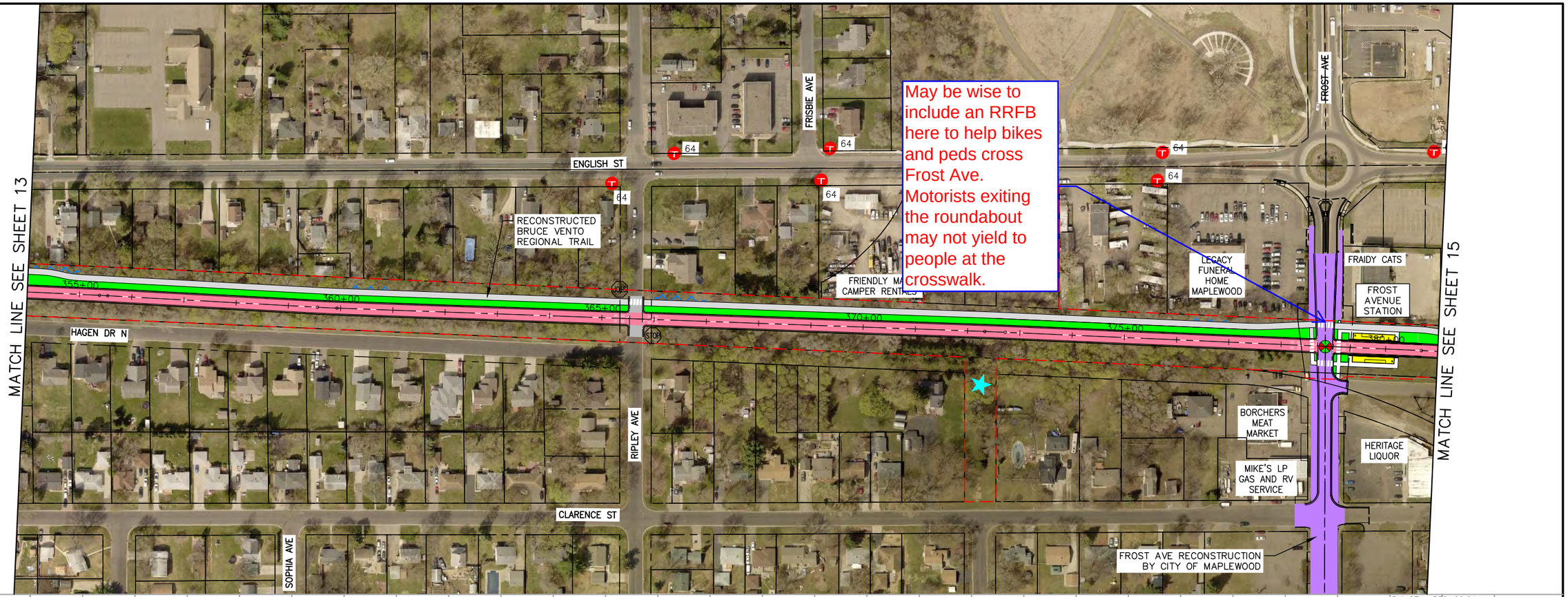

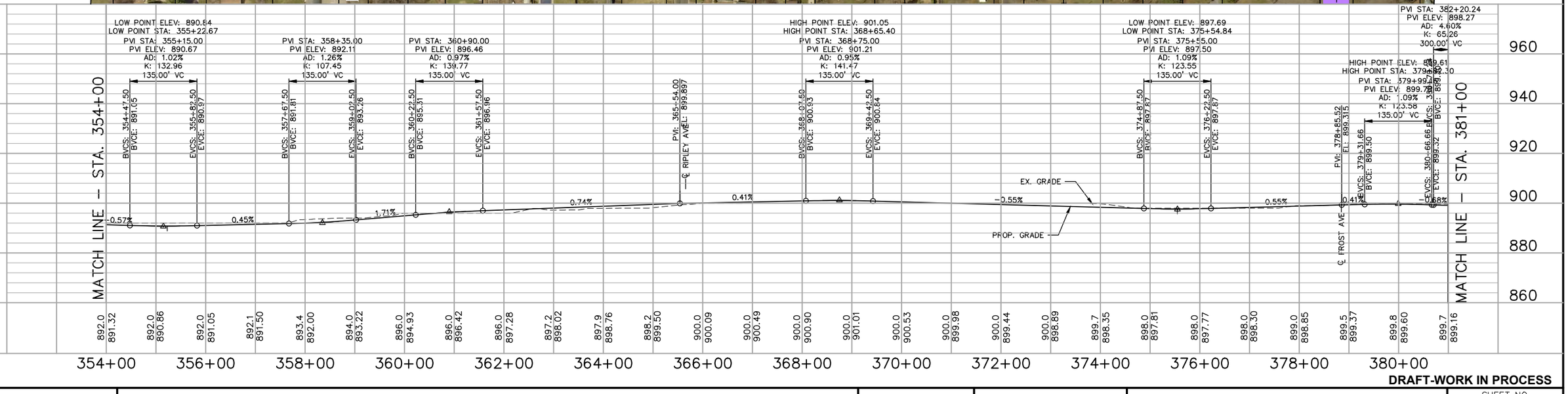

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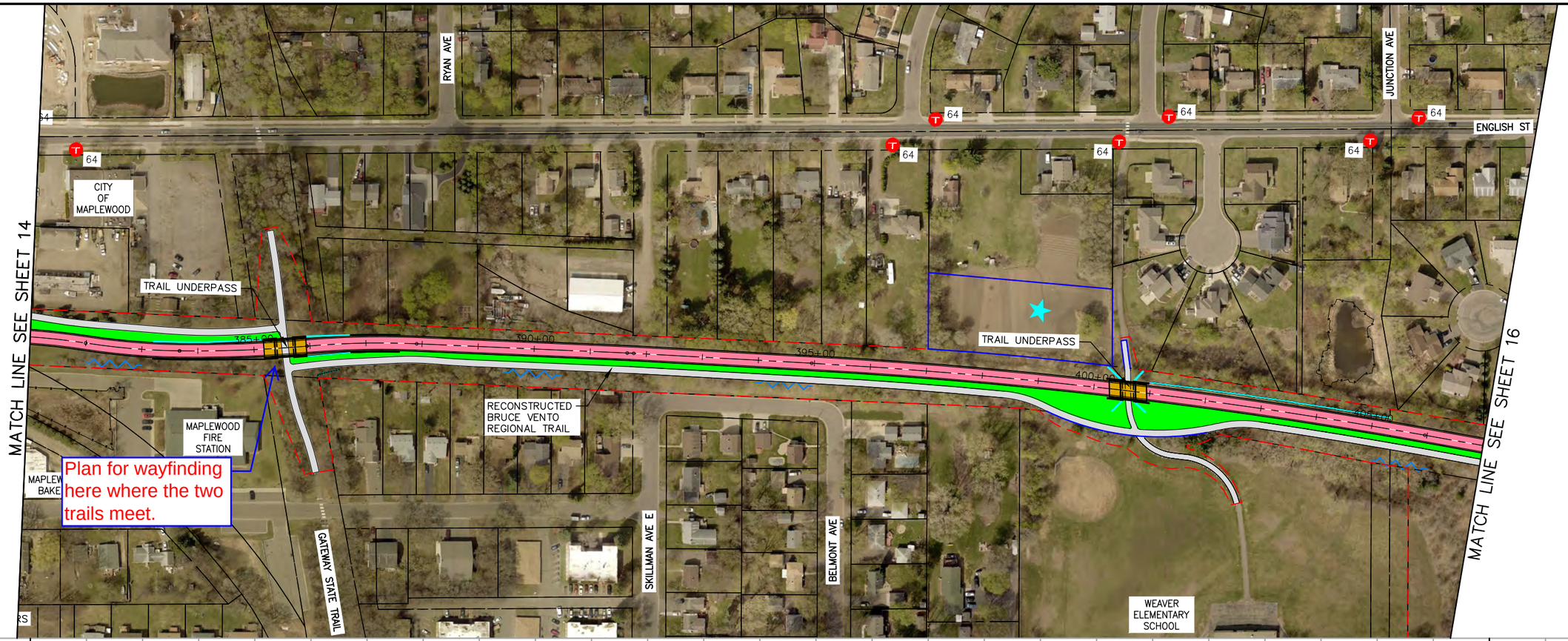

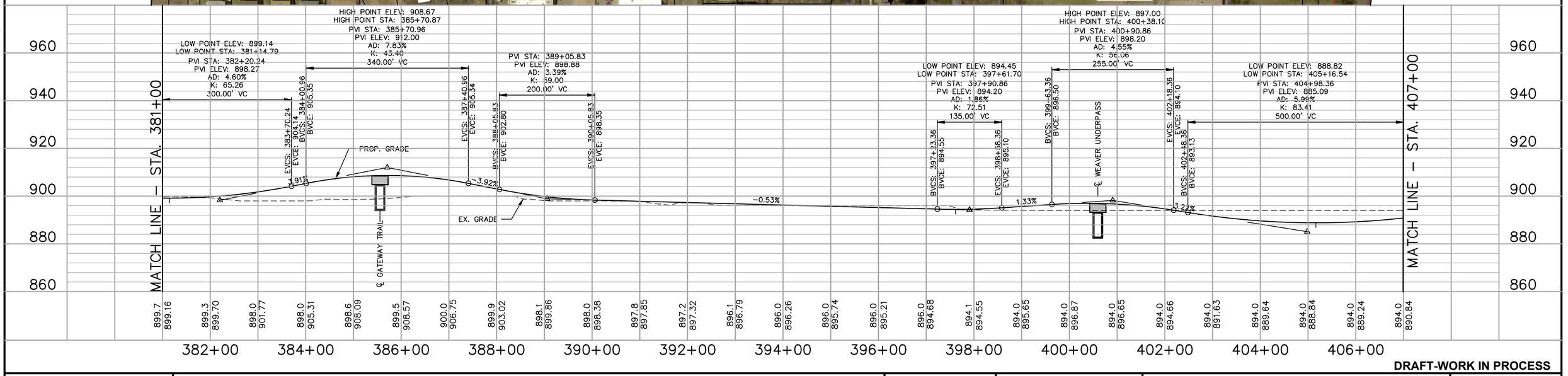

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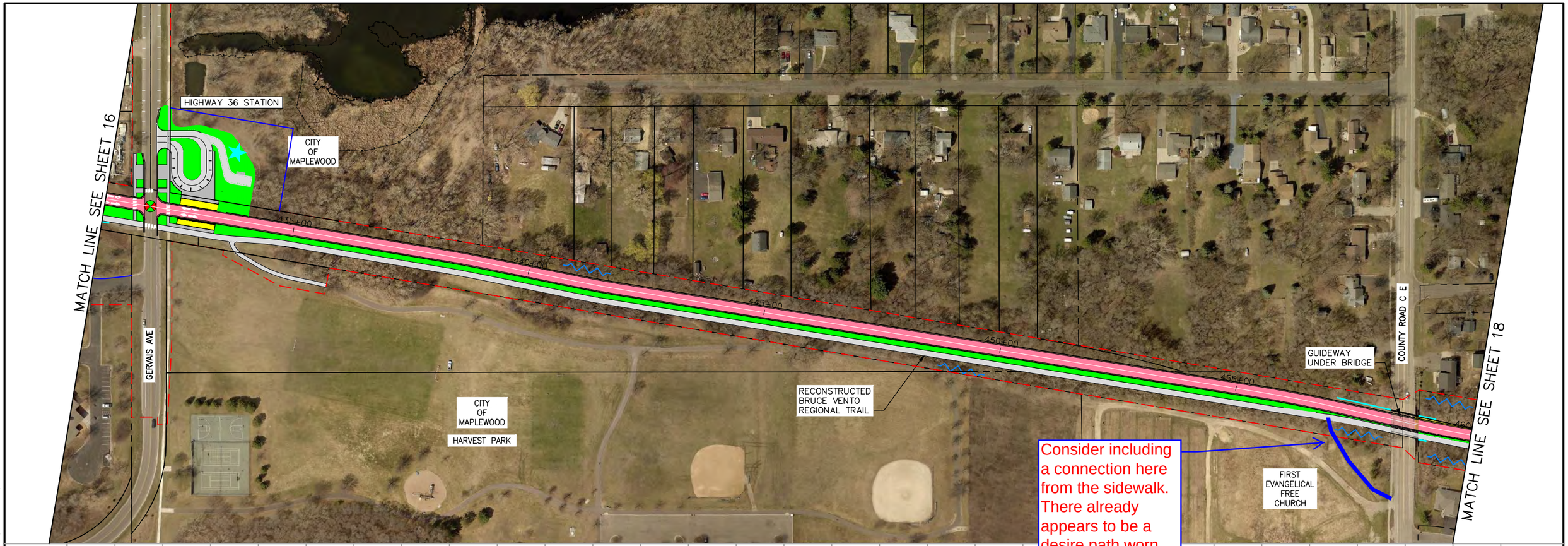

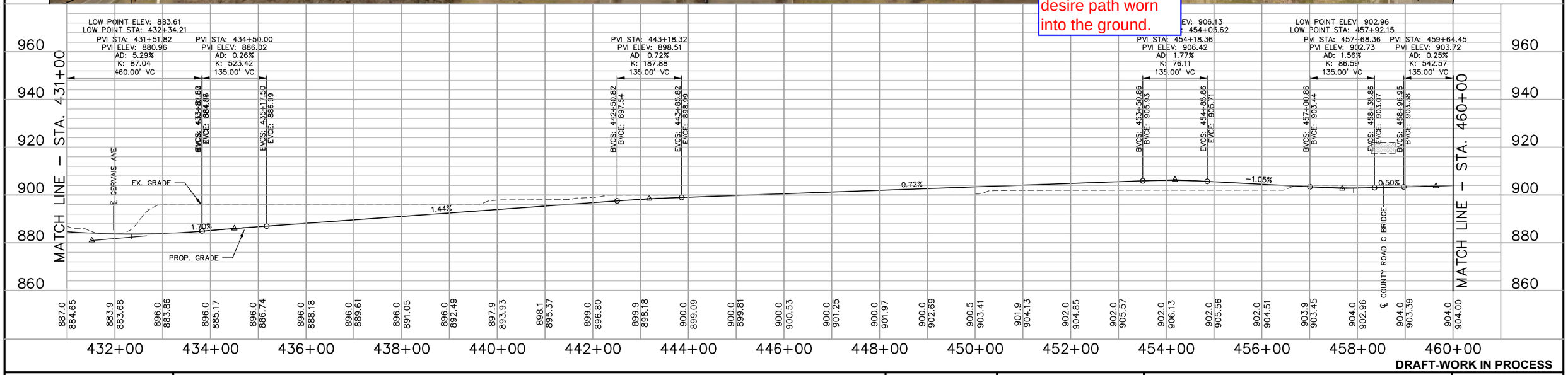

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Rush Line

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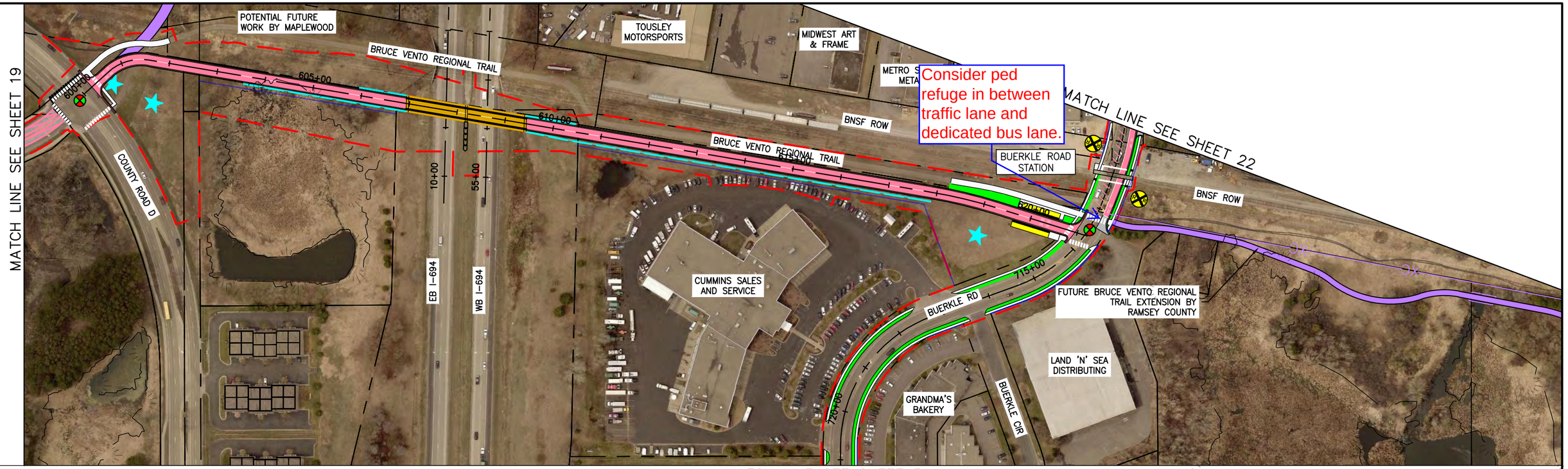

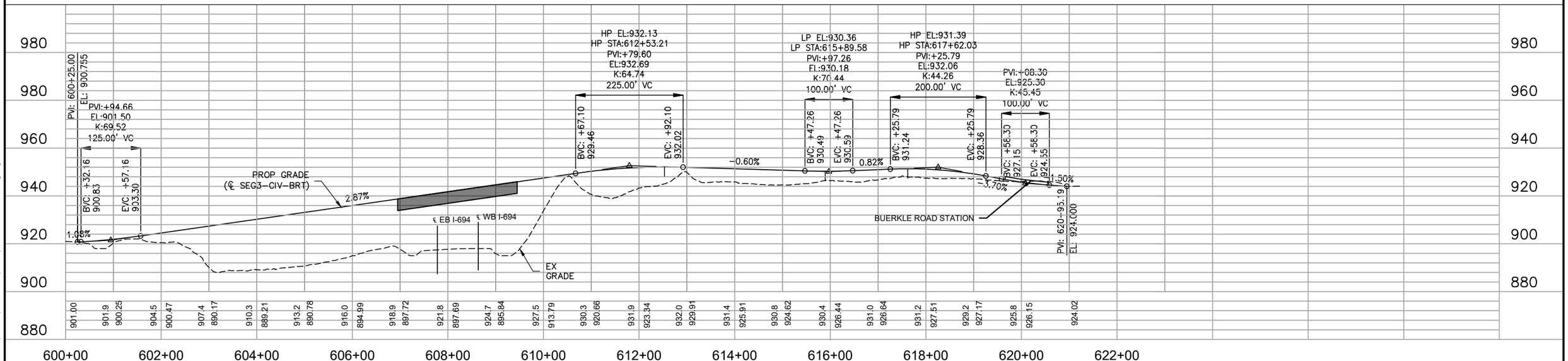

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MATCH LINE SEE SHEET 26

MATCH LINE SEE SHEET 28

FUTURE BRUCE VENTO REGIONAL TRAIL EXTENSION BY RAMSEY COUNTY

ALIGNMENT AND GRADING MAY REQUIRE AGREEMENT FROM BNSF RAILROAD

BAT LANE AUTHORIZATION TO BE FURTHER COORDINATED WITH MNDOT

WHITAKER STREET STATION

WHITAKER ST

HINKEY ST

PARK ST

CLARENCE ST

1ST AVE

EUGENE ST

LINCOLN AVE

BNSF ROW

TH 96

TH 61

WELLS FARO

SAM THAI CUISINE

MGM WINE & SPIRITS

SALON CHEVEUX

E-CIG FIREHOUSE

COST CUTTERS

ARTISTE SALON

WHITE BEAR JEWELERS

SERENITY NOW HEALING CENTER

WHITE BEAR AVE N

GOOSE LAKE

KOWALSKI'S MARKET

ST. CROIX CLEANERS

STARBUCKS

TACO JOHN'S

DRIVEWAY CLOSURE

MEET MARKET

GREAT CLIPS

AVILA BEAUTY LOUNGE

BOATWORKS COM APARTMENTS

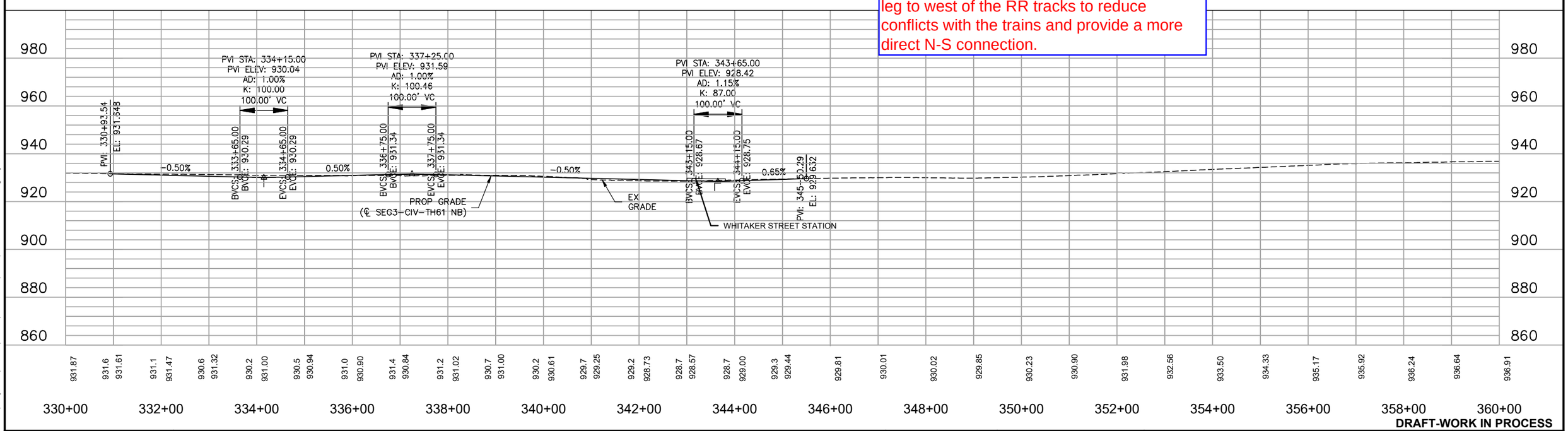
SATHER TRAIL (LAKE LINKS TRAIL)

LAKE AVE S

AA AUTO REPAIR

265

A signal replacement project (6222-120) for FY 26 will replace all signals at this intersection as well as make ADA and pedestrian and bike facility improvements. All 4 legs will include crossings and the connection between Bruce Vento Trail and Mark Sather Trail is being planned for. Discussions are currently underway to potentially shift the N-S crossing of the west leg to west of the RR tracks to reduce conflicts with the trains and provide a more direct N-S connection.



DRAFT-WORK IN PROCESS

RUSH LINE BRT PROJECT

15% PLANS - 08/07/2020

HORIZONTAL SCALE IN FEET: 0 50 100 200

VERTICAL SCALE IN FEET: 0 20 40 80

RAMSEY COUNTY

Kimley»Horn

SRF Consulting Group, Inc.

SHEET NO. 27 OF 83

Aug. 05 2020 03:04 pm H:\Projects\11000\11112\CAD_BIM\Plan\SEG3-CIV-PRF.dwg By: tborowicz

MnDOT Drainage Permits Checklist

Purpose of the MnDOT Drainage Permit

MnDOT Metro District regulates activities that impact its drainage systems and its MS4 regulated area. The purpose of the Drainage Permit is to protect State of Minnesota investment in infrastructure including but not limited to roadways, storm water treatment basins, ditches and storm sewer systems. Excess storm water and/or sediment laden storm water added to MnDOT's drainage systems leads to degradation of these assets. Negative impacts include but are not limited to: sediment deposition, loss of flood storage capacity and also loss of hydraulic conveyance capacity. These impacts may cause premature flooding of the road surface and/or erosion damage on State right-of-way.

Technical Requirements of the MnDOT Drainage Permit

The permit applicant shall demonstrate that offsite runoff coming to MnDOT drainage system and/or right-of-way will not increase as a result of the proposed project. This is quantified as a "no increase in discharge" criteria for the 2-year, 10-year and 100-year storm events. Compliance is demonstrated by applying hydraulic/hydrologic software models. HydroCAD and XPSWMM are the approved models to compare the pre and post project discharge values. Typically, HydroCAD is sufficient to model most proposed projects. However, XPSWMM may be required if the project contains extensive storm water pipe systems connected to MnDOT storm sewer or if HydroCAD cannot in MnDOT's judgment effectively model pressure flow, complex junctions and/or backwater effects that are present. The 2-year, 10-year and 100-year storm events shall be based upon Atlas 14 runoff amounts per the NOAA website.

In addition, Drainage Permit Applicants shall meet all applicable water quality treatment requirements established by the local Watershed District(s) and the MPCA.

Permit applicants should anticipate that specific projects that seek to divert runoff to another sub-watershed or watershed will be denied. It is MnDOT practice to avoid such watershed diversions whenever practicable.

Submittal Requirements:

- Readable/legible watershed maps that show pre and post project drainage conditions. These two separate contour maps shall be large enough in scale so that approximate flow paths can be determined for verifying the Time of Concentrations used in the models. The drainage/watershed maps shall include enough detail so that Curve Numbers used in the hydraulic models may be verified by MnDOT.

- Surface water flow direction and storm water pipe water flow direction shall be indicated on the pre and post project watershed maps.

- Minimum recommended watershed map scale is 1" =100'. Project applications submitted with smaller scales (e.g., 1"=500') may be rejected and returned to the applicant. The same would apply for project watershed maps that do not include topographic contours or basic land use information such as the location of buildings, pavement and "green space". Watershed maps submitted as pdf files or CAD files shall be readily printable at scales that allow for good readability.

- Pre and post project watershed maps shall be clearly linked to the drainage models such that the names of the sub-watersheds, ponds and drainage structures are the same in the models as shown on the watershed maps. In addition, watershed and sub-watershed boundaries shall be clearly shown.

- Submission of the actual pre and post project HydroCAD or XPSWMM models is required: pdf copies of the drainage model simulations are unacceptable. In the event that the models cannot be transferred readily by electronic mail or electronic repository site, a hardcopy CD shall be provided.

- Curve numbers shall be determined per NRCS methodology and should be modified as needed based upon detailed knowledge of soil type and specific conditions on site. HydroCAD modeling software includes NRCS guidance for determining curve numbers based upon land use and condition.

- Time of concentration (Tc) computations and assumptions that in MnDOT's assessment clearly overestimate or underestimate this critical runoff parameter will be rejected. Two common assumptions that lead to overestimating Tc include: using the "Lag/CN" method to determine peak runoff from watersheds that have a relatively long and/or diverse flow path, and assuming that sheet flow occurs for a distance exceeding100 feet. Conversely, pre-project Tc shall not be underestimated to offset post project increases in peak discharge.

- Available freeboard for existing and proposed treatment ponds shall be shown on the watershed maps as well as the normal and 100-year high water levels. All proposed pond treatment systems along MnDOT right-of-way shall have a minimum freeboard of 2.0 feet between the road surface and the proposed 100-year HWL.

- Infiltration basins, filtration basins and ponds adjacent to MnDOT right-of-way shall be designed to provide at least 2 feet of elevation difference between the 100-year HWL and the crest of the basin berm. The berm crest shall be at least 5 feet wide. The emergency overflow shall be lined from crest to toe of slope with Turf Reinforcement mat or Category 6 or 7 Erosion Control Blanket.

- Best management practices (BMP's) including infiltration/filtration sites, storm water ponds, etc. shall be clearly labeled on the pre and post project watershed maps.

- Plan sheets submitted as watershed maps shall be evaluated as such. They shall be readable and legible and meet all the same requirements including clear delineation of watershed boundaries, readable map scale, and land use shown by an aerial photo background map, or that is clearly depicted based on details on the plan sheet or sheets submitted.

- Project plan sheets relevant to the Drainage Permit are required and include: existing site conditions, the proposed grading plan as well as proposed site drainage system plans and profiles. The plans shall include applicable wetland impact/mitigation features and temporary sediment and erosion control measures for the project. In addition, erosion control blanket will be used to stabilize disturbed area on MnDOT right-of-way unless other methods such as rip-rap treatment are called for in the plans and approved by MnDOT.

- Pond and basin special structures including weirs and orifices shall be consistent with what is used in the HydroCAD or XPSWMM models submitted and include relevant calculations/details.

- A table summary of existing versus proposed site discharge to MnDOT drainage system/right-of-way is required for the 2-year, 10-year and 100-year Atlas 14 rainfall events.

- Post project storm water discharge to MnDOT ditches or other open channel shall be limited to flow velocities of 6 fps or less for a 50-year Atlas 14 rainfall event.

- Project discharge points that will connect to MnDOT ditch or channel shall be located such that they do not cause erosion or conflict with the grade of the existing ditch or channel.

- Proposed access road culverts on MnDOT right-of-way shall be designed for the 10-year Atlas 14 rainfall event unless they are part of a significant drainage ditch along the roadway in which case a 100-year or 50-year design will apply.

- Direct connections to MnDOT storm system shall be avoided. Connection to open ditch, or channel is preferred. If direct storm sewer connections cannot be avoided, it is the applicant's responsibility to provide a good connection typically via a new structure. Furthermore, MnDOT offers no warranty that there will not be a hydraulic backwater effects on the new storm line upstream that is connected to MnDOT's existing storm sewer.

- For all disturbed areas that sheet flow to MnDOT right-of-way and any disturbed areas within MnDOT right-of-way, either Erosion Control Mat or Bonded Fiber Matrix shall be used for temporary/permanent erosion control.

- Silt fence shall not be used for erosion control at the proposed project site perimeter. Rather, continuous Wood Chip or compost Sediment Control Logs shall be implemented.

Permit applicants are encouraged to contact MnDOT Metro Water Resource Engineering with questions/concerns. Questions posed early in the permit application process help to avoid project delays. This is particularly true for large project Drainage Permits with significant complexity.

MINNESOTA POLLUTION CONTROL AGENCY

520 Lafayette Road North | St. Paul, Minnesota 55155-4194 | 651-296-6300

800-657-3864 | Use your preferred relay service | info.pca@state.mn.us | Equal Opportunity Employer

June 23, 2021

Andy Gitzlaff
Senior Transportation Planner
Ramsey County
15 West Kellogg Boulevard, Suite 210
Saint Paul, MN 55102

RE: Rush Line Bus Rapid Transit Environmental Assessment

Dear Andy Gitzlaff:

Thank you for the opportunity to review and comment on the Environmental Assessment (EA) for the Rush Line Bus Rapid Transit project (Project) extending from White Bear Lake to St. Paul in Ramsey County, Minnesota. The Project consists of a 15-mile bus rapid transit route. Regarding matters for which the Minnesota Pollution Control Agency (MPCA) has regulatory responsibility or other interests, the MPCA staff has the following comments for your consideration.

Surface Waters 3.2.13
Please note that the 401 certification becomes an enforceable component of the associated federal license or permit – issued under either Section 404 of the Clean Water Act or Section 10 of the Rivers and Harbors Act. The scope of a Clean Water Act section 401 certification is limited to assuring that a discharge from a federally licensed or permitted activity will comply with water quality requirements. Revisions to the 401 rule became effective in September 2020, and now require applicants to request a pre-filing meeting from the certifying agency at least 30 days prior to submitting a 401 water quality certification request. The MPCA is the certifying authority in the State of Minnesota.

Also, please keep in mind that in accordance with Minnesota Statutes, the Rush Line Bus Rapid Transit project should include the MPCA as a regulator of all surface waters as defined by MN Stat. § 115.01 subd. 22. Waters of the state. "Waters of the state" means all streams, lakes, ponds, marshes, watercourses, waterways, wells, springs, reservoirs, aquifers, irrigation systems, drainage systems and all other bodies or accumulations of water, surface or underground, natural or artificial, public or private, which are contained within, flow through, or border upon the state or any portion thereof. Even though there maybe surface waters that are determined to be United States Amy Corps of Engineers non-jurisdictional, or exempt from Wetlands Conservation Act, all surface waters are regulated by the MPCA and any surface water impact needs to be described in the application, may require mitigation. For further information about the 401 Water Quality Certification process, please contact Bill Wilde at 651-757-2825 or william.wilde@state.mn.us.

Water Quality and Stormwater 3.2.14
The methods of permanent stormwater management for the Project have not yet been determined. The MPCA strongly recommends implementation of a variety of volume reduction methods to improve existing runoff conditions; including pervious pavements, tree trenches, bioretention and reuse, as mentioned in the EA, to retain stormwater on site that is not discharged to area waters.

Due to the presence of multiple water bodies, including impaired waters, the Project will be required to implement additional Best Management Practices to control sediment as required by the National Pollutant Discharge Elimination System/State Disposal System General Construction Stormwater permit (CSW Permit). In addition, any encroachment within 50 feet of a surface water or wetland will require use of redundant downgradient sediment controls during construction. Please direct questions regarding CSW Permit requirements to Roberta Getman at 507-206-2629 or roberta.getman@state.mn.us.

We appreciate the opportunity to review this Project. Please provide your specific responses to our comments and notice of decision on the need for an Environmental Impact Statement. Please be aware that this letter does not constitute approval by the MPCA of any or all elements of the Project for the purpose of pending or future permit action(s) by the MPCA. Ultimately, it is the responsibility of the Project proposer to secure any required permits and to comply with any requisite permit conditions. If you have any questions concerning our review of this EA, please contact me by email at karen.kromar@state.mn.us or by telephone at 651-757-2508.

Sincerely,
Karen Kromar

This document has been electronically signed.
Karen Kromar
Project Manager
Environmental Review Unit
Resource Management and Assistance Division

cc: Dan Card, MPCA, St. Paul
Bill Wilde, MPCA, St. Paul
Roberta Getman, MPCA, Rochester
Ken Westlake, USEPA, Chicago

Capitol Region Watershed District
595 Aldine Street • Saint Paul, MN 55104
T: 651-644-8888 • F: 651-644-8894 • capitolregionwd.org

June 25, 2021

Andy Gitzlaff, Senior Transportation Planner
Ramsey County
15 West Kellogg Blvd., Suite 210
Saint Paul, MN 55102

Dear Andy and Rush Line Project Team:

This letter is to provide comment from the Capitol Region Watershed District (CRWD) on the Rush Line Bus Rapid Transit (BRT) Environmental Assessment Worksheet (EAW) as solicited May 11, 2021.

We are grateful to have been included in the early planning conversations for the Rush Line BRT project and are excited about the potential to take advantage of some design, construction, and stormwater efficiencies along the route. Our involvement in a Phalen Creek daylighting effort began in 2010 and most recently included funding a 2020 study to explore the intersection of stormwater and daylighting options with the Rush Line BRT project through the corridor, to which Ramsey County/Rush Line Team was a coordinating partner.

CRWD is committed to the advancement of stormwater improvements in tandem with this exciting transportation project. As such, we request Ramsey County incorporate and synthesize the analysis and findings of *The Phalen Creek Daylighting Improvements - Detailed Feasibility and Design Recommendations Technical Memorandum* (Prepared for Capitol Region Watershed District, by HTPO, dated December 21, 2020) into the Environmental Assessment Worksheet for the Rush Line Bus Rapid Transit Project. CRWD fully supports both projects, and we ask for continued and increased coordination with and between the Rush Line Project, Ramsey County, the City of St. Paul, the Ramsey-Washington Metro Watershed District, Metropolitan Council Environmental Services the Lower Phalen Creek Project (LPCP), and the Payne-Phalen Community Council to pursue daylighting of Phalen Creek.

On a more specific note, CRWD requires wetland approvals for any impacted wetlands as well as the other agencies mentioned on pages 53, 80, 85: “In accordance with the Minnesota Wetland Conservation Act, approvals would be required for any impacts to wetlands within the regulatory boundaries of the city of Saint Paul, Ramsey-Washington Metro Watershed District, Minnesota Department of Transportation, *Capitol Region Watershed District*, and Vadnais Lake Area Watershed Management Organization.”

Page 53: “The Capitol Region Watershed District and Ramsey-Washington Metro Watershed District require all impacts to be replaced at a minimum of a 1:1 replacement ratio within the same sub-watershed.” Please note that impacted wetlands must be replaced at a 2:1 ratio within CRWD.

Capitol Region Watershed District
595 Aldine Street • Saint Paul, MN 55104
T: 651-644-8888 • F: 651-644-8894 • capitolregionwd.org

Thank you for the opportunity to review and comment on this and other stages of the Rush Line BRT project. CRWD looks forward to the continued coordination towards our shared and intersecting goals.

Best regards,

Elizabeth M Hosch

Elizabeth Hosch, Permit Program Manager
Capitol Region Watershed District

APPENDIX G

RESPONSES TO PUBLIC COMMENTS

RESPONSES TO PUBLIC COMMENTS

INTRODUCTION

In addition to the agency comments received (see Appendix E and Appendix F), 184 comment letters were received on the Rush Line Bus Rapid Transit (BRT) Project Environmental Assessment (EA) from members of the public and community organizations. Copies of the public comment letters are included in Appendix H.

To provide information in a reader-friendly format and minimize repetition, substantive comments were summarized into common themes and a response is provided for each theme. Substantive comments are comments that raise specific issues or concerns regarding the project or the study process, suggest new alternatives, or question or raise concern over new impacts not previously addressed in the EA. General statements of support or opposition to the project were also received and are not considered substantive comments. An index of the comment letters received and the themes included in each is provided in Table G-1.

Table G-1: Index of Public Comment Letters

Comment Number[1]	Name of Individual or Organization	Substantive Themes Addressed									
		Locally preferred alternative process	Build Alternative definition	Project cost and funding sources	Ridership	Traffic and parking	Pedestrian and bicycle facilities	Natural resources	Community, economic and social analysis	Public engagement	Support for or opposition to the project
1	Stacey Meade						X				
2	Cameron Hintzen						X		X		X
3	Greg Lees					X	X				X
4	Peggy J Van Sickle		X	X	X	X				X	X
5	Bridget Kranz								X		X
6	Carol Hunn-Gregory					X					
7	Greg Norden	X		X			X				X
8	Gregory Norden	X		X			X				X
9	Randy Stoehr				X						X
10	Jay Mangine		X	X	X	X					X
11	Jill Peterson						X	X			
12	John Slade									X	
13	Donald Kluegel			X							
14	John and Carolyn Johnson			X	X	X			X		X

[1] Each comment letter received was assigned a number based on the order received. If one person submitted multiple comment letters, each one is listed in the index.

Comment Number[1]	Name of Individual or Organization	Substantive Themes Addressed									
		Locally preferred alternative process	Build Alternative definition	Project cost and funding sources	Ridership	Traffic and parking	Pedestrian and bicycle facilities	Natural resources	Community, economic and social analysis	Public engagement	Support for or opposition to the project
15	SLR					X					
16	Jim Wilson			X	X		X	X	X	X	X
17	Tom Basgen										X
18	Mike Babcock								X		X
19	Mark Peterson			X	X	X			X		X
20	Joy E Benn		X								
21	Nick & Haja Batterman								X		
22	Lee Momsen			X							
23	Mary H										X
24	Edna Tratar										X
25	Loni Kay				X	X					X
26	Corey Whipps								X		X
27	Tom Kenny			X	X						
28	Kristeen Bullwinkle										X
29	Jo Anne Murphy				X	X					X
30	Ryan Solberg			X	X						X
31	K Strane			X	X						
32	Dave Ruan				X						X

Comment Number[1]	Name of Individual or Organization	Substantive Themes Addressed									Support for or opposition to the project
		Locally preferred alternative process	Build Alternative definition	Project cost and funding sources	Ridership	Traffic and parking	Pedestrian and bicycle facilities	Natural resources	Community, economic and social analysis	Public engagement	
33	Laurie Sampair			X	X						X
34	Aaron Propes						X				
35	Karen Larson			X						X	X
36	Victoria Canterbury			X	X						X
37	Matt Lewis							X			X
38	Trisha Ngu	X			X		X	X	X		
39	Darlene Ascheman			X		X			X		X
40	Russ Senn					X					X
41	Dane Snow			X	X						X
42	Dennis Stevens			X	X	X				X	X
43	Lilach BarShai										X
44	Sonja Irlbeck								X		X
45	Bradley Dupre			X	X				X		X
46	Barb Frederick			X	X	X					
47	Soren Stevenson										X
48	Vicky J Moore			X	X	X					X
49	Gary Bosch			X	X						X
50	Mary Pollard							X			

Comment Number[1]	Name of Individual or Organization	Substantive Themes Addressed									
		Locally preferred alternative process	Build Alternative definition	Project cost and funding sources	Ridership	Traffic and parking	Pedestrian and bicycle facilities	Natural resources	Community, economic and social analysis	Public engagement	Support for or opposition to the project
51	Phyllis J Erickson			X	X						X
52	Kristin Keating		X		X	X			X		X
53	Don W			X							X
54	Robert Rudolph			X	X	X	X				X
55	Gerry Schulz										X
56	James Sanford				X						
57	Lisee Cacioppo						X		X		X
58	John Moran										X
59	Emily Cox			X	X						X
60	Beth Artner			X	X	X					
61	Karen Jorbul			X	X						X
62	Barbara Bicha			X	X					X	X
63	John Taylor	X	X	X	X	X	X		X	X	X
64	Joseph Anzel		X			X					
65	Pamela Aanenson			X	X						X
66	Karin				X		X		X		
67	Suzanne Terry				X						
68	Travis Dupre								X		X

Comment Number[1]	Name of Individual or Organization	Substantive Themes Addressed									Support for or opposition to the project
		Locally preferred alternative process	Build Alternative definition	Project cost and funding sources	Ridership	Traffic and parking	Pedestrian and bicycle facilities	Natural resources	Community, economic and social analysis	Public engagement	
69	Gay Parker										X
70	Pamela Younghans				X						
71	Sharon Guiser							X	X		X
72	Kellie	X		X	X	X					
73	Paul Grachek		X								
74	Mary Anderson			X	X						X
75	Keith Hisdahl			X	X						
76	Carole Garrison			X	X						X
77	Dave Person								X		X
78	Justin Drieling	X	X			X			X		X
79	Dr. Linda Wolf			X	X	X			X		X
80	Gillette Children's Specialty Healthcare				X				X		X
81	Bernard James Krupowicz			X							X
82	Suzanne Ruedy			X	X						X
83	Ray Kappers			X	X						X
84	Yang Lor								X		
85	Natalie				X		X				X

Comment Number[1]	Name of Individual or Organization	Substantive Themes Addressed									Support for or opposition to the project
		Locally preferred alternative process	Build Alternative definition	Project cost and funding sources	Ridership	Traffic and parking	Pedestrian and bicycle facilities	Natural resources	Community, economic and social analysis	Public engagement	
86	Gloria Hage		X		X	X			X	X	X
87	Melanie					X					X
88	Pamela Aanenson			X	X						
89	Kelly Potz			X	X				X		X
90	Matthew M.		X				X				
91	Bart and Sharon Benshoof			X	X	X				X	
92	Thomas Black		X								
93	Tyler Bouwens							X	X		X
94	Cindy Cash			X	X			X	X		
95	Yang Lor									X	
96	Carol McFarlane			X	X						
97	Fred Dahm	X									
98	Thomas Herr		X								X
99	Diana Longrie			X				X			
100	Darlene Ascheman			X		X			X		X
101	Linda Scott			X							X
102	Cheryl Arcand				X						X
103	Cheryl Arcand										X

Comment Number[1]	Name of Individual or Organization	Substantive Themes Addressed									
		Locally preferred alternative process	Build Alternative definition	Project cost and funding sources	Ridership	Traffic and parking	Pedestrian and bicycle facilities	Natural resources	Community, economic and social analysis	Public engagement	Support for or opposition to the project
104	William Barth			X	X				X		X
105	Roger Goerke				X		X	X	X		
106	Lona Peterson				X				X		X
107	Deb Helseth			X	X				X	X	X
108	Karen Anderson			X							X
109	Larry Parker	X		X	X						
110	Toni								X		
111	Teresa Dupre			X	X						
112	Deborah Crosby										X
113	Deborah Zuehlke			X			X		X		X
114	Bill and Roberta Kolesar			X	X	X					X
115	Reyne M Rofuth			X	X						X
116	Susan L.C. Mahoney			X	X						
117	Timothy Tebos			X			X	X			X
118	Jeanne Kapeller					X	X				
119	Jeanenne Rausch			X	X						X
120	Joe Zoborowski			X							X
121	Holly Zoborowski			X	X	X			X		X

Comment Number[1]	Name of Individual or Organization	Substantive Themes Addressed									Support for or opposition to the project
		Locally preferred alternative process	Build Alternative definition	Project cost and funding sources	Ridership	Traffic and parking	Pedestrian and bicycle facilities	Natural resources	Community, economic and social analysis	Public engagement	
122	Bev Zweig				X				X		X
123	Stephanie Goodman			X					X		X
124	Carolyn and Jerry Jacobs				X					X	X
125	Kathie Carlson										X
126	Sharon Traen				X		X	X	X		X
127	Loren and Merrilee Goligowski				X				X		X
128	Sue			X	X						
129	Lisa & Scott Lervoog			X	X	X					X
130	Tom Kehoe		X			X		X	X		
131	Shelia Rogers					X					
132	Keith and Judy Johnstone										X
133	Greg Blaeser			X	X		X		X		X
134	Ben Smetana			X		X			X		X
135	Kevin Whelan				X	X					X
136	Cheryl Arcaand				X				X		X
137	Doreen Blanchard					X					X
138	Mary Jo Anderson			X	X				X		
139	Paul Stepan						X		X		X

Comment Number[1]	Name of Individual or Organization	Substantive Themes Addressed									Support for or opposition to the project
		Locally preferred alternative process	Build Alternative definition	Project cost and funding sources	Ridership	Traffic and parking	Pedestrian and bicycle facilities	Natural resources	Community, economic and social analysis	Public engagement	
140	Dave Stepan						X				
141	Judy Hutchinson			X	X	X					
142	Bob Knieff										X
143	Sandra Bestland		X	X					X		
144	J Altman		X		X		X		X		
145	Bob Cardinal								X		
146	Chelsea DeArmond							X	X		
147	Ian R Buck						X				X
148	Patrick McNamara								X		X
149	Mai Her								X		X
150	Paul Langer						X		X		
151	Richard Emerson										X
152	Gina Knochenmus			X	X				X		X
153	Steve Knochenmus	X					X		X		X
154	St. Paul Area Chamber				X				X		X
155	Jeanne Hartle	X		X	X	X		X	X		X
156	Angela Spencer		X					X	X		X
157	Lisa Wersal									X	X

Comment Number[1]	Name of Individual or Organization	Substantive Themes Addressed									Support for or opposition to the project
		Locally preferred alternative process	Build Alternative definition	Project cost and funding sources	Ridership	Traffic and parking	Pedestrian and bicycle facilities	Natural resources	Community, economic and social analysis	Public engagement	
158	Louis Asher										X
159	Troy Wilhelmson						X				
160	Jenn Baarson			X	X						
161	Sue Samuelson				X						
162	Payne-Phalen Community Council		X	X	X		X	X	X	X	X
163	Maureen Reinhart			X	X						X
164	Carolyn Knieff				X						X
165	Suzanne Hall			X	X		X			X	
166	Fran Knothe				X	X			X		
167	Dale Carlson				X						
168	Move Minnesota				X			X			X
169	AliceJo Carlson			X	X						X
170	Brad W. Griffith	X					X				
171	Karen Taylor				X						
172	Teresa Munson						X	X		X	X
173	Andrew Singer	X		X	X		X	X			
174	Grant Cooper	X									

Comment Number[1]	Name of Individual or Organization	Substantive Themes Addressed									
		Locally preferred alternative process	Build Alternative definition	Project cost and funding sources	Ridership	Traffic and parking	Pedestrian and bicycle facilities	Natural resources	Community, economic and social analysis	Public engagement	Support for or opposition to the project
175	Keys Café & Bakery St. Paul, Sawatdee Thai Restaurant, Camp Bar, Tin Whiskers Brewing, Black Sheep Pizza, Jimmy John's		X		X	X			X		
176	Kathy Sidles	X			X		X	X	X	X	X
177	Glenn Gadbois					X	X		X		
178	Lower Phalen Creek Project							X	X	X	
179	Kory Lesnick	X		X							X
180	Ricardo Romer										X
181	Camille Scott-Potter						X	X			
182	Martha Ruff							X	X		
183	Teri Rossback										X
184	Amanda Mazumder			X	X		X				X

COMMENT RESPONSES BY THEME

Locally Preferred Alternative Process

SUMMARY

Comments expressed a preference for a route other than the locally preferred alternative. Some comments expressed a preference for the northern terminus to be located south of White Bear Lake (Maplewood or Vadnais Heights) or north of White Bear Lake (Hugo or Rush City). Other comments expressed a preference for the route to be located on Arcade Street (Highway 61) or White Bear Avenue rather than within the Ramsey County rail right-of-way.

