



Payne-Phalen

COMMUNITY COUNCIL

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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

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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 detriment 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.

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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.

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- 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 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 vision 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 buses, 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.

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- 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

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- 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

Andy Gitzlaff, Ramsey County

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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