The SAPCC Environment Committee supports the Twin Cities Boulevard proposal because it envisions a community-centric future rather than building on a car-centric past.

More specifically, the committee supports the proposal because it offers several sustained environmental benefits, among them:
- reduced air, water, and soil pollution from lessened, slowed, and diverted automobile traffic;
- expanded space for creation of much-needed affordable housing;
- opportunities for increased greenspace and tree planting; and
- the expansion and diversification of urban habitat for birds, small animals, and insects.

It is a rare opportunity to build healthier neighborhoods in the center of the Twin Cities.

There is a strong argument for a new vision for the corridor. For every project, planning agency personnel have a vision of the future, stated or not. What future does MnDOT anticipate for the two downtowns this corridor is intended to connect? We are seeing the outlines of those new downtowns now. Hybrid work and telecommuting, resulting from both public health and safety concerns, have likely forever altered the character and densities of urban core centers. City Center in Downtown Minneapolis lost Target as a tenant and 30 floors became unoccupied, Target has also announced its headquarters on Nicollet Mall will be hybrid work with most employees telecommuting. Target is the largest employer downtown, most of the other top ten employers will be following their lead.

> *"The projections for population gains between 2018 and 2070 recently were lowered to a gain of 1.1 million new residents. Even that estimate likely will fall."*
> *5-9-22 Star Tribune*

Has MnDOT adequately envisioned this likely new future of less dense downtowns as places to work, hence lower peak traffic and less need for a traditional traffic engineering solution? If MnDOT models are based on old assumptions that greatly exaggerate future demand, we will have a design that will be unnecessarily accommodating to vehicles, that perpetuates the injustice and inequity that resulted from the original design, and that further harms instead of heals the neighborhoods most directly impacted by the project.

Instead, we could create a transportation corridor of the future between two downtowns, rather than maintaining what is there. We could do something that could become a model for transportation planning.

Before selecting any plan—which will have implications for decades to come—MnDOT should conduct a thorough and detailed environmental review, in consultation with environmental advocacy groups and communities adjacent to the current highway. Unless the design is sensitive to the impacts on these communities, reflects

their desires, and is responsible from an environmental standpoint, the project violates the fairness principle underlying environmental justice as defined by the U.S. EPA. This environmental review should include likely impacts of

- climate change on transportation needs and patterns;
- ecological costs and benefits;
- habitat disruption and creation;
- human health impacts;
- noise abatement;
- air quality concerns and pollution of soil and water during construction and post-construction.

After construction, compression braking and other traffic-related noise should be strictly controlled.

If the Twin Cities Boulevard proposal is not adopted, we recommend the corridors flanking the new Interstate be treated as boulevards accommodating many of the needs, uses, and connections our communities deserve.

There are many stakeholders for the redesign of I-94. If the process and the outcome are to heal and not further harm the neighborhoods and communities directly adjoining the Interstate, they must be actively involved in the design of the project. We encourage Twin Cities Boulevard, the Cities of Saint Paul and Minneapolis, and MnDOT to consider creating a Neighborhood Advisory Committee consisting of representatives appointed by the respective neighborhood organizations that border the corridor and that can advise on the final design of the corridor.