RESPONSE

As part of the Pre-Project Development Study conducted from 2014 to 2017,[2] Ramsey County examined transit alternatives for a 30-mile corridor between downtown Saint Paul and Forest Lake using a three-step process. The first step (Tier 1 Evaluation) assessed eight transit modes, seven north/south alignments and 19 downtown Saint Paul alignments relative to overall implementation viability. The second step (Tier 2 Evaluation) assessed the four transit mode/alignment pairings that passed the Tier 1 Evaluation and compared the benefits and impacts of each. The alternative that fared best against the detailed criteria in this second step was further refined in the third step (Tier 2 Refinement). The locally preferred alternative was identified at the conclusion of the Tier 2 Refinement.

The Tier 1 Evaluation considered multiple modes on four major north/south routes from downtown Saint Paul to Forest Lake, including I-35E, Ramsey County/BNSF/Washington County right-of-way, Highway 61 and White Bear Avenue. Light rail, diesel multiple unit and dedicated BRT on Highway 61 were removed from consideration due to right-of-way constraints. Arterial BRT on Highway 61 from Saint Paul to Hugo was deferred due to low existing and planned development density. Streetcar on Highway 61 from Saint Paul to White Bear Lake was deferred because existing and planned land uses along Highway 61 were not compatible with streetcar, and high capital costs plus long travel times did not make it a competitive alternative. Based on the results of the technical and policy analysis and public feedback, alternatives on Highway 61 were not advanced to the Tier 2 Evaluation.

Of the four transit mode/alignment pairings that did advance to the Tier 2 Evaluation, three would operate in Ramsey County rail right-of-way. The fourth alternative, arterial BRT on White Bear Avenue, would operate in mixed traffic within existing roadways. The Tier 2 Evaluation found that arterial BRT on White Bear Avenue had the lowest number of new riders and the lowest total corridor ridership. It also had the lowest potential to generate economic development and would provide service similar to a planned extension of the Route 54.[3] For these reasons, arterial BRT on White Bear Avenue would not meet the project's purpose and need and was not advanced for further study.

The Pre-Project Development Study determined that the market for all-day, high-frequency (with buses arriving every 10 to 15 minutes) transit service in the corridor is between downtown Saint Paul and downtown White Bear Lake when accounting for current population data and forecasted population growth through 2040. Even with anticipated growth in Hugo and Forest Lake in the coming years, the residential and job density north of downtown White Bear Lake is not expected to warrant

[2] Final documents from the Pre-Project Development Study are available in the project library at https://www.ramseycounty.us/residents/roads-transit/transit-corridors-studies/rush-line-brt-project/project-library.
[3] The extension of Route 54 was implemented in June 2018.

investment in all-day, frequent transit service. The existing demand for transit service in the Hugo and Forest Lake area is predominantly for express service.

Following this alternatives development and evaluation process and extensive public engagement, Ramsey County, in coordination with the project area municipalities, selected the locally preferred alternative in September 2017 as an approximately 15-mile BRT route from Union Depot in downtown Saint Paul to White Bear Lake.

Build Alternative Definition

SUMMARY

Comments included questions and concerns about elements of the Build Alternative, including the Downtown White Bear Lake station location, station design and naming, availability of restroom facilities, business access and transit (BAT) lanes on Robert Street, vehicle type and service frequency.

RESPONSE

Downtown White Bear Lake Station

The Downtown White Bear Lake station location on Washington Avenue between 7th and 8th Streets was selected after extensive technical analysis and public engagement, and the project includes measures to reduce potential traffic impacts and improve pedestrian safety such as:

- Adjusting the timing of green and red lights at nearby intersections.
- Reconfiguring turn lanes to provide sufficient space for all cars waiting to turn.
- Adding medians and crosswalks on Highway 61.
- Extending curbs at intersections to shorten the pedestrian crossing distance.

White Bear Lake residents identified support for this station location because they felt that it would provide access to downtown without impacting the existing downtown character or parking availability. A summary of the public engagement can be found in the Downtown White Bear Lake Station Location Input Summary.[4]

Stations

Stations would include shelters, ticket machines for off-board fare purchase, real-time bus schedule information, bicycle parking, on-demand heat, trash and recycling bins, emergency telephones, security cameras, energy-efficient LED station lighting, and information about the station, route, transit system and neighborhood. Station platforms would generally be 10 inches tall. This platform height improves customer experience by reducing the step onto the bus and allows for a level boarding option at the front door if the bus kneels.[5]

Stations would not include restrooms. The Metropolitan Council's *Regional Transitway Guidelines* state that transitway stations generally should not include public restrooms unless the station is part of a larger, multi-use building or a major transfer point requiring routine daytime wait times of one hour or

[4] Available in the project library at https://www.ramseycounty.us/sites/default/files/Projects%20and%20Initiatives/2019%2002%2021%20White%20Bear%20Lake%20Station%20Input%20Summary.pdf.

[5] Kneeling is when the bus operator lowers the front end of the bus to assist passenger boarding.

more. [6] A driver facility that includes a restroom would be provided by the Downtown White Bear Lake station for bus operator use.

Station names may change as the project advances. Names will be selected by the Metropolitan Council with input from the community based on criteria outlined in the *Regional Transitway Guidelines*.[6]

Use of Bus Access and Transit (BAT) Lanes

The route would operate in dedicated guideway or in mixed traffic. Dedicated guideway is defined as the pavement area designed and designated for the exclusive use of transit vehicles and, if needed, emergency vehicles. In some areas, the dedicated guideway is a business access and transit (BAT) lane, which non-transit vehicles can use at intersections and driveways to make right turns. BAT lanes have a number of benefits, including:

- Increasing speed and reliability of buses by taking them out of general traffic and giving them their own space.
- Increasing transit ridership because more people use transit when it is efficient and dependable.
- Encouraging transit-oriented development by creating a sense of permanence and providing high-quality transit service that is attractive to employers and residents who want to be near transit.

In the city of Saint Paul, BAT lanes, including those proposed on Robert Street, would support the multimodal transportation system and complement investments in walking and biking. A BAT lane on Robert Street would also benefit existing and future bus routes that use Robert Street without widening the road. The BAT lane would result in the loss of 32 on-street parking spaces on Robert Street that are available only during off-peak times. As engineering advances, coordination with project area municipalities and impacted residents and businesses will continue to further minimize parking and access impacts. Project staff will also continue to coordinate with the city of Saint Paul on the planned Robert Street improvement project.

Vehicle Type

The EA assumes the use of an electric vehicle fleet for the Rush Line. The electric buses used by Metro Transit to date have not performed as well as anticipated on measures including range and charging infrastructure. Over the next few years, Metro Transit will continue to evaluate improvements to battery technology and other electric bus components to determine whether it will be feasible to purchase electric buses to use when Rush Line BRT begins operations in 2026.

Span and Frequency of Service

The project would operate from 5 a.m. to midnight on weekdays and Saturdays and from 6 a.m. to 10 p.m. on Sundays. Buses will run every 10 minutes during peak periods (6-9 a.m. and 3-6:30 p.m.) and every 15 minutes at other times.

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[6] Metropolitan Council. *Regional Transitway Guidelines.* Available at https://metrocouncil.org/Transportation/Planning-2/Reports/Transit-Transitways/Regional-Transitway-Guidelines.aspx.

Project Cost and Funding Sources

SUMMARY

Comments expressed opposition to public funds being spent on the project or a desire for the funds to be spent in other ways. Comments also included questions regarding sources of funding for construction and ongoing maintenance, if there would be a taxpayer subsidy for operations, and if the budget includes tree removal and planting and if federal funds can be used for those expenses.

RESPONSE

Sources of Funding

Capital funding for the Rush Line BRT Project will come from a combination of Ramsey County and federal funds. Ramsey County and the Metropolitan Council will ultimately seek federal funding for the project through the Capital Investment Grants Program administered by the Federal Transit Administration.[7] Based on the project's estimated cost, ridership and cost effectiveness rating, financial plan, environmental and congestion relief benefits and impacts on land use and economic development, the Rush Line BRT Project is expected to qualify for the program and be competitive with other projects around the country for funding. The county funds are primarily generated by Ramsey County's Transit Sales & Use Tax.[8] Funding for operating costs for the Rush Line BRT will come from transit fares and state and county sources.

Cost Estimate and Allowable Expenses

The estimated capital costs include construction of the dedicated guideway, stations and other project elements and factor in expenditures such as environmental mitigation, right-of-way acquisition, vehicle acquisition and professional services. Tree removal and planting are included in the cost estimate, and federal funds can be used for those expenses.

Ridership

SUMMARY

Comments included questions about who the riders will be, how they will access the stations and how the ridership impacts of COVID-19 have been considered. Some comments expressed skepticism in the ridership projections, while others expressed that Rush Line BRT will be beneficial for employees, seniors, youth, those living in poverty and those who are transit dependent.

RESPONSE

Ridership Forecast

The Rush Line is forecast to carry 7,400 rides per day by 2040. Just over half of the Rush Line BRT ridership (54 percent) would be for work trip purposes, demonstrating the utility of the service for non-work travel as well. Reverse commuting, or travel that occurs in the direction opposite the traditional downtown orientation (both work and non-work trips), is forecast to be 26 percent of daily ridership. Roughly half of these reverse commute trips are work trips to employment opportunities outside of downtown Saint Paul. About 23 percent of the total Rush Line ridership (1,700 daily trips) would be

[7] More information on the Capital Investment Grants Program is available at https://www.transit.dot.gov/CIG.
[8] More information on the county's Transit Sales & Use Tax is available at https://www.ramseycounty.us/businesses/transit-sales-use-tax.

made by riders from zero-vehicle households in 2040. Non-work trips would be 70 percent of the zero-vehicle household ridership on the Rush Line, compared to 45 percent for all Rush Line passengers.

Access to Stations

Stations would be accessed by a variety of modes. In 2040, 31 percent of Rush Line riders are forecast to access stations by walking, 28 percent by driving, 14 percent by drop-off and 27 percent by transferring from other transit service. Park-and-rides would be located at three stations along the route: Highway 36, Maplewood Mall Transit Center and County Road E.

Impact of COVID-19 on Transit Ridership

Ridership forecasts were completed based on data collected before the COVID-19 pandemic began. These forecasts used several inputs including transit system ridership, changes in ridership over time, travel patterns, population and employment densities, and an on-board transit survey that was completed in 2018. While transit ridership declined during the COVID-19 pandemic in the Twin Cities region and throughout the country, the Rush Line BRT Project remains a long-term investment in the region's transportation system. People will continue to count on transit to meet their transportation needs. In fact, the pandemic has underscored the importance of transit in providing essential workers with a means to get to work and to provide essential services. During the pandemic, existing BRT service in the Twin Cities region had some of the highest numbers of rides by essential workers even as service was limited. Pandemic protocols were also put in place to help keep customers and staff safe, including asking customers to not take transit unless it was an essential trip. As these protocols are lifted, transit ridership is beginning to rebound.

After the pandemic, ridership projections suggest that people will return to transit and will seek high-quality options with frequent service. While many employers have transitioned to remote work during the pandemic, studies have found that less than 40 percent of jobs can be done from home; the remaining 60 percent cannot be done remotely.[9] Regardless of short-term events, regional long-range planning still anticipates population and employment growth as described in Metropolitan Council's *Thrive MSP 2040* forecasts, which show population and employment in the study area increasing by 20 and 24 percent, respectively, between 2010 and 2040. Employment in Maplewood, White Bear Township, Vadnais Heights and White Bear Lake is still anticipated to grow at a faster rate than their respective populations. As concentrations of jobs and residents grow in different communities, the need to travel between these communities will increase.

As residents adjust to new working styles, commuting patterns are likely to look different. The fast, frequent, and all-day service of the Rush Line BRT will provide residents the flexibility to ride anytime, without a schedule. As Rush Line BRT planning continues, Ramsey County and its partners will continue to monitor and account for trends in travel patterns, including those related to COVID-19, to assess whether any adjustments may be needed.

[9] Mark Travers. "What Percentage of Workers Can Realistically Work from Home? New Data From Norway Offers Clues." Forbes. April 24, 2020. Available at https://www.forbes.com/sites/traversmark/2020/04/24/what-percentage-of-workers-can-realistically-work-from-home-new-data-from-norway-offer-clues/?sh=4e5d214078fe.

Traffic and Parking

SUMMARY

Comments included questions and concerns about impacts to traffic on Highway 61 and in downtown White Bear Lake. Comments also included questions and concerns about parking impacts in downtown Saint Paul and White Bear Lake.

RESPONSE

Traffic Impacts

The traffic analysis completed for the project took into account planned capacity-related roadway improvement projects in the study area, including adding a managed lane (i.e., a E-ZPass lane) on I-94 between 5th/6th Streets South in downtown Minneapolis and Mounds Boulevard in Saint Paul, adding a E-ZPass lane on I-35E between Little Canada Road and County Road J, and converting 10th Street in downtown Saint Paul to a westbound one-way street and adding a bikeway on 10th Street between Jackson Street and Cedar Street.

The concept plans included in Appendix A of the EA show all traffic signal modifications and reconstructions, grade crossings and other infrastructure changes that are proposed as part of the project. The Rush Line BRT Project would not reduce Highway 61 to one lane in each direction at any point along the route. Shoulder space on Highway 61 would be converted to business access and transit (BAT) lanes from Buerkle Road to approximately Whitaker Street. The Rush Line would operate in mixed traffic from Whitaker Street to the end of the route at the Downtown White Bear Lake station and new lanes will not be constructed in this area.

As discussed in Section 3.2.3 of the EA, with the Rush Line BRT Project all intersections evaluated are anticipated to operate at overall level of service D or better in the 2040 a.m. and p.m. peak hours except for the Highway 61/County Road E intersection in the p.m. peak hour, which would operate at level of service E as it would under the 2040 No Build Alternative.[10] The project would improve 2040 peak hour operations at two intersections: at Phalen Boulevard/Payne Avenue in the a.m. and p.m. peak hours and at Highway 61/Buerkle Road in the p.m. peak hour.

The traffic analysis found that implementation of Rush Line BRT would have a negligible impact on traffic operations throughout downtown White Bear Lake. BRT service every 10 to 15 minutes in each direction amounts to four to six buses per hour in each direction. Highway 61 serves approximately 25,000 vehicles per day, and the addition of these buses is not anticipated to affect traffic.

Ramsey County has been coordinating with the White Bear Lake School District to address questions about traffic and other changes resulting from the expanded White Bear Lake Area High School campus and Rush Line BRT Project. To improve traffic operations around the Downtown White Bear Lake station and the White Bear Lake Area High School, a new traffic signal will be added at the intersection of Highway 61 and 8th Street as part of the Rush Line BRT Project. The Rush Line BRT Project is also proposing pedestrian improvements along 7th and 8th Streets to increase accessibility for the Downtown White Bear Lake station, which will also improve access to the expanded high school. Additionally, students, faculty and staff may use the Rush Line to get to the school, further mitigating congestion and reducing demand for parking. The Rush Line BRT Project will continue

[10] Level of service D or better is considered acceptable for intersections during the peak traffic hour in urban and suburban areas according to standard practice in the traffic engineering industry, guidance from the American Association of State Highway and Transportation Officials and the Minnesota Department of Transportation.

coordinating with the school district regarding traffic mitigation as plans are advanced for the Rush Line and the new high school.

Parking Impacts

The Build Alternative would impact parking along the route, with a net loss of parking spaces in Saint Paul and White Bear Lake and a net gain of parking spaces in Maplewood and Vadnais Heights. Section 3.2.5 of the EA summarizes the parking impacts anticipated by municipality. These changes are not anticipated to have adverse impacts on commercial properties because parking space and driveway losses occur in areas where alternative parking and access options are available. As engineering advances, coordination with project area municipalities and impacted residents and businesses will continue to further minimize parking and access impacts.

Pedestrian and Bicycle Facilities

SUMMARY

Comments included questions and concerns about impacts to the Bruce Vento Regional Trail, safety of trail users, detours during construction, and pedestrian crossings of Highway 61. Comments also expressed support for sidewalk and trail connections to stations and along the route and a desire to see additional pedestrian and bicycle facilities and connections to car sharing and other mobility hubs.

RESPONSE

Multimodal Connections

As part of the station area planning work completed to date, efforts have been made to include new or improve existing multimodal connections to stations as part of the project, where possible. This work will continue as the project advances.

Co-Location With the Bruce Vento Regional Trail

The Rush Line BRT Project would be co-located with a reconstructed Bruce Vento Regional Trail through the portion of the route that utilizes the Ramsey County rail right-of-way. Ramsey County began acquiring the right-of-way in the 1990s for future transit use. The Ramsey County rail right-of-way is approximately 100 feet wide. The Bruce Vento Regional Trail would be 12 feet wide and the BRT guideway would be 26 feet wide in this segment of the route. The remaining space in the right-of-way would include vegetation, landscaping, stormwater facilities and buffer space separating the guideway, trail and adjacent properties.

The *Ramsey County Rail Right-of-Way Design Guide*[11] will guide the design of the Rush Line BRT Project and Bruce Vento Regional Trail. The design guide was created with public input collected in 2019 and in previous planning phases. It emphasizes the importance of the natural and historic character of the right-of-way, safety and security, ease of access and maintenance, and a safe, high-quality experience for trail and BRT users.

Safety of Pedestrians and Bicyclists

Safety is a priority of the Rush Line BRT Project. Six buses per hour in each direction would use the guideway, and buses would be operated by professional drivers, creating a safe travel environment

[11] Available in the project library at https://www.ramseycounty.us/residents/roads-transit/transit-corridors-studies/rush-line-brt-project/project-library.

for all users. Landscaping and vegetation would be used to help guide trail users to stay on the trail and away from the guideway, further enhancing safety in the area.

Where the guideway and Bruce Vento Regional Trail intersect with local streets, there would be enhanced crossing treatments including traffic signals or other devices to make it clear that it is an intersection with vehicle traffic, but there would not be gate arms, bells or other warnings typically implemented with light rail transit.

The project also includes improvements to enhance pedestrian safety when crossing Highway 61 at the County Road E, Cedar Avenue, Whitaker Street and Downtown White Bear Lake stations. The proposed improvements are illustrated on the concept plans included in Appendix A of the EA.

Detours During Construction

Where temporary closures of bicycle and pedestrian facilities are required during project construction, which could include the Bruce Vento Regional Trail, detours will be defined in construction phasing plans. Special facilities, such as handrails, fences, barriers, ramps and walkways, may be required at some locations to maintain bicyclist and pedestrian safety. If crosswalks are temporarily closed, pedestrians will be directed to use alternate crossings nearby. The closure of adjacent crosswalks will be avoided to allow for continued pedestrian movement across streets. All sidewalks and crosswalks will be required to meet minimum standards for accessibility and be free of slipping and tripping hazards.

Natural Resources

SUMMARY

Comments were related to vegetation, wildlife and habitat, water resources, air quality and other natural resources. Comments included questions and concerns related to vegetation impacts in Ramsey County rail right-of-way, impacts to threatened and endangered species and other wildlife, and water quality impacts to Goose Lake and Lake Phalen. Some comments expressed concern that the project would increase air pollution while others expressed support for the reduction in vehicle miles traveled and associated reduction in emissions that would result from the project. Some comments also expressed support for the Lower Phalen Creek Project's proposal to daylight portions of Phalen Creek.

RESPONSE

Vegetation, Wildlife and Habitat

As discussed in the *Natural Resources Technical Report* included in Appendix E of the EA, construction of the Rush Line BRT Project would require removal of some vegetation, particularly within the Ramsey County rail right-of-way. Removal of trees on private property is not anticipated. Most trees that would be removed are invasive species and have diameters of less than two inches. As the project design is advanced, the project is working to minimize impacts to vegetation, and preserve to the extent possible trees of high value. High value trees are defined as durable, slow growth, hard-wooded trees that may provide seasonal interest and that are in good health with a diameter at breast height of at least six inches. The project will also include mitigation such as planting new vegetation in compliance with local, regional and state requirements. Additional information about revegetation of the Bruce Vento Regional Trail and introduction of new trees in the

area following construction of Rush Line BRT can be found in the *Ramsey County Rail Right-of-Way Design Guide*.[12]

The Federal Transit Administration consulted with the US Fish and Wildlife Service regarding potential impacts to threatened and endangered species. There are five federally-listed species in the study area, and it was determined that the project would have no adverse impacts to the northern long-eared bat, snuffbox mussel, the Higgins eye pearlymussel or the winged mapleleaf mussel. The project may affect, but is not likely to adversely affect, the rusty patched bumble bee. Since the project falls within the high potential zone for the rusty patched bumble bee, there is potential for the species to be present within the project vicinity; however, according to the US Fish and Wildlife Service, the project area is unlikely to contain high value floral resources and would be considered sub-optimal habitat. Initial habitat disturbance would occur outside of the active season for the rusty patched bumble bee, and any area disturbed would be reseeded with pollinator-friendly native seed mixes that would benefit the species and other pollinators.

The Blanding's turtle is the only state-listed species that could be present within the project's potential area of disturbance. Mitigation measures required by the Minnesota Department of Natural Resources will be implemented during construction to avoid incidental impacts to Blanding's turtles.

The *Ramsey County Rail Right-of-Way Design Guide* includes information about safety measures for wildlife such as fencing, which can prevent crossings and reroute wildlife to safer locations, and culverts, which smaller animals and reptiles can use to cross under the guideway and trail. Additional wildlife safety measures will be developed as design progresses.

Water Resources

The Rush Line BRT Project is not anticipated to negatively impact surface waters or water quality. New impervious surface would be constructed as part of the project, which could result in runoff to nearby bodies of water. Sections 3.2.14 and 3.3.15 of the EA identify ways to control and treat runoff and protect nearby water features, such as Goose Lake and Lake Phalen, during construction and operation of the project. A stormwater management plan will address collection and treatment of runoff from the project. Project staff will continue to coordinate with watershed districts and other regulatory agencies, and the project will comply with applicable regulations.

Air Quality

Operating the Rush Line BRT Project is not anticipated to adversely affect air quality (see Section 3.2.1 and the *Air Quality Technical Report* in Appendix E of the EA). The project anticipates using all electric, zero-emission buses, which would not contribute to increases in localized mobile source air toxics. Construction of the project could temporarily increase concentrations of air pollutants due to traffic impacts and construction activities. Where applicable and prudent, measures recommended by the US Environmental Protection Agency to reduce short-term construction impacts to air quality would be implemented, and construction best management practices would be implemented to control dust.

Coordination With the Lower Phalen Creek Project

The Lower Phalen Creek Project is an organization based on the east side of Saint Paul that is advocating for daylighting (or bringing above ground) portions of Phalen Creek, which once ran

[12] Available in the project library at https://www.ramseycounty.us/residents/roads-transit/transit-corridors-studies/rush-line-brt-project/project-library.

between Lake Phalen and the Mississippi River and was moved underground approximately 100 years ago. Ramsey County has been collaborating with the Lower Phalen Creek Project to explore opportunities to incorporate elements of the creek daylighting proposal into the Rush Line BRT Project design and specifically the stormwater design for the project. Ramsey County has also worked with the city of Saint Paul and the Capitol Region Watershed District to identify locations along the Rush Line BRT route where aspects of the daylighting project can be incorporated. This work has identified two locations along Phalen Boulevard where Rush Line BRT stormwater design brings water to the surface in a way that reflects the creek daylighting proposal: near the intersection of Arcade Street and Neid Lane and the intersection of Frank and Earl Streets. Project staff will continue to collaborate with Lower Phalen Creek Project as the project design is advanced.

Community, Economic and Social Analysis

SUMMARY

Comments were related to community character, quality of life, crime, residential property acquisitions and changes in property values or affordability. Comments also included questions or concerns about environmental justice, impacts to low-income communities and businesses, noise impacts, visual impacts, parkland impacts and historic resource impacts. Some comments noted support for the increased access to destinations along the route, including health care facilities and employment.

RESPONSE

Community Character

Rush Line BRT vehicles would operate partly in dedicated guideway and partly in mixed traffic in existing public right-of-way. The project would be co-located with the Bruce Vento Regional Trail in the Ramsey County rail right-of-way along a portion of the route in Saint Paul and Maplewood. Existing designated public access across the rail right-of-way to the trail, surrounding neighborhoods and transit would be maintained, and the project would use vegetative buffers, fencing and railings to deter crossings and access in locations that pose a safety risk. Fencing may be installed along portions of the Ramsey County rail right-of-way to enhance safety for transit riders and trail users. In these areas, designated crossings would be implemented to maintain access across the right-of-way. In addition, new dedicated guideway bridges would cross over existing trail crossings at the Gateway State Trail, between English Street and Weaver Elementary School, and between Fitch Road and Barclay Street to maintain connections across the Ramsey County rail right-of-way.

Property acquisitions required for the project would generally consist of a limited number of partial acquisitions along the edges of properties and would not include any buildings. The project would not fully acquire any properties. Residential areas would remain intact, and the partial acquisitions are not anticipated to affect community cohesion or character.

Crime

Research shows that people generally tend to commit crimes near where they live. Studies from San Diego,[13] Los Angeles,[14] and Durham, North Carolina[15] have found no significant increase in crime due to the presence of a transit station. Using transit to flee a crime is especially uncommon.

Transit facilities in the Twin Cities follow best practices for safety and security with multiple security cameras, emergency call buttons, and open layouts that are well-covered with lighting for high visibility. Rush Line BRT stations and park-and-ride lots will have these same safety features. Uniformed and plainclothes Metro Transit Police continually patrol transit routes, vehicles and stations. Like other METRO lines, transit police officers will inspect fares on board Rush Line BRT vehicles. Buses are each equipped with multiple security cameras. Bus drivers continually serve as "eyes on the street" and have instant radio and silent communications capability with police dispatch.

Impacts to Property Values and Affordability

A central goal of the Rush Line BRT Project is to expand access to jobs, education, healthcare and recreation for people with low incomes. Historically, however, investment in high-quality transit service has the potential to increase property values near stations. In some instances, these increases can cause displacement due to higher rents or property taxes. The project area municipalities' comprehensive plans are required to address local housing needs and policies that include affordable housing for renters and owners. Through the advanced station area planning process anticipated to be initiated in late 2021 or early 2022, Ramsey County and the Metropolitan Council will continue to work collaboratively with project area municipalities regarding advancing policies and protections that preserve and expand affordable housing options near the Rush Line BRT Project.

Environmental Justice

The EA included an environmental justice analysis (see Sections 3.2.11 and 3.3.12), which used a multi-step process to identify the potential for disproportionately high and adverse effects on minority and low-income populations during project construction and operations. Through this process, no disproportionately high or adverse effects to minority and/or low-income populations were identified. In fact, the project is expected to benefit these populations by expanding the availability of safe, reliable and efficient transportation options, thereby providing better access to employment, healthcare, shopping and other destinations. The *Environmental Justice Technical Report* in Appendix E of the EA provides the full analysis.

Noise Impacts

The noise analysis conducted for the project found that there would not be long-term noise impacts as a result of the Rush Line BRT Project (see Section 3.2.1 and the *Noise and Vibration Technical Report* in Appendix E of the EA), meaning that project-generated noise is not likely to cause community annoyance. The projected noise levels are considered acceptable by the Federal Transit Administration and mitigation is not required. There are no plans to construct noise walls or other

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[13] San Diego Association of Governments. *Understanding Transit's Impact on Public Safety*. June 2009. Available at https://www.sandag.org/uploads/publicationid/publicationid_1483_10995.pdf.

[14] Liggett, Robin, et al. 2003. *Journeys to Crime: Assessing the Effects of a Light Rail Line on Crime in the Neighborhoods*. Journal of Public Transportation, 6 (3): 85-115. Available at https://scholarcommons.usf.edu/jpt/vol6/iss3/5.

[15] Willoughby, Jack. 2014. *The Effect of Public Transportation on Crime: An Analysis of Durham's Bull City Connector*. Available at https://sites.duke.edu/urbaneconomics/?p=1215.

similar visual barriers between the Ramsey County rail right-of-way and adjacent properties, though vegetation and landscaping will be used to create a visual screen and maintain privacy similar to existing conditions where applicable. Temporary noise and vibration impacts could result from activities associated with construction. A detailed noise and vibration control plan will be prepared to mitigate short-term noise and vibration resulting from construction activities.

Visual Impacts

New project infrastructure and buses would create visual impacts, with most impacts occurring near the dedicated guideway and stations. An assessment of visual contrast with the surrounding area is included in Section 3.2.9 of the EA. Table 16 in the EA identifies specific project elements where visual mitigation has already been incorporated into project design. Specific to the dedicated guideway bridge at Johnson Parkway, public engagement was conducted with residents regarding the bridge dimensions, placement and materials. Based on feedback, the bridge was changed from a single span to a more visually open three-span design. Because Johnson Parkway is a historic property, design of the bridge will be reviewed in accordance with Secretary of Interior Standards, as described in Stipulation VI.A.iii of the Section 106 Memorandum of Agreement. As engineering advances, design and construction best practices will be used to avoid, minimize and mitigate impacts of the project on neighboring properties and communities. The guiding principles from the *Ramsey County Rail Right-of-Way Design Guide*[16] will be used to inform the design work and ensure input received through the public engagement activities is incorporated.

Parkland Impacts

The project is anticipated to impact four park and recreation areas: Eastside Heritage Park and Phalen Park in Saint Paul and Harvest Park and Weaver Elementary School in Maplewood. In coordination with the officials with jurisdiction over these properties, the Federal Transit Administration has determined that the project will not adversely affect the features, attributes or activities of these properties. More information on the project's impacts on these properties is included in Section 4 of the EA and Section 6.3 of the Finding of No Significant Impact.

Historic Resource Impacts

Because federal funding from the Federal Transit Administration will be pursued for the Rush Line BRT Project, the project is considered a federal undertaking and must comply with Section 106 of the National Historic Preservation Act of 1966 (Section 106) (54 USC Section § 306108) and its implementing regulations (36 CFR Part 800). The Federal Transit Administration has determined in consultation with the State Historic Preservation Office and other consulting parties that the project will have no adverse effect on 14 historic properties; no adverse effect, with conditions, on nine historic properties; and an adverse effect on five historic properties. The Federal Transit Administration and Minnesota Department of Transportation Cultural Resources Unit, in consultation with the State Historic Preservation Office and other consulting parties, have considered ways to avoid, minimize and/or mitigate adverse effects and have agreed upon measures for minimizing and mitigating the identified adverse effects as outlined in a Memorandum of Agreement. A draft of the Memorandum of Agreement was included in Appendix C of the EA for public review and comment. Three consulting parties (the Federal Highway Administration, US Army Corps of Engineers and State Historic Preservation Office) provided comments on the draft Section 106 Memorandum of

[16] Available in the project library at https://www.ramseycounty.us/residents/roads-transit/transit-corridors-studies/rush-line-brt-project/project-library.

Agreement, and revisions were made as appropriate based on the comments received. The final Memorandum of Agreement is included in Appendix B of the Finding of No Significant Impact.

In response to comments received about the potential for Phalen Creek to be considered a cultural resource, the Federal Transit Administration conducted additional tribal consultation. The Federal Transit Administration continued consultation with American Indian tribal nations on August 2, 2021 to ensure all tribes who may have an interest in resources in the project Area of Potential Effect are consulted. The request for participation invited tribes to help identify places that may have traditional religious and cultural importance to their tribe and whether Phalen Creek is a resource of concern. The Federal Transit Administration held an online consultation meeting on August 23, 2021 to present the project, information on Phalen Creek, and request further input from tribes. Of the tribes contacted, the Shakopee Mdewakanton Sioux Community commented that because they believe there are no cultural properties directly impacted by the project they have no concerns. They also noted they would like to be kept informed of the project progress and future research studies. No other comments were received from tribes. Based on discussion during the consultation meeting and comments received from the tribes, the Federal Transit Administration determined additional cultural studies of Phalen Creek are not warranted as part of the project; however, the project Memorandum of Agreement allows for future surveys and evaluations.

Public Engagement

SUMMARY

Comments included opinions that public input was not being taken into account and that not enough had been done to make the communities along the route aware of the project. Comments also expressed a desire for continued engagement with the public and community organizations.

RESPONSE

Public engagement efforts throughout the environmental analysis phase have built upon public engagement conducted throughout the Pre-Project Development Study. The Pre-Project Development Study, completed in 2017, included extensive public engagement that was used to guide selection of the locally preferred alternative, which identified the preferred route and mode for what is now the Rush Line BRT Project. To guide and prioritize public engagement efforts throughout the environmental analysis phase, project staff created a Communication and Public Engagement Plan. This plan describes the diverse communities throughout the corridor, identifies methods for engaging with these communities and establishes goals for public engagement during the environmental analysis phase. The three goals are to inform a diverse public, collect input from a diverse public and use this public input to shape the project.

From March 2018 to July 2021, project staff hosted or attended 200 events and spoke to approximately 3,500 people. Public engagement events included the following:

- Attendance at community events, such as festivals and community-hosted family-oriented events.
- Targeted gatherings including listening sessions and drop-in discussions hosted by project staff.
- Presentations to city councils, district councils and public housing resident councils.
- Pop-up meetings at community facilities and destinations including city parks, hospitals, transit stations, shopping centers and farmers markets.

- One-on-one meetings with business and property owners whose properties would be temporarily or permanently impacted by the project.
- Online and in-person open houses to discuss the EA.

In addition to these in-person efforts, project staff also employed online engagement tools including the project website, contact form, email newsletters, social media and interactive maps. From January 2018 to July 2021, 37 email newsletters were sent out, and as of July 2021, the email newsletter had over 3,300 subscribers. A description of how the EA publication, public comment period and public open houses were noticed is included in Section 7 of the Finding of No Significant Impact.

Through these public engagement activities, project staff recorded approximately 3,200 comments from residents and other stakeholders throughout the project area. Project staff documented this input and shared it with the Technical Advisory Committee and Policy Advisory Committee, which considered this input when making decisions regarding station locations, design of the Ramsey County rail right-of-way, guideway design and other project elements.[17] Input received has influenced decision-making as described in Section 5 of the EA.

After the conclusion of the environmental process, public engagement will continue as the design is advanced.

[17] A summary of public engagement conducted during the Rush Line BRT Project environmental analysis phase is available on the project website at https://www.ramseycounty.us/residents/roads-transit/transit-corridors-studies/rush-line-brt-project/project-library.

APPENDIX H

PUBLIC COMMENTS RECEIVED

PUBLIC COMMENTS

INTRODUCTION

The project received 184 comments on the Rush Line Bus Rapid Transit (BRT) Project Environmental Assessment (EA) from members of the public and community organizations. Copies of the public comment letters are included in Appendix H. Comment themes are coded for each substantive comment for cross reference to comment themes and responses in Appendix G.

From: Stacey Meade
To: info@rushline.org
Cc: Brad Meade
Subject: Bruce Vento Trail
Date: Tuesday, May 11, 2021 9:44:16 AM

Comment Theme
Pedestrian and bicycle facilities

Hello,

I am younger woman who runs on the Bruce Vento trail by myself nearly every morning. The Bruce Vento trail is one of my favorite parts about where I live. I truly love the beauty, calm, nature and safety I feel. I am so concerned about how the Rush Line will impact the trail. Are you able to explain how close it will be to the trail? How long will construction take? How long will the trail not be accessible? I am so sad that this rush line is proceeding, knowing the many concerns brought forth from the community.

Thank you,

Stacey Meade

[redacted]

Comment Themes
Pedestrian and bicycle facilities
Community, economic and social analysis

From: cphintz .
To: info@rushline.org
Subject: Your public feedback
Date: Tuesday, May 11, 2021 10:06:42 AM

The problem with your public feedback is it's difficult to give a negative response to the project. The vast majority of residents in the many neighborhoods along the proposed route don't want the project. Their quality of life is better with the Vento multiuser trail. There is great resentment that their quality of life must suffer for the residents of White Bear Lake convenance. Those residents chose to live out there and knew the consequences of that decision.

Cameron Hintzen

Get Outlook for Android

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Tuesday, May 11, 2021 1:12:13 PM

Comment Themes
Traffic and parking
Pedestrian and bicycle facilities

Submitted on Tuesday, May 11, 2021 - 13:12
Submitted values are:

Name:Greg Lees

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:After reviewing the entire proposed route of the Rush Line BRT, the logic behind the concept fails to support it.
Upon leaving St. Paul, the route becomes a parasite on the Bruce Vento Trail - completely ignoring the original intent of the trail in an effort to move high-speed buses in close proximity to walkers, runners, and cyclists - and creates a costly and unnecessary intrusion into multiple communities.
It gets worse as the BRT path leaves the Maplewood Mall transit station and begins to head towards White Bear Lake. There are some existing "choke points" that have existed in White Bear Lake for decades - they start around the County Road E junction with Highway 61 and grow worse as the route moves North to Cedar Avenue and become intolerable as it goes across Goose Lake and hits the Whitaker Street area.
The Bus line appears to squeeze what is now a busy area of 4-lane highway into a 2-lane impossibility. How can anyone call that "progress"?
This is just another example - beyond the basic concept's folly - of the government deciding what's best for the citizens of a community and forcing it down their throats while telling them they'll love it.
Please stop this intrusion into White Bear Lake NOW!

Comment Themes
Build Alternative definition
Project cost and funding sources
Ridership
Traffic and parking
Public engagement

From: Peggy Van Sickle
To: info@rushline.org
Subject: Cancel the Rush Line
Date: Tuesday, May 11, 2021 1:56:07 PM
Importance: High

You never listen to the people, the residents impacted my what you do. You just ignore what they say at meetings or in the paper. We don't need the Rush Line. People can drive to Maplewood Mall, park, and ride the bus from there. Just like the whopping # of 5 people have done daily. It's clear that the Rush Line was a bad idea for our area of White Bear Lake before Covid, but it's even a worse idea after Covid, when a huge amount of people are working from home. And most will probably stay working from home. NO ONE WILL RIDE IT!! And, you'll destroy Highway 61 with limiting it to only 1 car lane in each direction, cutting it in half of what it is now for cars. All this will accomplish is major traffic jams on Highway 61. And it will also have people cutting over to Linden Avenue (a residential street) to avoid Highway 61, which drunken drivers currently do to avoid police. Now more people will do it to avoid the traffic jams on Highway 61.

Plus, having that bus station in White Bear Lake is really ridiculous, and right by the high school that is being expanded! Nothing good will come of adding anything to that area. Only bad traffic accidents.

I'm so disgusted with the White Bear Lake Mayor, the head of the Ramsey County Board, and the Met Council. All 3 just push things through whatever they believe is good just to get MONEY from the Feds, which is still people's tax money. None of you ever listen to the people that live in the area, you just continue to do whatever you want. I hope everyone gets voted out, and that a new Governor gets rid of the bias and non-people represented Met Council. But by then, you will have done your damage. Then to un-do what you're planning to do to Highway 61 and our lovely city of White Bear Lake will only end up costing us local tax payers more money. But you don't care. Everyone knows that you just do things for your own egos and power positions. You like playing & spending other people's money. It's not only sad, it's a disgusting abuse of power.

Peggy J Van Sickle

From: Bridget Kranz
To: info@rushline.org
Subject: Rush line
Date: Tuesday, May 11, 2021 6:46:39 PM

Comment Theme:
Community, economic and social analysis

As a new resident of White Bear Township, I would like to express my deep opposition to the Rush Line project. I moved out of St. Paul to get away from crime, and don't want the peace and safety that I feel in my new home to be destroyed by this public transit line, which it will surely do.

Sincerely,
Bridget Kranz
White Bear Township Resident

From:	Carol
To:	info@rushline.org
Subject:	Removing all parking on Robert Street
Date:	Tuesday, May 11, 2021 7:10:23 PM

Comment Theme:
Traffic and parking

Hello,
I am writing with great concern for the group of well established businesses at 500 N. Robert Street. Removing all the parking on Robert on our end will be devastating for all of the businesses in our building. We have already lost the majority of our parking to bike lanes. We do not see business from the bike lanes.
We do not have a visible parking ramp! They are down the street or behind us with no easy access. Pedro park still has not been developed, the annex building fell through. Cant you apply for a federal grant that would allow
a totally sustainable park on top of a 3 level ramp below it. It could be self sustaining and bring in revenue.
We are one of the largest block of street side businesses in Downtown and you will destroy it with no parking. Seriously adding one or two minutes surely can't hurt the riders if the bus has to go around a few parked cars. Thanks for showing how much you care for commerce in DT St Paul.

Carol Hunn-Gregory
Keys Café
Owner
[redacted]

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Wednesday, May 12, 2021 6:19:04 AM

Comment Themes
Locally preferred alternative process
Project cost and funding sources
Pedestrian and bicycle facilities

Submitted on Wednesday, May 12, 2021 - 06:18
Submitted values are:

Name:Greg Norden

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:What are you doing? This is NOT GREEN!! At all!
475 millon is insane for a worthless project that crushes the environment
from St Paul to White Bear! Tearing up this trail is NOT being green-at all!
WHY the heck are you going to tear up a beautiful trail named after a great
man, Bruce Vento from more bus lanes> USE HIWAY 61 or WB Ave !!!!!! Thaey are
alreay set in place for what you are trying to accomplish. Bruce Vento trail
is a safe PEDESTRAIN trail for BIKES and PEDESTRIANS for move safely from St
Paul to White Bear-free from ANY traffic! This is a HUGE waste of $475
million! STOP SPENDING MONEY ON WORTHLESS PROJECTS! This makes people LESS
SAFE! What are you doing? Are you liberals or not is the real question. If
you cared about the environment this project would have NEVER come up! YOU
HAVE MUCH BETTER OPTIONS AVAILABLE without destroying nature!

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Wednesday, May 12, 2021 7:03:47 AM

Comment Themes
Locally preferred alternative process
Project cost and funding sources
Pedestrian and bicycle facilities

Submitted on Wednesday, May 12, 2021 - 07:03
Submitted values are:

Name:Gregory Norden

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:475 million is insane for a worthless project that crushes the environment from St Paul to White Bear! Tearing up this trail is NOT being green-at all! WHY the heck are you going to tear up a beautiful trail named after a great man, Bruce Vento from more bus lanes> USE HIGHWAY 61 or WB Ave !!!!!! They are already set in place for what you are trying to accomplish. Bruce Vento trail is a safe PEDESTRAIN trail for BIKES and PEDESTRIANS to move safely from St Paul to White Bear-free from ANY traffic! This is a HUGE waste of $475 million, makes it LESS safe for bikes and peds, destrys a beautiful nature trail in the name of what? To get to White Bear and Maplewood Mall WE HAVE HIGHWAY 61 for this! Your study should have ended there with this "finding!" STOP WASTING OUR MONEY WITH UNNEEDED PROJECTS! ok?

From: randy stoehr
To: info@rushline.org
Subject: Put an 8 by 40 ft bus where it safely belongs!
Date: Wednesday, May 12, 2021 7:51:09 AM

Comment Theme
Ridership

Any model is only as good as the assumptions behind it. Real city planners know that no model is perfect. Good ones continually update assumptions to compensate for output that deviates from observations and “unforeseeable” changes.

The best safe cost effective blueprints will discard a defective model and “start over” to produce a better one. These best practices are often ignored by official elected committee’s and associated to the project personnel, who are more interested in attention, power, or over reaching the budgetary confines of the vitality of research grants for development.

The ruining and abusing a 100 ft wide X Rail Road corridor for archaic unreliable and non profitable modes of moving people from point A to B is faulty at best. This is not an economic development. Not like the original land grab by right of eminent domain was for Railroad expansion corridor and absolute commerce fertility of which the Railroads did in fact provide.
Billions of dollars in jobs were created, towns sprouted in trading hubs along it for decades, moved millions of tons of materials and goods across our Minn and maybe the world. Lumber and steel made it to factories at a fraction of a cost never conceived by the original planners. It was an investment that kept on giving back the broadest possible growth return to Minnesota and a nation of workers and dreamers.
Put the busses on the streets and highways where they belong.
You are building a bridge to nowhere. And I think it’s time you realize this plandemic “Thing” is not going away soon.
#NORUSH

If you cant make it simple….
You don’t understand it well enough. A. Einstein

From: Jay Mangine
To: info@rushline.org
Subject: Stop the Rush Line Boondoggle!
Date: Wednesday, May 12, 2021 8:20:46 AM

Please don't waste public resources for the greatly not needed Rush Line. More people will forever be working from home. The site for the station in White Bear Lake is about the dumbest location you could think of, and would hurt a longstanding business' parking.

Simply stop this!

--
Thank you,

Jay Mangine, Realtor
[redacted]

Comment Themes
Build Alternative definition
Project cost and funding sources
Ridership
Traffic and parking

Comment Themes
Pedestrian and bicycle facilities
Natural Resources

From: Jill Peterson
To: Alicia Valenti
Subject: Rush Line Project
Date: Wednesday, May 12, 2021 9:13:05 AM

Questions for the online open house:

Will the Vento bike trail be eliminated or narrowed?

What will happen to the woody areas on the sides of the bike trail?

--

JILL PETERSON
Admissions Staff
Admissions

[redacted]

From: John Slade
To: info@rushline.org
Subject: Community board
Date: Wednesday, May 12, 2021 1:26:33 PM

Comment Theme
Public engagement

Are you planning to have meetings of the Community Advisory Board again?

John Slade

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Contact Rush Line Corridor Project
Date: Wednesday, May 12, 2021 2:45:10 PM

Comment Theme
Project cost and funding sources

Submitted on Wednesday, May 12, 2021 - 14:45
Submitted values are:

Name:Donald Kluegel

Email address:[redacted]

Phone number:[redacted]

Would you like someone to contact you?:Yes

Your comments or questions:Contact by e-mail
Question; After the bus line is in place what is the estimated cost subsidy from the tax payer per year from the state and/or federal government?.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Wednesday, May 12, 2021 4:32:18 PM

Comment Themes
Project cost and funding sources
Ridership
Traffic and parking
Community, economic and social analysis

Submitted on Wednesday, May 12, 2021 - 16:13
Submitted values are:

Name:John and Carolyn Johnson

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:We are opposed to this Rush Line because we think it is expensive, not needed , will be under-used, create traffic problems and probably affect our small-town atmosphere. Please listen to our residents!
Thanks.
John and Carolyn Johnson

From: [redacted]
To: info@rushline.org
Subject: Rush line
Date: Wednesday, May 12, 2021 7:39:57 PM

Comment Theme
Traffic and parking

Has there been a survey done of how many people will actually use this line? I think the number would be low.

Transportation needs in WBL would be better served if HWY 61 would be just one lane going north and one lane going south and the other lanes used for pedestrian, bike, wheelchair and golf cart usage. Many cities are closing down lanes for cars and converting to use by walkers, bikers, etc. The city of St Paul is closing down 4 areas. NYC closes portions of streets during the weekends. The Champs de Élysée in Paris is eliminating many of its traffic lanes in the city.
Less traffic in our historical town would be welcomed.

SLR

Comment Themes
Project cost and funding sources
Ridership
Pedestrian and bicycle facilities
Natural Resources
Community, economic and social analysis
Public engagement

Comment 16

From: Jim Wilson
To: info@rushline.org
Subject: Comments regarding rush line
Date: Friday, May 14, 2021 9:11:28 AM

Hi, my name is James Wilson and I live at [redacted]. We live along the Bruce Vento trail where the line is planned to go.

My comments do not support the rush line for the following:

1) Work norms are changing since Covid and will continue to do so. More and more people are working from home and all the studies that have been done to justify the half billion dollar expenditure are now invalid in a post Covid workforce. These studies are obsolete before the project starts. No one anticipated Covid and it couldn't have been. Please consider this and update your assumptions.

2) The jobs promised at a city council meeting at Maplewood Mall (5000?!) is a farce. The mall is a skeleton of itself and currently being studied to determine how to use or tear down. The mall is a ghost town.

3) There is already adequate infrastructure for people to get to work, shopping, events, medical facilities and all the things noted by those planning the rush line. Hwy 61 and White Bear Ave have many buses now operating for this purpose and still are very empty. Why is adding another empty bus line going to change this?

4) A recent article in the Pioneer Press referenced a recent study that ridership on buses is down 65%, light rail 75% and commuter lines over 80%! Building the rush line will not change this trend. Are you taking this study into account?

5) Safety- this has come up at several of the meetings I've attended. Walking or biking along the rush line 6-10 feet (we were told this by planners) next to 20 ton buses traveling 45-50 mph all day long is not safe. Children, pets and adults will be killed. At the very least not a very relaxing and enjoyable place to exercise and enjoy your family. The bus line in our area will go by a school with children having to cross the line every day. Not good.

6) Destruction of one of the best green spaces we have in the East metro. The majority of trees and open spaces will be destroyed and replaced with concrete parking ramps and bus stations. You will never be able to replace all the trees lost and green space lost. Forever gone. Sad.

7) Taking private property and running the line through backyards destroying privacy and quiet space for thousands of people. We witnessed people at meeting pleading and crying that their properties are being destroyed. And for what good purpose? Buses running early morning until late at night every 15-20 minutes, guaranteed to be mostly empty, will just destroy the privacy and quiet of people homes and lives.

8) No one is listening. Very few have supported this project. If a vote were to be taken it would not pass. Politicians and bureaucrats are not listening. When the maplewood mayor came through the neighborhood for "feedback" she got a lot. None of which she wanted to hear. The council rammed it though.

There has been a poor attempt to publicize this plan over the last few years. Many have not heard about it and when they do the questions and comments listed above all come up. Very few see the value or reasoning. They do not support.

9) Lastly. $475 million. Really? Do you truly think by the time the project is completed it will be on budget? Even if it is, half a billion dollars when we have so many other higher priority ways to spend tax dollars is a travesty and waste of tax payers dollars. We already have infrastructure available to be used at a much lower cost.

I apologize for the long email. I could write more but you've heard it before from the constituents and it hasn't seemed to matter.

I truly hope you are really looking with open minds and ears to the public and also looking at the changing work trends and needs. Because this project does not look successful from the start.

Thank you.

Jim Wilson

Sent from my iPhone

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Friday, May 14, 2021 11:25:14 AM

Comment Theme
Support for the project

Submitted on Friday, May 14, 2021 - 11:25
Submitted values are:

Name:Tom Basgen

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I got family that lives up in WBL. And just speaking as someone without a car, that makes WBL a real pain to access. No offense to the 71, but it does suck. The A Line was the thing that allowed me to ditch my car so I would be stoked to have another brt route.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Friday, May 14, 2021 2:57:18 PM

Comment Theme
Community, economic and social analysis

Submitted on Friday, May 14, 2021 - 14:57
Submitted values are:

Name:Mike Babcock

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:The proposed path of this line cuts through large swaths of parkland. The serene path along Phalen Blvd will be paved over, detracting one of the few attractions this neighborhood has replacing it with industrial concrete. The bridge over Johnson parkway, while necessary for this plan, is an extreme eye sore.
It is clear the planning commission has not questioned the residents of the areas affected by the construction of this line. Instead doing what they think the residents of more affluent communities want instead. Perhaps this is a new form of redlining... destroying the lower income neighborhoods in favorr of what they think the upper class neighborhoods and residents want.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Friday, May 14, 2021 5:04:58 PM

Comment Themes
Project cost and funding sources
Ridership
Traffic and parking
Community, economic and social analysis

Submitted on Friday, May 14, 2021 - 17:04
Submitted values are:

Name:Mark Peterson

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I am generally and strongly opposed to construction of the BRT project as planned. In brief, my opposition is based on: 1. a very probable lack of minimum required ridership consequently providing inadequate funding to sustain its operation and thereby requiring a new and additional source of perpetual funding in the future; 2. personal security concerns based on obvious current, relatively recent, and more historical developments this century in this country that indicate security threats and occurrences are increasing substantially across various venues; 3. the BRT will increase various types of congestion; 4. the area covered is not conducive or suited to such a transit scheme (its practicality is near minimal in my estimation); 5. the area has other issues to which such monies could be more properly and effectively applied; 6. many employment positions are moving to working remotely which will reduce the need for creating such an expensive putative transit "solution". BRT cannot be justified here by need or affordability. These are a few of more reasons that generate my opposition to this project. Thank you.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Saturday, May 15, 2021 9:44:52 AM

Comment Theme
Build Alternative definition

Submitted on Saturday, May 15, 2021 - 09:44
Submitted values are:

Name:JOY E BENN

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:What about public restrooms? Basic needs for human sanitation must be addressed. There is no dignity for anyone when people don’t have adequate access to restroom facilities. Please address this public health concern for me.

Comment Theme
Community, economic and social analysis

From: Nick Batterman [redacted]
Sent: Monday, May 17, 2021 2:08 AM
To: Yang, Nelsie (CI-StPaul) <Nelsie.Yang@ci.stpaul.mn.us>
Subject: Re: Form Submission - Contact Us - PPE...Health care workers have rights to protect themselves

Think Before You Click: This email originated **outside** our organization.

Hello Nelsie,
My wife & I live on the north west corner of Arlington & McAfee street.
What can you tell us about the proposed RUSH LINE ?
Which houses will be removed ?
Please be honest.
It is not possible to build without removing some homesteads.

Please & Thank you.
I am expecting you to be direct & honest,

Nick & Haja Batterman
Your constituents.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Monday, May 17, 2021 8:04:07 PM

Comment Theme
Project cost and funding sources

Submitted on Monday, May 17, 2021 - 20:04
Submitted values are:

Name:Lee Momsen

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:Stop wasting our money. The Rush Line will never make a profit, won't come close to breaking even, it would always have to be subsidized, it would only benefit a very few people. Be responsible!!!

From: mary h
To: info@rushline.org
Subject: Stop
Date: Monday, May 17, 2021 10:27:00 PM

Comment Theme
Opposition to project

No need

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Tuesday, May 18, 2021 7:30:31 AM

Comment Theme
Opposition to project

Submitted on Tuesday, May 18, 2021 - 07:30
Submitted values are:

Name:Edna Tratar

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:No Rush Line!!

From: Loni Kay
To: info@rushline.org
Subject: NO to the rush line!!!
Date: Tuesday, May 18, 2021 8:06:24 AM

Comment Themes
Ridership
Traffic and parking

White Bear residents should DEMAND an opportunity to hold a SPECIAL VOTE FOR or AGAINST this invasive addition to our city! That would only be fair....let the people decide.

In order for people to use the Rush Line they would have to GET TO the station in White Bear AND PARK.....just where are these parking places going to be provided, for all day parking, without further impacting the existing neighborhoods and the business located at that bus station.

Do you want more parking provided for POSSIBLE bus riders OR for customers visiting shops in town?

How is an accordion bus going to turn, crossing a railroad track pausing to make sure there is not a train coming, without holding up traffic on highway 61 which is so busy and getting busier. Also adding yet ANOTHER traffic light on 61?

IF WB really needs a commuter system use a TRAIN....the train tracks are already in place!

Maplewood Mall ALREADY HAS bus parking/buses going places and to the airport, etc. please expand that service area and leave White Bear ALONE!!! Bad idea all away around... I am not aware of a lot of people using that already existing service as it doesn't look busy when I am in the area.

PLEASE.....NO RUSH LINE. Sincerely, Loni Kay

Sent from my iPad

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Tuesday, May 18, 2021 9:57:13 AM

Comment Theme
Community, economic and social analysis

Submitted on Tuesday, May 18, 2021 - 09:57
Submitted values are:

Name:Corey Whipps

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:To Whom it may concern,

I am strongly opposed to the bus line coming into White Bear Lake. Most people that live in White Bear Lake choose to live outside of the city to enjoy a quieter living experience. It's well documented that the rise in crime has skyrocketed in both Minneapolis and St. Paul in the last year. Our family moved out of St Paul for this very reason. The amount of assaults, robberies, vandalism, loitering and littering that happens regularly at bus stops in Minneapolis and St. Paul is not something that we want to expand to White Bear Lake. The amount of working class individuals that would use the proposed bus line would be minimal. The "cons" far outweigh the "pros". Please contact me with any questions or further input.

Very Respectfully,

Corey Whipps

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Tuesday, May 18, 2021 9:59:20 AM

Comment Themes
Project cost and funding sources
Ridership

Submitted on Tuesday, May 18, 2021 - 09:59
Submitted values are:

Name:Tom Kenny

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:With transportation norms changed so drastically over the past 18 months with Covid, I believe the extent of this project is a huge waste of taxpayer dollars! The changes in work venues regarding home vs brick and mortar, people uneasy about being in closed quarters with others make me believe that we should try running buses on a prototype volume to gauge what type of volume would actually take the bus and if millions are actually needed for permanent road changes/construction. Although I do believe in public transportation, at this point in time there is no way I can believe we need this line built to extend you are proposing.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Tuesday, May 18, 2021 10:12:53 AM

Comment Theme
Support for project

Submitted on Tuesday, May 18, 2021 - 10:12
Submitted values are:

Name:Kristeen Bullwinkle

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I look forward to this project's completion and my ability to walk to a station and take a bus to St. Paul. After reviewing your documents I see no significant negative impacts to my community. It will make it much more likely that I will attend events in St. Paul more often than I do now.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Tuesday, May 18, 2021 12:07:31 PM

Comment Themes
Ridership
Traffic and parking

Submitted on Tuesday, May 18, 2021 - 12:07
Submitted values are:

Name:Jo Anne Murphy

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:Please reconsider putting this Rush Line in our beautiful city of WBL! The pandemic has changed the way many of us work and working from home is here to stay. We do not need to add to the traffic congestion on Hwy 61! Please stop the Rush line!

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Tuesday, May 18, 2021 1:45:05 PM

Comment Themes
Project cost and funding sources
Ridership

Submitted on Tuesday, May 18, 2021 - 13:44
Submitted values are:

Name:C. Ryan Solberg

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:Waste of money. We DO NOT NEED more infrastructure like this- we have people working from home now more than ever before. This is a waste. Typical Minnesota! More government must be good. NOT!

Ryan Solberg

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Tuesday, May 18, 2021 2:11:44 PM

Comment Themes
Project cost and funding sources
Ridership

Submitted on Tuesday, May 18, 2021 - 14:11
Submitted values are:

Name:K Strane

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:This seems like a pretty big expense since a lot of the businesses are staff work
remotely. They are finding they do not need the office space. It is my observation from many letters to the editors by residents that the majority do not want this or the expenses.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Tuesday, May 18, 2021 2:37:24 PM

Comment Theme
Ridership

Submitted on Tuesday, May 18, 2021 - 14:37
Submitted values are:

Name:Dave Ruan

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I want to add my comment and concerns about the Rush Line. I'm not in favor of the current version you have planned. I think it's a bad fit for the location. I know that ridership is reduced. My concerns are the same that you are already aware of. I know that you feel you're too far in to put a pause on the project. I believe that if you take an objective look with the current data we know you have, you will agree that it's time to reconsider.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Tuesday, May 18, 2021 3:32:05 PM

Comment Themes
Project cost and funding sources
Ridership

Submitted on Tuesday, May 18, 2021 - 15:06
Submitted values are:

Name:Laurie Sampair

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:Me and my household are totally against this project! It costs to much, there will not be enough people using it to justify the money , look at the current green/blue lines! They are to frequent and to many stops! Nobody in our household or my extended family say they will ever need or want yo take it! Please listen to people before you sink so much money into this project. Thank you!

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Tuesday, May 18, 2021 3:59:55 PM

Comment Theme
Pedestrian and bicycle facilities

Submitted on Tuesday, May 18, 2021 - 15:59
Submitted values are:

Name:Aaron Propes

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I'm concerned about the detours for pedestrians and cyclists along the proposed route. I currently bicycle commute all year from Lake Phalen to White Bear Lake, so I'm very much in favor of the route, but I also know from experience there's not many good places for detours near the Burkle Road area - White Bear Lake is not a good place for cyclists - there's no shoulder on the road and many aggressive drivers, and the sidewalk is often shielded from cars exiting driveways or adjacent roads, not to mention frequently unshoveled during the winter.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Tuesday, May 18, 2021 4:10:07 PM

Comment Themes
Project cost and funding sources
Public engagement

Submitted on Tuesday, May 18, 2021 - 16:10
Submitted values are:

Name:Karen Larson

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:Seems like we are beating our heads against the wall, how many people need to express their views against the Rush Line? Seems like the mayor of WB and Victoria Reinhart will push this through regardless of public input. What a ridiculous waste of money in these times,
We seem to be wasting our breathe, I have yet to meet anyone in favor of this project.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Tuesday, May 18, 2021 4:20:58 PM

Comment Themes
Project cost and funding sources
Ridership

Submitted on Tuesday, May 18, 2021 - 16:20
Submitted values are:

Name:Victoria Canterbury

Email address:

Phone number:

Would you like someone to contact you?:

Your comments or questions:The Rush Line is not needed or wanted in downtown WBL. The project was pitched to us as small business owners 'needed' the service to help find employees. Not one business owner stated that they were in favor or were having issues finding employees in downtown WB. Downtown WB is a quant small community that is family friendly. We pay taxes to keep it that way. We do not need empty over sized buses driving on the shoulder of Hwy 96, which are currently used for bikes. The current buses are rarely used. Data was taken before COVID, which did not justify adding transportation, and now fewer professionals are working outside of their home so less buses are needed. Also, if Rush Line can not support itself, we the WB tax payers were told that we will need to pay for it. Please listen to the WB tax payers and support our needs. No Rush Line is needed.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Tuesday, May 18, 2021 4:24:20 PM

Comment Theme
Natural Resources

Submitted on Tuesday, May 18, 2021 - 16:24
Submitted values are:

Name:Matt Lewis

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I strongly support the Rush line BRT project. In order to meet federal, state, and local carbon emissions goals, we need drastic mode shifts from people living in every part of the state. Projects like the Rush line can play a key role in reducing VMT from the emissions-heavy parts of the metro. This environmental impact cannot be overstated. We need to reduce emissions from transportation extremely quickly, and that means providing options to car-dependent subarbs.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Tuesday, May 18, 2021 4:35:37 PM

Comment Themes
Locally preferred alternative process
Ridership
Pedestrian and bicycle facilities
Natural Resources
Community, economic and social analysis

Submitted on Tuesday, May 18, 2021 - 16:35
Submitted values are:

Name:Trisha Ngu

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I am disappointed in the decision to run the BRT down the Bruce Vento trail in Maplewood and would like to see it run down hwy 61 instead. Please protect and preserve the nature trail, as it has grown into an irreplaceable asset to our community over the years. Also, I saw no mention of the pandemic in the assessment; how will traffic patterns and transportation needs/demands change as a result of the pandemic? Can existing roadways be utilized as we seek to understand the 'new normal' of rush hour commuting post-pandemic?
I strongly disagree with taking land from Harvest park to build a parking lot/ramp. That is our community green space and should not be considered for acquisition. A parking lot/structure will permanently change the character and beauty of the park (along with bulldozing of the mature trees along the BVT), and take valuable green space from our community.
I support the No Build Option and request that existing transitways be utilized to meet transportation demands, which need further study as a result of drastic life and work changes following the pandemic.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Tuesday, May 18, 2021 5:29:14 PM

Comment Themes
Project cost and funding sources
Traffic and parking
Community, economic and social analysis

Submitted on Tuesday, May 18, 2021 - 17:29
Submitted values are:

Name:Darlene Ascheman

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:We oppose the rush line that will be going through White Bear Lake. The cost, the increased bus traffic, loss of parking, and making it easier for thieves to get in and out of our quaint town are good reasons to leave well enough alone and don't wreck our town. Listen to the people not the appointed officials.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Tuesday, May 18, 2021 5:34:31 PM

Comment Theme
Traffic and parking

Submitted on Tuesday, May 18, 2021 - 17:34
Submitted values are:

Name:Russ Senn

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I oppose this project. If allowed, will parking for nonresidents be allowed on Stewart Avenue East of Highway 61?

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Tuesday, May 18, 2021 8:09:53 PM

Comment Themes
Project cost and funding sources
Ridership

Submitted on Tuesday, May 18, 2021 - 20:09
Submitted values are:

Name:Dane Snow

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:Please do not move forward with this project. We are still in the midst of covid-19. We do NOT need to recklessly waste money. This is NOT needed and certainly NOT needed now. As a resident of White Bear Lake and one who did use public transportation prior to the pandemic, I urge you to cancel the Rush Line project.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Tuesday, May 18, 2021 8:10:26 PM

Comment Themes
Project cost and funding sources
Ridership
Traffic and parking
Public engagement

Submitted on Tuesday, May 18, 2021 - 20:10
Submitted values are:

Name:Dennis Stevens

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:The Rush Line is a complete waste of money and is being forced upon an entire community who does not need it or want it. City leaders are not listening to the residents they are supposed to represent.
Very few would actually ride it and many more ABSOLUTELY do the want it. The buses would be 3/4 empty, stopping two often, too many times a day. It createbe a traffic and parking issues and disrupt the small town feel of historic downtown White Bear Lake. It would be a complete waste of money.
Stop the plan NOW!

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Tuesday, May 18, 2021 8:11:10 PM

Comment Theme
Opposition to the project

Submitted on Tuesday, May 18, 2021 - 20:11
Submitted values are:

Name:Lilach BarShai

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:No to the rush line! We do not need it!

From: s irlbeck
To: info@rushline.org
Subject: Rush line
Date: Tuesday, May 18, 2021 8:40:23 PM

Comment Theme
Community, economic and social analysis

Hello. I know you are getting a lot of negative comments about the Rush Line. As a senior citizen, I am in favor of the Rush Line. As I drive less and less, I see it as an advantage to get to appointments downtown. I have some concern about the impact on the downtown and the old small town feel. I hope electric buses or smaller commuter buses can be considered for runs other than morning and evening rush hours.
Thank you.
Sonja Irlbeck

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Contact Rush Line Corridor Project
Date: Tuesday, May 18, 2021 8:46:57 PM

Comment Themes
Project cost and funding sources
Ridership
Community, economic and social analysis

Submitted on Tuesday, May 18, 2021 - 20:46
Submitted values are:

Name:Bradley Dupre

Email address:[redacted]

Phone number:[redacted]

Would you like someone to contact you?:Yes

Your comments or questions:I am against the proposed Rush Line Project. It will not be a good use of resources and few people will use it. When the massive cost is compared to the small number who will use it we cannot justify building it. Then the Rush Line will continue to be a drain on tax dollars due to it not being used by paying riders. Like the Green Line and Light Rail it will not pay for itself. It is unsafe to use those lines due the high crime rate. Since the current lines are unsafe due to crime and are also used for winter shelters by the homeless we can expect the same for any future line. There isn't a working plan to address those problems.
I don't know of a single person who supports this plan and also don't know anyone who will use it. Is there data to show there is a need for this project?

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Tuesday, May 18, 2021 9:32:47 PM

Comment Themes
Project cost and funding sources
Ridership
Traffic and parking

Submitted on Tuesday, May 18, 2021 - 21:32
Submitted values are:

Name:Barb Frederick

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:In our Post-Covid society, will there be ridership to self-support this bus endeavor?
Where do the funds come from? Are they guaranteed?
Highway 61 is compromised in terms of space now. Adding buses will further condense space for vehicles. There will be increased traffic going to the 9-12 high school. More inexperienced young drivers will be part of the congestion creating conflict and more accidents.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Wednesday, May 19, 2021 7:08:43 AM

Comment Theme
Support for the project

Submitted on Wednesday, May 19, 2021 - 07:08
Submitted values are:

Name:Soren Stevenson

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:The criticism that this route is unnecessary because of civic is mut because by the tribe the line is running downtown St Paul will be a large draw again. While the exact location of stops may need to change to accommodate stadium goers for example, the concept of routes from the suburbs to the cities and back is still needed. The stops in the first ring suburbs like Maple Grove should be expanded to allow better transit for folks unable to afford the city but still dependent on it for employment

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Wednesday, May 19, 2021 7:24:30 AM

Comment Themes
Project cost and funding sources
Ridership
Traffic and parking

Submitted on Wednesday, May 19, 2021 - 07:24
Submitted values are:

Name:Vicky J Moore

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:This entire project needs to be reconsidered. Even before Covid, it's usefulness was questionable. Now, as more people continue working from home, even more so. From a cost benefit analysis, this does not make sense. There is no way we'll have enough riders to justify rides every 10-15 minutes. It will also cause immeasurable harm to our community in terms of traffic. With the new High School expansion, it's already going to be greatly increased in the downtown White Bear area. Adding frequent buses to the mix will create an unsafe environment, especially at the planned 7th Street stop which is right by the schools. That's going to be thousands of teen drivers trips daily when you consider arriving and departing for school as well as sports activities. The increased congestion will deter people from shopping downtown here, and result in traffic being diverted to side streets which are almost 100% family homes, many with children.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Wednesday, May 19, 2021 9:57:03 AM

Comment Themes
Project cost and funding sources
Ridership

Submitted on Wednesday, May 19, 2021 - 09:56
Submitted values are:

Name:Gary Bosch

Email address:

Phone number:

Would you like someone to contact you?:

Your comments or questions:We are opposed to the Rush Line for the following reasons...
1) Down Town White Bear Lake does not need/want the additional infrastructure that will be required. The Down Town area is perfect just as it is.
2) If a person needs transit to get to work outside of WBL, there's already several (Maplewood Mall, C and 61, Walmart, Hugo) Transit sites within several several miles.
3) The additional taxes, grants, etc that will be required would be a total waste of resources, and could be better used by the ultimate payers (taxpayers).
4) The general WBL population does not want it...PLEASE LISTEN TO "THE PEOPLE"!!!!
5) And likely the most logical reason for stopping this...the lower (permanent) number of people going to the office as a result of the new normal working from home...WE SIMPLY DON'T NEED IT!!!!!!!

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Wednesday, May 19, 2021 10:35:19 AM

Comment Theme
Natural Resources

Submitted on Wednesday, May 19, 2021 - 10:35
Submitted values are:

Name:Mary Pollard

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:Goose Lake in White Bear Lake has been the subject of restoration efforts for more than a decade. This poor lake and the flora and fauna surrounding it have been mistreated for decades, including having sewage dumped in it, native plants torn from it and, of course, a highway built through it. That the county would propose adding two additional lanes of highway through the middle of this lake is unfathomable. It is 2021. We don't mistreat our natural resources like this anymore.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Wednesday, May 19, 2021 1:47:12 PM

Comment Themes
Project cost and funding sources
Ridership

Submitted on Wednesday, May 19, 2021 - 13:46
Submitted values are:

Name:Phyllis J Erickson

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:Scrap the whole project. Too expansive and expensive and not enough demand.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Wednesday, May 19, 2021 1:54:07 PM

Comment Themes
Build Alternative definition
Ridership
Traffic and parking
Community, economic and social analysis

Submitted on Wednesday, May 19, 2021 - 13:54
Submitted values are:

Name:Kristin Keating

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:To Whom it may concern,

Our family, who resides just a couple blocks from the proposed white Bear hub is very OPPOSED to the rush line.

The rush line is a horrible idea for several reasons including:

*THE MAIN REASON- the location of the proposed bus stop is misguided. Not only is it across highway 61 from “downtown” white bear lake, but it is in an area with stop lights that are already too close together. These lights cause huge log jams during busy times, in particular when school is starting and letting out. Now The white bear school district is turning the current high school off of division street into one giant high school for the whole district. This means there will be a major upswing in drivers in this area when the project is complete. Both you and the school district seem to claim that this traffic will mitigated so that is not a problem but I don’t think this is realistic. Especially since the rumor going around is adding more traffic lights in this small area...

*need is another issue. I am not sure that there will be enough ridership to support the Millions and millions of dollars you want tax payers to pay to support this. I see the bus stops we do have (even pre-covid) and they were usually empty with the occasional rider. Most people do not want to take a hour plus ride to get downtown (especially Minneapolis) when they can get there in 20 minutes.

*safety-The last few times I was on public transportation, I did not feel safe. I saw people get on without payment, individuals physically fighting, a man with a clear mental condition yelling and spitting in riders faces including my mother who was In a wheelchair, and several homeless people asleep across seats. We do not need these safety concerns spreading out in our community because anybody who is bored and wants to stir trouble can now access our neighborhood by jumping on the rush line.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Wednesday, May 19, 2021 2:33:15 PM

Comment Theme
Project cost and funding sources

Submitted on Wednesday, May 19, 2021 - 14:33
Submitted values are:

Name:don w

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:Victoria Reinhardt came to our office a few years back and said, "public transportation NEVER is profitable". This will be another project that wastes taxpayer dollars, with very little or no economic gain, especially when one considers all of the negative aspect of what surrounds public transit. all one has to do is look at the light rail project-need i say more! STOP!

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Wednesday, May 19, 2021 4:03:00 PM

Comment Themes
Project cost and funding sources
Ridership
Traffic and parking
Pedestrian and bicycle facilities

Submitted on Wednesday, May 19, 2021 - 16:02
Submitted values are:

Name:Robert Rudolph

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:Any plans for the Rush Line should be scraped. Totally unnecessary and a waste of money. Will bring more congestion to area and ruin current green space. This is bike and walking trail area and not vehicle transportation area. Totally against this project. Who do you think is going to use this? The Rush Line is not needed.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Wednesday, May 19, 2021 6:03:38 PM

Comment Theme
Opposition to the project

Submitted on Wednesday, May 19, 2021 - 18:03
Submitted values are:

Name:Gerry Schulz

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I am against the Rush Line Project!

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Wednesday, May 19, 2021 6:13:23 PM

Comment Theme
Ridership

Submitted on Wednesday, May 19, 2021 - 18:13
Submitted values are:

Name:James Sanford

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:Covid-19 has forced companies to change how workers do their work. The number of workers traveling to downtown centers has diminished and probably will not increase to old levels.
Under these circumstances, it makes no sense to continue with this very expensive project.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Wednesday, May 19, 2021 6:55:28 PM

Comment Themes
Pedestrian and bicycle facilities
Community, economic and social analysis

Submitted on Wednesday, May 19, 2021 - 18:55
Submitted values are:

Name:Lisee Cacioppo

Email address[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I support the No Build option (Don't build the bus road down the Bruce Vento trail)!!! I do NOT support the acquiring of Harvest Park to build a Park & Ride lot!

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Wednesday, May 19, 2021 8:41:20 PM

Comment Theme
Opposition to the project

Submitted on Wednesday, May 19, 2021 - 20:41
Submitted values are:

Name:John Moran

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:We have never had a need for the bus or light rail from white bear to St.Paul or beyond. For one thing the transit system has never gone to anyone of our jobs or anywhere near where we go to work. If the bus goes down town from White Bear we had to walk more than a mile to get to the point where we were trying to get. One time we road on the train from Lexington Ave to downtown Minneapolis and people get on and off without paying $. This thing is because the Mayor of White Bear is on the Metro Transit board and is getting kickbacks from Metro transit and Ramsey County . Thanks John Moran

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Thursday, May 20, 2021 5:15:36 AM

Comment Themes
Project cost and funding sources
Ridership

Submitted on Thursday, May 20, 2021 - 05:15
Submitted values are:

Name:Emily Cox

Email address[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:Vehemently opposed. Plan does not make sense for the cost. Please reconsider as ridership is down 95% and even before Covid 50%. Noon want is this or wants this in WBL.

From: Beth Artner
To: info@rushline.org
Subject: Rush Line BRT
Date: Thursday, May 20, 2021 8:09:09 AM

Comment Themes
Project cost and funding sources
Ridership
Traffic and parking

The push for this project is disappointing and does not consider how our working life has changed so much since COVID19.

This project running through town at the number of times, and places it services, is just lunacy. It signs the taxpayers up for a long term debt for a project that just won't be useful. It can't even justify 25% of its cost. Let alone the insane subsidies necessary for this sad project, that will cause a ton of traffic problems going into and out of the downtown White Bear Area. Being on the same roads with the high school will have the effect of driving people away from the downtown area as it will be too inconvenient for people to want to wait and put up with the traffic.

Do something useful. A bad decision was made to destroy a transit system that actually worked, now you are trying to make something work that has already seen neighborhoods build up along driving somewhere, not along a line where transit was a part of your day and you could plan on riding the transit to work as your work might have also been close to the transit lines. Work places have spread out and there isn't a big employer with tons of employees that use the transit service. The transit service should actually try and work for places people want to go and have a single destination in mind. A shuttle to the airport. Event buses to Xcel, CHS ball park, Vikings Stadium, Mall of America, Duluth. Destination places where it's truly inconvenient to navigate or park.

I sat on an Advisory Board for the largest medical provider in the east metro area. Our surveys to the clients/patients showed no one thought being on the bus line was a benefit when visiting the doctors offices. Most people wanted to be in and out, elderly people don't want to ride the bus, they brought themselves or had family with them.

Seems like you should work for servicing many people at one time rather than the random onesie twosie crowd.

This isn't a good and helpful project. It's got a big hierarchy of people committed to doing it and not really thinking about whether it serves people in a meaningful way. This project is just building on bad decisions.

Beth Artner
[redacted]

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Thursday, May 20, 2021 9:43:21 AM

Comment Themes
Project cost and funding sources
Ridership

Submitted on Thursday, May 20, 2021 - 09:43
Submitted values are:

Name:Karen Jorbul

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:Public transportation ridership has declined immensely since covid. This bus line is not needed. People are not going to spend almost a hour each way commuting by bus to get to work. There is certainly no need for the purposed number of buses running every 10-15 minutes. Total waste of money to use big vehicles (buses) for a couple of people. Not needed and certainly not wanted by citizens of White Bear Lake.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Thursday, May 20, 2021 1:15:07 PM

Comment Themes
Project cost and funding sources
Ridership
Public engagement

Submitted on Thursday, May 20, 2021 - 13:15
Submitted values are:

Name:Barbara Bicha

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I feel that this whole project is a waste of time and money! This past week, Ramsey County approved a $5.8 million payment to Metro Transit who is experiencing heavy losses in the light rail and busses on the Green Line. Ridership is down considerably as demographics have changed dramatically from the past year and a half, and your environmental study goes back 3 years. The study is already outdated. I bet those of you on this project if there was a show of hands more than likely wouldn't even use this as a mode of transportation! Ramsey County Commissioner, Victoria Reinhardt was even quoted in the White Bear Press a while back that with her schedule, she probably wouldn't utilize it herself! I and a great majority of White Bear Lake residents feel the project should be tabled. One more thing...you are having a meeting in June at the Union Depot in downtown St. Paul. Why are you not holding it in White Bear Lake so more residents can attend? Surely a school auditorium or other large facility in the area could be used to get more people to participate.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Thursday, May 20, 2021 1:48:00 PM

Comment Themes
Locally preferred alternative process
Build Alternative definition
Project cost and funding sources
Ridership
Traffic and parking
Pedestrian and bicycle facilities
Community, economic and social analysis
Public engagement

Submitted on Thursday, May 20, 2021 - 13:47
Submitted values are:

Name:John Taylor

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I do not support the BRT. Aside from the members of the BRT PAC, I hear/ read of nobody wanting to see this happen in White Bear Lake. Local letters to the editor are overwhelmingly against the plan. Instead of working on talking points, maybe the BRT PAC (and especially the elected officials) should be LISTENING to the community and their voters.

This is NOT FREE money- beyond the staggering initial cost, it is a long term obligation to subsidize every rider on this streetcar service dressed up as a shiny electric bus. You can put lipstick on a pig, but it's still a pig.

It is not possible to predict future behaviors based on history. Anyone who thinks life will return to the old "normal" needs to pay close attention to the last 15 months. Ridership numbers on local public transportation have plummeted. People have found better new ways to do what needs to be done without actually going there. The future of work has changed forever. "My business hours are my customer's hours" is the norm. Even small businesses have built an online presence using alliances with delivery services. Major employers are speaking of working remote as a way of life for many roles that used to require commuting. Doctors have determined that yes, indeed they can even practice some medicine over facetime or zoom. With low ridership comes the opportunity for increased crime. If you think for a moment that I would encourage my mother to take a bus to a clinic or shopping trip you have another thing coming.

Traffic lights on highway 61 through White Bear Lake already cause congestion. The town is split by a five lane, busy road. BRT could add yet another dedicated lane that pedestrians need to cross. Cross traffic frequently "runs" the light at 61 and Lake/96 because the light cycle is extremely short. The plan will add at least one more light at Whittaker, possible another farther north. Each of lights will require a crosswalk. Every use will cause a new 30+ second delay of the normal cycle. The signals through town cannot be synchronized with this type of random disruption. BRT is not expected to be for commuters, so there will be negligible reduction in cars during peak commute times. Bus platforms will only be on one side of 61, so on average each rider will need to cross 61 once per round trip. If the ridership projections are right, this will make the congestion worse- especially during peak traffic times. The plan to provide BRT buses the "priority" to change the lights will further degrade the overall flow for 99%

of all traffic. The longer cars wait at stop lights (yes, including EV's), the greater their carbon footprint. Need I mention that there are fire and police services located downtown that would be hampered by this increased congestion?

From a quality of life perspective, BRT as proposed will negatively impact the character of downtown White Bear Lake. I've already mentioned the addition of another traffic lane. Whether the physical roadway is widened or not, the visual impact will be significant. The required platforms will also change the town's character. Building a private facility where drivers can park their buses and rest seems unnecessary when there already is one along the proposed route only a few miles away at Maplewood Mall. Why not think of the WBL leg of the BRT as a "north loop" based in Maplewood Mall? Instead of taking land for the rest area, drop riders of on platforms placed on both sides of 61.

Every action has a consequence. If the addition of bus infrastructure and more visitors incrementally reduces the appeal of the town as a "destination", how do you ever get that back? Maybe you could maybe ask businesses on St. Paul's east side. Beyond the intangible "charm" impact, some local businesses are losing valuable customer parking/access. Increased traffic near the new, expanded high school is another concern.

It's my understanding that there is no intention to extend the line farther north, which is why we need this terminal/rest stop. If there is actually a master plan to extend the line, don't take downtown space now to park buses. Figure out how to provide that elsewhere. If downtown is in fact the intended long term final stop (terminus) for BRT, shorten the route to Whittaker street or perhaps White Bear Avenue, then consider some sort of shuttle to downtown. The city already owns undeveloped land there- maybe a new use for the old maintenance building? We are testing autonomous vehicles to ferry people to the YMCA from senior housing. Why not extend that concept to ferry people from White Bear shopping center to downtown? Until that happens, a subsidized on-demand Uber/Lyft arrangement would certainly cost society less than running nearly empty buses through downtown on a frequent schedule. Maybe the chamber of commerce could support a shuttle? We wouldn't need bus platforms or rest areas. If riders are dropped off "at the door" the expected new crosswalk wait times would be eliminated.

Autonomous vehicles are likely to be roaming the streets before this project is ready for riders. When (not if) the bus becomes autonomous, would we need a private 3-bathroom rest stop? With the ubiquity of smartphones across all demographics or even "tap to pay" smart cards, why would platforms need pay stations? There could certainly be an app for that. Just another couple examples why a project like this should make the future, not propagate the past. There will be many disruptors in our future. This plan is based on the past.

For these and many reasons expressed by others, I don't support any of the BRT project as it relates to White Bear Lake. This is not a "greater good" topic. It has progressed this far because our county commissioner and mayors see free federal money and want to leave a "visionary" legacy to the community. They have assembled a team of like thinking advisors that can't grasp the local community opposition. Beyond the staggering initial cost, this is never projected to be self sufficient. It will unnecessarily burden generations to come, and will negatively change the character of the town we

call home. Now is the time for elected leaders to listen, not talk. Then, do the responsible thing and stop this project.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Thursday, May 20, 2021 7:21:17 PM

Comment Themes
Build Alternative definition
Traffic and parking

Submitted on Thursday, May 20, 2021 - 19:21
Submitted values are:

Name:Joseph Anzel

Email address:

Phone number:

Would you like someone to contact you?:

Your comments or questions:The location of the final stop in White Bear Lake is a poor choice. The white bear lake community recently approved construction on a new middle school and high school. Both the middle school and high school are located in close proximity to the rush line. The middle school will be located At the end of eighth Street. White bear Lake is one of the largest schools in the state of Minnesota. The rush line accompanied by the new schools will absolutely create congestion.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Thursday, May 20, 2021 8:33:53 PM

Comment Themes
Project cost and funding sources
Ridership

Submitted on Thursday, May 20, 2021 - 20:33
Submitted values are:

Name:Pamela Aanenson

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:Please stop this project. Lots of money. Not many proven who will ride it. Would like to see stats on how many riders there will be & how they can justify the expense.

Completely opposed! Please stop the project & maybe re-evaluate the need in a couple of years

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Thursday, May 20, 2021 9:33:03 PM

Comment Themes
Ridership
Pedestrian and bicycle facilities
Community, economic and social analysis

Submitted on Thursday, May 20, 2021 - 21:32
Submitted values are:

Name:Karin

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I'm concerned why this project isn't on pause due to the community impacts of the COVID-19 pandemic. In the last year the world drastically changed. How people are living and using public transportation is not what it was in 2018 when this project got off the ground or even 2019, pre pandemic.

The project website states the project addresses:
Serving the needs of people who rely on transit.
Meeting increasing demand for reliable, high-frequency transit.
Planning for sustainable growth and development.

My question is, do these things still need to be addressed in the same way you anticipated pre COVID?

While the general community may use this, if business people traveling downtown for work was a large percentage, this project needs to be on pause. Many businesses have embraced remote working. Is there still demand for this service? At a rate that make this investment worth the state's money?

Did you survey the residents of White Bear Lake and Maplewood to see if this rapid bus transit to downtown St. Paul is a service they see as a gap in their current transportation options? I would be interested to your market analysis for this project. Do people even feel safe to ride community buses due to COVID? How are you going to support the community that your buildings and noise will negatively impact? Are there safety precautions for pedestrians? White Bear Lake has a lot of foot and bike traffic, lots of kids, elderly, and animals. What is your education plan to ensure the community is prepared to embrace this new service? What about light pollution from the safety lighting that will be necessary at the parking facility? Will there be increased safety to prevent loitering or crime?

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Thursday, May 20, 2021 10:26:06 PM

Comment Theme
Ridership

Submitted on Thursday, May 20, 2021 - 22:26
Submitted values are:

Name:Suzanne Terry

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:Why not post pone plans and implementation until it is verified there is a transit need post Covid. It may seem like a good transit plan but the statistics show ridership is low and workers will not take public transit even if offered. Why propose a costly and environmental unfriendly bus line where there is NO demand? Covid has changed the home to work commuting patterns, possibly forever or at least for several years. Postpone until there is a true demand for adding additional buses.

From: Alicia Valenti
To: info@rushline.org
Subject: FW: White Bear Lake Rush Line
Date: Monday, May 24, 2021 9:54:47 AM

Comment Theme
Community, economic and social analysis

On May 21, 2021, at 8:05 AM, travis dupre [redacted] wrote:

Ms. Jo Emerson,

I would like to say that many of the people of White Bear Lake and surrounding towns are not in support of The Rush Line Project. One of the big reasons people move to the White Bear Area is to have the small hometown feel. Which is currently flourishing in White Bear Lake. We have never had so many great venues to eat and be entertained at. What will happen to the downtown area of 4th St. when busses are rushing by on a new massive highway? What will happen to the Railroad Park when the Highway is widened?

We also see the crime rates that rose in Maplewood after the bus station was installed. The bus line gives easy access to the city and cars located within the city limits. All a thief has to do is quickly run out of a store or break into a car and hop on the bus and disappear. How will this impact our Police force efforts? Will the police be patrolling our streets more than they currently are? What will be the impact to our new high school that will be located just blocks from the major bus turnaround? Would there be drug pedaling, robbery, kidnapping, raping of our youth that are trying to get ice cream after school...

I have had three new neighbors move into my area in the past year and they all have said White Bear Lake sold them on the feel of the downtown. I for one agree, and this is why I choose to live here after my tour of duty. Their hearts were broken when I told them about the bus line and they couldn't believe it.

We need to ask ourselves is The Rush Line really worth destroying our downtown? What is the cost to many current / future residents? By building the Rush Line will we kill everything that makes White Bear Lake, White Bear Lake?

We are not in support of The Rush Line.

--

Travis Dupre
Email: [redacted]

From: Gay Parker
To: info@rushline.org
Subject: Rush Line
Date: Friday, May 21, 2021 9:46:12 AM

Comment Theme
Opposition to the project

The WBL rush line is out of date. Many mistakes are made trying to get free money! Not necessary to trash a town for it.

Sent from my iPad

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Friday, May 21, 2021 11:19:12 AM

Comment Theme
Ridership

Submitted on Friday, May 21, 2021 - 11:19
Submitted values are:

Name:pamela younghans

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:Excessive cost for something that probably will NOT be utilzed as much as you believe - particularly POST COVID. People are moving and changing the way they live and their transportation requirements. Please consider these changes! Most WBL resisdents I have talked to do NOT want the Rush Line!

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Friday, May 21, 2021 11:27:06 AM

Comment Themes
Natural Resources
Community, economic and social analysis

Submitted on Friday, May 21, 2021 - 11:27
Submitted values are:

Name:Sharon Guiser

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I support the development of the Rush Line route because the North and Eastern areas of the Twin Cities have been underserved in public transit. This plan supports sustainable development with long term regional mobility and accessibility. It will serve the needs of people who rely on transit. And after reading the Environmental Assessment I believe it will be done with limited land acquisition and relocation. I also like that there was thorough consideration of floodplain, water quality and stormwater management and the potential need to coordinate with local governments when needed to control these further.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Friday, May 21, 2021 8:18:39 PM

Comment Themes
Locally preferred alternative process
Project cost and funding sources
Ridership
Traffic and parking

Submitted on Friday, May 21, 2021 - 20:18
Submitted values are:

Name:Kellie

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I think the Rush Line should go back to Rush Lake. It does not belong in White Bear Lake. I have seen some buses around the area after work and they are always empty. Highway 61 is already busy during rush hour and not the people in the area who work will have to deal with unwanted buses. I think the money being used on something that is not wanted to residents, the money should go elsewhere.

From: Paul Grachek
To: info@rushline.org
Subject: Downtown White Bear Stations.
Date: Friday, May 21, 2021 8:24:30 PM

Comment Theme
Build Alternative definition

Thank you for the detailed explanation of White Bear station options. I am in favor of option D. I believe It is the easiest option for buses to exit and enter Hwy 61.
There is the opportunity for future development of the area to the east of Clark Av. Also there are not any homes located on this route that would be disturbed by increased traffic. It would be easy to use the library from this location. I see it as a good opportunity to have higher density housing, retail space, as well as office space. Quality of life would be fantastic with expanded access to the walking path on White Bear Lake. In 10 to 20 years it could be like the 50th and France area in Edina. Thank You, Paul G.

From: Lanny
To: info@rushline.org
Subject: Into White Bear Lake
Date: Saturday, May 22, 2021 8:29:27 AM

Comment Themes
Project cost and funding sources
Ridership

What a waste of money, more people are working from home, which means ridership will never be high. We have a bus system that goes from White Bear Lake to St. Paul, and is never full. Why would you want to put in a rail system that will cost millions, when the money could be used for other things, like road improvements? I wrote the bus system for 18 years and it works just fine, no need whatsoever for rail service. I say NO to it.

Mary Anderson

Sent from Mail for Windows 10

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Saturday, May 22, 2021 1:27:53 PM

Comment Themes
Project cost and funding sources
Ridership

Submitted on Saturday, May 22, 2021 - 13:27
Submitted values are:

Name:Keith Hisdahl

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:Really, more economic waste on something only a fraction of the population will use. Along with safety problems and complete inefficiencies of moving people. I thing the future is in remote control public vehicles distributing people at will in safety and to the destination. This is the future, not big people movers that can be compromised, not managed safely and cause bigger death tolls.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Saturday, May 22, 2021 8:50:18 PM

Comment Themes
Project cost and funding sources
Ridership

Submitted on Saturday, May 22, 2021 - 20:50
Submitted values are:

Name:Carole Garrison

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:You haven't listened to us yet, sadly this will be no different. This line will destroy our community and in a few years time leave us with an ugly station and probably a bill from Ramsey County for cost overruns. This whole project is a disgrace, especially with changes in work and transportation from COVID. I use to ride the bus to St. Paul every day. Only stopped because I took a job closer to home that was not (and even under this stupid plan would not be) on a bus line. Please make better use of my tax dollars.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Sunday, May 23, 2021 3:06:39 PM

Comment Theme
Community, economic and social analysis

Submitted on Sunday, May 23, 2021 - 15:06
Submitted values are:

Name:Dave person

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I am a home owner in white bear, we do not want the rush line!!! This will create crime from the community. Because it WILL BRING CRIMINALS from st.paul to downtown businesses that spent their life savings to serve the community. We do not want our town to turn in to Minneapolis!! No thank you!

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Sunday, May 23, 2021 4:38:13 PM

Comment Themes
Locally preferred alternative process
Build Alternative definition
Traffic and parking
Community, economic and social analysis

Submitted on Sunday, May 23, 2021 - 16:38
Submitted values are:

Name:Justin Drieling

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:Hello,

I've lived in White Bear Lake my entire life. The thought of a Rush Line being a part of this city is wrong on so many levels to me. First, this is a smaller town with smaller roads and can already become quite congested at times. There is no location in this downtown that wouldn't cause an issue. The location by Bear Town Bar will cause not only issues to the surrounding business and homes, but congestion on 61 and the small side streets. Secondly, this is a small, quaint town that is very loyal to its roots. A bus line is the complete antithesis of that. People come here for the small-town feel, the simpler aesthetic, and to get away from the big city. Bringing in a rush line contaminates said aesthetic. Third, I haven't seen any postings or links by the city or the Federal Transit Administration to verify the claim that the rush line won't bring crime. From 2018-2019, crime, and especially violent crime, rose 35%. This rush line WILL bring crime to this town in one form or another. Lastly, there are better areas to build this stop. The southern border part of White Bear Lake has some more open spots that would make a much better stop. Hugo, just north of White Bear, is much more open and has undergone large steps forward in terms of construction and development in the last 10 years. Hugo has more than enough room for something like this.

Thank You,

Justin Drieling

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Monday, May 24, 2021 9:27:24 AM

Comment Themes
Project cost and funding sources
Ridership
Traffic and parking
Community, economic and social analysis

Submitted on Monday, May 24, 2021 - 09:27
Submitted values are:

Name:Dr. Linda Wolf

Email address[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I cannot say enough to express my displeasure about the proposed rush line. So many reasons to reconsider and not go ahead with this project. I have always thought that there would not be enough riders to justify the enormous cost of this project.
Even before Covid, it's usefulness was questionable and the cost per rider will be outrageous. Are the pushers for this project willing to pay that cost in the future when there will be few riders per bus. There is no way we'll have enough riders to justify rides every 10-15 minutes. It will also cause immeasurable harm to our community in terms of traffic. People who are pushing the project are using one reason of bringing more people into White Bear to help the businesses. I think it will do the opposite. The increased congestion will deter people from shopping downtown here, and result in traffic being diverted to side streets which are almost 100% family homes, many with children. Not to mention that the shoppers business want would probably not ride a bus in from St. Paul.
And then there is the very real environmental impact.
White Bear Lake character will be permanently changed and not in a positive way.
Please stop this project.
Dr. Linda Wolf

Comment Themes
Ridership
Community, economic and social analysis

May 24, 2021

Andy Gitzlaff, Senior Transportation Planner, Ramsey County
15 West Kellogg Boulevard, Suite 210
Saint Paul, MN 55102

Dear Mr. Gitzlaff,

I write to you today in support of the Rush Line Bus Rapid Transit Project. The Rush Line will benefit patients, employees, and trainees at Gillette Children's Specialty Healthcare.

Ensuring equitable access to care is a priority for Gillette. The Rush Line route has two stops that are conveniently located near Gillette facilities. One stop is within a block of our main hospital campus at 200 University Avenue East in St. Paul, and another stop is near our Phalen Clinic at 435 Phalen Boulevard. This route makes clinical care more accessible for our patients that do not drive or do not want to pay for parking.

Increased access to fast, reliable, and convenient transportation will be beneficial for our employees. Gillette offers fully subsidized public transportation to our staff. The Rush Line will decrease the amount of time our employees spend commuting to work while also eliminating the need to pay for parking. In addition to having stops near two of our clinical sites, the Rush Line's route is also near our warehouse at 455 Phalen Boulevard, where some of our staff are stationed. Finally, Gillette hosts medical and nursing students, residents, fellows, and interns each year. The Rush Line's route would allow these trainees to easily commute to Gillette without having to pay for parking.

The Rush Line Bus Rapid Transit Project will undoubtably benefit Gillette's community of patients, their families and our staff. We support this project and look forward to its completion.

Sincerely,



Barbara Joers
President and CEO
Gillette Children's Specialty Healthcare

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Tuesday, May 25, 2021 7:21:18 AM

Comment Theme
Project cost and funding sources

Submitted on Tuesday, May 25, 2021 - 07:05
Submitted values are:

Name:Bernard James Krupowicz

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:Searching for the value of this project and pondering; what problem are we trying to solve, who will benefit and is it independently financially sustainable. Without answers to these questions, I cannot support.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Tuesday, May 25, 2021 11:50:07 AM

Comment Themes
Project cost and funding sources
Ridership

Submitted on Tuesday, May 25, 2021 - 11:49
Submitted values are:

Name:Suzanne Ruedy

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I think the Rush Line is an absolute waste of money. Where are people going to park on the 7 stops. There is also a park & ride line at Co Rd C and Hwy 61. Did you even consider that??

How many people from the surrounding cities are
actually going to use this line.
Get your act together - look at the facts and drop this ridiculous project.

From: ray kappers
To: info@rushline.org
Subject: Rush line
Date: Tuesday, May 25, 2021 1:31:39 PM

Comment Themes
Project cost and funding sources
Ridership

I am sorry to say that I do not support the building of the Rush Line.
1. To costly for the taxpayers.
2. Not enough rider to support itself.
3. It will be slower than automobile.
4. Will not bring out the development that you are proposing.
I know that once the governments has a plan in place there no turning back. Please listen to the taxpayer before spending the taxpayers money.

Sent from my iPad

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Tuesday, May 25, 2021 4:45:41 PM

Comment Theme
Community, economic and social analysis

Submitted on Tuesday, May 25, 2021 - 16:45
Submitted values are:

Name:Yang Lor

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:How does the county and this project evaluate the damages that may cause to the bordering homes and properties along this rush line from such as trash or environmental. I'm more concern especially during snow season, that when this lane/line will be plowed, that additional snows will be moved to our property over time. Once it melts during the warmer days/weathers/seasons, it will/may cause puddle or flooding to our regular property that are next or close to/bordering. Will there be a process taking place to take care such situations or something along the line of creating ditches to make a flow of water away from home owner properties?

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Wednesday, May 26, 2021 5:53:00 PM

Comment Themes
Ridership
Pedestrian and bicycle facilities

Submitted on Wednesday, May 26, 2021 - 17:52
Submitted values are:

Name:Natalie

Email address[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:No one wants this. No one will use this bus. So many kids and families enjoy this trail and don’t want to compete with a bus for space. People who work in downtown St. Paul and live in white bear lake are not trying to take a bus to work. Terrible terrible idea.

Comment Themes
Build Alternative definition
Ridership
Traffic and parking
Community, economic and social analysis
Public Engagement



[redacted]

Email: info@rushline.org

Opposition to the Rush Line

I am saddened by the politics that the Rush Line as brought to WBL. When a high percentage of the downtown WBL community (businesses and neighbors) doesn't want it and yet we are forced to get it just doesn't add up.

After the community opposition, this project was moved to **my side of town**; actually, my front porch view. We built a new home in 2013 on an empty lot that sat for six years. Yes. This is my forever home. I can tell you if my family knew about the Rush Line coming in and how it is being pushed on its citizens--there is no way we would have ever moved to White Bear Lake.

I am wondering the answers to the following concerns:

1. Would you want a bus line as your new view in front of your home?

2. Would you want this for your family, grandchildren, or friends in your front yard?

3. Do we want our town to mimic St. Paul, Minneapolis or Maplewood? Don't we want to remain as a very special place in Minnesota?

4. The mayor said—the only meeting I attended with my husband I might add—"I adamantly oppose the Rush Line coming to White Bear Lake". Two weeks later she changed her mind and now it is coming here. This leaves me not understanding politics and not able to trust what is going on.

5. Why are we changing the footprint of White Bear Lake?

6. Going forward will we still hear, "you live in White Bear Lake, how wonderful"? I am guessing not.

We have seen other towns/cities that receive massive transportation efforts—either locally or regionally or, in fact, nationwide. Every day in the news media there is something grossly negative about mass transportation. Yes. Everyday. It is not difficult to find the negatives which far exceeds the positives.

My best friend (Kathy) owns the Midway Book Store (36 years she bought her store). She was promised so much from her city council members when the massive transportation came through. The area would be beautiful. Business would be booming! All these promises were the complete and total opposite. What really happened…. everyday Kathy cleans up graffiti, damage to her building, theft, yelling vulgarity at her and her employees, and at least once a week on her front doorstep she picks up human feces. She can no longer call 911 as there is a fee to call them now. Please by all means give Kathy a call to find out more information on what mass transportation has done to her community.

Facts:

Yes Traffic will increase on Hwy 61 and the surrounding area.
Yes People are leaving the cities as employers are leaving and stores are leaving (only condos/apartments remain).
Yes Minimum wage increases in the cities making employer's flee.
Yes Working from home is working just fine for employees and employers.
Yes An extremely small percentage of people have ever used the bus line in White Bear Lake and this will continue. Even the people who want it I can guarantee they will never take the bus. They just enjoy a good argument.
Yes Ridership is down nearly 90 percent.
Yes Home values drops.
Yes Two surveys went out in WBL and thousands were against it.
Yes I attended just one city council meeting. Our elected official stood up and said, "I adamantly oppose the Rush Line in White Bear Lake." Everyone stood up and clapped. We were proud of her stance. She turned around two weeks later and was "pro Rush Line". How do you trust anyone after this statement?
Yes The Rush Line will indeed be my front view on my porch early morning to 10 p.m. I have my dinner on the front porch all summer long. Would you want that for you or your family? *Is that really fair to me*?
Yes Crime (as well as violent crimes) increases.
Yes Sadly, homeless/mentally ill use the mass transportation to get around.

Thank you for taking the time to listen to the citizens of White Bear Lake. I truly hope we make a difference in our community.

Gloria Hage

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Friday, May 28, 2021 11:06:09 AM

Comment Theme
Traffic and parking

Submitted on Friday, May 28, 2021 - 11:06
Submitted values are:

Name:Melanie

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:We don’t need this in WBL. I commute to work and this doesn’t help me at all, as it doesn’t go in the direction I need to go. It will only cause more confusion/congestion on hwy 61 that currently functions just fine for me. Spend the money on 694 across the river where there are actual problems that aren’t being addressed.

From: Comcast
To: info@rushline.org
Subject: Please re-evaluate
Date: Monday, May 31, 2021 2:52:25 PM

Comment Themes
Project cost and funding sources
Ridership

Please re-evaluate the need for the Rush Line project before just pushing forward because the plans have already been made.

I would like to see the numbers of riders, etc to justify building Rush-Line in our current post-covid environment where people are not going into the city as much & working from home (many of whom will continue working from home). How many people will honestly or really need Rush Line to connect residents & workers in downtown St Paul, St Paul's East side, Maplewood, Vadnais Heights & White Bear Lake. Looking at the LTR in Minneapolis (except when there is a ball game) I sure do not see the ridership to justify the cost.
Desiring to get more people into the city is not a justification for costs.

Have you done a recent study on what ridership looks like & if it will justify the cost not only in $$ but also the land that it being taken up. Please do an open & honest current post covid evaluation.

Thank you for your time & for your response.

Pamela Aanenson
Concerned Lifelong WBL resident

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Tuesday, June 1, 2021 3:30:16 PM

Comment Themes
Project cost and funding sources
Ridership
Community, economic and social analysis

Submitted on Tuesday, June 1, 2021 - 15:30
Submitted values are:

Name:Kelly Potz

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:The Rush Line will be significantly underutilized, at a significant cost to taxpayers. There are buses that connect the Maplewood Mall to various areas in St. Paul. This project is not needed, and it will destroy the charming and historic small-town feel of downtown White Bear Lake. Please consider running the line elsewhere or not as far into White Bear Lake. It isn't needed and will destroy our lovely area.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Tuesday, June 1, 2021 3:40:25 PM

Comment Themes
Build Alternative definition
Pedestrian and bicycle facilities

Submitted on Tuesday, June 1, 2021 - 15:40
Submitted values are:

Name:Matthew M.

Email address:

Phone number:

Would you like someone to contact you?:

Your comments or questions:Arcade Street station area has three signalized turns within a small distance of one another, which will inevitably slow the line - consider running the BRT guideway under Arcade instead, connecting at the Neid Lane intersection with a station integrated with the Arcade Street bridge.

St. John's and Maplewood TC stations - consider signage and platform alignment as would make northbound/southbound travel directions abundantly clear - can see people becoming confused easily with this spur segment on what way the bus is going.

Bus lanes in roads generally - consider physically protecting (e.g. bollards, curbs) and/or permitting bicycles to use where possible (and no facility is in the road threshold).

TH 61 portions of alignment - if stations are being placed along this road, ask MNDOT to add sidewalks on both sides of the road. Not a lot of transit users are going to want to walk to a station through snow banks or variable condition grass.

Station platforms - consider full level boarding enhancements - like the Metro Red Line and other systems (possibly use computer assisted alignment systems to allow the bus to align properly with the platform as used on London Underground trains to assure level access). Further consider enclosing the stations and using platform edge/screen doors to protect from weather and more readily assure fare collection (if paired with a gate system). Consider on-site bicycle parking facilities.

From:	BARTON A BENSHOOF Owner
To:	info@rushline.org
Subject:	Rush line.
Date:	Tuesday, June 1, 2021 10:23:41 PM

Comment Themes
Project cost and funding sources
Ridership
Traffic and parking
Public engagement

Sharon and I and our family have lived at our present address in White Bear Lake for just a couple of months short of fourty-nine years, and we dearly love our unique community. Over the years we have seen many changes take shape in our community. Some good, some not so good. Some times our city leaders have listened to the citizens that elected them to ***represent*** us, and some times they thought they knew better than their constituents and ignored our wishes. It's obvious that the thoughts and wishes of the majority of White Bear Lake area folks are being ignored when it comes to the Rush Line issue.

I would suggest that our City Council and County Commission stop trying to turn our unique community into an Apple Valley or Woodbury. The massive increase in traffic in and out of our town will create terrible traffic and pollution problems, will get very little actual use and cause the tax payers to subsidize the tremendous loss in revenue. This is the worst kind of white elephant and begs the question; who's getting what out of promoting this kind of boondoggle???

Bart and Sharon Benshoof

[redacted]

From: Thomas Black
To: Alicia Valenti
Subject: BRT Traffic on Hazelwood Street in Maplewood
Date: Wednesday, June 2, 2021 8:23:29 AM

Comment Theme
Build Alternative definition

How frequent will BRT buses be passing along narrow Hazelwood Street in Maplewood, on which the St. John's Boulevard Station is located? Also, will all buses be electric and relatively quiet?

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Wednesday, June 2, 2021 12:33:10 PM

Comment Themes
Natural Resources
Community, economic and social analysis

Submitted on Wednesday, June 2, 2021 - 12:33
Submitted values are:

Name:Tyler Bouwens

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:Our East Side neighborhood has a lot of noise pollution from cars, planes (we are flyover area of St. Paul Airport), and trains. I do not want more noise pollution so close to my neighborhood. Also, the proposed route affects the Phalen Creek. I would rather have the creek daylighted and have it be a green space. I do not want the Rush Line BRT.

Comment Themes
Project cost and funding sources
Ridership
Natural Resources
Community, economic and social analysis

From: Cindy Cash
To: info@rushline.org
Subject: BRT
Date: Wednesday, June 2, 2021 1:00:30 PM

Good Afternoon,
I have so many concerns about the proposed Rushline.

First and most important, there is no need for this bus line. If you would research current ridership, you'd see the numbers significantly down. I'm sure this has been impacted by the pandemic but I don't foresee ridership ever going back to what it was.
So why spend half a billion dollars to build something that will fail. Plus the cost to maintain all the proposed facilities involved. Where ever the money came from, it's always taxpayers money you're spending. It could be put to better use. One suggestion would be to repair the many awful roads in the area. Let's maintain what we currently have.

Second, I foresee this Rushline creating a lot of noise and air pollution. Do you realize how much pollution is created by 89 daily buses running through areas currently covered with beautiful trees and wildlife? And then there's the residential areas and right past a grade school. We already have pollution from the highways (36 and 61) so why add an additional source. Please keep the buses on the highways. I don't believe I've heard any concerns or plans about controlling air or noise pollution!

Please don't waste our money-it could be put to such good use rather than destroying a beautiful nature path in the middle of multiple cities. Let's embrace what we have rather than destroying it.

I would appreciate a response to these concerns.
Thank you,
Cindy Cash
Sent from my iPad

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Wednesday, June 2, 2021 1:01:33 PM

Comment Theme
Public engagement

Submitted on Wednesday, June 2, 2021 - 13:01
Submitted values are:

Name:Yang Lor

Email address[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:During the open-house online ZOOM meeting, I just want to comment that if this presentation notes can be shared with the interpreter before hand - I'm listening also to the Hmong channel and sometime the presentation is rushing and the interpreter is falling behind or sometime skipping part of the slides. I believe it can be better communicate if the notes can be shared with the interpreter who will then have time to evaluate the wording and how to communicate the wording to the audience so that it is better understood instead of rushing through it and skipping. A lot of words are not clearly interpreted because of the jargon of the word, which cannot be translated.

Thank you,
-Yang

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Wednesday, June 2, 2021 1:46:08 PM

Comment Themes
Project cost and funding sources
Ridership

Submitted on Wednesday, June 2, 2021 - 13:46
Submitted values are:

Name:Carol McFarlane

Email address[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I have attended meetings regarding the Rush Line for over 10 years as a State Representative, WB Chamber, and as a member of the White Bear Economic Development Corp.
While I am supportive of buses, I am not in favor of the infrastructure cost to bring this to White Bear Lake. Building a bridge over 694 to bring buses to White Bear area is obscene.
Since the pandemic, ridership is next to nothing and no park in rides are in service in our area. With the change in the economy and more people working from their homes, how many people from our area will be going to work in St. Paul and/or Minneapolis.
I do not believe people from our area will be using the buses to get to medical appointments. There are not connecting services to bring patients to the actual doctor or hospital.
I would suggest that the review of the project with projected ridership be revisited to see if there is still a need in our area.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Thursday, June 3, 2021 10:00:14 AM

Comment Theme
Locally preferred alternative process

Submitted on Thursday, June 3, 2021 - 09:59
Submitted values are:

Name:Fred Dahm

Email address[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:running buses down a bike trail is nonsense, run them down highway 61.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Thursday, June 3, 2021 12:39:25 PM

Comment Theme
Build Alternative definition

Submitted on Thursday, June 3, 2021 - 12:39
Submitted values are:

Name:Thomas Herr

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:On behalf of the more than 300+ vendors at Hmong Village Shopping Center, I want to support the BRT Project Environmental Assessment process. However, I would like to strongly recommend that the Cook Station be named "The Foung Hawj" station because it is the right thing to do. Thank you.

From: Diana Longrie
To: Alicia Valenti
Subject: Tonight"s Open House Meeting = Rushline
Date: Thursday, June 3, 2021 4:12:42 PM

Comment Themes
Project cost and funding sources
Natural Resources

Along the Bruce Vento Trail, where the Rushline is set to be constructed, using the boundaries employed for the Environmental Review:

1. how many trees are projected to be cleared and of those trees cleared, what is the approximate percentage, of the whole, for each tree species cleared?
2. Describe the range of tree age of those being cleared (is there a bell curve representation or something similar?)
3. Is there a plan to replace some of the cleared trees, what percentage of each tree species planted will be present and describe the range of the tree age of those trees planted?
4. Does the current and/or future project construction budget include tree clearing and tree planting?
5. What is the estimated expense to clear the trees? What is the estimated expense of replanting trees?
6. Can Federal Funds, for a transit project such as this, be used to clear trees? replant trees? Are there caps to the amount of Federal funding that can be used for clearing or planting trees?

Best Regards,
Diana Longrie
[redacted]

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From:	darleneascheman
To:	info@rushline.org
Subject:	Listen to the people
Date:	Friday, June 4, 2021 10:04:15 AM

Comment Themes
Project cost and funding sources
Traffic and parking
Community, economic and social analysis

I do not want the increase traffic or expense that the rush line will add. Crime will increase. Traffic congestion will increase. We don't need or want this. LISTEN TO THE PEOPLE.
Thanks

Sent from my T-Mobile 4G LTE Device

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Friday, June 4, 2021 3:51:48 PM

Comment Theme
Project cost and funding sources

Submitted on Friday, June 4, 2021 - 15:51
Submitted values are:

Name:Linda Scott

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I am NOT in favor of the Rush Line coming into White Bear Lake. The cost will not support the need. Take those Rose colored glasses off, we don't want or need it. Put it up for a vote from White Bear residents, it will fail miserably. Didn't you learn anything from the disastrous Light Rail?

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Friday, June 4, 2021 4:41:46 PM

Comment Theme
Ridership

Submitted on Friday, June 4, 2021 - 16:41
Submitted values are:

Name:Cheryl Arcand

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:Seniors, young people, and those who work at starter jobs all benefit from reliable, frequent mass transit

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Friday, June 4, 2021 4:43:00 PM

Comment Theme
Support for the project

Submitted on Friday, June 4, 2021 - 16:42
Submitted values are:

Name:Cheryl Arcand

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:MICAH understands that reliable transportation, like affordable housing, is critical to quality of life.
MICHA member

From: William Barth
To: info@rushline.org
Subject: Reassess plan for Rushline into White Bear
Date: Saturday, June 5, 2021 6:53:04 PM

Comment Themes
Project cost and funding sources
Ridership
Community, economic and social analysis

Who will benefit from the creation of a hub and hundreds of buses traveling through our small community of White Bear Lake? Millions of dollars will be spent for the operation of empty buses ruining our quaint town setting. An environmental impact study was made without considering the negative impact on our community. This decision was made by people who do not live here. Please reconsider.

Sent from my iPad

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Sunday, June 6, 2021 8:06:26 AM

Comment Themes
Ridership
Pedestrian and bicycle facilities
Natural Resources
Community, economic and social analysis

Submitted on Sunday, June 6, 2021 - 08:06
Submitted values are:

Name:ROGER GOERKE

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:The environmental assessment for the Rush Line BRT is a complete fallacy. The only reason they cite for needing this route is lower median incomes in the service area. To go from there to needing a faster way for these poor people to get to an empty mall seems a huge logical fallacy.
This assessment completely ignores the negative effect the proposed BRT will have on noise and air pollution along the route and the destruction of thousands of trees along the path.
Also by closing the Bruce Vento Trail (even temporarily) this will discourage these poor local residents from using a healthier and more environmentally friendly form of transportation, notably bicycling. The transportation corridor in question is already covered with 2 local bus lines (64,80) and 1 limited stop bus line (54) and 2 express lines (270,219). I think that reviewing the usage on these lines will clearly indicate that the BRT is not going to be used at all. Running empty busses along what was a very nice rails-to-trails project will have a severe negative impact on the the environment and cause a mass evacuation of those upper middle class residents to other places that are not so encumbered.
This evacuation will further lower the median income of the area and from that you will infer the need for more busses. This is shear madness.
Thank you for your time and attention.
Roger Goerke PhD.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Monday, June 7, 2021 8:16:46 AM

Comment Themes
Ridership
Community, economic and social analysis

Submitted on Monday, June 7, 2021 - 08:16
Submitted values are:

Name:Lona Petersen

Email address:

Phone number:

Would you like someone to contact you?:

Your comments or questions:This Rush Line will wreck our small town, bring trouble to our area and no one will use it, since most people are working from home and will continue to do so. Also, you have a huge park and ride at the Maplewood Mall. 61 is busy enough. Stop wasting money.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Monday, June 7, 2021 11:32:05 AM

Comment Themes
Project cost and funding sources
Ridership
Community, economic and social analysis
Public engagement

Submitted on Sunday, June 6, 2021 - 16:05
Submitted values are:

Name:Deb Helseth

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I personally don't feel this is a value to our White Bear Lake community. I feel the city management and the transit department are not listening to the concerns of the residents. Especially since so many people are working from home now the need is not there to the extent "they" say it was. This line with the hours of operation and the frequency of stops will be a huge disruption to our downtown area and the residents in close proximity! I have not read one editorial in support of this transit line. I am very disappointed that our voices are not being heard. I feel the amount of money being spent on this project can be put to better use at least in our community. There are families and children suffering from homelessness and poverty and children not get a he education support needed because our teachers are stretched too thin. Let's really look at the basic needs of our community and spend our tax dollars where it will have the most impact!

From: Karen Anderson
To: info@rushline.org
Subject: Rush Line
Date: Tuesday, June 8, 2021 8:12:52 AM

Comment Theme
Project cost and funding sources

I'm a long time resident of White Bear Lake. WE DO NOT NEED A RUSH LINE! Quit spending money! Especially coming off a Pandemic!

Karen Anderson
[redacted]

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Wednesday, June 9, 2021 9:53:17 AM

Comment Themes
Locally preferred alternative process
Project cost and funding sources
Ridership

Submitted on Wednesday, June 9, 2021 - 09:53
Submitted values are:

Name:Larry Parker

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:Do you ever tire of spending our money. I happened to drive by the Maplewood bus center as I saw a bus going into the area, the only observance I had was nobody was on the bus. I understand that I also pay for riders on the various lines as they choose not to pay. For the amount of money, our money you are planning on spending. Why don't you purchase a few hundred cars that people can just leave after they drive to the doctor. 99% of the people who live in White Bear don't want this...perhaps you can do another study and stop this insanity at Vadnais Heights, as your plan will destroy the community of White Bear.

From: Toni [redacted]
Date: June 9, 2021 at 10:45:19 AM CDT
To: Marylee Abrams <marylee.abrams@maplewoodmn.gov>, Kathleen Juenemann <kathy.juenemann@maplewoodmn.gov>, william.knuteson@maplewoodmn.gov, Nikki Villavicencio <nikki.villavicencio@maplewoodmn.gov>, Rebecca Cave <rebecca.cave@maplewoodmn.gov>
Subject: Our future with the Rush Line. KSTP

Comment Theme
Community, economic and social analysis

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https://kstp.com/news/reports-of-drug-use-intoxication-and-overdoses-reveal-depth-of-public-health-crisis-on-light-rail/6134706/?cat=1

Please keep this off our trail and out of our backyards.

From: Teresa Dupre
To: info@rushline.org
Subject: White Bear Mn
Date: Wednesday, June 9, 2021 2:52:30 PM

Comment Themes
Project cost and funding sources
Ridership

What identified problem is the new bus line from White Bear to St Paul attempting to solve?

What data was collected to support the numerous busses that will run daily?

How can anyone support the millions of dollars this will cost?

I look forward to hearing your response.

Kind Regards,
Teresa Dupre

Sent from my iPhone

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Wednesday, June 9, 2021 4:38:10 PM

Comment Theme
Opposition to the project

Submitted on Wednesday, June 9, 2021 - 16:38
Submitted values are:

Name:Deborah Crosby

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I am against the rush line for White Bear Lake.

From: Deborah Zuehlke
To: info@rushline.org
Subject: WBL rush line
Date: Thursday, June 10, 2021 8:00:38 AM

Comment Themes
Project cost and funding sources
Pedestrian and bicycle facilities
Community, economic and social analysis

I am opposed to every aspect of this project. I have been walking the Bruce Vento trail for 20 years. It is heavily used and would be a real loss to the community.
The damage to downtown WBL would be irreversible. Stop this waste of money now.

Sent from my iPhone

From:	Bill Kolesar
To:	info@rushline.org
Subject:	Rushline
Date:	Thursday, June 10, 2021 9:49:16 AM

Comment Themes
Project cost and funding sources
Ridership
Traffic and parking

There are more reasons against the Rush Line than for. Number one is the total lack of ridership and the second is the cost of $475,000,000 of taxpayers money. If you want to spend $475,000,000 or a portion of that to better the east metro community, offer free vocational training in East St. Paul. That would multiply whatever is spent by creating tax paying employed citizens. The Rush Line will be a continually subsidized bus line without riders. Lastly, the fact that there will be buses on a regular basis in an already busy downtown White Bear Lake, makes it a real negative. When the new High School is completed it will grid lock and dangerous. We oppose the Rush Line.

Bill and Roberta Kolesar

[redacted]

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Thursday, June 10, 2021 10:16:57 AM

Comment Themes
Project cost and funding sources
Ridership

Submitted on Thursday, June 10, 2021 - 10:16
Submitted values are:

Name:Reyne M Rofuth

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:The potential ridership numbers do not support the high cost of this project. I strongly oppose the project.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Thursday, June 10, 2021 2:23:47 PM

Comment Themes
Project cost and funding sources
Ridership

Submitted on Thursday, June 10, 2021 - 14:23
Submitted values are:

Name:Susan L.C. Mahoney

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:The recent pandemic, which kept many downtown employees home, is destined to have an effect on the need for public transportation. Many employees who previously went downtown to work are going to continue to work from home and will no longer be traveling downtown.
The current electric buses that are available to people seeking transportation downtown seems to be more than enough public transportation for our present and future transportation needs. Spending nearly $500 million on an unnecessary Rush line seems to be a very poor use of taxpayers' money.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Thursday, June 10, 2021 2:27:13 PM

Comment Themes
Project cost and funding sources
Pedestrian and bicycle facilities
Natural Resources

Submitted on Thursday, June 10, 2021 - 14:27
Submitted values are:

Name:Timothy Tebos

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:How many trees will be removed or killed due to the bus route construction along the Bruce Vento Trail? Has this been estimated and are funds in place to raplace the trees? Where will the trees be reaplaced, and how much will that cost? Will that cost be funded through the financing for the Bruce Vento Trail?

I am 100% against this line being built, as I believe it will ruin the wonderful biking/walking path that is the Bruce Vento Trail, which will soon to be improved. Busses rushing past every 15 minutes sounds like a terrible way to ruin a pleasant and environmentally friendly green space.

Half a billion dollars for a bust line that will annually cost millions to maintain, and where there isn't a clear need or desire from the WBL community, is a huge waste of taxpayer money, money which could be much better spent elsewhere.

Please listen to the community and do not build the Rush Line.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Thursday, June 10, 2021 2:46:03 PM

Comment Themes
Traffic and parking
Pedestrian and bicycle facilities

Submitted on Thursday, June 10, 2021 - 14:45
Submitted values are:

Name:Jeanne Kapeller

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:My husband and I have lived in WBL since 1978. In 2007 we moved into a townhome on Division, south of the railroad tracks and just down the street from North Campus. We love living on the north side of town and the convenience of walking downtown to shop, bank, dine, etc. There are a few drawbacks about our location because it is nearly impossible to drive south down Division, or walk safely for that matter, for part of each afternoon as busses and cars of parents picking up students line up and clog the street at the end of the school day. Also, the traffic is so heavy on 61 that crossing the highway safely into downtown has become an issue as not all drivers obey the walk signs for pedestrians. Do you think this will improve?The Rush Line and the expansion of the school is only going to make this worse. The traffic will greatly increase both on 61 and Division and the bus areas will eliminate pedestrian sidewalks in key areas. You are basically isolating all residents who live on the west side of Hwy 61 who try to enjoy the “walkability” of the area. The loss of parking and pedestrian access, as well as increased traffic is not justified by the limited ridership.

From: Jeanenne
To: info@rushline.org
Subject: No!
Date: Thursday, June 10, 2021 8:44:29 PM

Comment Themes
Project cost and funding sources
Ridership

Absolutely do not need this to go thru White Bear Lake! The amount that you all are planning on spending can be distributed in better areas for the communities. There is no great need for this. Riders are making it work. Even if you gave out Uber vouchers for riders to get to Maplewood or Shoreview would be better cost effective. How about a 10 passenger van that picks up once or twice an hour and takes them to these bus stations? You need to re-evaluate this unnecessary expense and impact on our community. Please do not make or let this happen.
Jeanenne Rausch
White Bear Township

Sent from my iPhone

From:	Joe Zoborowski
To:	info@rushline.org
Subject:	Rush line BRT project in White Bear Lake
Date:	Thursday, June 10, 2021 9:39:20 PM

Comment Theme
Project cost and funding sources

Hello, I am a resident of White Bear Township who regularly uses Hwy 61 (daily). I am writing to voice my strenuous opposition to the $475 M rush line project. Please cancel this boondoggle immediately.

Regards,
Joe Zoborowski
[redacted]

Comment Themes
Project cost and funding sources
Ridership
Traffic and parking
Community, economic and social analysis

From: Holly Zoborowski
To: info@rushline.org
Subject: Rush line comments
Date: Thursday, June 10, 2021 9:41:02 PM

As a concerned citizen of White Bear Lake, I highly oppose the Rush Line project. The financial cost, lack of ridership, congestion on Highway 61, and upheaval to downtown are several contributory reasons.

Sincerely,
Holly Zoborowski

Sent from my iPhone

From: Bev Zweig
To: info@rushline.org
Subject: I am for Rush Line in White Bear Lake MN
Date: Thursday, June 10, 2021 9:51:35 PM

Comment Themes
Ridership
Community, economic and social analysis

This is what we are missing in White Bear Lake. I know I would use it to get to the Market in St. Paul. There is no parking for your car/van when you get anywhere near that market. It is crazy. People love to go to the markets so more people would purchase their produce etc there if you didn't have to park your car blocks away.

There are jobs that need people to fill them in White Bear Lake but they don't own a car to get here. A bus is better for the environment .

Bev

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Friday, June 11, 2021 7:59:18 AM

Comment Themes
Project cost and funding sources
Community, economic and social analysis

Submitted on Friday, June 11, 2021 - 07:59
Submitted values are:

Name:Stephanie Goodman

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I am opposed to the Rush Line project. I travel through the Hwy 61 and Hwy 96 area several times a week, and also visit/use downtown White Bear businesses frequently. This project will negatively impact the vibrant and charming downtown and surrounding area. Please read all the letters to the editor published in the WB press regarding this project. There is already a bus hub at maplewood mall that is under used. Tax payers have repeatedly seen costly mass transit decisions made and implemented around the metro area fail to live up to the pie-in-the sky dreams of planners and create new, more serious problems.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Friday, June 11, 2021 8:05:55 AM

Comment Themes
Ridership
Public engagement

Submitted on Friday, June 11, 2021 - 08:05
Submitted values are:

Name:Carolyn Jacobs, Jerry Jacobs

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:This whole thing needs to be stopped! It is not needed and certainly not wanted by the White Bear Lake residents. Is anyone listening to the residents? Ridership before COVID on the express buses into downtown WBL only averaged 3-4 people per day. Why in the world do we need a mass transit bus line? This boondoggel must be stopped and stopped now!!!!!!!

From: Kathie Carlson
To: info@rushline.org
Subject: Rush line
Date: Friday, June 11, 2021 9:25:24 AM

Comment Theme
Opposition to the project

The rush line affects all residence and business in white bear lake. This should be a voted item not just a few of you who think you know what's best for us all. We Do Not need this expensive project. We have limited space as it is in white bear why on earth would you take this away for a possible few who may ride this. This plan is already an outdated one, you all are not thinking clearly and do not see the congestion picture that will be getting worse.

We already have limited housing, limited commercial business, limited parking, limited roadways..listen up we do Not want this!

Sent from my iPad

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Friday, June 11, 2021 11:26:28 AM

Comment Themes
Ridership
Pedestrian and bicycle facilities
Natural Resources
Community, economic and social analysis

Submitted on Friday, June 11, 2021 - 11:26
Submitted values are:

Name:Sharon Traen

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I am not in favor of the rushline. I do not see a need for this. Many people are continuing to work from home post covid. There is not enough use of existing lightrail and buses at this time. It is currently being widely used as a bike/walking trail. It will only create more noise/pollution in our neighborhood. I think it will also become a safety issue for those who want to bike or walk near it. There has also been a substantial increase in alcohol and drug use now on the green and blue lines. This line is not needed or wanted.

From: Merrilee Goligowski
To: info@rushline.org
Subject: Comments on Rushline
Date: Friday, June 11, 2021 12:28:48 PM

Comment Themes
Ridership
Community, economic and social analysis

To whom this may concern,

My husband and I have lived in our home in White Bear Lake for 30 years. We moved here for the small town feel and the charming downtown area. We have watched as our town has grown and the downtown has stayed vibrant, even during Covid.

When we have brought family members to the downtown area, they too have been impressed with the area and usually they ask to take a walk, do some shopping and stop for a bite to eat downtown.

We are NOT in favor of the Rushline that is being proposed. It is not necessary since ridership is down and many people will continue to work from home in some capacity post-Covid. It will also take away from the overall look and feel of downtown WBL.

Thank you,
Loren and Merrilee Goligowski
Dorothy Avenue – residents for 30 years
White Bear Lake, MN

This message and any attachments are intended only for the addressee(s) and may contain privileged or confidential information. Any unauthorized disclosure is strictly prohibited. If you have received this message in error, please notify us immediately so that we may correct our internal records. Please then permanently delete the original message including any attachments and any copies that may have been made.

From: Sue smf
To: info@rushline.org
Subject: opposing this bus line
Date: Friday, June 11, 2021 12:40:02 PM

Comment Themes
Project cost and funding sources
Ridership

Treat this wasteful spending like it is your own wallet! There are many bus stops and buses already in that area that even in rush hours are empty! There is the light rail that are empty even in rush hours. Why are we not getting a tax break rather than coming up with wasteful, unuseful spending! Our taxes keep going up to ridiculous amounts only for our city leaders to keep spending. This will serve no one!

From: Lervoog, Lisa (CI-StPaul)
To: "info@rushline.org"
Subject: RUSH LINE BRT PROJECT
Date: Friday, June 11, 2021 1:23:18 PM

Comment Themes
Project cost and funding sources
Ridership
Traffic and parking

I am writing to let you know that I do not want the Rush Line BRT Project to go through.

Since Covid 19 many people are out of work or working from home and the ridership numbers do not validate having a bus line to WBL.
I do not believe that it would help the businesses financially in WBL.
I also do not like the idea of increased traffic and pollution in WBL.

Please listen to what I and many others are letting you know; the money should go to a project that is more beneficial than this one.

Lisa & Scott Lervoog
[redacted]

Comment Themes
Build Alternative definition
Traffic and parking
Natural Resources
Community, economic and social analysis

From: Tom Kehoe
To: info@rushline.org
Subject: White Bear Station
Date: Friday, June 11, 2021 3:22:34 PM

I live at the northwest corner of 7'th and Washington ([redacted]). The proposed White Bear transit station will be on the east side of my home and I have a number of concerns regarding this project:

Given the frequency of the buses (every 10-15 minutes) "7 days a week from early in the morning to late at night" just going in to and out of my driveway will present a challenge, especially since the buses will be parked directly across the street from my driveway. One drawing of the proposed changes to Washington Ave. also seems to show that my already short driveway would be shortened even more – a change that make accessibility even more of a daily challenge. In addition, the shortened driveway will have the potential impact on parking our vehicles in the driveway without overhanging into the street.

With all these buses will come the almost constant side effects they'll bring: congestion, noise, diesel fumes, light pollution. These side effect will not only be experienced when we're in our yard, but the noise and fumes will follow us into the house through open windows. And since my furnace air intake is on the east side of my house I'm concerned the fumes may make it inside even in the winter months.

One of the BRT documents states: "VISUAL RESOURCES Downtown White Bear Lake station Nearby commercial and residential properties Low: Consistent with existing visual context (off-street parking for businesses); nearby residential properties are well-screened by vegetation on private property." This is a misleading statement since my lilacs only have leaves (or "screening" effects) for 6 months out of the year, the rest of the year I would be looking at the comings and goings of these buses. As far as the off street parking for businesses goes, they only park on Washington when the Beartown Lounge is open – which is not anywhere comparable to the 5:00 a.m. to midnight that the buses will run.

We have lived in our home for over 40 years and have seen many changes in the neighborhood, all of which pale to issues that the proposed station will bring all day, every day. One of the BRT documents states "Historically, however, investment in high-quality transit service has the potential to increase property values near stations. In some instances, these increases can cause displacement due to higher rents or property taxes. The potential for this form of displacement and strategies to mitigate potential displacement along the Rush Line BRT route are being studied as part of the environmental analysis phase." I doubt that there is any "spin" even the best realtor could put on our property that would result in a price we could live with or relocate to another in the town we've spent our lives in.

I think our situation is unique as far as these stations go and would hope you could offer some way to mitigate our concerns regarding these issues.

Tom Kehoe

Sent from Mail for Windows 10

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Friday, June 11, 2021 7:44:45 PM

Comment Theme
Traffic and parking

Submitted on Friday, June 11, 2021 - 19:44
Submitted values are:

Name:Sheila Rogers

Email address[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:More public transit is definitely not needed. I am very concerned with the traffic issues. I live in the cul de sac across from the North Campus high school in White Bear Lake and my family already has trouble getting in and out of it prior to the expansion. Concerned about more traffic in the way blocking my access to Hwy 61.

From: Judy Johnstone
To: info@rushline.org
Subject: Project Opinion
Date: Sunday, June 13, 2021 9:22:25 AM

Comment Theme
Opposition to the project

I have been born and raised in White Bear Lake. My husband has lived here since he was in 7th grade. We have raised our children here and ran a business for 43 yrs. We absolutely DO NOT WANT this project with buses invading our community!

Keith and Judy Johnstone

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Sunday, June 13, 2021 6:09:31 PM

Comment Themes
Project cost and funding sources
Ridership
Pedestrian and bicycle facilities
Community, economic and social analysis

Submitted on Sunday, June 13, 2021 - 18:09
Submitted values are:

Name:Greg Blaeser

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:This is a big waste of taxpayer money. We already have roads that the buses can drive on. This will not increase ridership. It will add costs and take away trails that are currently being used by the residents. This will have a negative impact on property values nearby. There are transit hubs at Maplewood Mall and other places along the route. There is no benefit to riders, property owners. And extra unneeded costs for taxpayers. Do not go forward with this project.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Monday, June 14, 2021 1:30:41 PM

Comment Themes
Project cost and funding sources
Traffic and parking
Community, economic and social analysis

Submitted on Monday, June 14, 2021 - 13:30
Submitted values are:

Name:Ben Smetana

Email address[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:This rush line project is a terrible idea for the community of white bear lake and it will be a tremendous waste of tax payer dollars. Do not destroy the beautiful, downtown area of white bear lake with this project. We do not need a bunch of empty busses congesting the already congested highway 61 corridor.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Monday, June 14, 2021 2:24:18 PM

Comment Themes
Ridership
Traffic and parking

Submitted on Monday, June 14, 2021 - 14:24
Submitted values are:

Name:Kevin Whelan

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:In my opinion the Rush Line is absolutely unnecessary and will fail if approved. Just as the North Star Commuter line failed. Prior to the pandemic the Met Council subsidy for each rider on the North Star was $19.39.
Having 89 buses running daily from St. Paul to White Bear Lake is preposterous.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Monday, June 14, 2021 4:24:10 PM

Comment Themes
Ridership
Community, economic and social analysis

Submitted on Monday, June 14, 2021 - 16:24
Submitted values are:

Name:Cheryl Arcaand

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I was a long time resident of White Bear Lake and am a member of MICHA and our Social Justice Committee at St Mary of the Lake, WBL. I moved to Oakdale right before the pandemic. I purchased a townhouse. My hopes are that more people will see the importance of the Rush Line than seemed to be present at the initial viewing open house with the choices of the stops.
White Bear Lake needs a way to be connected with St. Paul and surrounding communities if you don't drive. There are businesses downtown WBL that have needed more employees at different times and if a person doesn't have a vehicle there are not enough options to get to White Bear Lake during the work hours needed. There is bus service but not often enough to support workers on different shifts and in the evening.
There will be Students and Seniors that would appreciate a frequently scheduled service. High School students that don't drive yet and Seniors that are no longer able to drive and any other individuals that would like to us the Rush Line to shop or eat in White Bear Lake or use any of their many other services available, including the Theatre.
People need to have an open mind and think of more than themselves. We need to have more kindness in our world after the last two years. I am praying that when the opportunities arise for public comment on the Rush Line again we can have a more positive outcome for current and future Residents of WBL and St. Paul, Maplewood, Vadnais Heights, and WB Township.
I will be watching for future opportunities to learn about the Rush Line.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Tuesday, June 15, 2021 8:55:57 AM

Comment Theme
Traffic and parking

Submitted on Tuesday, June 15, 2021 - 08:55
Submitted values are:

Name:Doreen Blanchard

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:Pursuant to the investigative comments printed in the White Bear Press by Linda Demeny on June 9th 2021, I firmly believe the Rush Line BRT project is a detriment to White Bear and will cause traffic congestion and loss of necessary parking spaces which are vital to businesses in the city of White Bear Lake.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Tuesday, June 15, 2021 11:46:30 AM

Comment Themes
Project cost and funding sources
Ridership
Community, economic and social analysis

Submitted on Tuesday, June 15, 2021 - 11:46
Submitted values are:

Name:Mary Jo Anderson

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:This is a total waste of money. Another way to increase taxes. But the worst part is who will ride later in the evening - most likely undesirable people who will cause trouble. We don't need this or want this. How many will ride during the day? The bus line is not full now. Why spend the money for something only a few want?

From: Paul Stepan
To: info@rushline.org
Cc: [redacted] ; Mike Casey
Subject: Comments
Date: Tuesday, June 15, 2021 12:55:39 PM

Comment Themes
Pedestrian and bicycle facilities
Community, economic and social analysis

Hello,
I am a history enthusiast and have been working to get the Lake Superior and Mississippi nominated as a history site, primarily in the Duluth area.
My contact at the State Historical Preservation Office told me about the plans to use the southern reach of the LSMRR as a bus lane.
I am not in support of destroying this historic corridor nor am I in favor of turning a picturesque pedestrian/bike trail into a bus route.

Paul Stepan
[redacted]

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Tuesday, June 15, 2021 10:58:02 PM

Comment Theme
Pedestrian and bicycle facilities

Submitted on Tuesday, June 15, 2021 - 22:57
Submitted values are:

Name:Dave Stepan

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I recently biked this route from East 7th to Buerkle Road. I was simply amazed at the beauty of the trail. We in Twin cities have too few bike routes and Converting this to a bus lane would be BIG mistake. I am Not in favor of any changes to this bike trail.

From: Judy Hutchinson
To: info@rushline.org
Subject: Rush Line
Date: Wednesday, June 16, 2021 2:14:16 PM

Comment Themes
Project cost and funding sources
Ridership
Traffic and parking

I was the public transportation coordinator for two dial-a-ride services in White Bear Lake, White Bear Township, Mahtomedi, Vadnais Heights, Maplewood, North St Paul, Oakdale, Birchwood, Willernie and Gem Lake for 27 years. The two dial-a-ride services (Lake Area Bus and Northeast Suburban Transit) served all citizens in the 10 St Paul suburban cities. The services were funded by local contributions and state funding. Considering the large geographic area served and the many lakes that had to be circumnavigated, our ridership was strong and both dial-a-ride systems were cost-effective.

Based on my substantial experience with public transportation in the White Bear-Maplewood area, I have the following concerns about the Rush Line proposal.

(1) Rush Line assumes that most people can drive to/from the fixed-route pickup and drop-off locations. Surveys with Lake Area Bus and Northeast Suburban Transit consistently showed it was difficult, if not impossible, for most people needing bus service to access fixed routes. Their reason for taking our bus was because they did not drive. The necessity of driving to a fixed-route pickup/drop-off location will eliminate a great many people from using Rush Line fixed-route service and defeat the goal of reducing traffic.

(2) Rush Line proposes several park-and-ride locations that will use up parking spaces in shopping areas that are already scarce. There are limited-time parking spaces in downtown White Bear Lake that employees use. They often trade spaces with other downtown employees throughout the day to avoid getting ticketed. Customers in downtown White Bear Lake also have difficulty finding parking spaces. I have heard many concerns from business owners, shopkeepers and employers about potential loss of business.

(3) Rush Line appears to be a solution looking for a problem. The addition of some fixed-route buses throughout the day would likely be beneficial, but 90 buses is too extreme.

(4) Rush Line cost is inappropriate for taxpayers to assume at this time. A small portion of the dollar amount projected would be better utilized with more dial-a-ride service and a few more fixed-route buses.

(5) When I was the public transportation coordinator, I was told that the suburban cities had few large fixed-route buses because of the wear and tear on streets. If that is true, there is another cost to consider. If that is not true, I resent the fact that I wasn't told the truth for those 27 years.

On a personal note, I am proud of the fact that Lake Area Bus and Northeast Suburban Transit took part in activities, parades and community events in the 10 suburban cities for all 27 years as a way of letting citizens know about the services. We also put into our budgets money for advertising our services to everyone. Not everyone has access to a computer or can handle reservations/cancellations via computer. We made it easy for all citizens to know about and to use our services. I haven't seen that happening since the dial-a-ride services were replaced by Metro Transit vehicles about 10 years ago. I still get calls from citizens who are desperate to get to a medical appointment but don't have a clue about their Metro Transit options, and that concerns me. More than that, it upsets me. Citizens paying for public transportation should know their options with or without computer access or expertise. It's not hard to place ads in the local newspaper, put up posters, hand out flyers, or appear in a parade or at a community event and answer peoples' questions.

I have lived in and worked in White Bear Lake for 50 years and would be happy to answer any questions you may have about my 27 years of experience with public transportation in St Paul's 10 northeast suburban cities.

Thank you,

Judy Hutchinson
[redacted]

[redacted]

From: Bob Knieff
To: info@rushline.org
Subject: NO NO NO to Rush Line
Date: Thursday, June 17, 2021 6:28:02 AM

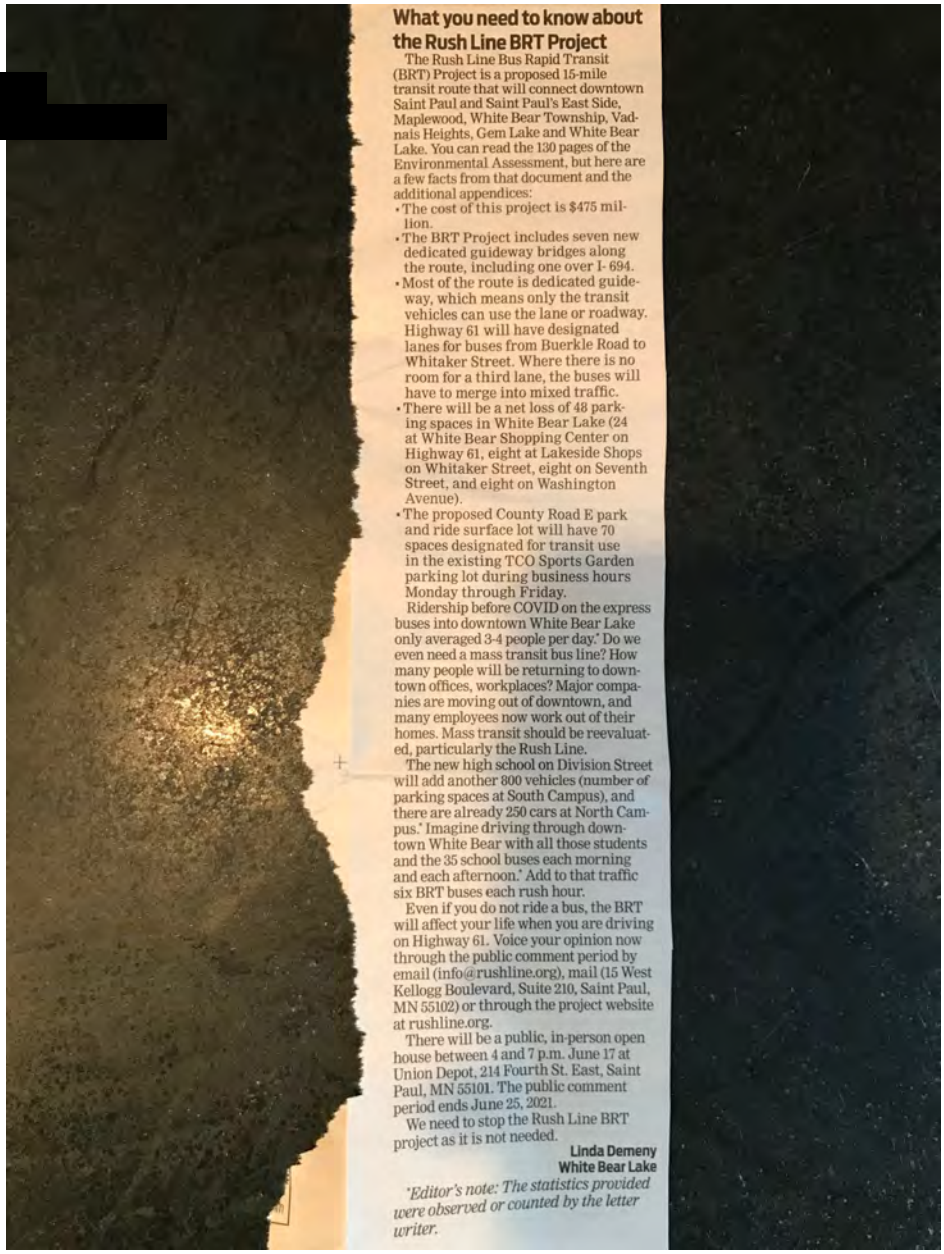
Comment Theme
Opposition to the project

STOP with the government boondoggles and social engineering!

NO to Rush Line! NO to Rush Line!

For all the reasons outlined below WE **DO NOT WANT** RushLine.

Sincerely,
Bob Knieff
[redacted]



What you need to know about the Rush Line BRT Project

The Rush Line Bus Rapid Transit (BRT) Project is a proposed 15-mile transit route that will connect downtown Saint Paul and Saint Paul's East Side, Maplewood, White Bear Township, Vadnais Heights, Gem Lake and White Bear Lake. You can read the 130 pages of the Environmental Assessment, but here are a few facts from that document and the additional appendices:

- The cost of this project is $475 million.
- The BRT Project includes seven new dedicated guideway bridges along the route, including one over I- 694.
- Most of the route is dedicated guideway, which means only the transit vehicles can use the lane or roadway. Highway 61 will have designated lanes for buses from Buerkle Road to Whitaker Street. Where there is no room for a third lane, the buses will have to merge into mixed traffic.
- There will be a net loss of 48 parking spaces in White Bear Lake (24 at White Bear Shopping Center on Highway 61, eight at Lakeside Shops on Whitaker Street, eight on Seventh Street, and eight on Washington Avenue).
- The proposed County Road E park and ride surface lot will have 70 spaces designated for transit use in the existing TCO Sports Garden parking lot during business hours Monday through Friday.

Ridership before COVID on the express buses into downtown White Bear Lake only averaged 3-4 people per day.* Do we even need a mass transit bus line? How many people will be returning to downtown offices, workplaces? Major companies are moving out of downtown, and many employees now work out of their homes. Mass transit should be reevaluated, particularly the Rush Line.

The new high school on Division Street will add another 800 vehicles (number of parking spaces at South Campus), and there are already 250 cars at North Campus.* Imagine driving through downtown White Bear with all those students and the 35 school buses each morning and each afternoon.* Add to that traffic six BRT buses each rush hour.

Even if you do not ride a bus, the BRT will affect your life when you are driving on Highway 61. Voice your opinion now through the public comment period by email (info@rushline.org), mail (15 West Kellogg Boulevard, Suite 210, Saint Paul, MN 55102) or through the project website at rushline.org.

There will be a public, in-person open house between 4 and 7 p.m. June 17 at Union Depot, 214 Fourth St. East, Saint Paul, MN 55101. The public comment period ends June 25, 2021.

We need to stop the Rush Line BRT project as it is not needed.

Linda Demeny
White Bear Lake

**Editor's note: The statistics provided were observed or counted by the letter writer.*

From: SANDRA BESTLAND
To: info@rushline.org
Cc: Kristine Goodrich
Subject: BRT Rushline - consumer feedback
Date: Thursday, June 17, 2021 9:01:16 AM

Comment Themes
Build Alternative definition
Project cost and funding sources
Community, economic and social analysis

Dear BRT Rushline Planners:

I just watched the BRT Rushline video on the Ramsey County website. I have used the A-Line, the Green line, and the Blue line to access shopping malls, sporting events, and the State Fair. This is my experience with existing mass transit:

While the A-line was typically clean and comfortable, the light rail trains were uncomfortable, and filthy with trash and human bodily fluids. All the stations along the various light rail routes were also filthy. The station heat lamps, lighting, and elevators were often non-functional due to recurring vandalism. Men would openly urinate on the light rail platforms and harass customers waiting for the next train. Crime around the stations, including theft and assault, was rampant causing businesses in downtown St. Paul to relocate to the suburbs. Lastly, the light rail and its infrastructure was obsolete from day one as it offers no route flexibility if there is a snowstorm, or an accident along the track.

Based on my experience while riding mass transit, here are my thoughts about the BRT:

- **Rush Line Bus Rapid Transit**: With an end destination of White Bear, which is a quaint, historic, and quiet town, why would you name the proposed bus service "rush line?" Clearly, there is a disconnect between those pushing for rapid transit and the citizens who choose to live in a peaceful, hamlet-like setting.
- **Staffing**: There was and will continue to be a shortage of bus drivers. How will you staff the BRT? Who has the skills to maintain the BRT?
- **Safety:** Light rail and A-line stations are a hangout for criminals. How will BRT stations be any different?
- **Obsolescence:** Driverless buses are the future. The proposed buses for the BRT are already obsolete.
- **Ongoing Maintenance:** How will the county afford the ongoing maintenance for the BRT when it currently cannot afford to clean and maintain existing light rail trains and stations?
- **Route:** Maplewood Mall is along the route. The mall owners have filed for bankruptcy. Part of the BRT planned route may become a bus to nowhere.
- **Development:** The BRT video states that the rush line "**should** spur investment and development." What is the alternate plan if the rush line does not "spur" development?

Please respond to my concerns and queries. Thank you.

Sandra Bestland



From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Thursday, June 17, 2021 4:16:22 PM

Comment Themes
Build Alternative definition
Ridership
Pedestrian and bicycle facilities
Community, economic and social analysis

Submitted on Thursday, June 17, 2021 - 16:16
Submitted values are:

Name:J Altman

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:As a resident of White Bear Lake it is disappointing to hear about the buses running right through the small downtown area. My main concern is with the school district having passed the referendum. The high school (located just blocks from the last stop on this bus line) is going to double in size to add grades 11 and 12 in the coming years. This is double the traffic, busing, pedestrians, carpool that already crowds that area. The location of the bus station and idea of adding several buses an hour appears excessive. Was the school district's referendum considered during the planning of this route? I'm wondering if there is still evidence of ridership need after COVID? Much of the workforce is forever changing with flexibility to work from home. I could understand if there were large corporations for jobs or survival needs in this area - pharmacies, groceries, department stores. Instead, it's quaint cafes, restaurants, and boutique shops. People who visit this area drive, walk or bike from their homes. Creating a transit stop in the middle of downtown changes the entire feel and draw for residents living here. People move here to get away from the city feel not for a rush line bus route to be drawn right down the middle of it. For commuters in outer lying areas that work downtown, what's wrong with the Park N Ride at Maplewood Mall which is now basically empty? Those commuters still have several options down 61 that are only minutes from downtown WBL. The rush line plan no longer appears to make sense economically and in my opinion it detracts from the sense of safety/community in the downtown area.

Comment 145

ENVIRONMENTAL ASSESSMENT

COMMENT SHEET

Rush Line BRT

Please provide your comments on the Rush Line Bus Rapid Transit (BRT) Project Environmental Assessment. Additional pages may be submitted to complete written comments.

Public comments will be collected from May 11 to June 25, 2021.

Comments submitted on the Environmental Assessment will be available for the public record; however, addresses and other non-public information will be removed. Substantive comments will be responded to in the environmental decision document issued after the public comment period concludes.

Comment Theme
Community, economic and social analysis

You can submit written comments through:

- Mail to:
  Andy Gitzlaff, Senior Transportation Planner
  Ramsey County
  15 West Kellogg Boulevard, Suite 210 Courthouse
  Saint Paul, MN 55102
- Email to: info@rushline.org
- An online comment form at rushline.org

Name: Bob Cardinal

Primary Address: [redacted]

Secondary Address [redacted]

Email: [redacted]

Provide an email address to be added to the Rush Line BRT email list and to receive follow-up information on the environmental decision document.

Concern about buried Rail Road Tracks off Bruce Vento Trail, South of County Road C in Maplewood.
Maplewood Area Historical Society. MAHS

Note: Bob Jensen - Locator for notes.

Comment 146

ENVIRONMENTAL ASSESSMENT

COMMENT SHEET

Rush Line BRT

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- Mail to:
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  Ramsey County
  15 West Kellogg Boulevard, Suite 210 Courthouse
  Saint Paul, MN 55102
- Email to: info@rushline.org
- An online comment form at rushline.org

Comment Themes
Natural resources
Community, economic and social analysis

Name: Chelsea DeArmond

Primary Address: [redacted]

Secondary Address: [redacted]

Email: [redacted]

Provide an email address to be added to the Rush Line BRT email list and to receive follow-up information on the environmental decision document.

~~The~~ As someone who lives in Dayton's Bluff and is a small business owner across from the proposed Larpenteur station, the ~~BRT~~ Rush Line will have a significant impact on where I live and work. I will miss the tree cover on the Bruce Vento trail, but I know new landscaping will be put in place. I'm very supportive of the partnership with Lower Phalen Creek Project to daylight Phalen Creek. The Rush Line will greatly improve transit access for me, my neighbors, and my customers. ~~I do not bike~~ I currently bike commute using the Bruce Vento Trail, but I look forward to having much better bus access. Thanks!

Please continue to prioritize this →

Comment 147

ENVIRONMENTAL ASSESSMENT

COMMENT SHEET

Rush Line BRT

Please provide your comments on the Rush Line Bus Rapid Transit (BRT) Project Environmental Assessment. Additional pages may be submitted to complete written comments.

Public comments will be collected from May 11 to June 25, 2021.

Comments submitted on the Environmental Assessment will be available for the public record; however, addresses and other non-public information will be removed. Substantive comments will be responded to in the environmental decision document issued after the public comment period concludes.

Comment Theme
Pedestrian and bicycle facilities

You can submit written comments through:

- Mail to:
  Andy Gitzlaff, Senior Transportation Planner
  Ramsey County
  15 West Kellogg Boulevard, Suite 210 Courthouse
  Saint Paul, MN 55102
- Email to: info@rushline.org
- An online comment form at rushline.org

Name: Jan R Beck

Primary Address: [redacted]

Secondary Address:

Email: [redacted]

Provide an email address to be added to the Rush Line BRT email list and to receive follow-up information on the environmental decision document.

General project comment:

I am very much looking forward to this line opening! Currently I have a hard time getting to events up in White Bear Lake, this will be a huge help.

Is there a stage in the planning process when we will learn what kinds of detours are planned for Bruce Vento trail during construction? We really want to avoid another situation like Cedar Lake Trail, where a vital regional bike trail disappears during construction for a great transit project.

TRANSCRIPT FOR RUSH LINE OPEN HOUSE

June 17, 2021

4:00 - 7:00 p.m.

Union Depot

St. Paul, Minnesota

REPORTED BY: Amy Kristina Lizotte

C O M M E N T S

Patrick McNamara

Comment Theme
Community, economic and social analysis

[redacted]

[redacted]

For me, the Rush Line is beneficial for getting to St. John's campus, because I use the medical services there on a regular basis. So it would be quite a lifeline for me. Because I'm older, I've been driving less. And they've been consolidating medical systems in the Twin Cities and closing stuff off downtown. And because of that, there's nothing that I can get to easily. And this would rectify the situation, because I do go up to St. John's on a regular basis. I don't have any complaints against it at all.

Mai Her, Operations Manager
Hmong Village Shopping Center
1001 Johnson Parkway, Suite B18
St. Paul, Minnesota 55106

Comment Theme
Community, economic and social analysis

I think that having the Rush Line out on the east side of St. Paul is going to be a big benefit to the community. What I realize in my village is we have a diverse age group customers. We have young people that are vibrant and they have their own cars. Then we have the career family that has a van full of kids. Then we have the retirees that some can drive, some can't drive. So having something like the Rush Line it will really benefit them to where they don't need to worry about calling their kids to come pick you up to go to Hmong Village when you can just hop on the Rush Line and get to the point where they drop you, go do your shopping, go do your -- have your breakfast or lunch, and then go back home.

So to me I think it's going to be a big benefit to the community, because Hmong Village is in the heart of east side St. Paul. So not only do we service the close-knit community, but we also are a big stop for out-of-town visitors. And they love to stop by Hmong Village when they arrive, or

especially when they're leaving, it will be the last stop they go to before they hit the road. So I favor it, I support it. I'm a newbie to east side St. Paul, so, yes, I definitely favor it.

Comment Themes
Pedestrian and bicycle facilities
Community, economic and social analysis

Paul Langer

[redacted]

[redacted]

So I have two concerns about the bus rapid transit. Overall, I think it's a really good idea, we should have a bus rapid transit. But as we do it, I know it's running along a bicycle corridor right now, and that bicycle corridor should be considered. And, actually, there's opportunities here to make it better than it is right now. And as long as we're doing the bus, we should be making it better at the same time.

One of those things is there is quite a few road crossings for the bike route right now. They don't have good sight lines. The bikes have to stop. That doesn't make any sense on a bike route, on a major bike route, to require that. So just like you're going to have the bus be able to go through intersections, you should allow the bikes to be able to go through those same intersections.

And in the past at intersections the bikes had to almost come down a curb to cross and then back up another curb to cross. That's really hard for bikes to do and keep going. So I know that they're making much smoother road crossings. For

example, on Johnson Parkway where they just made a new bike route they made very smooth bike crossings, so it can be done. And I think that should be considered as they go through this construction also. That summarizes that we should be improving the bike route at the same time as they're building the bus route.

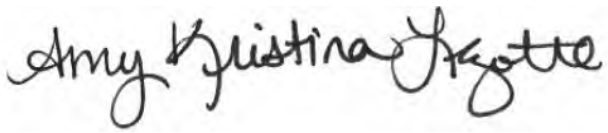
Then the other concern I had was simply if we're building this bus way, a lot of this area that the bus way is going through is quite low density population, even though it's kind of in the inner part of St. Paul, Lake Phalen or whatever. And it doesn't make any sense to be making a bus way through low density populated areas. So to be ensuring and even encouraging that there is high density changes in the zoning near the transport centers, the stations, so that a lot more people can be served by this bus way, and at the same time we don't contribute to urban sprawl, instead people are being able to be in these spots.

The way I see it, putting the bus way, the transit way, and having an improved bike route through those areas should actually make those encouraging places to develop. And so I would encourage that zoning changes to allow for that.

REPORTERS CERTIFICATE

I, Amy Kristina Lizotte, Notary Public of and for the State of Minnesota, do hereby certify that the foregoing pages of typewritten material constitutes an accurate verbatim stenographic record taken by me of the proceedings aforementioned on the 17th day of June, 2021, at the times and place specified.

DATED: 6-18-21



Amy Kristina Lizotte
Notary Public, Hennepin County, Minnesota
My commission expires January 31, 2022

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Sunday, June 20, 2021 1:30:46 PM

Comment Theme
Opposition to the project

Submitted on Sunday, June 20, 2021 - 13:30
Submitted values are:

Name:Richard Emerson

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I see no reason to run this through people's back yards to connect this to the community's you say it will benefit. That's what the roads were built to do. Figure out a better way! Stop this before it ruins the trail that so many enjoy.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Sunday, June 20, 2021 9:24:17 PM

Comment Themes
Project cost and funding sources
Ridership
Community, economic and social analysis

Submitted on Sunday, June 20, 2021 - 21:24
Submitted values are:

Name:Gina Knochenmus

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:Please stop the Rush Line. It is going to destroy my neighborhood and decrease the value of our home. I truly believe the crime rate will increase and I am afraid for my family and their safety. We walk the beautiful trail that this will destroy daily almost all year long. This is going to destroy peoples actual backyards. How can this be a good idea especially since ridership is so low due to the pandemic. We do not need this. Our tax money should go to something that helps our city not destroys it. Please stop the Rush Line before its too late and our beautiful neighborhood is destroyed and filled with more crime. Maybe it was a good idea initially, but so much has changed. There is no good that will come from this.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Sunday, June 20, 2021 9:30:29 PM

Comment Themes
Locally preferred alternative process
Pedestrian and bicycle facilities
Community, economic and social analysis

Submitted on Sunday, June 20, 2021 - 21:30
Submitted values are:

Name:Steve Knochenmus

Email address:

Phone number:

Would you like someone to contact you?:

Your comments or questions:The Rush Line will ruin my neighborhood. The trail will no longer be safe for my family. Who wants to walk next to a bus line? Not me. That is about the opposite of being in nature. What about the crime that will come from this? Look at what happens on these light rail lines in St. Paul and Minneapolis. It is terrifying and nothing is done about this. Why would something like this be brought into the middle of our neighborhood? Build it on highway 61 don't build this in peoples backyards. It's criminal. If this happens I know many houses will be up for sale but too bad for the homeowners and their home values will significantly decrease because of this atrocity. Please listen to the actual people this is going to effect and not he leaders that don't live in this neighborhood. How can the mayor say she wants to preserve parks and trails and back this ridiculous Rush Line? Please stop this before its too late.

Comment 154

ST PAUL
AREA CHAMBER

MAKING CONNECTIONS THAT COUNT

401 N Robert Street, Suite 150
St. Paul, MN 55101
stpaulchamber.com

Comment Themes
Ridership
Community, economic and social analysis

June 21, 2021 via email

Andy Gitzlaff, Senior Transportation Planner
Ramsey County
15 West Kellogg Boulevard, Suite 210 Courthouse
Saint Paul, MN 55102

Mr. Gitzlaff,

The St Paul Area Chamber would like to emphasize our continuing support for the Rush Line Corridor project connecting downtown St. Paul via Union Depot to White Bear Lake. The Rush Line is a vital element to connecting people working, living in, and visiting the East Metro.

The Rush Line will provide a much-needed connection for the East Metro, facilitating increased growth opportunities for businesses and their employees across the entire metro region. Currently, there is a need for connectivity between the north-end suburbs and St. Paul and the Rush Line will provide that connection. Transit has also become essential for businesses to attract new employees and the Rush Line will facilitate access to good jobs in a reliable, consistent matter.

High quality transit will create value for employers, employees, clients, customers, and residents along the corridor. The A Line along Snelling Avenue has shown how beneficial bus rapid transit can be in connecting communities, giving workers access to more jobs through a unique transit system model. The Rush Line will expand on the model of the A Line and connect workers with more opportunities across the region.

The Rush Line will provide transportation choices for a growing and diverse community. The St. Paul Area Chamber strongly supports the creation of a transit line that provides reliable and consistent access and supports economic opportunity that works for all of us.

Thank you for the opportunity to comment, and for your support of this important project.

Sincerely,

Brenda L Kyle

B Kyle
President and CEO
St. Paul Area Chamber

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Monday, June 21, 2021 5:15:18 PM

Comment Themes
Locally preferred alternative process
Project cost and funding sources
Ridership
Traffic and parking
Natural resources
Community, economic and social analysis

Submitted on Monday, June 21, 2021 - 17:15
Submitted values are:

Name:Jeanne Hartle

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:As a resident and taxpayer of Ramsey County, I am very much in support of increasing citizen mobility through means that are cost-effective. With that said, I am VERY opposed to the Rushline BRT project coming into and terminating in White Bear Lake for the following reasons:

1) Ridership usage and community growth projections for the Rushline BRT project are from September, 2017 and are no longer relevant or accurate. The study stated that the overall population growth in the corridor is projected to increase 24% by 2040. In White Bear Lake, our population has actually decreased 0.07% during each of the last three years after peaking in 2018.

2. The Sept 2017 study says that area employment is projected to increase 30% along the corridor by 2040. This may very well be true for communities such as St. Paul and Maplewood, but is very unlikely to happen in White Bear Lake due to existing density. There simply is NO ROOM for that great of an increase in business and employment within our city. The only possible way an increase like this might occur is if employers allowed work-from-home options, which would greatly decrease the need for public transportation that already exists (Metro Transit line 219 and the currently closed express route 265 between WBL and downtown St. Paul). If needed, the Metro Transit bus line 219 could be expanded to go all the way through White Bear Lake, at a significantly reduced price tag, especially considering how many people might actually be served.

3. The increasing number of people living below poverty level was another reason cited in the Sept. 2017 (and most current assessment impact study) as a growing reason for improved public transportation via the proposed Rushline BRT system. I believe the BRT document I read stated poverty rates of 11% - 15% along the overall corridor. The data suggests that people in poverty are less likely to own a vehicle and are therefore in need of public transportation. In White Bear Lake, the poverty level is 5.7% of our population, well below that of most of the communities within the corridor. Again, perhaps White Bear is not in need of this BRT system?

4. Ridership on the new BRT is projected to be 7400 people by 2040. If this reflects the total annual number of riders, and the buses make stops at 21 stations every 7-12 minutes from 6 AM - 10 PM M-F over its 15 miles, the new $475M build price tag would be paid to accommodate an average of only 20

people per day. This seems absurd! Furthermore, 2019 year-end data from the Metro Council reveals that bus ridership actually declined 5% from 2018-2019 (BEFORE THE PANDEMIC)! That document goes on to identify long-term challenges to bus ridership as "increased auto availability with decreased auto costs" and "changing travel behavior - new modes". According to the most current Census data, the percentage of people from White Bear Lake who use public transportation = 0.0%! Many bus routes - especially express routes to downtown St. Paul - were shut down completely during Covid and haven't started up again and an increasing number of employers plan to allow employees to continue to work from home, decreasing the need for public transportation for work. Additionally, research indicates that LRT draws more riders than buses while increasing property values and generating new jobs ... benefits that a BRT system in White Bear Lake is NOT likely to produce.

5. Aging members of our communities are increasing in White Bear Lake, like everywhere else. Unlike other communities, we already have a variety of transportation options that serve our senior community, making getting to the grocery store or other places of business much less of an issue. Additionally, on-the-spot transportation is almost always available through Lyft and Uber, among others.

6. The proposed BRT that travels along HWY 61 through downtown White Bear Lake would create a tremendous burden on an already congested main road (especially during rush hour). Having buses stop along Hwy 61 every 7-12 minutes would not only significantly add to the congestion, but would increase both noise and air pollution without providing sufficient benefits to the 25,000+ citizens of White Bear Lake. Perhaps the proposed Rushline BRT should terminate at Maplewood Mall (or prior to reaching downtown White Bear Lake).

7. Lastly, in addition to there being insufficient need for BRT in White Bear Lake, given low ridership projections compared to the high cost to build and operate the system and the increased congestion on the main road used by 25,000 residents, the terminal currently under consideration creates a significant safety hazard for 3200 of our area high school students. The North and South campuses of White Bear High School are merging and will be located just 4 blocks away from the proposed transit station in WBL. Currently, the property purchased for this school expansion does not have the 800 parking spaces that are anticipated to be needed. So overflow street parking by high school students will occur. And, since there will not be a Park n Ride option at the proposed transit station, riders of the BRT system will also be looking to park their vehicles on the street. These are small town streets that are already stressed in terms of parking spaces! I think this is a real safety issue ... increased # of buses, increased # of people driving around looking for street parking so they can catch the bus, and a greatly increased student body of inexperienced drivers making their way to and fro school each day! In my opinion, the risks far outweigh the benefits of putting a transit station in downtown White Bear Lake. As well, there are insufficient benefits to the people of White Bear Lake to support BRT being made available throughout this small city. For the few people here who need and might use BRT, there are existing (or easily expanded) public transportation options via Metro Transit Route 219 that could provide the link between White Bear and the Maplewood Transit Center at a much more affordable and appropriate cost.

Thank you for thoughtfully considering the points I am making in this Comment section.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Monday, June 21, 2021 9:17:00 PM

Comment Themes
Build Alternative definition
Natural Resources
Community, economic and social analysis

Submitted on Monday, June 21, 2021 - 21:16
Submitted values are:

Name:Angela Spencer

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I am against the number I’d huge noisy polluting buses driving and potentially stopping in front 9f my building all day and into the night. Important my opinion it is ridiculous , overkill and at least twice the frequency it would need to be if it’s needed at all.

From:	Lisa Wersal
To:	info@rushline.org
Subject:	Comments about project
Date:	Tuesday, June 22, 2021 7:23:07 AM

Comment Theme
Public engagement

Hello, friends,

My husband and I are generally in favor of public transportation as a means to provide access to jobs, shopping, cultural events while reducing our carbon footprint. The many anti-rush line letters in the local paper have questioned this project, and it is good that Commissioners and Council members are revisiting projections of use and the like.

However, it might also be useful to ensure that you are hearing from all demographics. My question is: Do all or most of the letter writers who are objecting represent a particular demographic?

Also, keep in mind that letters to the editor can be hypercritical. For example, recently there was a letter by someone who wants to try to stop buyers of homes along Lake Avenue in White Bear Lake from tearing down old homes (which the writer considered "historical") and building new ones. Some time ago, after major road and bridge improvement projects on 35E and bridges in our area, one letter writer complained that a decorative feature on a bridge railing was green in color, rather than white. (It was a green bear, rather than a white bear, for White Bear Lake.) So, some people with a lot of time on their hands can generate plenty of negativity.

I do hope the project proceeds and is well-utilized. I think younger people are probably more receptive to using public transport, and they are too busy with work and school and family to even be reading the paper or commenting.

Lisa Wersal
[redacted]

From: [redacted]
To: info@rushline.org
Subject: The Rushline
Date: Tuesday, June 22, 2021 9:18:38 AM

Comment Theme
Support for the project

I am very much in favor of getting into the 21st century!

This includes providing public transportation just like the majority of the developed nations have. We are far behind and need to greatly improve in this area. I therefore support the proposed rushline that will connect white bear Lake to downtown St. Paul.

Regards,

Louis Asher

[redacted]

[redacted]

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Tuesday, June 22, 2021 12:16:17 PM

Comment Theme
Pedestrian and bicycle facilities

Submitted on Tuesday, June 22, 2021 - 12:16
Submitted values are:

Name:Troy Wilhelmson

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I’m against this line if it destroys the Bruce vento trail

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Tuesday, June 22, 2021 5:04:52 PM

Comment Themes
Project cost and funding sources
Ridership

Submitted on Tuesday, June 22, 2021 - 17:04
Submitted values are:

Name:Jenn Baarson

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:Since the pandemic a new assessment should be taken. Many people will continue to work from home and it would be a waste of taxpayer money to have a bus line that will not pay for itself.

Comment Theme
Ridership

From: Susan Samuelson [redacted]
Date: June 23, 2021 at 10:38:52 AM CDT
To: Marylee Abrams <marylee.abrams@maplewoodmn.gov>, Kathleen Juenemann <kathy.juenemann@maplewoodmn.gov>, Bill Knutson <Bill.Knutson@maplewoodmn.gov>, Rebecca Cave <rebecca.cave@maplewoodmn.gov>, Nikki.Vallavicencio@maplewoodmn.gov
Cc: ICE Steve Samuelson [redacted]
Subject: RUSH LINE SINCE COVID

External message alert: This message originated from outside the City of Maplewood email system. Use caution when clicking hyperlinks, downloading pictures or opening attachments.

_____

Hi City Council members.

I am a Maplewood resident, address; [redacted]. My property abuts the route on the Bruce Venmo trail, on the Beam avenue intersection, southeast corner area.

I have questions about the basis for advancing the development of the Ramsey County Rushline, since the impact of Covid in our entire population.

The recent results of the environmental effect of Rush Line have been publicized, and it seems the project is going ahead as planned.

Do you think the statistics regarding ridership needs have changed since COVID?
Will any ridership changes impact the many areas of consideration studied and reviewed in the original planning of the line?
Is it justifiable to continue with this plan without re-visiting the important surveys etc. that were referred to in making decisions before COVID?
(I read a few pages of the environmental assessment, noting that all of the references were dated before COVID)

To me, it feels a little as if we have our heads in the sand and are not facing reality and it's changes very wisely. I am guessing I am not the only Maplewood resident with concerns in this regard.

Can you convince me otherwise?
Sue Samuelson
[redacted]

P.S. Thank you very much for your work on the Maplewood City Council.
P.S.Our personal decisions as to moving or staying in Maplewood do rely partly on how successful this effort is.

Payne-Phalen COMMUNITY COUNCIL

567 Payne Avenue, St. Paul MN 55130 www.paynephalen.org 651-774-5234 district5@paynephalen.org

Comment Themes
Build Alternative definition
Project cost and funding sources
Ridership
Pedestrian and bicycle facilities
Natural resources
Community, economic and social analysis
Public engagement

June 23, 2021

VIA EMAIL

Andy Gitzlaff, Senior Transportation Planner
Ramsey County
15 West Kellogg Boulevard, Suite 210
Saint Paul, MN 55102

Re: Review and comment on Rush Line Bus Rapid Transit Environmental Assessment Worksheet (EAW)

Dear Andy:

I am writing to you on behalf of the Board of Directors of the Payne-Phalen Community Council (PPCC) to provide our review and comment of the County's Rush Line Bus Rapid Transit (BRT) Environmental Assessment Worksheet (EAW), dated May 11, 2021.

As you know, our Board and community members met with the Rush Line Project office staff in April 2021 in advance of the publication of the Environmental Assessment Worksheet. We are grateful for the overview provided at that meeting and that our preliminary questions were addressed. Since the EAW was published on May 11th, PPCC staff and several PPCC board members have been working together to read and review the document and to prepare the review on behalf of our organization. Our Board of Directors met in community in our regular meeting last night - Tuesday, June 22, 2021. The only topic of last night's community meeting was PPCC's final review and discussion of the EAW document.

At last night's meeting, the Board of Directors of the Payne-Phalen Community Council voted to continue to our organization's support for the Rush Line Bus Rapid Transit Project and to submit the review and comment that follow herein for inclusion in the public comments for the Environmental Assessment Worksheet (EAW).

The following comments, recommendations, and declarations are respectfully submitted based on review of the Environmental Assessment Worksheet document by PPCC staff and several PPCC Board Members. Our comments are organized in two ways. First, we offer a series of "top line" comments on big picture issues. Second, our more specific comments are organized sequentially by chapter. Wherever possible we've tried to organize these comments in the same numerical sequence as the EAW document. That said there are cases where we've provided comment but were not necessarily sure of which numerical item or place in the EAW document was the best place or right place to record our own comment. This was particularly the case where we had

comments on topics or considerations that we could not necessarily find in the body of the EAW document or appendices. So, with that in mind, we ask that as the Project staff reviews our letter and comments that you consider *all of our comments* for whichever sections or topics they are germane, regardless of whether we were able to match the numerical sequence of the document through the body of this particular letter.

BIG PICTURE AND TOP LINE ISSUES:

PPCC understands, agrees with, and amplifies the Rush Line BRT Project's stated goals:

- Increase the use of transit and its efficiency and attractiveness for all users.
- Develop and select an implementable and community-supported project.
- Contribute to improving regional equity, sustainability and quality of life.
- Improve sustainable travel options between and within the study area communities.
- Enhance connectivity of the corridor to the regional transportation network.
- Support sustainable growth and development patterns that reflect the vision of local and regional plans and policies.

While PPCC is very supportive of the Rush Line project as a whole, we have a number of concerns that our organization brings to your attention on behalf of the many diverse communities of District 5. The support of the Payne-Phalen Community Council for this project is based on the following:

> ***Environmental justice, community values, and true intersectionality:*** The Rush Line Bus Rapid Transit Project places many of our community values in the spotlight. We believe that affordable, reliable public transportation is essential for a strong community. We also believe that environmental and shared economic benefits need to be protected, maintained, and enhanced for future generations. Our communities deserve to be treated well and therefore they should not have to accept trade-offs between projects. In other words, we do not need to compromise one project over another, and we will not place one of our values over another. Instead, PPCC wants all of our communities' values to be respected and uplifted in this project together.
>
> Therefore, PPCC calls upon the Rush Line Project to take whatever steps are necessary – further study, more extensive and intensive public engagement, securing additional funds, additional more detailed design work – in order to ensure that creation and implementation of this project is a benefit to all and that it is not created at the determinant of any. If done properly, all of our community values can be built into this project and raised up together and in support of one another.
>
> ***Electric buses only:*** PPCC's support for the Rush Line project is predicated on the commitment by Ramsey County and Metro Transit to operate electric vehicle buses only in the length of the Rush Line corridor.

Simultaneous planning, design, and engineering for implementing the community vision for daylighting Phalen Creek: While implementation and construction timelines may be different, the Rush Line EAW needs to ensure that the design, planning, and engineering necessary for the daylighting Phalen Creek will be compatible and synchronous with the design, planning, and engineering of the bus rapid transit project and facilities. More specifically, PPCC calls upon Ramsey County to incorporate and synthesize the analysis and findings of *The Phalen Creek Daylighting Improvements - Detailed Feasibility and Design Recommendations Technical Memorandum* (Prepared for Capitol Region Watershed District, by HTPO, dated December 21, 2020) into the Environmental Assessment Worksheet for the Rush Line Bus Rapid Transit Project. PPCC fully supports both projects, and we ask for continued and increased coordination with and between the Rush Line Project, Ramsey County, the City of St. Paul, the Ramsey Washington Watershed, the Capital Region Watershed, the Lower Phalen Creek Project (LPCP), and the Payne-Phalen Community Council on the daylighting of Phalen Creek.

Recognition and incorporation of Phalen Creek into the Lake Superior & Mississippi Railroad Corridor Historic District: The Payne-Phalen Community Council sees Phalen Creek (in its past, present, and future form) as a cultural resource. While the Lake Superior & Mississippi Railroad Corridor Historic District may be listed or eligible on the National Register, the path of the railroad was built in this location *because there was a creek* and the steady change in elevation of the creek provided an easier grading of elevation for the railroad. It is understood that the creek and the land that parallels the creek was used by Dakota peoples as a connector between settlement on the shores of Lake Phalen, settlement in (what is now known as) Swede Hollow, and sacred sites near the banks of the Mississippi River. With that in mind, the creek and the associated topography should be studied as a cultural landscape - an original character-defining feature of this historic district. The period of significance needs to be re-evaluated to account for the formerly daylighted creek, which was a part of this district, one that now needs to be restored.

Reconsideration of proposal for de minimus recommendations to be made by the City of St. Paul: On the whole, much of the EAW document is focused on the built environment. Much less attention and study are included regarding the natural environment.

- Eastside Heritage Park: Rush Line BRT must be configured so that it can co-exist with the segment of daylighted creek that will flow through the park from Arcade Street southwesterly into Swede Hollow. (Reach 5), see *Phalen Creek Daylighting Improvements - Detailed Feasibility and Design Recommendations Technical Memorandum,* Prepared for Capitol Region Watershed District, by HTPO, dated December 21, 2020.
- Lake Phalen: There is a lack of clarity in the EAW about how run-off is specifically being handled and whether or not the proposed drainage ponds will be enough. We are particularly concerned about the relationship between the run-off ponds and Lake Phalen. Lake Phalen is the only swimmable lake in either city, so it is crucial that more study is undertaken to determine how this project will affect water quality in the Lake

and to spell out how that water quality will be maintained and enhanced in the future. In addition, we seek more information about how the proposed run-off ponds will be connected eventually to the daylighted creek and how they will function to ensure adequate mitigation and water quality before draining into the Mississippi River.

Additional, more detailed analysis of land use and economic development impacts: The Environmental Assessment largely assumes that land use patterns will remain the same over the coming two decades. While that may be true for the most part, the *intensity* of land uses may change a great deal, particularly at station stops along the route. PPCC supports the intensification of uses in locations that are appropriately called out in the adopted *City of St. Paul 2040 Comprehensive Plan*. Likewise, PPCC looks forward to working side-by-side with the City, the County, and our local partner organizations on station area planning. We believe strongly in the kind of investment that is being made in the Rush Line Project – to bring new forms of transit access to our district and to the East Metro. Likewise, we support the high-level of transit efficiency and dependability that bus rapid transit will bring. With this in mind, we are concerned that the study does not adequately address the potential consequences of gentrification in Payne-Phalen and the hard realities that may come from displacement of vulnerable populations by change in land use, land use intensity, and land values. Likewise, the document does not address the need for maintenance of naturally occurring affordable housing (NOAH) nor the need for construction of new affordable housing in the corridor. PPCC calls for the EAW to include analysis and consideration of such concerns in the body of the document. We call on our partners in Ramsey County, the City of St. Paul, the Metropolitan Council and state and federal agencies to work with PPCC and our local partner organizations to forge a serious, organized and well-reasoned economic development plan, strategy and toolbox to address the challenges and opportunities to that come with the development of new high-frequency transit in Payne-Phalen. A key component of the economic development plan, strategy and toolbox must include a commitment to expand affordable housing along the Rush Line.

Economic Benefits Commitment: PPCC calls for the Environmental Assessment Worksheet to include an economic benefits commitment to employ local BIPOC skilled labor on the planning, design, construction and operation of the Rush Line BRT.

A place at the table in Station Area Planning: In addition, PPCC calls for Project staff to continue in collaboration with PPCC in our district planning work and to include PPCC Staff and Board in Station Area Planning Working Groups.

Pedestrian access and safety at stations: PPCC has a strong interest in making sure that all of our many diverse communities are well connected to all of the proposed facilities of the Rush Line BRT project. While most of the stations in our district are thoughtfully located, we urge the Project to ensure that all barriers to safe access are eliminated so that everyone who can benefit from this transit line can easily do so.

Additional, broader and more intensive community engagement regarding the proposed bridge over Johnson Parkway: Given, the potential impacts of the proposed bridge over Johnson Parkway, PPCC calls on the Project to create schematic drawings (understandable and digestible to the lay reader) for inclusion in the body of the Environmental Assessment Worksheet. In addition, we call for a thorough analysis of the visual impacts of this bridge in relation to the very open feeling of the park space as it currently exists. We seek more detailed information about how the Bruce Vento Trail connects with the surrounding trail system adjacent to the proposed bridge. And we seek more detailed analysis of the environmental impact (water, air, etc.) of constructing and maintaining this bridge for normal operations of the project. We seek detailed information about the differences between an at-grade crossing and a bridge crossing especially as relates to traffic, safety, and headways between transit vehicles. The current document would seem to suggest that public engagement related to this bridge was done with the residents of the building immediately adjacent to this bridge. While that is laudable, the Project needs to conduct public engagement with residents on a district-wide basis regarding the bridge dimensions, placement, and materials. Too many people were surprised to learn through this review process that such a bridge is to be constructed.

Synchronization of planning, design, and construction of the proposed bridge over Johnson Parkway: In addition to additional community engagement related to the bridge, we call on the Project to work with the Lower Phalen Creek Project to synchronize the planning, design, and construction of the BRT bridge facility with the day lighting of Phalen Creek in and around Reach 6, 7, and 8.

PPCC pledges our cooperation and collaboration with Ramsey County, The Metropolitan Council, and the Rush Line Project as they seek review and approval from the Federal Transit Administration (FTA) in order to respond to substantive comments, identify ways to avoid, minimize or mitigate impact, and to document which components of this project require additional analysis.

SPECIFIC COMMENTS

(Generally organized by chapter topic)

Section 1. Purpose and Need

a) The Payne-Phalen Community Council strongly supports the purpose and need of the project. The many, diverse communities in District 5 include many cost-burdened households and transit-dependent households. Adding high-frequency transit capacity to this part of St. Paul makes a great deal of sense and has many potential benefits, particularly for those communities in the Metropolitan Council's defined "Areas of Concentrated Poverty."
b) *Project and Project Need:* PPCC supports developing new transit projects that will meet the needs of people who rely on transit. More than forty percent of all households in our district

live below the poverty level. Many of our households cannot afford to own a car and rely on transit to meet their regular transportation needs.

c) PPCC applauds the Project's intention to meet our communities' increasing demand for reliable, high-frequency transit particularly as a way to help connect residents to places of employment. We are particularly excited by the Project's capacity to expand investments in new multimodal travel options and to help create and foster mobility hubs within our district and across the reach of the project. We strongly encourage the Project to work with local communities going forward to develop more detailed plans for creating mobility hubs at each station to foster strong connections between transit, bicycle and pedestrian infrastructure as well as sharing services for driving, biking and rolling.

Section 2. Alternatives

2.3 Build Alternative: Overall, the Payne-Phalen Community Council strongly supports the Build Alternative for this project even while there are particular components and aspects of the project that deserve further consideration. Comments for each of those components and aspects are included below and within the body of this letter. Most importantly, our expectation and strong desire is that the Project will continue to work with the communities of District 5 Payne-Phalen throughout the design, development, construction and implementation stages of the Project.

2.3.1. Route:

PPCC supports the route and operating environment within our district, namely the segments of mixed traffic and dedicated guideway within the boundaries of our district:

a) We are particularly supportive of intention to construct the Rush Line so that service connects directly to the businesses on Arcade Street at the grade-level where those businesses currently operate.
b) We understand that in order to forge greater high-frequency transit service in our district and across the region, it is necessary to construct a dedicated guideway along the Bruce Vento Trail and we pledge to work closely with the Project to ensure that the design of these co-located facilities meet the needs of our communities and the Project simultaneously.
c) In particular, we strongly urge the Project to collaborate closely with our organization and with our partner organization and allies on the East Side of St. Paul to ensure that the vision of daylighting Phalen Creek continues to be possible and that the efforts of this project do not set back the progress of that vision and that project. With that in mind, we call upon the Project to continue to work closely and collaboratively with PPCC, the Lower Phalen Creek Project (LCPC), the Capital Region Watershed, the Ramsey Washington Watershed, and other allied organizations to ensure that both projects can be developed in a mutually beneficial manner.
d) PPCC looks forward to working together in community with the Project to develop the following facilities: (a) The connection from the existing Arcade Street bridge to the Ramsey County rail right-of-way north of Phalen Boulevard and (b) the connection over Johnson Parkway.

The Payne-Phalen Community Council has the following comments *on the route and locations between each station* as follows:

e) PPCC calls for the Project scope to include construction of a pedestrian bridge and related facilities to connect the Railroad Island neighborhood across the CP Rail tracks to the Cayuga Station. The Railroad Island neighborhood has high levels of poverty, high transit dependency, and a great need for increased transit capacity to provide connections to and from places of employment, education and the like. In the interest of economic, social and environmental justice, the Project must find the means and the design solution to construct such a connection. Logical places for the connection would be from the ends of Minnehaha Avenue East or Clark Street.
f) PPCC supports the Railroad Island Neighborhood's call for a pedestrian bridge reconnecting Bush Avenue on the north and south sides of the Phalen Corridor.
g) PPCC calls for a pedestrian and bicycle trail connection from the east end of Aguirre Street to the Bruce Vento Trail in the Eastside Heritage Park.
h) PPCC calls for a pedestrian and bicycle trail connection under the Arcade Street Bridge and next to Guideway on Structure.
i) PPCC fully supports the coordination between the Rush Line Project, the Capital Region Watershed, and the Lower Phalen Creek Project on the daylighting of Phalen Creek. PPCC is especially concerned that now is the time (when both projects are in the planning phase) to coordinate how the Rush Line guideway and the daylighted creek can co-exist in the alignment between Heritage Park and Earl Street.
j) *East of Earl Street:* PPCC supports the construction of a new sidewalk on the south Side of Phalen Boulevard between Atlantic Street and Johnson Parkway. The match lines of the drawings make it difficult to see and understand the pedestrian crossing at Atlantic Avenue. The connection from Atlantic Avenue will be a critical connection to the Rush Line from commercial and residential districts immediately south of the CP rail tracks. Additional information should be made available for community review and consideration.
k) PPCC calls for additional analysis and design concerning how the section of the Bruce Vento trail that are not on the proposed bridge at Johnson Parkway will connect to those sections of the trail that are on the bridge.
l) PPCC calls for close attention and more detailed analysis being paid to the design for safe pedestrian, bicycle and vehicular crossing at the Arlington Avenue Crossing.

2.3.2. Stations:

Seven proposed station locations are in District 5 and/or serve the residents of Payne-Phalen including: Olive Street, Cayuga Street, Payne Avenue, Arcade Street, Cook Avenue, Maryland Avenue and Larpenteur Avenue. The Payne-Phalen Community Council has the following comments on the location and design of each station as follows:

Olive Street Station:

a) PPCC supports the inclusion of this station as an existing employment hub, one that has the potential to grow in the future.
b) PPCC strongly encourages zebra-striped markings on pedestrian crossings at the Street Station and all BRT stations. We also call for signal-phase pedestrian crossings with countdown timers. Wherever possible, PPCC encourages the construction of pedestrian bump-outs in the vicinity for each station to help pedestrians and transit users get safely to and from each BRT station.
c) Given the curve of Phalen Boulevard at the station (and the poor sightlines), PPCC recommends flashing pedestrian timers east and west of the approach to this intersection.

Cayuga Street Station:

a) PPCC calls for the Project scope and budget to include construction of a pedestrian bridge and related facilities to connect the Railroad Island neighborhood across the CP Rail tracks to the Cayuga Station. Railroad Island has one of the highest transit-dependent populations in the entire metropolitan area, as noted in *Appendix E, Figure 6: Zero-Vehicle Households projected in 2040.* In the interest of economic, social and environmental justice, the Project must find the means and the design solution to construct such a connection. Logical places for the connection would be from the ends of Minnehaha Avenue East of Clark Street.
b) PPCC supports the inclusion of this station as an existing employment hub, one that has the potential to grow in the future.
c) PPCC strongly encourages zebra-striped markings on pedestrian crossings at the Cayuga Street Station and all BRT stations. We also call for signal-phase pedestrian crossings with countdown timers. Wherever possible, PPCC encourages the construction of pedestrian bump-outs in the vicinity for each station to help pedestrians and transit users get safely to and from each BRT station.
d) Given the curve of Phalen Boulevard at the station (and the poor sightlines), PPCC recommends flashing pedestrian timers to the east northwest and southwest vehicular approaches to this intersection.

Payne Avenue Station:

a) PPCC strongly recommends against locating a stormwater BMP in the parcel on the southwest corner of Payne Avenue and Phalen Boulevard. This site has strong potential for transit-oriented development (TOD). Such development would complement the very purpose of the Rush Line BRT. Moreover, this site is specially called out as an "Opportunity Site" in recently adopted the *City of St. Paul 2040 Comprehensive Plan*. Moreover, PPCC envisions this site as a gateway connector between the upper portion of Payne Avenue (north of the railroad bridge) and lower Payne Avenue (south of the railroad bridge). More in-depth consideration of these opportunities should be explored in the Station Area Planning process. As a standard practice, locating stormwater BMPs should be moved as far away from station sites as possible in order to allow for TOD.
b) Likewise, PPCC strongly recommends against locating a stormwater BMP in the parcel on the southeast corner of Payne Avenue and Phalen Boulevard. This site has strong potential

for transit-oriented development (TOD). Such development would complement the very purpose of the Rush Line BRT. Moreover, this site is specially called out as an "Opportunity Site" in recently adopted the *City of St. Paul 2040 Comprehensive Plan*. Moreover, PPCC envisions this site as a gateway connector between the upper portion of Payne Avenue (north of the railroad bridge) and lower Payne Avenue (south of the railroad bridge). More in-depth consideration of these opportunities should be explored in the Station Area Planning process. As a standard practice, locating stormwater BMPs should be moved as far away from station sites as possible in order to allow for TOD. In addition, this site holds strong potential for creating a bike/ped connection between Swede Hollow Park, the commercial district along Payne Avenue, and the Payne/Phalen BRT station.

c) PPCC envisions a mobility hub at this station site. Design of the station and transit vehicle approach and exit from the station should be designed in such a way as to be compatible with new and existing stops on other bus lines, new electric car share service and charging stations ("Evie"), all bike and ped facilities envisioned in the *City of St. Paul 2040 Comprehensive Plan.*

d) PPCC strongly encourages zebra-striped markings on pedestrian crossings at the Payne Avenue Station and all BRT stations. We also call for signal-phase pedestrian crossings with countdown timers. Wherever possible, PPCC encourages the construction of pedestrian bump-outs in the vicinity for each station to help pedestrians and transit users get safely to and from each BRT station.

Arcade Street Station:

a) PPCC envisions a transit-oriented eco-village and mobility hub at this station site. Design of the station and transit vehicle approach and exit from the station should be designed in such a way as to be compatible with new and existing stops on other bus lines, new electric car share service and charging stations ("Evie"), all bike and ped facilities envisioned in the *City of St. Paul 2040 Comprehensive Plan.*

b) PPCC envisions this site as a gateway connector between the upper portion of Arcade Street (north of the railroad bridge) and lower Arcade Street (south of the railroad bridge). More in-depth consideration of these opportunities should be explored in the Station Area Planning process.

c) PPCC strongly encourages a robust, well-designed intersection at this station site in order to create strong, safe, and convenient connections to and from this station stop from the commercial/retail district, nearby employment sites, residential neighborhoods, and community facilities (such as the East Side YMCA). Design of this intersection should be closely coordinated with MnDOT's Highway 61/Arcade Street redesign project which is currently underway.

d) PPCC strongly encourages zebra-striped markings on pedestrian crossings at the Arcade Street Station and all BRT stations. We also call for signal-phase pedestrian crossings with countdown timers. Wherever possible, PPCC encourages the construction of pedestrian bump-outs in the vicinity for each station to help pedestrians and transit users get safely to and from each BRT station.

e) PPCC urges strong coordination between the Rush Line Project, the Capital Region Watershed, and the Lower Phalen Creek Project on the daylighting of Phalen Creek east of Arcade Street along the BRT alignment and the Bruce Vento Trail.

Cook Avenue Station:

a) PPCC strongly supports the addition the Cook Street Station to serve the residential neighborhoods in this part of the district and to serve the patrons and employees of Hmong Village and Baldinger Bakery.
b) PPCC strongly supports the use of zebra-striped crosswalk at the Cook Avenue Station as well as all BRT stations. We support the ped crossing signs with rapid flash beacons.
c) We support the sidewalk connection to the eastern end of Cook Avenue (north and west of the station).
d) We encourage the Project to add additional sidewalks from the station to Magnolia Avenue and northward along Burnquist Avenue to Jessamine Street.
e) Likewise, we also encourage the creation of a sidewalk connection from the eastern end of Case Avenue, along the southern boundary of the ballfields (or the northern edge of the Yard Waste site) to the Bruce Vento Trail, Phalen Boulevard and the Cook Street Station. This short sidewalk would complement the improvements being made at Atlantic Avenue and it would enhance accessibility to the station for residents in that neighborhood.

Maryland Avenue Station:

a) PPCC endorses a robust, well-designed intersection at the Maryland Avenue station site in order to create strong, safe, and convenient connections to and from this station stop from the commercial/retail district, nearby employment sites, residential neighborhoods, and nearby parks and other community facilities.
b) PPCC strongly encourages zebra-striped markings on pedestrian crossings at the Maryland Avenue Station and all BRT stations. We also call for signal-phase pedestrian crossings with countdown timers. Wherever possible, PPCC encourages the construction of pedestrian bump-outs so to help pedestrians and transit users get safely to and from each BRT station.
c) Additional consideration should be made for improved sidewalk connections east and west along Maryland Avenue. Special consideration should be made for whatever pedestrian infrastructure updates and improvements should be made at along Maryland Avenue between Burnquist and Clarence Streets.
d) PPCC strongly encourages zebra-striped markings on pedestrian crossings at the Payne Avenue Station and all BRT stations. We also call for signal-phase pedestrian crossings with countdown timers. Wherever possible, PPCC encourages the construction of pedestrian bump-outs in the vicinity for each station to help pedestrians and transit users get safely to and from each BRT station.

Larpenteur Avenue Station:

e) PPCC supports the inclusion of this station as a way to better connect residents of this area to employment, education, commercial and recreational opportunities up and down the corridor.

f) PPCC looks forward to working with the Project on further design development at this station site, particularly in relation to good bus connectivity between the Rush Line and existing bus transit on Larpenteur.
g) PPCC supports the creation of a signalized intersection in this location. We strongly encourage the addition of pedestrian bump-outs at the intersection of Larpenteur with English Street, Hagen Street, and McAfee Street.
h) PPCC supports adding pedestrian-activated crossing signals to this intersection to allow safe crossing into the station area before and after the actual moment when transit vehicles are passing through.
i) PPCC strongly encourages zebra-striped markings on pedestrian crossings at the Larpenteur Avenue Station and all BRT stations. We also call for signal-phase pedestrian crossings with countdown timers. Wherever possible, PPCC encourages the construction of pedestrian bump-outs in the vicinity for each station so to help pedestrians and transit users get safely to and from each BRT station.

2.3.3 Park and Rides:

The Payne-Phalen Community Council supports the decision *against* locating park-and-ride facilities in District 5; this would be an inefficient use of land use and the impacts to local communities would be too great from an environmental justice perspective. We call upon the Project and the City of St. Paul to work with local residents and businesses on the creation of critical parking requirements to guard against neighborhood street parking being used as all-day commuter parking for Rush Line patrons.

2.3.4 Operations

a) PPCC supports and welcomes the enhanced transit frequency proposed in the Operations Timetable (Table 2). Improving transit frequency and reliability are two key priorities that our residents and businesses have been calling for over many years.
b) PPCC's strong support of this project is contingent upon the use electric buses. If this project were to introduce additional busses that run on fossil fuels to this area, that would be counter to the environmental justice and social justice considerations for the communities we serve.
c) PPCC supports the proposed hours of operation and frequency noted in Table 2.
d) PPCC supports the use articulated electric buses. We also support the location of charging stations being constructed at the Union Depot bus deck.
e) PPCC does not support the introduction and use of new gas-powered, or biodiesel powered transit vehicles for this project.
f) The East Metro Garage is located in Payne-Phalen, District 5. The addition of thirteen (13) new 60' vehicles using this facility may have substantial impacts in the district and the surrounding neighborhoods. PPCC calls on the Rush Line project to work closely with the Payne-Phalen Community Council, our partner organizations, our residents and businesses to design operations and service related to use of this facility in ways that minimize the impact of that additional traffic on our neighborhoods.

g) With that in mind, PPCC supports the intention to reassign some of the current buses assigned to this facility to other operating garages to provide space for Rush Line BRT vehicles.

2.3.5. Capital and Operating Costs

PPCC understands that Capital costs are an estimation of the fixed costs needed to build the project and bring it into revenue service. We also understand that these costs include construction of the dedicated guideway, stations and other project elements and factor in expenditures such as environmental mitigation, right-of-way acquisition, vehicle acquisition and professional services. Several additional components should be added to the capital cost of this project in order to ensure that it adequately serves the neighborhoods, communities, residents and businesses along the corridor in a fair and equitable manner.

a) For example, in order to fully serve the local communities in District 5, the Payne-Phalen Community Council calls on the Rush Line Project to make the necessary revisions to the capital and operating costs of the project to include the pedestrian infrastructure noted in our comments on sections 2.3.1 Route and 2.3.2 Stations.

Section 3. Environmental Impact Areas

3.2.1. Environmental Resources of No Concern

The Payne-Phalen Community Council takes exception to several categories being considered "of no concern." PPCC does not necessarily agree with all of the determinations in the EAW at this time. We do not yet have enough information to agree that several issues can be sufficiently considered "negligible adverse effects" in the long term (the operating phase) and, therefore, we believe additional analysis of these items these should be included in Section 3.2. For the following items, we refer the Project to PPCC's "Big Picture and Top Line" comments, in this letter, above:

a) Land use plan compatibility
b) Safety and security
c) Land and water conservation
d) Geology, groundwater and soils
e) Energy
f) Hazardous materials

If the vehicles used are not electric, the following may be detrimental

g) Noise and vibration (If the vehicles used are not electric, noise and vibration may be detrimental).
h) Air quality (If the vehicles used are not electric, *Air Quality* may be detrimental).

Farmlands: The Payne-Phalen Community Council asks the project to reconsider the blanket suggestions that farmlands are of "of no concern." While it's true that there is no mass-production farmland in the general vicinity of the Project, Payne-Phalen is home to many community gardens

that are used to cultivate healthy foods for at risk populations on the East Side. These gardens include (but are not limited to) sites that are adjacent to or nearby the Project Area:

a) Green Pride Garden – Greenbrier and Lawson
b) Railroad Island Garden – 516 Beaumont
c) Urban Roots at Rivoli Bluff
d) The Bruce Vento School

The Environmental Assessment should consider the potential impacts to such resources, particularly as a matter of environmental and social justice because these gardens help local communities with the challenges of food security - a major issues and challenge for many households in the St. Paul segment of the Rush Line corridor.

3.2.2. Transit

2040 Base Connecting Bus Network:

a) PPCC supports increasing the weekday peak and non-peak frequency on Route 61 from 30 minutes to 20 minutes.
b) We also support the Route 61 connection to the Arcade Street station because it provides a north/south connection along Arcade Street as well as an east-west connection on Larpenteur Avenue/Hennepin Avenue, including a connection to downtown Minneapolis.
c) PPCC strongly supports the future H Line Bus Rapid Transit proposed to run between downtown Minneapolis and Sun Ray Transit Center in St. Paul via Como Avenue and Maryland Avenue. We strongly encourage this review to account for the intersection of the H Line and the Rush Line at the Maryland Arcade intersection.

Other Bus Network Improvement Considerations: PPCC supports the following:

d) An extension of Route 61 east to the Frost Avenue station
e) Service later into the evenings on Route 61
f) Sunday service on Route 61
g) Restructuring Route 64
h) The new H Line route that would provide an east-west connection on Maryland Avenue

3.2.3. Traffic

a) PPCC supports traffic queueing improvements for the Payne/Phalen intersection.

3.2.4 Pedestrians and Bicycles

a) PPCC supports improvements to the pedestrian network around each station to improve transit access and use. Specific comments are provided (above) in our comments on each station site.
b) In addition to those comments made above, PPCC strongly urges the project to create new connections to and from the stations, guideway and trail along Phalen Boulevard to the neighborhoods immediately north and south of the corridor. Such connections should be made

at the following locations: Aguirre Street, Forrest Avenue, Russell Street/Wells Street, Earle Street, Frank Street, Magnolia Avenue East, and Minnehaha/Arkwright and Cayuga.

c) PPCC encourages the reconstruction of the Burr Street pedestrian bridge to reconnect the neighborhoods north and south of the corridor.
d) PPCC is tentatively supportive of the proposed bridge crossing Johnson Parkway, but there are important caveats to that support, see "Big Picture and Top Line Concerns," above.

3.2.12 Utilities: The County and the Project should strongly consider laying internet cable while the project is in construction to improve access to communities on St. Paul's East Side.

3.2.13 Surface Waters, see PPCC's "Big Picture and Top Line" comments, in this letter, above.

3.2.14. Water Quality and Stormwater

a) Where runoff and stormwater management features from the Rush Line BRT Project may contribute flow to the proposed Phalen Creek daylighting system and/or where there is potential for a combined conveyance system, consideration of options should be coordinated with representatives of the Capitol Region Watershed District and the Lower Phalen Creek Project. In early 2021, the Capitol Region Watershed District initiated a study intended to develop design recommendations for the areas of the creek daylighting project that are adjacent to the Rush Line BRT Project. As previously noted in this letter, PPCC calls upon Ramsey County to incorporate and synthesize the analysis and findings of *The Phalen Creek Daylighting Improvements - Detailed Feasibility and Design Recommendations Technical Memorandum* (Prepared for Capitol Region Watershed District, by HTPO, dated December 21, 2020) into the Environmental Assessment Worksheet for the Rush Line Bus Rapid Transit Project.
b) This document needs more specificity about how wells will be treated if they are encountered and how what strategies will be used to ensure against contamination of ground waters and surface waters.

3.3. 8 Noise and vibration:

a) Please note that a great number of businesses and single and multifamily residences are close by the corridor – many of the these are older structures. All of these may be sensitive to short- and long-term noise and vibration, especially during construction. See additional comments in Section 4, below.

3.3.11: Cultural resources:

a) The Payne-Phalen Community Council sees Phalen Creek (in its past, present, and future form) to be a cultural resource. The Payne-Phalen Community Council sees Phalen Creek (in its past, present, and future form) as a cultural resource. While the Lake Superior & Mississippi Railroad Corridor Historic District may be listed or eligible on the National Register, the path

of the railroad was built in this location *because there was a creek* and the steady change in elevation of the creek provided an easier grading of elevation for the railroad. It is understood that the creek and the land that parallels the creek was used by Dakota peoples as a connector between settlement on the shores of Lake Phalen, settlement in (what is now known as) Swede Hollow, and sacred sites near the banks of the Mississippi River. With that in mind, the creek and the associated topography should be studied as a cultural landscape - an original character-defining feature of this historic district. The period of significance needs to be re-evaluated to account for the formerly daylighted creek, which was a part of this district, one that now needs to be restored.

PPCC's support of this project is contingent upon the understanding that the Rush Line Project, Ramsey County, MetroTransit, and all associated agencies involved in building this project will cooperate with the Lower Phalen Creek Project, all interested tribes, the Ramsey Washington Watershed, the Capital Region Watershed, the City of St. Paul and the Payne-Phalen Community Council on a design and implementation scheme that allows both project to proceed and to occupy side-by-side space along the same corridor of land stretching from Payne Avenue to Lake Phalen. We call for recognition and incorporation of Phalen Creek into the Lake Superior & Mississippi Railroad Corridor Historic District. See additional comments (above) and in Section 4, below.

3.3.12: Environmental Justice:

a) PPCC does not necessarily agree that with planned mitigation measures, there will be no adverse impact on community facilities or neighborhood cohesion. As mentioned, we support this project but believe there is further analysis, planning, and action steps needed to ensure that there will be no adverse impacts on minority and low-income populations, see "Big Picture and Top Line Issues," above.

3.4. Cumulative and Indirect Effects:

a) The Payne-Phalen Community Council and the communities we serve are strong supporters of the vison to daylight Phalen Creek from Lake Phalen on the north, through the Phalen Corridor to Swede Hollow and on to the Mississippi River to the south. Phalen Creek was, is and will continue to be an important cultural, environmental and historic resource for our communities.
b) PPCC's support of this project is contingent upon the understanding that the Rush Line Project, Ramsey County, MetroTransit, and all associated agencies involved in building this project will cooperate with the Lower Phalen Creek Project, all interested tribes, the Ramsey Washington Watershed, the Capital Region Watershed, the City of St. Paul and the Payne-Phalen Community Council on a design and implementation scheme that allows both project to proceed and to occupy side-by-side space along the same corridor of land stretching from Payne Avenue to Lake Phalen.

c) This includes all considerations including but not limited to transportation, visual resources, cultural resources, safety and security, utilities, surface water, water quality and storm water, hazardous materials, a land acquisitions and relocations, environmental justice, economics, geology ground water and soils, air quality, noise and vibration, and protected species and wildlife habitat. This statement includes, by reference, all categories noted in Table 24.
d) Likewise, this statement also includes, by reference, all categories and information on indirect effects noted in the *Indirect and Cumulative Effects Technical Report* (see Appendix E).

3.5. Environmental Permits, Commitments and Mitigation Measures:

a) Concerning Table 24: Summary of Commitments and Mitigation Measures for the Build Alternative: In the section on "Neighborhoods and Community Resources" for the line on construction, please note that PPCC calls upon the Project to ensure that noise, dust, and air pollution will be mitigated during construction phase of the Project as well as the operating phase of the Project.

Section 4. Section 4(f) Evaluation

The Payne-Phalen Community Council has concerns related to several potential impacts:

a) PPCC concurs with the route (alternative) that was selected for this project to proceed. We acknowledge that the project will greatly alter Lake Superior & Mississippi Railroad Corridor Historic District. We understand that to build this project, the historical integrity of the corridor will be greatly impacted and because of this cannot be considered de minimis. That being said, after evaluating the entirety of this project, we believe it is more beneficial to the community to build this project.
b) We appreciate the seeming close collaboration that the project has had with the MN State Historic Preservation Office. We acknowledge their concerns (found in Appendix C Section 106 Coordination), and we encourage their continual correspondence with the project team.
c) Generally, this project will have moderate to low impact on some historical locations and that the benefits provided to the community outweigh the detriments to the historical integrity of the rail corridor (as railroad infrastructure). While we are happy to see mention of continued coordination and collaboration with the Lower Phalen Creek Project regarding the potential daylighting of the Phalen creek. We continue to have concerns about the past, present, and future form of Phalen Creek as part of the corridor, see "Big Picture and Top Line" comments in this letter, above .
d) Within Appendix C Section 106 Coordination there is a draft Memorandum of Agreement statement that notes that federally recognized American Indian tribes have been contacted about this project though none of the Tribal Historic and Preservation Offices have commented on the project (Appendix C, 2). It is further noted that the Tribes will again be contacted. It is our hope that deeper engagement - more than an email - is taken up with the THPO officers.
e) For PPCC, it makes a great deal of sense that all four Dakota communities were contacted since it is understood that as the project is based on Dakota lands and that exiled Dakota and Lakota reservations were connected.

f) PPCC notes that Turtle Mountain was contacted by the Project but none of the other Ojibwe nations in Minnesota were contacted. We call on the Project to address this.
g) PPCC encourages further outreach through the official tribal historic preservation offices and suggests that additional community outreach is also conducted through indigenous and indigenous-led non-profits on the East Side of St. Paul. The project should continue their outreach to Dakota communities and consider connecting with local St. Paul Native American community organizations or non-profits for community engagement.
h) PPCC supports the Project's efforts to prevent runoff from polluting Lake Phalen, but continues to have questions and concerns, see "Big picture and Top Line" items noted in this letter, above.
i) The report notes that vegetation will be used to minimize the impact to the historical nature of the corridor. PPCC calls for as few of the trees as possible to be removed in order to preserve the look, feel, and natural look of the corridor as well as the benefits that trees provide for the community.
j) One of the larger impacts of this project is loss of vegetation. While we acknowledge that much of this is unavoidable, PPCC calls for those losses to be minimized through creative use of plantings throughout the corridor.
k) PPCC appreciates the details related to engaged and threatened species and we're glad that mitigation efforts will be taken there. Please note that we have concerns about the impact on wildlife that is not presently classified as "endangered" but could nevertheless be negatively impacted by this project.
l) *Wildlife and waterfowl populations:* While there are presently no defined wildlife and waterfowl refuges, please note, the Project's proposed alignment intersects with several significant waterways on the East Side of St. Paul, all of which originally drained to the Mississippi River: Trout Brook, Phalen Creek and Lake Phalen, and the Keller Lakes chain. The Mississippi River is one of North America's chief migratory paths for birds, the matter of avian wildlife in these area – both presently and in terms of future potential as areas of the East Side that are restored to their natural presence. With that in mind, this EAW must more fully consider the relationship that construction and operations of this project may have on local and migratory bird populations.
m) De Minimis Impact Determinations: See comments in the Big Picture and Top Line issues section (above).
n) Parks and Recreation Areas: See comments in the Big Picture and Top Line issues section (above).
o) As previously mentioned, PPCC's support of the Project is predicated upon electric buses being the only buses that will operate in the BRT the corridor. While we support and agree with the Project's *commitment* to the use of electric busies, we remained concerned about the potential that the corridor is built and then operations are switched away from electric buses for whatever reason. It is understood that electric buses have less noise and pollution than alternatives so we call on the Project to make the appropriate capital investments to ensure that the vehicles using this route will be fully electric.
p) PPCC supports the Project's efforts reduce automobile trips.

q) We support the Project's efforts to provide greater mobility for car-less and transit dependent households and we call on Ramsey County and Metro Transit to join with the City of St. Paul, HourCar and PPCC to ensure that the Electric Vehicle Car Sharing Program ("Evie") now being installed in Payne-Phalen will be integrated and supported into the overall direction of the BRT project.
r) Related to community concerns over policing and crime: We acknowledge that it may be difficult to forecast what, if any impact, this route will have on crime. We suggest that it may be prudent to hold a future community conversation with Metro Transit Police to discuss issues of policing especially in light of recent community conversations around policing.

Section 5. Public Engagement and Agency Coordination

5.1. Public Engagement:

a) PPCC acknowledges and appreciates the extensive outreach the BRT Project has initiated and undertaken in the community this far. As the project moves forward, we look forward to continued collaboration on community engagement related to the issues of the project generally and the issues specifically raised in this review and comment letter.
b) As noted, PPCC fully supports the Rush Line BRT Project and the Lower Phalen Creek Daylighting project, and we ask for continued and increased coordination with and between the Rush Line Project, the Capital Region Watershed, the Lower Phalen Creek Project, and the Payne-Phalen Community Council on the daylighting of Phalen Creek.
c) PPCC invites and encourages the Rush Line BRT project to work in continued collaboration with the community partner organizations identified by our Board of Directors as being critical to long-range district planning in Payne-Phalen. Those partner organizations include:
    - Railroad Island Neighborhood Group
    - East Side Area Business Association (ESABA)
    - East Side Neighborhood Development Company (ESNDC)
    - Payne-Arcade Business Association (PABA)
    - African American Cultural Wellness Institute/Economic Development Center
    - American Indian Family Center
    - Hmong American Partnership (HAP)
    - Karen Organization-Minnesota (KOM)
    - Pebmoob Senior Center
    - Arlington Hills Community Center
    - Boys and Girls Club Eastside
    - Catalyst Music, The Treasury
    - CLUES St Paul- Chicanos Latinos Unidos En Servicio
    - Cookie Cart
    - East Side Elders
    - East Side Freedom Library
    - Merrick Community Services
    - Mom's Food Shelf
    - Salvation Army Eastside Corps

- Volunteer Lawyers Network (in conjunction with HAP)
- YMCA East

5.2. Agency Coordination:

a) As noted above, PPCC calls for Project staff to continue in collaboration with PPCC in district planning and to include PPCC Staff and Board in Station Area Planning Working Groups.

Please include and incorporate this letter as public comment on the Rush Line BRT Environmental Assessment Worksheet. We are grateful to Ramsey County for taking the position of the Payne-Phalen Community Council into full consideration as you proceed. Thank you again for the opportunity to provide feedback on this very important project. On behalf of the Payne-Phalen Community Council, we are appreciative and grateful for all of the hard work and high intentions for this project. If you have any questions or require further clarifications, please feel free to contact me.

Respectfully submitted,



Jack Byers
Executive Director

cc. Commissioner Toni Carter, Chair, Ramsey County Board of Commissioners
Commissioner Victoria Reinhardt, Ramsey County, District 7 and Chair of the Rush Line Policy Advisory Committee
Councilmember Nelsie Yang, City of St. Paul, Ward 6, and Vice-Chair of the Rush Line Policy Advisory Committee
Commissioner Jim McDonough, Ramsey County, District 6
Commissioner Trista MatasCastillo, Ramsey County, District 3
Ryan O'Connor, Ramsey County Manager
Elizabeth Tolzmann Ramsey County, Director of Policy & Planning
Frank Alarcon, Ramsey County, Planning Specialist II
Representative Betty McCollum, U.S. House of Representatives
Council Member Chai Lee, Metropolitan Council, District 13
Melvin Carter, Mayor, City of St. Paul
Council President Amy Brendmoen, City of St. Paul, Ward 5
Councilmember Jane Prince, City of St. Paul, Ward 7
Russ Stark, City of St. Paul, Chief Resilience Officer

Noel Nix, City of St. Paul, Director of Community Initiatives
Kaohly Her, City of St. Paul, Policy Director
Nicolle Goodman, City of St. Paul, Director of Planning and Economic Development
Kayla Schuchman, City of St. Paul, Housing Director
Martin Shieckel, City of St. Paul, Economic Development Director
Luis Pereira, City of St. Paul, Planning Director
Bill Dermody, City of St. Paul, Principal Planner
Sean Kershaw, City of St. Paul, Director of Public Works
Michael Hamm, City of St. Paul, Director of Park and Recreation
Maggie Lorenz, Executive Director and Wakan Tipi Center Director, Lower Phalen Creek Project
Sam Wegman, Environmental Stewardship Program Manager, Lower Phalen Creek Project
Tina Carstens, Administrator, Ramsey-Washington Metro Watershed District
Sage Passi, Watershed Education Specialist, Ramsey-Washington Metro Watershed District
Mark Doneux, Administrator, Capital Region Watershed District
Forrest Kelley, PE Regulatory Division Manager, Capital Region Watershed District
Elizabeth Hosch, Permit Program Manager, Capital Region Watershed District
Lisa Theis, Executive Director, Greater East Side District Council
Damian Schaab, Co-Chair, Railroad Island Neighborhood Group
Don Lorr, Co-Chair, Railroad Island Neighborhood Group
Robin Rivard, Co-Chair, Railroad Island Neighborhood Group
Rebecca Nelson, President, Payne-Phalen Community Council
Board Members of the Payne-Phalen Community Council

Comment Themes
Project cost and funding sources
Ridership

On Jun 24, 2021, at 8:22 AM, [redacted] wrote:

External message alert: This message originated from outside the Ramsey County email system. **Use caution** when clicking hyperlinks, downloading pictures or opening attachments.

Dear Commissioner Reinhardt:

I am so saddened that our public officials are not listening to the people that they support with regard to the Rush Line in White Bear Lake. I can't imagine that any of the buses - the 89 per day will ever be full or even half full. That is a crazy number of buses running through a very iconic and historic downtown area only to be not useful. To be honest there is not that many businesses in the downtown area that numerous people each day will be coming into downtown to shop as daily or weekly repeat visitors. In addition, most companies in the metro area are now rethinking brick and mortar buildings and whether everyone actually needs to come into the office. Because of that new flexibility in the work place there won't be a big need for the buses to pick up people to bring them to work. So really who is this Rush Line for - is it a feather in the caps of the Commission?

With the poverty, homelessness and food insecurity and all the other issues we face in Ramsey County I would really like to see this nearly half a billion dollars spent on actually helping people of Ramsey County that need help on a daily basis. I know everyone involved with the Rush Line feels they have done their homework and this is important to the community - but why - how is running empty buses many times an hour helpful to anyone? It doesn't appear those that are involved are not listening to the people that live here and say they will not be using the Rush Line nor will that many people be coming into WBL.

If this has to go forward - why wouldn't this commission start with a few buses a day to see how it goes - to see if there is in fact a need for the buses and if they will be filled? I for years have had an office right outside the light rail in Bloomington - those cars are rarely full or even half full even during rush hour they carried more people but never full - this was when the light rail started and continued through to the pandemic.

The approach being used to get this pushed through - we will have buses going all day long - seems a bit like bullying the residents that don't want or need this line. It seems like those in power are not choosing to listen to the people impacted, using taxpayer money on a project that isn't proven to be necessary or thinking of the impact on the community. I don't understand why you believe this must happen. I would be interested in understanding how or why this project has to go forward. It seems this is a train that can't be stopped with conductors that don't care who is negatively impacted with little regard to the actual usage of the buses nor the money spent on the project. I am beyond bewildered but I truly know you can't fight city hall but hope that by reading this you might enlighten me and maybe think through the rationale of the volume of buses that are unnecessary.

Thank you for reading and listening to this I look forward to your response.

Maureen Reinhart

[redacted]

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Wednesday, June 23, 2021 12:46:09 PM

Comment Theme
Ridership

Submitted on Wednesday, June 23, 2021 - 12:46
Submitted values are:

Name:Carolyn Knieff

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I am totally against the Rush Line project. I do not believe this transportation "solution" was needed before COVID-19. We certainly do not need it now. It is socially irresponsible to move ahead with this project without waiting to determine how COVID-19 has impacted the transportation needs of our community.

It would be cheaper to provide free Uber service to those people who are requesting public transportation than it will be to create the Rush Line. There is a responsibility to do what is right, not to take funding because it is available or build it because a small number of people want it.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Wednesday, June 23, 2021 2:34:31 PM

Comment Themes
Project cost and funding sources
Ridership
Pedestrian and bicycle facilities
Public engagement

Submitted on Wednesday, June 23, 2021 - 14:34
Submitted values are:

Name:Suzanne Hall

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:The rush line is an unwise use of public money for the following reasons:
1) Very few passengers ride the bus from White Bear Lake to downtown St. Paul. My husband was a regular rider of this route, and he reports that there were never more than 4 people on the bus from White Bear - and this was during morning rush hour.
2) White Bear Lake has no facilities or businesses that do not have a comparable alternative in downtown St. Paul. Because of this, the bus riders going north (with White Bear Lake as their destination, rather than just returning back home) would be even fewer than those going south (with St. Paul as a destination).
3) Because of reasons 1 and 2 above, the exorbitant price of this project makes no sense when compared to the small number of people it would benefit.
4) The rush line would cause disruption of the Bruce Vento Trail. Reworking the trail to accommodate the rush line would necessitate additional spending of public money.
5) Covid has forever changed how people work. Because many companies have opted to have their employees work part time or even full time from home, fewer people need to physically commute to work. This decreases the number of bus riders even more.
6) Who is asking for this rush line? The companies who will be paid to build it? This is a PUBLIC project paid with PUBLIC money, yet over 4,700 citizens have signed a petition (link here: http://chng.it/fvsVqvr7g8) AGAINST this project. If public money (which comes from taxpayers) is to be used to fund this project, those who would benefit from the finished project (those who would actually ride the bus, NOT those who would benefit financially from the construction) must outnumber those who oppose the project.
7) One job of the U.S. government is to listen to its citizens and try to work in the citizens' best interest. There is a large and strong opposition to this project, and government officials need to listen and put a stop to the project.

wed June 23, 2021

Comment 166

Hello Andy!

Well here's what I think about the proposed Rush Line.
Our area really needs better transportation in general -
there are people who have stopped driving, parking is always
an issue and buses would help with that. And then the
elderly who don't have friends or family to help them with
transportation to doctor etc.
We never did get a subway or an ell built when
other major cities in the US did so -
I worked nites and before I moved to White Bear -
I had to learn to drive so I get to my job in downtown
St Paul (the Post Office was there then)
For awhile I got rides from friends but then I was on
my own. Also I needed to get my husband to his many eye
appts all over the Metro.
So the Rush Line seems like a solution for the
suburb of WBL but the way it's set up it'll only
help to get from A to B not A to C or B to C.
- and you need transportation to get to your station
and a parking spot for your vehicle. Not everyone
will be riding a bicycle or walking.
So there's that -- we already have so few
parking spots. we would be taking more than 50
spots away for this project. -
How about spending money on a ramp or
two instead?
Also you say you are giving people a chance
to work here, But you are killing existing businesses
so many buses can go thru our town. Hoy Wash and
Bear Town will be hampered on 8th near Wash Ave -
one of the turnarounds. This is backward planning.
Plus - Remember - our expanded school will have
senior high students who drive - You are adding
these students to school buses to regular traffic
to all those buses every 10 min. all day. - Impossible

Traffic issues for a small town like this.
A Disaster waiting to happen.

Has no one thought of SAFETY there?

And has anyone thought of vans that can be used for appts - the idea of "Dial-a-Ride" that did work -!! (A Lot of senior facilities have their own Transportation

That would be money well spent.

Please consider also that a lot of people just will not get on a bus alone - even during the day - either for fear of falling or other physical issues - not just of crime as others have mentioned. (Tho the Green Line + city Metro Transit buses have reported an increase in crime)

I know lots of people - including vulnerable folks with mental illness who fear being taken advantage of on public transit.

-Andy - you + your staff - please step back and look not at your stats of future ridership but at individuals and their needs.

Thank you - Thank you
for just considering this letter!

Always,
Fran Knothe
Fran Knothe

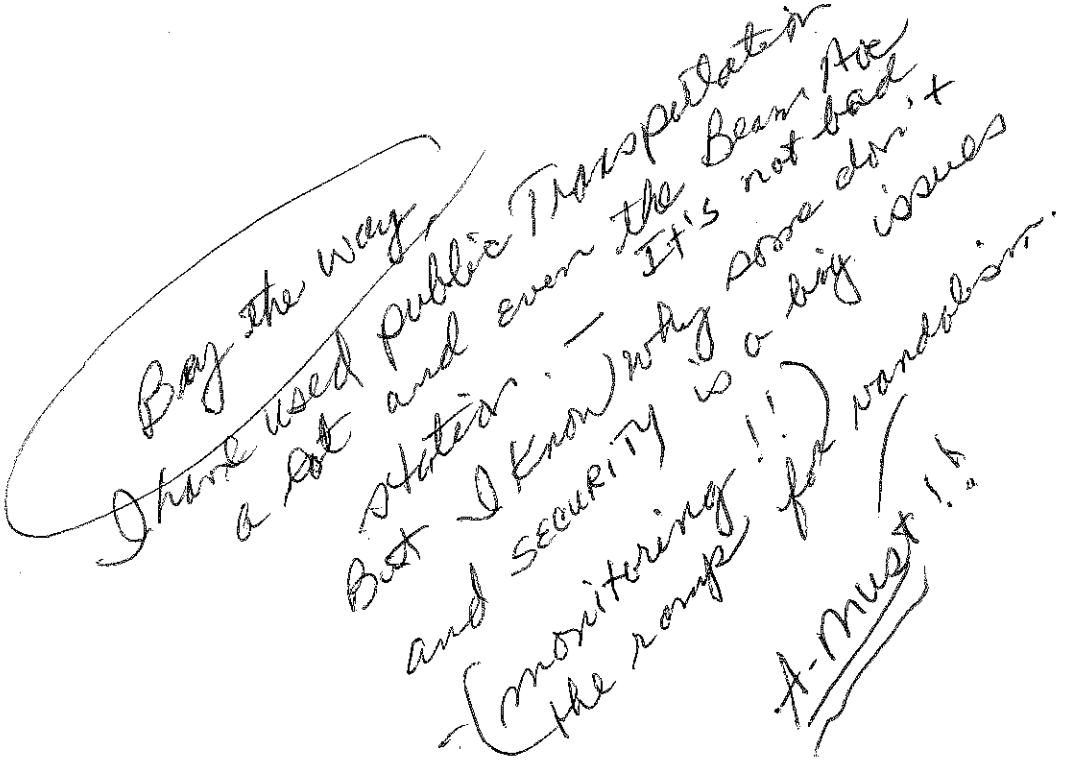
[redacted]

[redacted]

Turn over

Comment 166

Comment Themes
Ridership
Traffic and parking
Community, economic and social analysis



From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Thursday, June 24, 2021 3:25:01 PM

Comment Theme
Ridership

Submitted on Thursday, June 24, 2021 - 15:24
Submitted values are:

Name:Dale Carlson

Email address[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I still don’t know who will use this. The park and rides at Maplewood mall and 61/Co. rd c are virtually empty. Building more parking ramps that not many people use is a waste resources and a huge parking subsidy for people who really don’t need it. Rush line is a 19th century model for public transit. Can’t we think 21st century solutions?

Comment Themes
Ridership
Natural resources

June 24, 2021

Andy Gitzlaff, Senior Transportation Planner
Ramsey County
15 West Kellogg Boulevard, Suite 210 Courthouse
Saint Paul, MN 55102

Dear Mr. Gitzlaff,

Thank you for the opportunity to provide comments on the environmental assessment worksheet for the proposed Rush Line corridor. Transit has the ability to markedly improve the lives of Minnesotans, and the Rush Line Corridor would dramatically improve mobility, increase access to jobs, education, health care and recreational opportunities, and improve environmental quality and reduce greenhouse gas emissions in the East Metro.

Transit on the Rush Line Corridor is an essential component of the state's strategy to combat transportation-based greenhouse gas emissions, and to build climate resilience. Vehicle transportation is the largest source of climate pollution in Minnesota and the U.S. Transit reduces our dependence on harmful fossil fuels, protects vulnerable lands and water, and gets us closer to ending the climate crisis we're all facing. Now is the time to innovate and expand the system so that Minnesotans see transit as not just a viable option for their commutes—but their preferred means of transportation.

To reduce driving, Minnesotans must increase their transit use. Transit—with supporting shifts to walking and biking—is the only transportation mode with the capacity to shift enough people away from car travel to meet climate imperatives. To attract significant new ridership, transit needs to be fast, reliable, frequent, navigable, and must provide comprehensive access to daily needs and wants. The Rush Line Corridor will advance this need.

Further, current transit-dependent Minnesotans—who are disproportionately people of color, lower income, and essential workers—can only access 0.5-10% of the opportunities of car drivers in the Twin Cities metro, and less than that elsewhere in Minnesota. Cars are crushingly expensive ($9000+ per year), putting car ownership out of reach for many Minnesotans and making ownership an enormous burden for others. Further, cars emit dangerous pollutants that damage the hearts, lungs, and minds of those living closest to major car infrastructure—again, predominantly people of color.

Transportation emissions are easier to reduce than other sectors—so Minnesota must reduce those emissions faster. Agriculture and buildings generate significant carbon pollution in Minnesota but reducing these emissions will be difficult and slow. For Minnesota to reach necessary carbon-reduction benchmarks, the state will need to reduce emissions faster in some sectors—like transportation and energy—to make up for slower reductions in others.

Thank you again for the opportunity to comment. If you have any questions for our organization, please do not hesitate to contact me.

Sincerely,



Sam Rockwell
Executive Director, Move Minnesota

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Thursday, June 24, 2021 3:34:41 PM

Comment Themes
Project cost and funding sources
Ridership

Submitted on Thursday, June 24, 2021 - 15:34
Submitted values are:

Name:AliceJo Carlson

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:The concept of the Rush Line BRT is an archaic leftover of the 20th century. Since the beginning of the COVID pandemic, many people are working from home and will continue to do so. Rush hour is non-existent. Medical clinics and hospitals have moved to the suburbs. Maplewood has become an epicenter of medicine, M Health Hospital and a variety of medical and health clinics centered on Beam Ave. and Hazelwood St. There is literally no reason for suburban residents to travel to either downtown. Moving forward with this project would be an egregious use of taxpayer dollars.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Thursday, June 24, 2021 9:07:46 PM

Comment Themes
Locally preferred alternative process
Pedestrian and bicycle facilities

Submitted on Thursday, June 24, 2021 - 21:07
Submitted values are:

Name:Brad W. Griffith

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:While I live in Centerville, I am a Realtor® with an office in Saint Paul. Over the last 35 years, Ramsey County has demonstrated that the best use of the former Northern Pacific Railway Right of Way is as a north-south recreational and environmental corridor. The Rush Line belongs on White Bear Avenue. Please do not destroy the Bruce Vento Trail.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Thursday, June 24, 2021 10:04:02 PM

Comment Theme
Ridership

Submitted on Thursday, June 24, 2021 - 22:03
Submitted values are:

Name:Karen Taylor

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:Given how much peoples' travel habits have changed with Covid it seems like pausing the Rush line would make sense. Wait and see how commuting habits evolve.

From: Teresa Munson
To: info@rushline.org
Subject: Environmental Impact Study Response
Date: Thursday, June 24, 2021 10:57:31 PM

Comment Themes
Pedestrian and bicycle facilities
Natural resources
Public engagement

Dear Andy Gitzlaff

I am writing in regards to the overall impact of The Rush Line Project. As a long-term citizen of Maplewood and a home owner along the Bruce Vento Trail, I have several concerns, which I will highlight below.

Since the beginning of the project, I have attended many Town Hall Meetings regarding the Rush Line proposal. I want you to be aware that the overwhelming majority of attendees were opposed to this expansion, throughout the process. At these meetings, I have witnessed numerous times where reasonable questions and concerns have been voiced and the planning committee have consistently avoided or left the concerns unanswered. I have participated in official online surveys, sponsored by the Rush Line committee. I want you to be aware that these surveys were not structured appropriately and suffer from confirmation bias. For example, the survey contained leading questions and allowed no room for any negative or critical feedback. I believe that they are not inclusive to opinions other than those that conform to a pro-Rush Line agenda. I ask you to investigate further as to why this project has systematically silenced the voices of the citizens of your communities.

From a practical standpoint, this project doesn't seem necessary as there are numerous alternatives for any perceived transportation inequities. This project really appears to be a "bus line to nowhere", with almost no tangible benefit to the citizens of our communities. The data that was provided to the community was shoddily constructed and insufficient to draw the conclusions that this a necessary project. I see the main benefits as monetarily benefitting the architects and contractors, not the citizens who will live with this decision for decades to come.

When looking at the Environmental Study, I noted that the proposed development would have a "High Negative Impact" in both the short-term and long-term, in many areas along the Bruce Vento Trail. I have further concern regarding the destruction of the green spaces on and along the Bruce Vento Trail. On this 8 mile stretch of MN historic railroad corridor, which sees countless walkers, joggers and cyclists on a daily basis, they are proposing that on any given day there will be 68 to 89 buses, from early morning until very late at night. This is a large amount of traffic going through a residential area with plenty of young families and will ruin the green spaces which are getting to be fewer and fewer in the communities along the Bruce Vento Trail, which serves a diverse economic citizenry.

These areas of High Negative Impact will undoubtedly affect the diverse animal population, from tiny tree frogs to Barred Owls. All of these animals depend on the delicately balanced environmental ecosystem that has been established. The proposed removal of countless large trees, grasses, wild flowers and wetlands that provide shelter and habitat for all these animals is scheduled to be destroyed and this will have a "High Negative Impact" for generations to come. This proposal is eliminating green spaces in our communities that have a direct impact on residents and voters.

This begs the question, "**Why would the committee recommend the project moving forward when**

there are so many areas of long-term negative impact to the surrounding communities?"

As such, I feel this is yet another example of government waste, where lawmakers are being misled by contractors and other people with positions of power. Therefore, I urge you to not support the Rush Line Project. I would be happy to meet with you to discuss any of these concerns, at your convenience.

Regards,

--
Teresa Munson

[redacted]

[redacted]

From: Andy Singer
To: info@rushline.org
Subject: formal comment on the Rush Line BRT Project Environmental Assessment
Date: Friday, June 25, 2021 2:15:06 AM
Attachments: SPBC_rush_line_comments.txt

Comment Themes
Locally preferred alternative process
Project cost and funding sources
Ridership
Pedestrian and bicycle facilities
Natural resources

Andy Gitzlaff, Senior Transportation Planner Ramsey County
15 West Kellogg Boulevard, Suite 210
Saint Paul, MN 55102
info@rushline.org

Dear Mr. Gitzlaff (and Rush Line Project Planners),

As regards the May 2021 Draft Rush Line Bus Rapid Transit (BRT) Project Environmental Assesment:

This project will require thousands of tons of concrete and asphalt and the removal of thousands of trees, particularly along the Bruce Vento Trail. This will lead to loss of habitat, drainage and water problems, and an increase in the urban heat island, as new concrete and asphalt absorb heat, and further contribute to climate change. Concrete manufacturing alone now accounts for 5% of the world's greenhouse gas emissions. The Rush line could have used existing streets and roadways exclusively, which would have reduced its impact on the environment and on the Bruce Vento Trail. But this is considered "Outside" the scope of this assessment. Meanwhile, the travel demand projections for the Rush Line (and the Gold Line) were based on pre-pandemic travel and growth patterns that may or may not hold up in a post-pandemic world. Many employers and employees will continue to work remotely, and some employers will permanently downsize or close their downtown offices, reducing commute traffic into downtown Saint Paul and other US Cities. This project could well end up like Northstar Commuter Rail-- a major boondoggle that never reaches ridership projections and has to be heavily subsidized to the detriment of the rest of the Metro Transit system.

But, as volunteer co-chair of the Saint Paul Bicycle Coalition, I will focus my comments on the bicycle and pedestrian aspects of the project. The following comments refer to "Appendix A" concept plans.

The Environmental Assessment fails to consider the project's impact on pedestrians and bicyclists at a couple of stations and points along the route. Since most transit riders become pedestrians, cyclists or wheel-chair users at the beginning and end of every bus trip, failure to adequately address pedestrian and bicycle connectivity issues means that this BRT project will be less likely to meet its goals.

The 14th Street Station is likely to negatively impact the Capital City Bikeway on Jackson Street just before it reaches University Avenue and its connection to the Gateway Trail. If the project forces the Bikeway to be put on the other/east side of Jackson, it will force cyclists to make an extra street crossing, increasing their exposure to motor vehicle crashes.

The Mt Airy Station is the worst and, as planned, has the least pedestrian and bicycle connectivity, particularly going northbound. It is located near housing and some large employers. But the sidewalks on Jackson and

the on-ramp and off-ramp pedestrian and bike lane crossings of Pennsylvania Avenue (and the railroad line) are so inadequate and dangerous that it is difficult for transit riders to safely walk, bike or wheel to and from the station. The turn radius for the Pennsylvania Avenue eastbound on-ramp is much too high-speed and has a poorly designed, unsignalized crosswalk. There are no written or diagrammed plans in the Environmental Assessment to improve the bicycle and pedestrian environment near this station, especially across Pennsylvania on Jackson Street and the sidewalks that connect to or fail to connect to Jackson. There are also no sidewalks on Pennsylvania or Empire Drive going west and only a terrible, non-ADA compliant sidewalk going east.

Pennsylvania Avenue, which the Rush Line Buses will be using, has no sidewalks or access for pedestrians and cyclists of any kind from just east of Jackson Street all the way west to Como Avenue. This is unfortunate because a multi-use path or sidewalks on Pennsylvania could connect the off-street bikeway on Phalen Boulevard with bike lanes and sidewalks on Como Avenue. This BRT project should install sidewalks and/or an off-street bicycle and pedestrian pathway on Pennsylvania, west of L'orient at the same time they are adding dedicated guideways for buses. These sidewalks or multi-use paths should connect to the existing street grid. The BRT project should also make bicycle and pedestrian safety improvements across the on and off ramps at Jackson and on the Jackson Street bridge over Pennsylvania. Increasing northbound access to this station is critical for meeting the project "purpose and needs" (sections 1.2 and 1.3).

I urge you and other planners to get out from behind your desks and try to walk or (better yet) bike to Jackson Street From L'Orient along the north side of Pennsylvania. Then try to keep walking or biking west. Also walk north from your proposed station across Pennsylvania and the railroad bridge on Jackson. I guarantee that doing this will be eye-opening for you in a way that Google Street View or Satellite Maps simply can't capture. Imagine that you are a pedestrian, cyclist or wheelchair user attempting to reach or leave the Mt Airy Station.

The Arcade Station also doesn't do much to improve a currently hostile bicycle and pedestrian environment. Some of the problems are caused by the massive mall parking lots (often with no sidewalks) but the sidewalk, driveway and street design at this intersection could be greatly improved to improve pedestrian access to this station.

Along Phalen Boulevard, the BRT's fixed guideway will make it even harder for turning motor vehicle drivers to see pedestrians and cyclists on the adjacent north-side multi-use path. This increases the likelihood of "Right-hook" and "left-hook" crashes. This is particularly true at the various unsignalized cross-streets, like Mendota Circle, Wells, and Frank. If the proposed signals are not installed, (or even if they are) the project should include tabled crosswalks at many of these intersections to alert drivers that they are crossing a multi-directional bike path.

Metro Transit planners did a decent job with designing intersections along the Bruce Vento Trail. The proposed traffic signal at Maryland will be critical and it will be critical that this signal works for pedestrians and cyclists. However, removal of thousands of shade trees from the Bruce Vento Trail will transform a popular and beautiful trail into a brutal asphalt moon-scape. This isn't adequately addressed on page 34 "Visual

impacts". I urge the planners to minimize tree loss because shade for cycling is fairly important when we have weeks of 90 degree, humid weather as early as June (and throughout July and August). Newly planted trees often die or take decades to mature to the point where they will provide real shade. So planners should preserve as many of the existing large trees as possible.

There are also not adequate provisions in the Environmental Assessment plan for creating high-quality construction detours for cyclists and pedestrians while the project is under construction.This is particularly important along Phalen Boulevard and the Bruce Vento Trail. Phalen Boulevard is one of the only safe off-street trails through the east side of Saint Paul. So planners need to commit to keeping it accessible to cyclists during construction. Section 3.3.5 (on page 67 or table 24) doesn't really commit to much beyond a vague, perfunctory statement. Many of the places this BRT line will pass through have a lot of bicycle and pedestrian traffic, such as Phalen's interstion with Johnson Parkway and along the Bruce Vento Trail near Lake Phalen.

I hope you will incorporate these suggestions into the final Environmental Assessment and the project plan.

Thank you for your consideration.

Andrew Singer, Co-Chair
Saint Paul Bicycle Coalition
[redacted]
http://www.saintpaulbicyclecoalition.org/

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Friday, June 25, 2021 11:07:43 AM

Comment Theme
Locally preferred alternative process

Submitted on Friday, June 25, 2021 - 11:07
Submitted values are:

Name:Grant Cooper

Email address[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:This route is prioritizing quick travel times for White Bear Lake residents over providing better stops near local businesses for St. Paul residents. The Rush Line would be much more useful and equitable if it were located on Arcade or White Bear Ave.

June 25, 2021

Andy Gitzlaff, Senior Transportation Planner
Ramsey County
15 West Kellogg Boulevard, Suite 210 Courthouse
Saint Paul, MN 55102
Sent via email at info@rushline.org

Comment Themes
Build Alternative definition
Ridership
Traffic and parking
Community, economic and social analysis

RE: Comments to the Federal Transit Administration and Ramsey County on the Rush Line Bus Rapid Transit (BRT) Project Environmental Assessment.

Dear Mr. Gitzlaff,

We are writing, collectively, to provide public comment to the Rush Line Bus Rapid Transit (BRT) Project Environmental Assessment, specifically on the segment on Robert Street around the 10th Street intersection in downtown St. Paul.

We strongly oppose a full-time BAT Lane for the Rush Line BRT on Robert Street downtown St. Paul.

We specifically request the special BAT Lane be used part-time, ONLY during the 4-6 PM rush-hour, as it is currently used by Metro Transit for their buses, and parking be available to customers and delivery the other times. This solution maintains both our priorities - accessibility for our customers, viability of small businesses to serve economic development along the route, as well as speed of the Rush Line BRT.

We have operated our small businesses for many years in our part of downtown St. Paul. We are proud of being able to provide hospitality and services to many residents and customers. We are invested in making St. Paul a thriving downtown with vibrant, street-level retail that provides important jobs and creates sales and real estate tax revenues that can support other parts of the city. In addition to owning our businesses, many of us also own our physical storefront real estate – showing the strength of our commitment to St. Paul.

Being in an active downtown also means making sure there are a variety of transportation options for residents and our customers. We support a robust transit system and have watched and supported the

planning for future projects and transportation investment to nurture a thriving downtown. The challenge is making sure all of this work is done in coordination to create the best plan and take fully into account how these projects will impact all stakeholders, and the economic viability of our community in the face of the COVID-impacted economic crisis our country.

We have several significant concerns related to Rush Line BRT project on the Robert Street/10th Street intersection. Downtown St. Paul retail was already difficult, and there are now additional challenges – such as elimination of customer parking – coupled with the COVID-19 pandemic that has shuttered our businesses, along with increased crime that reduces foot-traffic. While some are returning to in-person work in their downtown offices, COVID-driven changes to how and where people work has created a significant change to the Downtown Saint Paul economy. With fewer people coming to work every day and a decrease in people attending events and other activities, the viability for downtown businesses has considerably changed since the process to plan for the Rush Line began.

Economic information that was incorporated into the initial phase of planning work are may no longer be valid because of these changes and the overall uncertainty as to how downtown Saint Paul economically recovers, what the recovery looks like in terms of the physical presence of workers and visitors, and when does a "normal" situation happen.

Not taken into account in this document is the most recently completed Capitol City's 10th Street Bikeway that was completed in the fall of 2020 fall, reducing more than half of the on-street parking and changing traffic directions, in addition to the changes planned for Robert Street. These substantially affects our businesses and organizations for customer accessibility.

As a result, we strongly oppose a full-time BAT Lane for the Rush Line BRT on Robert Street downtown St. Paul, as it removes, on a full-time basis the needed on-street parking near important small businesses and organizations.

We request the special BAT Lane be used part-time, ONLY during the 4-6 PM rush-hour, as it is currently used by Metro Transit for their buses, and parking be available to customers and delivery the other times. This solution maintains both our priorities - accessibility for our customers, viability of small businesses to serve economic development along the route, as well as speed of the Rush Line BRT.

At a time when we need to keep every St. Paul business and organization operating, particularly during the economic crisis, this proposed full-time BRT BAT Lane - in use once every 10-15 minutes - will make it harder for people to access our businesses and creates an additional and unnecessary challenge. There may be a time in the future to activate this lane to full time but starting this way is unnecessary and hurtful to our local downtown.

Where in the past a change in customer volume to our businesses may have been something that could be accommodated, the COVID-impact to sales, customer engagement, and overall activity stretched margins and the bottom line beyond a place that can absorb any additional economic challenges. We believe this is reason enough to change how the BAT lane would operate and supports our concern as the broader impact of this project beyond what could be have understood before COVID.

ACCESSIBILTY FOR CUSTOMERS AND CLIENTS WITH LOSS OF ON-STREET PARKING

- The elimination of most of the parking spaces in a one-block area surrounding all of our businesses will dramatically and negatively affect accessibility and the economic viability of our small businesses, dramatically affecting access and livability.
- This will make it more difficult for every customer and clients to access our locations, and it is anticipated they will patron our businesses less frequently. We know this, because we surveyed our customers – and saw how the loss of on-street parking on Jackson Street (due to the bikeway) also negatively affected our clients and our businesses.
- Keys Café, Sawatdee, Camp Bar, Tin Whiskers Brewing, and Black Sheep Pizza surveyed 783 customers in January and February 2020. We found:
  - 74% said they would not come to our businesses or would be much less likely to come, if parking removals move forward as planned.
  - About 80 percent of customers travel to the Rossmor Building retailer by car. Two-thirds – 66% - of the customers who drove used on-street parking on Robert Street. The availability of street parking is critically important in deciding which restaurant they patronize.
- Accessibility for MCIL and customers: Accessibility is crucial to clients of the Minnesota Center for Independent Living. Clients and visitors often use Metro Mobility services and are in wheelchairs or walkers. These clients need to access the street entrance. MCIL has a federal mandate to serve those living with disabilities, and the construction changes that are planned for the streets around the Rossmor Building would directly interfere with that federal mandate. In addition, these clients and many senior citizens frequent Keys Café and other retailers on the Rossmor block. Longer walking distances to parking is challenging or impossible.
- Accessibility for carry-out/delivery: Lastly, a very large and fast-growing part of the food retail business is takeout and delivery – such as through carry out or services like BiteSquad and UberEats. Customers picking up – and delivery drivers – require close and quick access to our building, and street parking is a necessity. This is a growing trend in the restaurant industry, which has been grown even faster during the Stay-at-Home order which allows people to maintain social distance. Eliminating or dramatically reducing this option with less on-street parking would be extremely harmful to customer accessibility and our businesses.

ECONOMIC IMPACT

- Economic impact of the small businesses: The retailers in the Rossmor building, specifically, pay hundreds of thousands of dollars in taxes and millions of dollars in wages. From just the five businesses of Keys Café, Camp Bar, Black Sheep Pizza, Sawatdee, and Tin Whiskers Brewing – as of January 2020:
  - $489,799 was paid sales tax in 2019
  - $74,757 was paid in property tax in 2019
  - An estimated $2,257,612 was paid in yearly wages.
  - 120 people were employed - and in a survey of employees, none plan to use BRT or bike lanes to commute to work.

We have worked cooperatively with county staff and other stakeholders to look at any and all opportunities to mitigate our concerns on the loss of on-street parking long before the COVID-19 pandemic impacted us all.

- **Right now, our businesses are just re-opening after either completely closed or existing with few staff to provide limited carry-out services.**
- **We've had to lay off staff and are completely focused on finding a way to keep our businesses operating at a time when it is almost impossible to predict what the next few months – and the next few years – will bring**.

We are now forced to make the important, yet complex decision about the future.

- Do we try to continue to operate our businesses, not knowing when customers come back, what our costs will be, and what taxes and other expenses will be?
- With all of that to take into account, the impact of losing more parking may not seem as significant, but to us creates one more challenge at a time of such significant uncertainty.

When we purchased our space, there was accessible parking for customers. This proposed BRT line, dramatically limiting parking, makes facilities and small businesses worth less and hurts our economic viability. We would NOT have purchased - or even leased these spaces - under the current BRT proposal!

To be specific, we strongly disagree and believe these statements are untrue.

- Page 36 of the Environmental Assessment regarding economics and loss of parking:

"These changes are not anticipated to have adverse impacts on commercial properties because the partial acquisitions do not impede the primary use of any affected parcels and parking space and driveway losses occur in areas where alternative parking and access options are available. On-street parking in Saint Paul is time-restricted, and meters are enforced on select high-demand days. These standards apply to the on-street parking spaces that would be removed as well as the on-street parking options that would remain following implementation of the project. Typically, there is a charge for off-street parking ramps and lots regardless of the day or time."

- Page 51 regarding parking and loading zones. **To be clear, our loading zones for delivery services would be eliminated under the current proposal.**

"The loss of parking along Robert Street due to the Rush Line BRT is not expected to result in negative impacts on nearby businesses due to the availability of parking on nearby streets and in nearby off-street parking structures. Additionally, improved transit access and increases in ridership compared to current conditions could bring additional customers to businesses in downtown Saint Paul."

- On page 33 of the Environmental Assessment, it notes:

Saint Paul: net loss of 69 parking spaces. • Loss of 57 on-street parking spaces on Robert Street in downtown Saint Paul that are currently not available during peak hours (6-9 a.m. and 4-6:30 p.m.). Twenty-five spaces would be constructed, for a net loss of 32 on-street spaces in this area

- On page 34 of the Environmental Assessment, it notes:

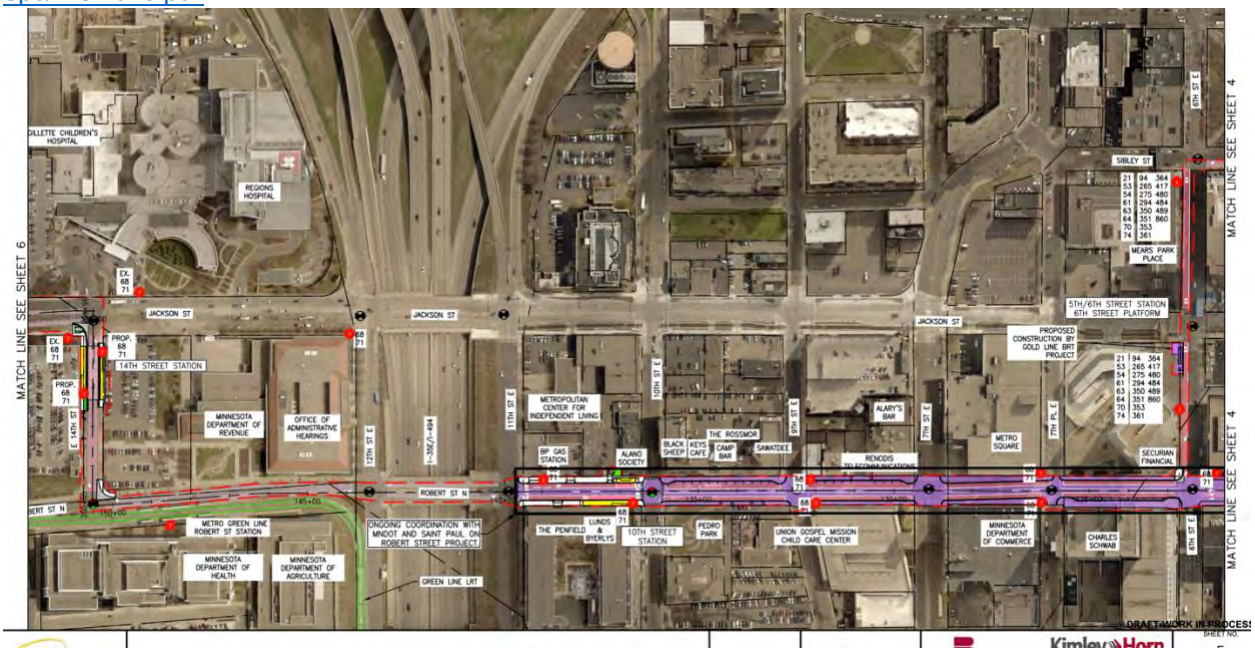
Parking: The project would result in a net loss of 32 on-street parking spaces in Saint Paul. These 32 spaces on Robert Street are located near historic properties; however, the loss of parking would not adversely affect access to these properties due to available alternative parking options.

We also would like to highlight that areas just north of the project BRT lane are NOT BAT lanes.

- **Again, we request that that the block in front of our business be used as a BAT lane ONLY for the 4-6 PM time, which is currently used right now, and leave the remainder open for customer and delivery parking.**

Source: Page 6 in Appendix A:

https://www.ramseycounty.us/sites/default/files/Projects%20and%20Initiatives/Appendix%20A%20Concept%20Plans.pdf



LEGEND

	DEDICATED GUIDEWAY		PARK AND RIDE
	BRT IN MIXED TRAFFIC		ROADWAY
	STATION PLATFORM		BRIDGE/UNDERPASS
	SIDEWALK OR MULTI-USE TRAIL OR DRIVEWAY APRON		MEDIAN
	CONSTRUCTION BY OTHERS		PROPOSED GREEN SPACE
	SHOULDER		LIMITS OF DISTURBANCE
	RETAINING WALL		EXISTING WETLAND DELINEATION
	EXISTING PROPERTY LINE		PARTIAL PROPERTY ACQUISITION
	EXISTING RIGHT OF WAY		POTENTIAL STORMWATER BMP LOCATION
	EXISTING SIGNAL SYSTEM TO REMAIN INPLACE		POTENTIAL LINEAR STORMWATER BMP LOCATIONS WITHIN RCRRA RIGHT OF WAY
	MODIFY EXISTING SIGNAL SYSTEM		PROPOSED DIRECTIONAL LANE USE
	PROPOSED SIGNAL SYSTEM		LOCAL BUS ROUTE

Importantly, traffic patterns on Robert Street and the 10th Street intersection were assessed BEFORE the completion of the 10th Street Bikeway which radically changed the street into one-way (travelling East on 10th after Robert Street) and eliminated parking on one side of the road - again negatively affecting availability.

- **The impacts of the two projects (Rush Line and Capitol City Bikeway loss of parking) are NOT included in the Environment Assessment.**
- **Many of the maps and assessments are now <u>out of date and incorrect</u>**
- **What is also not included is how COVID-19 pandemic related restrictions for both transit and hospitality, as well as an increase in downtown crime, will change user patterns.**

Citation: Source: Appendix A, Page 84:
Page 84:
https://www.ramseycounty.us/sites/default/files/Projects%20and%20Initiatives/Appendix%20E%20Technical%20Reports_Part%201.pdf
(Note how it does not include the changed traffic pattern on 10th Street due to a one-way and removal of parking spots -



In addition, there was no mention of the loss of parking spots on 10th Street - a major location of accessibility for our customers.

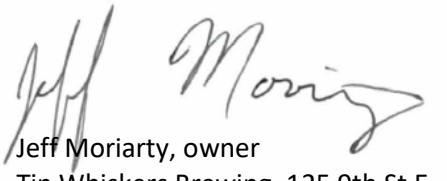
In summary, we strongly oppose a full-time BAT Lane for the Rush Line BRT on Robert Street downtown St. Paul.

We request the special BAT Lane be used part-time, ONLY during the 4-6 PM rush-hour, as it is currently used by Metro Transit for their buses, and parking be available to customers and delivery the other times. This solution maintains both our priorities - accessibility for our customers, viability of small businesses to serve economic development along the route, as well as speed of the Rush Line BRT.

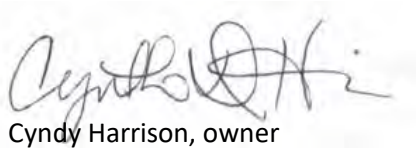
1. **The traffic directional change of 10th Street traffic and loss of one-side of the street's parking was wrongly not taken into account in the Environment Assessment.**
2. **The lack of this information has led to an improper loss of parking assessment for the Robert Street/10th Street interchange which negatively affects customers and our small businesses accessibility.**
3. **A full-time BAT Lane for the Rush Line BRT on Robert Street downtown St. Paul removes, on a full-time basis, the needed on-street parking near important small businesses and organizations.**

Thank you,

Carol Hunn-Gregory, owner
Keys Café & Bakery St Paul
504 Robert St N, Downtown St Paul



Jeff Moriarty, owner
Tin Whiskers Brewing, 125 9th St E
Downtown St. Paul.

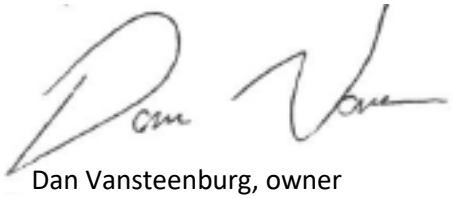


Cyndy Harrison, owner
Sawatdee Thai Restaurant
486 Robert Street N, Downtown St. Paul

Jordan Smith, owner
Black Sheep Pizza St. Paul, 512 N. Robert St.
Downtown St. Paul



Bill Collins, owner
Camp Bar, 490 Robert Street N
Downtown St. Paul



Dan Vansteenburg, owner
Jimmy John's, 519 Jackson Street
Downtown St. Paul

*****Here are my concerns about the Rush Line's impact on our neighborhood and the environment after reading the Environmental Assessment and walking, playing, commuting, picking up trash, bird watching and bumblebee surveying along the trail for over 20 years.*****

Comment Themes
Locally preferred alternative process
Ridership
Pedestrian and bicycle facilities
Natural resources
Community, economic and social analysis
Public engagement

Kathy Sidles
[redacted]

1. **BACKGROUND -** I live in District 2, six blocks east of Lake Phalen off of Arlington. I am a Saint Paul Parks Volunteer. I pick up trash at nearby Frost Lake Park and along the Vento Bike Trail and woods and berm between Arlington and Maryland in this area that you see in the pictures. The Vento Bike Trail and berm will be bulldozed between Hwy 36 and Phalen Boulevard and be replaced with two concrete bus lanes with the bike lane between them. There will be a station at Larpenteur and at Ames Lake apartment area. It will replace a safe wooded bike and walking trail that is cool in the summer and wind-free in the winter with an open air unsafe concrete road that will pollute Lake Phalen with buses we won't take - the local 64 is faster to downtown than walking and waiting or taking the 64 and then the Rush Line. And there are few jobs for us in White Bear…but LOTS north and south with the rejected alternative of BRT north and south on 35E with a fast 64 bus added.



2. **THE RUSH LINE IS UNSAFE AND WILL KILL KIDS** - Right now the trail is tree-lined and free of wind in the winter and sun in the summer and totally safe for people of all abilities. It is a green space that my low and moderate income neighbors, and myself can go to without having a car or taking time off and spending money to go somewhere "up north". When the thousands of trees are bulldozed and the bike lane put in the middle right behind at least 80 apartments and houses with no walls with buses going fast every fifteen minutes until late at night this all will be taken away. It will be unsafe for almost everyone except skilled bike riders. Kids won't walk to the new traffic signals at the five cross streets between Arlington and Larpenteur and wait for green light. They will go across behind their apartment and house. I think kids will be killed on this road.



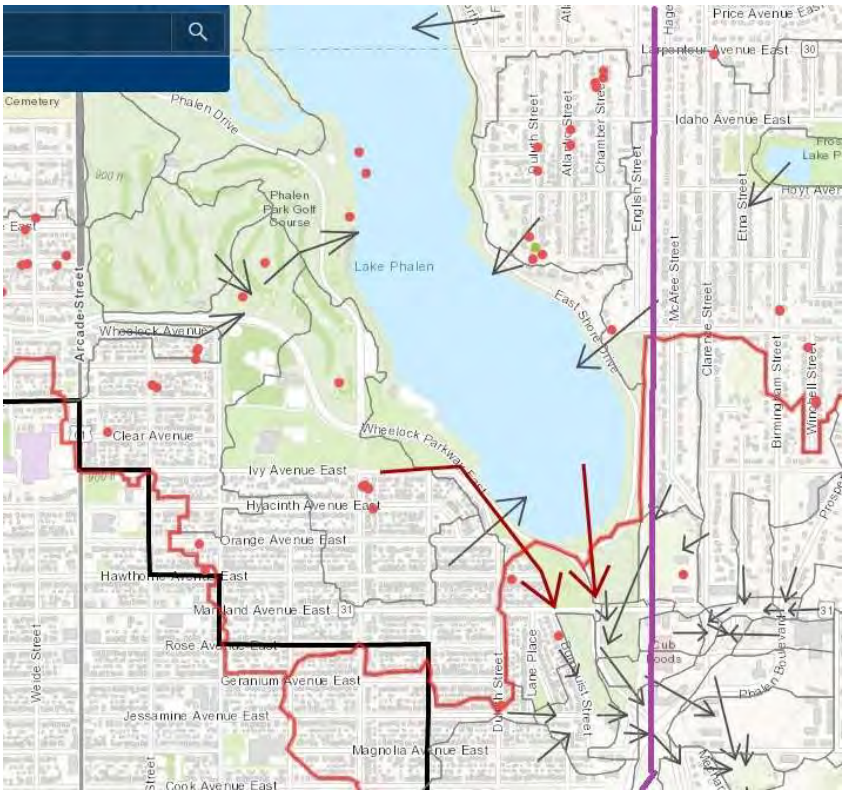
3. **THERE WILL BE TRAFFIC JAMS AND KIDS LOSE A SAFE GREEN SPACE** – There are many many dirt paths up to the trail between Maryland and Larpenteur that kids and families use to access the green space shown in this



picture. We are a low to moderate income neighborhood ($37,000 per year average at Maryland up to ~$60 per year average closer to Larpenteur) with a nice but neglected park and wildlife corridor in our back yard! But the Rush Line project takes this away. Instead there will be thousands of trees removed and two strips of concrete added. There are five cross roads between Arlington and Larpenteur that the Rush Line people told me would have crossing arms installed that would go down every time a bus was coming. This will make it slower for people to get to work, and kids won't wait they will dart across. And we lose our local park that even Day Cares take their two-year olds to on walks, and old people with walkers and everyone else no matter ability are now using. We even have an urban woodland dirt path like some of us from more rural areas grew up with! It's a short cut to Maryland and the stores there instead of walking all the way to Johnson Parkway then left down the trail and sidewalk. This path woods should be restored along with the former Indigenous people's wild rice patties that are now the wetlands south of Lake Phalen as a Regional Park trail for low to moderate income city people not bulldozed for concrete lanes.

4. **BRT ON 35E GETS US TO JOBS, THIS ROUTE DOESN'T** - It seems to me that the most jobs are downtown and in the south suburbs and some in various places north, but this bus just goes to White Bear Lake where there are few jobs for people in our neighborhood. If the plan five years ago gave more ridership points to this option please look at it again – it looked like to me that points were given for riders transferring downtown after the bus got there not riders from the east side. The other alternative that was rejected was Bus Rapid Transit on 35E. BRT on 35E could go to south and north jobs with the addition of a fast and coordinated 64 bus. My neighbors lose jobs a lot and need a big pool to choose from get another one right away! Even though bus riders in District 2 are east of Prosperity on Maryland and north on White Bear and those riders were used to justify this project they will continue to use the 64 bus since it only takes 21 minutes to ride it downtown where most of the jobs are. They won't take the 64 bus to the Rush Line bus and wait 15 minutes and then go downtown. Phalen Boulevard parallels the Rush Line route. It has been closed for COVID walking for months. If a bus has to be added why not run it on English and Phalen Boulevard? English has never had much rush hour traffic. Phalen Boulevard with new post-COVID work patterns is also never full of traffic. Route 3 is being enhanced along Maryland - a bus can be added going north from White Bear along English to tie in to 35E BRT. And another tied in to the new enhanced Route 3 going south on White Bear. And Saint Paul already has plans to upgrade White Bear Avenue that were developed as a third option for the Rush Line. Upgrade the 64 bus and enhance the new Route 3 and add BRT on the existing new lanes on 35E so we can get to jobs including south of town where it now takes two and a half hours to get to since you have to go to Minneapolis first last time I checked – I worked at 494 and 35E for 40 years as a manufacturing engineer where lots of jobs are and you can't get there by bus. Let us and the wildlife that also use it keep this safe trail and not fragment the wetlands and woods even more so maybe a few suburban people can take it to downtown Saint Paul while they keep their trails and then we can't compete with them for homeowner investment. https://www.metrotransit.org/route-3

5. **50 ACRES OF CONCRETE WITH SALT WILL POLLUTE LAKE PHALEN AND AQUIFERS** - The neighborhoods east of Lake Phalen slope for a mile down to the lake. Right now due to low use of lawn chemicals Lake Phalen tests at its target cleanliness - see the Ramsey Washington Metro Watershed District



water quality reports. When the berm and forest and trees are removed and 50 acres of concrete laid down and salt is put on it during the winter the salt will cause Lake Phalen to be impaired like the suburban lakes tend to be. Ramsey County has hit its limit of water that can be put into water running off of concrete and asphalt so that is why you see so many rain gardens. You can also build a big underground storage tank like was done under the Cub parking lot and at Hope Academy off of Payne above Swede Hollow, to replace wetlands and rain gardens. There is no way to know if these containers are leaking and need repair or if the water in them is contaminated, from what I read. So if the Rush Line is using those that is a pollution problem. The environmental report says it will try not to use these containers but it doesn't say where all the water will go and there will be high impact.

6. **THERE ARE HIDDEN COSTS TO REMOVING TRAIL GREEN SPACE WITH IT BEING HARDER TO RECYCLE HOUSES NOW GETTING OLD AT ONCE** - It costs a lot to build this road. It runs alongside Hwy 61 once it gets to Hwy 36. So the suburbs get to keep their bike trail and have public transit. We have to get rid of our green space bike trail in Saint Paul. Without a green space bike trail it will be hard to recycle east side housing that is now getting old all at once since this part of District 2 was built just after WWII and houses are 70 years old. My husband and I moved here because of the bike trail and affordable houses. I met three people on the trail who are moving because they don't want a bus in their back yard when they moved here for the trail. So there is a hidden cost of getting rid of green space with housing being less desirable and getting old. I lived in South Minneapolis when I bought my first house and started a housing committee in the Corcoran neighborhood keep track of the empty houses. As a young renter in Des Moines I walked by them every day and knew we had to at least keep track of them and figure out where money could come from to try to recycle the neighborhood with its expensive infrastructure there but houses at the end of their life. When you get one empty house that doesn't sell and is unsafe and boarded up then you get a lot of them. THIS IS REALLY BAD FOR THE KIDS. Have you had a child look up to you who lives next to an empty house and ask if someone will move in they can play with? I have! The Neighborhood Revitalization Program had to be started by convincing the Legislature to let the city of Minneapolis keep more downtown tax dollars to solve the housing problem. This resulted in grants to non-profits to buy, demolish and replace these houses plus grants to homeowners. Otherwise the homeowners couldn't get loans because the value of their houses were now less than what they owned on them just because houses started being empty. Keeping a quality green space like the Vento Bike Trail makes recycling older neighborhoods easier and cheaper to do and keeps it a good space for kids to grow up and families to remain in place and not have to keep moving.

7. **THE RUSH LINE BRT WRECKS ENDANGERED RUSTY-PATCHED BUMBLEBEE GREEN SPACE AND THE CORRIDOR TO OTHER NESTS** - Five years ago at the beginning of this project I saw that replacing the tree-lined Vento Bike Trail with concrete bus lanes made us lose green space without providing better public transit . I worked at 494 and 35E for 40 years and you have to spend 2.5 hours on a bus to get there. I saw that the BRT on 35E option plus a fancy and fast Snelling-like local bus would work great

while keeping the trail. I have been going to meetings and being against the trail removal option ever since. My friends, who were horrified that this beautiful tree lined and safe trail would be made a road, said "Kathy, find an Endangered Species! That will stop them building it!". I never in a million years thought they were right since the woods at the SEE corner of Lake Phalen is rich Mesic Forest but degraded with Buckthorn. BUT I DID FIND AN ENDANGERED SPECIES! I have seen 50+ Rusty Patch Bumblebees in this area since 2016. We have great wetland plantings of the Watershed Districts, no pesticide use by cities since the 1980s, and are a river town which are rich in the wood/prairie combination they like best. BUT THEY NEED WILDLIFE CORRIDORS SO THE NEW QUEENS MEET THE NEW MALES FROM A DIFFERENT NEST. Fewer than 1 in 200 bumblebees I see (I look for them picking up trash and pulling invasive Garlic Mustard and on walks) is a Rusty Patch. So there aren't many nests. I HAVE SEEN THEM THREE DIFFERENT TIMES AT EAST SIDE HERITAGE PARK. And five times over the years at Ames Lake (three times just this week!). And four times over the years south of Lake Phalen. Plus a few around Lake Phalen and in native plantings north to Keller. Plus in my native-planted yard three times with "Rusty" being in our Watershed District designed rain garden for ten days in a row last summer! Plus some at the courthouse area off of White Bear, and a few off of E. Third by Harding where the pipes are buried. Often I have seen Queen bumblebees moving along the berm looking for the early spring flowers that are there (violets, gooseberry, sumac, red elder…) and at least three times seen them go into logs or the soft soil of the berm, with one picture captured and uploaded to Bumblebee Watch. SO YOU CAN SEE THAT THE NATIVE PLANT LINED BRUCE VENTO BIKE TRAIL IS ONE OF THE WAYS THESE AREAS ARE CONNECTED. IT SHOULD BE ENHANCED AS A CORRIDOR FOR THESE ENDANGERED BEES SO THEY HAVE GOOD GENE FLOW.

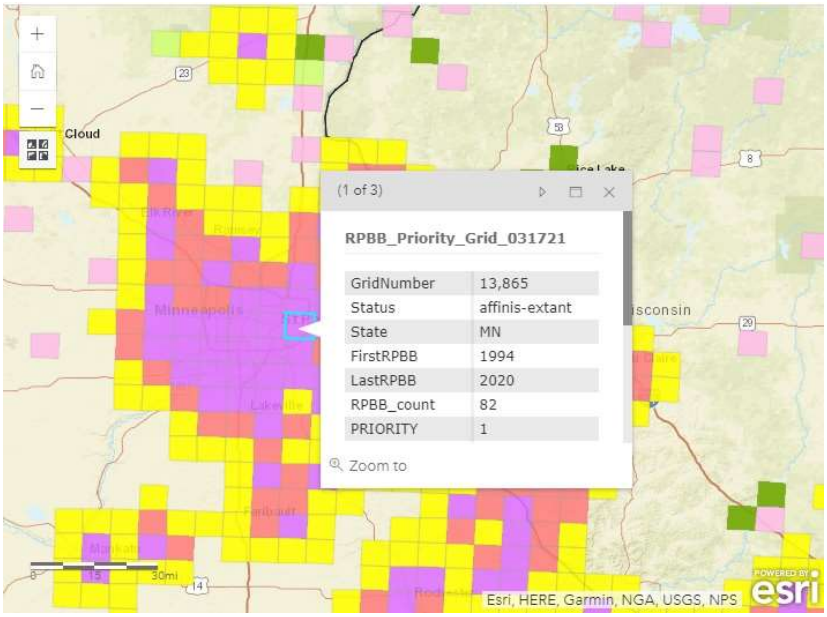
THE BRUCE VENTO BIKE TRAIL AND SURROUNDING WETLANDS AND WOODS SHOULD BE AN URBAN REGIONAL PARK AND THE BRT BULLDOZING THIS MAKES THIS IMPOSSIBLE. We should be enhancing the Vento Trail for public use and as a wildlife corridor by making it an urban Regional Park where kids can learn about nature with a professional naturalist right here on the east side like the state Gateway trail does in the suburbs. And to provide a wildlife corridor for the endangered rusty patched bumblebee, not wreck it with acres of concrete for a bus that doesn't get residents to jobs. This rusty-patched bumblebee was seen by me with three other rusty-patches just off the berm woodland in the wetland planted with native wetland plants by the watershed district.



8. **THE REPORT DOESN'T SHOW LOW INCOME NEIGHBORHOODS ACCURATELY AND MY BIPOC AND LOW INCOME PRECINCT IS THE ONE WITH THE HIGHEST GREEN SPACE LOSS AND DEGRADATION** - My precinct W6-P4 is a low income BIPOC community. Half of the people between Maryland and Arlington and East Shore Drive and White Bear Ave rent and the average income as I recall is $37,500 and $44,167. It will be losing lots of its green space as a precinct. That is going backward. It doesn't show up as low income on the Rush Line map. UNFORTUNATELY I CAN NO LONGER FIND THE MAP OF ROUTE VS INCOME VS GREEN SPACE LOSS. There are new studies out showing green space vs neighborhoods. Those studies of loss of green space vs income and increased heat vs tree loss should be in the

environmental plan but I don't see them. https://www.city-data.com/nbmaps/neigh-Minneapolis-Minnesota.html

9. **THE REPORT ACCEPTS THAT BULLDOZING THE HABITAT AND MOWING IT FIRST IS OK EVEN THOUGH MAJOR ENVIRONMENTAL GROUPS ARE OPPOSED TO THIS USFWS METHOD** - All my rusty-patched bumblebee sightings have photos that I uploaded to www.bumblebeewatch.org and to www.inaturalist.org. I am still waiting for an expert to view the last four sightings. Our confirmed sightings show up on the US Fish and Wildlife Service Red Zone map if you hover over this area with your cursor. There are 80+ endangered rusty-patched sightings on the USFWS Red Zone map east and west of Lake Phalen, and two areas to the west that have more. It looks to me like this makes us the place in the US with the most rusty-patched bumblebees! The area the Rush Line goes through is top-rated by the USFWS as the best rusty-patched bumblebee habitat.



Unfortunately the USFWS doesn't consider being in a Red Zone as Critical Habitat. This means they think it is OK to remove habitat. The Xerces Society has been fighting to conserve insects for a long time and is critical of not designating areas where they are seen the most as areas for special consideration for upgrading and before development: https://www.xerces.org/blog/us-fish-wildlife-service-fails-to-designate-critical-habitat-for-rusty-patched-bumble-bee The Minnesota Friends of Scientific and Natural Areas and the Center for Biological Diversity are suing the USFWS for this reason: https://biologicaldiversity.org/w/news/press-releases/lawsuit-challenges-trump-administrations-denial-of-crucial-habitat-protection-to-endangered-rusty-patched-bumblebee-2021-03-24/

The Rush Line is just doing what the US Fish and Wildlife Service says to do about them which is to mow all the flowers down before bulldozing so the bees go elsewhere. The USFWS says it's OK to do this because it is a degraded area for rusty-patched bumblebees. How can it be degraded and have a count on their map that is among the higher counts in the US and is in a high priority area? https://www.fws.gov/midwest/endangered/insects/rpbb/PrioritiesMap.html

10. **PHALEN CREEK CAN'T BE DAYLIGHTED WITH THE TRAIL BULLDOZED IN THE SAME AREA, AND WHAT IS LEFT OF THE CREEK BED AS A WILDLIFE CORRIDOR FROM THE MISSISSIPPI IS WRECKED NOT ENHANCED** - The Lower Phalen Creek Project is trying to daylight Phalen Creek along its old creek bed between the south end of Lake Phalen and the entrance to Swede Hollow at the East Side Heritage Park. The Rush Line bus lanes go parallel to Phalen Boulevard which puts them in the same area as the Lower Phalen Creek Project daylighting. I went to a community meeting to reconcile the two plans. Our table of residents looked at the maps and couldn't see any way to do that. The Phalen Creek bed is still in the woods along Phalen Boulevard. Fast buses could run along English and East Shore Drive and Phalen Boulevard to BRT on 35E AND Phalen Creek could be daylighted AND families and kids would have an urban wildlife corridor AND the endangered rusty-patched bumblebee would have a corridor for habitat and gene flow AND the threatened Chimney Swifts that live in apartment brick chimneys and eat bugs over Phalen Boulevard Green Space would thrive instead of lose their habitat AND all the migrating birds I see along the

Vento Trail would continue to thrive instead of lose their habitat. See data entered for Home to Ames Lake at www.ebird.org for all the bird species I see along the trail and below (2). I noticed in the news today that the Wakan Tipi project for an interpretive center at Bruce Vento Nature Sanctuary has been funded by this state Legislature. Bruce Vento Nature Sanctuary, Swede Hollow, East Side Heritage Park and Rivoli Park above where Urban Roots kids are employed, the Big Urban Woods and Prairie around the yard waste site, the fields at the south end of Lake Phalen, all the wetlands at the SE corner of Lake Phalen, and Ames Lake are all tied together by the Bruce Vento Bike Trail. I learned in from my southern Iowa high school teacher Mr. Cool that wildlife need corridors for gene flow. None of the wildlife in these areas exist in a vacuum. Right now the Bruce Vento corridor and bike trail ties them all together. It should be enhanced with large patches of native plants that are maintained by burning or by mimicking burning and constant removal of non-native plants. For instance Bumble Bees of North America says bumblebees don't cross busy streets. When Portland designed its transit system it studied its wildlife corridors first. Minnesota should do the same thing. Instead the Ramsey County design guidelines mostly show trees and shrubs with mowed grass around them. This is a degradation of how the Phalen Boulevard was planned with its corridor of native plants, and how the woodland remnants in large areas at the SE and east of Lake Phalen remain and still operate as homes and migrating stop-overs for wildlife. This is a migrating Palm Warbler, Chimney Swift who are declining and live in our many brick chimneys and feed over the trail and lakes and Phalen Boulevard, and Oriole who nest in all the Cottonwoods in the bottomland forest and along the trail and at Lake Phalen, and a migrating Yellow-rumped Warbler. https://www.oregonmetro.gov/sites/default/files/2019/08/22/wildlife-corridors-and-permeability-report-April-2010.pdf









11. **SAINT PAUL AND CITIES ALONG THE PROPOSED RUSH LINE SHOULD REVIEW ITS 2040 PLAN IN LIGHT OF THE MINNEAPOLIS AUDUBAN LAWSUIT IT WON THAT SAYS CITIES NEED TO COMPLY WITH THE STATE 1970S ENVIRONMENTAL RIGHTS ACT.** To the extent adoption of the Rush Line Busway to replace the natural area Bruce Vento Bike Trail involves the necessity or expectation of increasing density it looks to me like the Environmental Rights Act applies for this project also. The project shouldn't be moved forward on this corridor until a review of the impact of this ruling – that the state Environmental Rights Act does apply to city development just as a practical understanding of the reason it was created. I hope people reviewing these comments come up to speed on the Minnesota ERA and what it means for plans for increased density along transit corridor.
https://www.minneapolisaudubon.org/blog/2021/2/10/minnesota-supreme-court-rules-in-favor-of-environmental-justice-audubon-chapter-of-minneapolis

12. **PEOPLE WHO LIVE ALONG THE TRAIL AS RENTERS WHICH EAST OF LAKE PHALEN IS AT LEAST HALF OF THE PEOPLE RIGHT NEXT TO THE TRAIL IN DUPLEXES AND APARTMENTS WEREN'T NOTIFIED OF THIS PROJECT OR PUBLIC RUSH LINE MEETINGS.** Talking to people along the trail I find out they rarely know about this project even though its been planned for five years. A couple of times I created flyers saying "Bruce Vento Trail to be Bulldozed" and information about a meeting and put them on apartment steps under a rock in stuck in house doors. I talked to people while doing this and they rarely knew about the project and never knew about the meetings. Also the one meeting near those of us east of Lake Phalen at a church along English street ALL OF THE PEOPLE THERE (SINCE I DELIVERED FLYERS ABOUT IT) WHO ACTUALLY LIVE HERE SPOKE AGAINST IT. This is in the public record. Also twice I brought resolutions to my W6P4 DFL precinct caucus and except for one person everyone voted for my resolution to put BRT on 35E going north and south and improve the 64 and make the Vento Bike Trail a Regional Park and urban wildlife corridor. And the first District 2 vote was against the trail, with some people voting for it they said only because "when suburban people ride it the buses will be good unlike the 64 bus". When I talk about the replacement with the Rush Line bus roads to people on the trail like me they are heartbroken when they look around and see that the berm that is covered with plants and trees from the surrounding forest remnants will be bulldozed for bus lanes that it will be hard for them to use, plus they lose their beloved urban forest space to be in. I see comments like this in social media too – just yesterday I saw in Friends of Swede Hollow "What can we do to stop this?".

13. **THERE WAS NEVER A WALKTHROUGH OF THE TRAIL BETWEEN LARPENTEUR AND PHALEN BOULEVARD.** There was one walk through five years ago when the discussion first started about which route to pick, but the Rush Line employee wasn't allowed to answer questions. We asked "how wide will it be" and he didn't answer. It was a beautiful fall day and a great day to be on a wooded trail There was a Meet and Greet at Larpenteur once that got rained out and re-scheduled. There was an open house at a building at Frost and the trail with a table set up on the trail. BUT THERE HAS NEVER BEEN A WALK THROUGH OF THE HIGHEST WILDLIFE IMPACT ALONG THE TRAIL IN ONE OF THE LOWEST INCOME PRECINTS. I talked to many Rush Line staff people who didn't realize the trail and woods from Larpenteur to Phalen Boulevard will be bulldozed. Walk throughs should be done ASAP so people reviewing our public comments have a chance to see what is really being proposed and not just words that say "yes, there are lots of high impacts especially in lower income areas but we will somehow figure that out after approval."

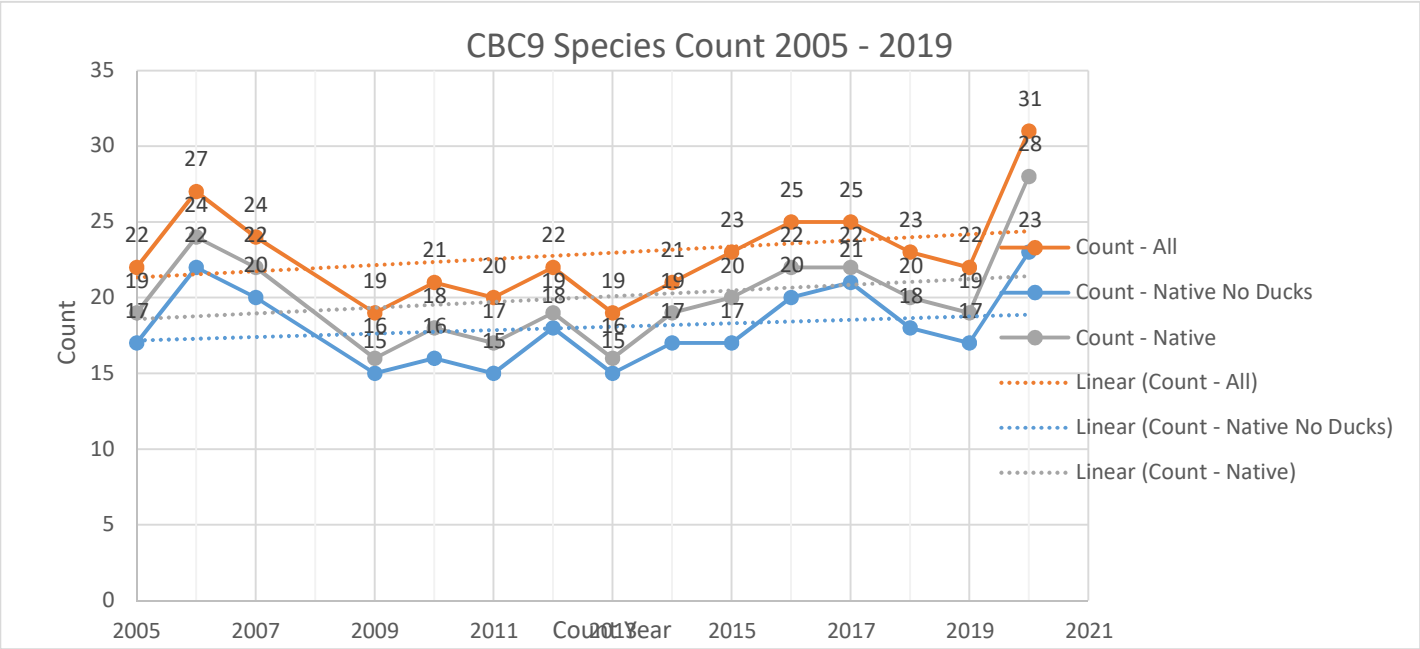
14 I HAVE SEEN 99 SPECIES OF BIRDS WALKING FROM MY HOUSE DOWN THE TRAIL AND DIRT PATH AND BERM ABOVE THE TENNIS COURTS TO PHALEN BOULEVARD AND TAKE TRASH TO LAKE PHALEN. Many of these birds nest in the woods, like Orioles and Warbling Vireos and Kingbirds, and others migrate through and stop in the berm woods and will be losing their home and rest stop when the woods is removed for the Rush Line road and the bottomland forest woods is fragmented. Here is the list of birds seen since I started entering them in 2014:

Common Name	Species Total
American Woodcock	1
Barred Owl	1
Blackburnian Warbler	1
Blue-headed Vireo	1
Eastern Phoebe	1
Eastern Wood-Pewee	1
Least Flycatcher	1
Merlin	1
Mourning Warbler	1
Orange-crowned Warbler	1
Red-breasted Nuthatch	1
Red-eyed Vireo	1
Rough-legged Hawk	1
Sharp-shinned Hawk	1
Tennessee Warbler	1
Veery	1
Vesper Sparrow	1
American Redstart	2
Broad-winged Hawk	2
Brown Creeper	2
Green Heron	2
Horned Grebe	2
Ovenbird	2
Savannah Sparrow	2
White-crowned Sparrow	2
Cooper's Hawk	3
Cooper's Hawk	3
Hermit Thrush	3
Killdeer	3
Lark Sparrow	3
Mallard (Domestic type)	3
Swainson's Thrush	3
Yellow-rumped Warbler	3
American Tree Sparrow	4
Black-and-white Warbler	4
Ruddy Duck	4
Swamp Sparrow	4
Yellow Warbler	4
Common Loon	6
Golden-crowned Kinglet	6
Indigo Bunting	6

Brown Thrasher	7
Bufflehead	7
Cackling/Canada Goose	7
Common Yellowthroat	7
Pileated Woodpecker	7
Eastern Bluebird	8
Great Crested Flycatcher	8
Brown-headed Cowbird	10
Common Nighthawk	15
House Wren	15
Bald Eagle	16
Eastern Kingbird	16
Great Egret	16
Great Blue Heron	18
Red-tailed Hawk	18
White-throated Sparrow	20
Double-crested Cormorant	21
Gray Catbird	23
Palm Warbler	24
Ruby-crowned Kinglet	24
Northern Flicker	25
Barn Swallow	26
Downy/Hairy Woodpecker	27
Cedar Waxwing	31
swallow sp.	31
gull sp.	32
Lesser Scaup	32
Pied-billed Grebe	33
Red-breasted Merganser	33
Common Goldeneye	38
Hairy Woodpecker	39
Red-bellied Woodpecker	53
Chipping Sparrow	58
Warbling Vireo	62
Mourning Dove	76
Wood Duck	83
Song Sparrow	99
*Chimney Swift	100
Downy Woodpecker	102
Tree Swallow	104
Barn Swallow	109
House Finch	111
Ring-billed Gull	132

Dark-eyed Junco	150
White-breasted Nuthatch	161
Common Grackle	162
Trumpeter Swan	177
American Goldfinch	187
American White Pelican	200
Rock Pigeon (Feral Pigeon)	258
European Starling	385
House Sparrow	385
Northern Cardinal	397
Blue Jay	406
Black-capped Chickadee	527
Red-winged Blackbird	585
Canada Goose	692
American Robin	715
American Crow	859

14 **PEOPLE THINK CITIES DON'T HAVE WILDLIFE SO CAN BE DEVELOPED BUT THE EAST SIDE CHRISTMAS BIRD COUNT I LEAD SHOWS AS MANY SPECIES HERE AS IN THE SUBURBS** I have lead the Saint Paul Audubon Christmas Bird Count between Hwy 35E, White Bear, Hwy 94 and Hwy 36 for about ten years. The birds we count are the birds that stay in our neighborhood year-round. I compared the data we get with that of other count circles and unless a count circle has a large quality natural area or lots of open water like Pig's Eye then due to the lakes and wetlands and woods on the east side at 20 – 30 we see about the same number of species. <u>The Ramsey County guideline pictures almost all show transit roads with scattered trees and mowed grass which is a downgrade, not and upgrade, in bird and wildlife habitat for the East Side which until now has been hold steady (or we are better at finding birds…).</u> Note – the species count went up in 2020 because we split into more groups for distancing due to COVID.



15. **WHOEVER IS IN CHARGE OF THE RUSH LINE LAND BETWEEN LARPENTEUR AND JOHNSON PARKWAY IS NOT A GOOD STEWARD OF IT.** 50 tent campers had to camp in the woods along the Bruce Vento Bike Trail last winter due to distancing at homeless shelters during the COVID pandemic crises. When room inside was finally made for them at the end of September the city of Saint Paul moved out their trash with front end loaders, but they told me they didn't have resources to pick up all the trash. So I picked it all up! With a day's help from my Pollinator church group. The tent campers removed a lot of Buckthorn, and over the last five years as a Saint Paul Parks volunteer I have removed a lot of the Garlic Mustard and Burdock as well as continual trash pick up. Here I am with the biggest camp trash, with a picture of it recovering (the birds like the openings!) and with last year's World's Biggest Pile of Garlic Mustard that I pulled. I am hoping to be done pulling the Garlic Mustard next year. It is fun watching all the wild raspberries and violets and other woodland plants move back in. I hope to see this woods taken care of and not bulldozed. Saint Paul residents give a lot of sales tax money to the Lessard-Sam's projects but 5-to-1 that money goes outstate. More should be spent to keep our many neglected low to moderate income neighborhood natural areas in good shape. People enjoy seeing all the birds as they walk and in their yards and their walks around the lakes. This is where many of them live, in these woods that will be bulldozed by the Rush Line project without it going by where most transit dependent people live along Maryland and White Bear.





LOTS OF GARLIC MUSTARD BUT ITS GONE FROM THE TRAIL EDGES AND ALMOST GONE THIS YEAR FROM THE WOODS

COVID EMERGENCY HOMELESS CAMP RECOVERING AFTER TRASH PICK UP BY SAINT PAUL PARKS, ME AND MY CHURCH GROUP



THIS IS THE BERM WOODS/OAK SAVANNA/BLACK CHERRY GROVE THAT GETS BULLDOZED FOR THE RUSH LINE BUS LANES, BETWEEN THIS WETLAND AND A NICE BOTTOMLAND FOREST:



Kathy Sidles
[redacted]

Comment Themes
Traffic and parking
Pedestrian and bicycle facilities
Community, economic and social analysis

June 25, 2021

Andy Gitzlaff, Senior Transportation Planner Ramsey County
15 West Kellogg Boulevard, Suite 210
Saint Paul, MN 55102

Email via: info@rushline.org

Dear Mr. Gitzlaff,

I am a citizen who happens to have 20+ years of professional experience in planning, user-design, and implementation of non-auto mobility solutions. There is a lot to appreciate in the Draft Rush Line Bus Rapid Transit (BRT) Project Environmental Assessment dates May 2021; however there are some important omissions that need to be addressed.

Current Bruce Vento Trail Users

We do appreciate that "The *Ramsey County Rail Right-of-Way Design Guide* 9 F1 92 was created to develop a safe dedicated guideway and shared-use trail within the Ramsey County rail right-of-way that fits in with the surrounding landscape and reflects relevant user, stakeholder and public guidance." But this is burying the headline for current trail users. One must have enough stamina and experience to read through the appendices before one finds a commitment to the current Bruce Vento Trail and the many people who use it. The first actual mention is not until **3.2.4. Pedestrians and Bicycles and then** all but the first sentence focuses on temporary closures. This response is inadequate given how many people already use and care about continued access to this trail.

In the Purpose and Need Sections of this Assessment's Introduction, there are several missed opportunities to show a commitment for the value and retention of the significant bicycling, walking, running, and wheeling that already occurs, especially since these modes of travel present little or no environmental impact, are comparatively low cost, and are convenient for shorter distance travel.

This reference to current uses should be easily found in the introduction: "**Bruce Vento Regional Trail in Ramsey County rail right-of-way:** Rush Line BRT would operate parallel to the Bruce Vento Regional Trail in the Ramsey County rail right-of-way. Construction of the dedicated guideway would require reconstruction of the trail, and landscaping and design features would be incorporated as outlined in the *RamseyCountyRailRight-of-WayDesignGuide*.3 2 3F 3"

There is also an opportunity to acknowledge a commitment to (1) offer adequate detours during construction and (2) replacing the trail/crossings with at least as good as is current available in 1.3 PROJECT NEEDS sections:
1.3.1 Many households with one or no cars, seniors, people living with low income, and people with disabilities that already use this trail for low cost and efficient travel needs.
1.3.3. This corridor is already an active transportation connector between residential origins and all sorts of destinations include retail, public services, employers, etc.
1.3.4 The active transportation uses already support a regional commitment to safe, convenient, healthier, and lower cost multimodal transportation options.

Partnerships and Collaboration

This document should clearly express a commitment to work with local entities and even the private sector to plan collaboratively and prepare for necessary adjacent improvements. For example, please also consider language for 2.3.2 and 2.3.3 that acknowledges the important of collaboration with cities to plan for sidewalk, trail, lane, curb management, and micro-mobility services for first/last mile connectivity to stations/stops that gives travelers more environmentally and financially sustainable travel options to and from transit. Table 4: **2040 Rush Line BRT Ridership Characteristics** references ridership projections assuming this kind of ground work is done without any preceding context for how these projections can be realized.

Demand Management

Any discussions of 3.2.3 Traffic and 3.2.4 Parking really should also include demand management strategies to prioritize transit and to remove incentives encouraging driving alone.

Environmental Justice

While there is no specific requirement currently to measure results, many public and private sector professionals are using evidence-based practices such as results-based accountability (RBA). Given the increasing use of RBA, the following paragraph offers little context or data to support its claims.

“The Rush Line BRT Project would benefit minority and low-income populations by improving the availability of safe, reliable and efficient transportation options. The proposed project would provide better access to employment, healthcare, shopping, parks and recreational amenities and better connections to other elements of the regional transit network, including local bus routes, the METRO Green Line, the proposed METRO Gold Line and other proposed transitways.”

Consider adding to section 3.2.11 Environmental Justice results-based accountability processes to define who will measure benefits and impacts, what will be measured to show progress toward these aspirations, and who will prompt a consideration of adjustments as needed? For example, does the “availability of this safe, reliable, and efficient” BRT service actually provide “better **access** to employment, healthcare, shopping, parks and recreational amenities”? That is measurable before and continuously afterwards, but it must a commitment and an assignment.

Sincerely,
Glenn Gadbois


Lower Phalen Creek Project
804 Margaret Street
Saint Paul MN 55106
651.370.2016
lowerphalencreek.org

EIN 27-5469929

June 25, 2021

Comment Themes
Natural resources
Community, economic and social analysis
Public engagement

Andy Gitzlaff, Senior Transportation Planner
Ramsey County
15 West Kellogg Boulevard, Suite 210 Courthouse
Saint Paul, MN 55102

Re: Rush Line Bus Rapid Transit Environmental Assessment comments from Lower Phalen Creek Project

Dear Mr. Gitzlaff:

This letter from Lower Phalen Creek Project (LPCP) is in response to the Rush Line Bus Rapid Transit (BRT) Environmental Assessment (EA). LPCP is grateful for the many opportunities we have had to work closely with Rush Line staff and stakeholders during BRT project development. Comments in this letter represent LPCP's: (1) advocacy on behalf of the community in preserving and enhancing green space in Saint Paul's East Side, and (2) responsibility to conduct programming, engage community members, and work towards environmental justice for East Side neighborhoods.

As a community-led organization, LPCP has long pursued the daylighting of Phalen Creek along approximately 4 miles between Lake Phalen and the Mississippi River. A detailed map of the creek project area is attached to this letter. We appreciate that the EA recognizes this project and its co-location with the Rush Line. (EA p. 54.) LPCP also works on behalf of the community to promote, establish, and protect high quality green space in East Side Saint Paul, for example along the Bruce Vento Regional Trail, and with an environmental justice focus. In line with LPCP's projects and goals, we submit the following requests:

1. **Clarify enhancement of remaining green space along Phalen Boulevard and Johnson Street.**

The EA mentions enhancing the transit and trail corridor "with ecologically beneficial, resilient and low-maintenance habitat" (p. 59), but in other areas states only that existing vegetation and character will be preserved or omits mention of higher quality green space (e.g. Environmental Justice Technical Report p. 15; Ramsey County Rail Right-of-Way Design Guide pp. 36–46, 56–58). LPCP requests that the EA consistently and clearly state that all vegetation along the Phalen

Blvd. and Johnson St. stretches will be enhanced to include pollinator species, native species, and/or wildlife habitat. For example, the *Ramsey County Rail Right-of-Way Design Guide* (Design Guide) should clearly state this commitment on pages 42-44. This is particularly important mitigation to clarify because the Phalen and Johnson BRT stretches significantly impact highly concentrated low-income and minority communities. In addition, clearly committing to habitat enhancement in these areas will help mitigate other potential impacts to wildlife including the rusty patched bumble bee and monarch butterfly.

2. **Commit to additional aesthetic treatments for the Johnson Street bridge.**

The EA recognizes the high visual impact of the Johnson St. bridge and refers to design modifications as mitigation. Given the impact to highly concentrated low-income and minority communities, as well as the bridge's proximity to the future daylighted Phalen Creek, LPCP requests that the EA specifically commit to the "further mitigation" of "additional aesthetic treatments (screening, vegetation, etc.)." (EA p. 15)

3. **Recognize environmental mitigation and environmental justice benefits of a daylighted Phalen Creek.**

The EA references LPCP's daylighting initiative and the Rush Line's continuing involvement to "ensure compatibility with the Rush Line BRT Project." (EA p. 54.) We appreciate the recognition of the daylighting project. LPCP respectfully requests that the EA recognize the significant environmental benefits and environmental justice progress that the daylighting project will promote. LPCP and the community we represent are particularly interested in project compatibility along Phalen Blvd, through the Phalen/Johnson intersection, and along Johnson St. to Lake Phalen. To that end, we ask that the EA state that project collaboration will, to the greatest extent possible, ensure that the Rush Line is similarly compatible with the daylighting project.

4. **Continue close collaboration with LPCP, including Section 106 Coordination**

LPCP looks forward to continued collaboration, reciprocal involvement, and the collective success of the Rush Line project, daylighted creek, trail enhancement, and environmental justice measures. Going forward, and given LPCP is Indigenous-led with strong ties to the Dakota and Native communities, we also request close collaboration during Section 106 Coordination.

Thank you for your consideration. Please contact me at mlorenz@lowerphalencreek.org or at (651) 370-2106 if you have any questions about our comments.

Sincerely,



Maggie Lorenz
Executive Director

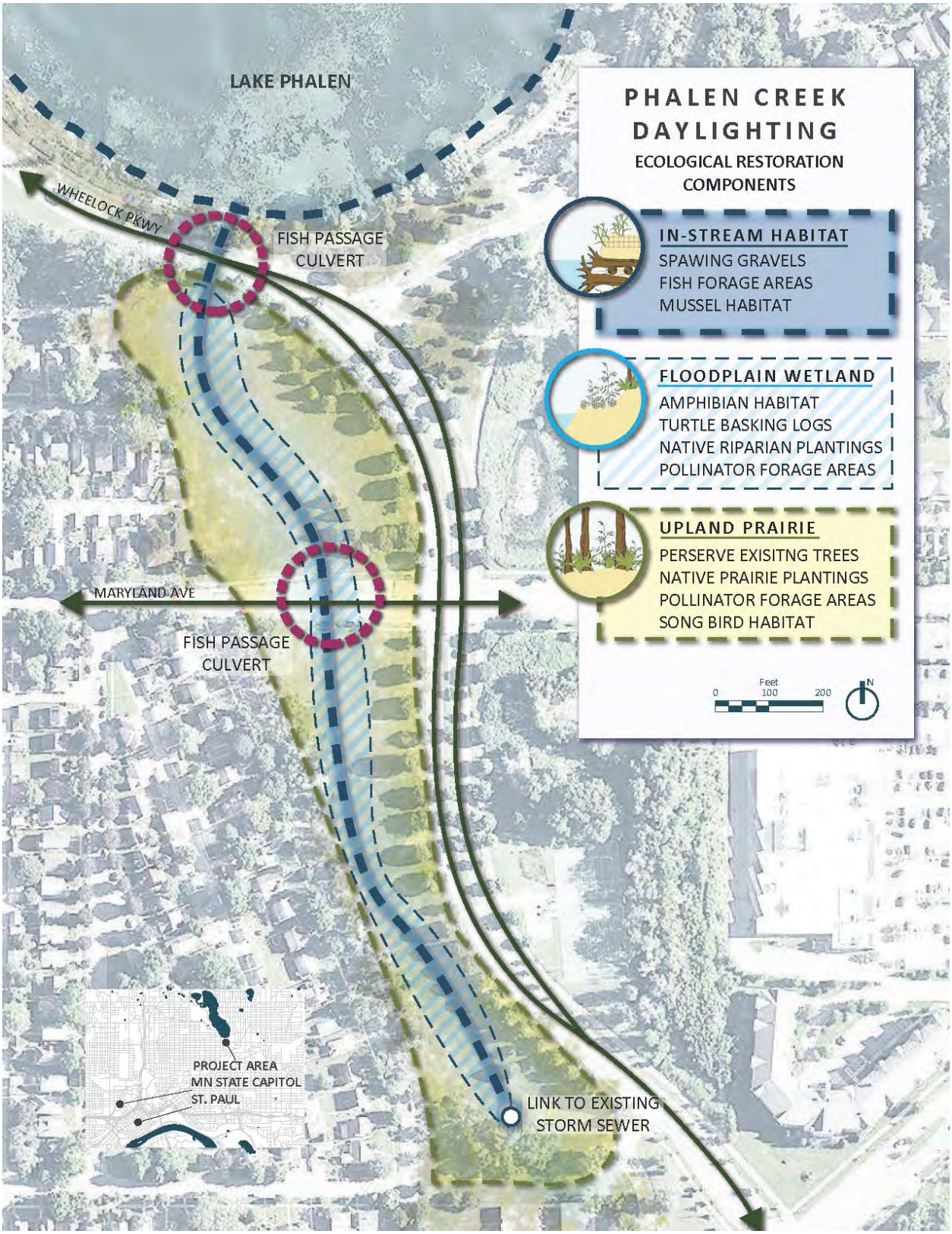


Figure 1: Diagram of proposed daylit channel of Phalen Creek between the southwestern shore of Lake Phalen and the intersection of Magnolia Avenue and Johnson Parkway.

On Jun 25, 2021, at 3:33 PM, Kory Lesnick [redacted] wrote:

External message alert: This message originated from outside the Ramsey County email system. **Use caution** when clicking hyperlinks, downloading pictures or opening attachments.

Comment Themes
Locally preferred alternative process
Project cost and funding sources

I would like to have more information on the rush line please. Current information. Assessment. I do NOT want this to come through White Bear Lake!

It is perfectly fine staying at Maplewood Mall that is underutilized as it is! People can drive 2 miles to Maplewood Mall.

Please stop wasting tax payers money if not needed. Ramsey County charges us enough as it is on every thing else.

Thank you.

A very concerned White Bear Lake Business owner!

Kory Lesnick
[redacted]

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Friday, June 25, 2021 5:02:56 PM

Comment Theme
Support for the project

Submitted on Friday, June 25, 2021 - 17:02
Submitted values are:

Name:Ricardo Romer

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I support this project.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Friday, June 25, 2021 5:59:21 PM

Comment Themes
Pedestrian and bicycle facilities
Natural resources

Submitted on Friday, June 25, 2021 - 17:59
Submitted values are:

Name:Camille Scott-Potter

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I think the Assessment does not do an adequate job of addressing the air quality and greenspace/wildlife effects of putting a bus line through a neighborhood and park. I can't imagine the minutes saved by using a dedicated route vs using existing streets to create a similar route can be worth the destruction of habitat for wildlife and the significant investment. Does this population deserve access to better transit? Absolutely. Does this population also deserve a quiet trail without having exhaust blown into their faces while recreating? Also yes! The Bruce Vento trail connects areas that don't have many public natural spaces and serves an area without many bike lanes or sidewalks as a safe, peaceful space to recreate. Personally, I can't imagine using the trail in the same way once bus lanes have been added - I ride on it to get away from vehicles and breathing exhaust fumes.
I've seen no comments in opposition to providing better transit infrastructure, but there has to be a better way.

From: CommunicationsHelpDesk@co.ramsey.mn.us on behalf of Ramsey County via Ramsey County
To: Alicia Valenti
Subject: Form submission from: Comment on the Rush Line Environmental Assessment
Date: Friday, June 25, 2021 8:08:48 PM

Comment Themes
Natural resources
Community, economic and social analysis

Submitted on Friday, June 25, 2021 - 20:08
Submitted values are:

Name:Martha Ruff

Email address:[redacted]

Phone number:

Would you like someone to contact you?:

Your comments or questions:I think this is a good idea if:
1. Method of transport is low-carbon producing.
2. Local work forces are utilized.
3. Any private property taken to complete the project will be paid a fair and reasonable price.
4. All transportation stops will be kept clean and safe for all.

From: Teri Rossbach
To: info@rushline.org
Date: Friday, June 25, 2021 9:01:32 PM

Comment Theme
Opposition to the project

I live south of the Hazelwood bridge on Clarence St so the Rush Line will run in my backyard!! You need to
reassess the planned route!! It just makes NO sense. We are ready to fight this. Thank you

From:	Amanda Mazumder
To:	info@rushline.org
Subject:	Rush line concern
Date:	Saturday, June 26, 2021 4:48:15 PM

Comment Themes
Project cost and funding sources
Ridership
Pedestrian and bicycle facilities

Hello,

I know you are getting lots of emails, but I just wanted to put mine out there as well in case it can help stop the damage to the Bruce Vento trail. Our family regularly bikes the trail from county Rd c to lake phalen. I am deviated that the trail will never be the same after this decision. Is the only option to travel buses down the trail? With major recent events, such a large number of people have changed their lifestyles and many now permanently work from home. Is this venture going to be cost effective? Please consider turning over the management of the trails to parks and recreation.

Thank you for your time,
Amanda Mazumder