

MnDOT response to EHNA member questions

Oct. 11, 2022

SDD Document

1. Who wrote the draft SDD version 2.4?

- a. MnDOT hired the SRF Consulting Group along with their sub-consultants to develop and write the Hwy 252/I-94 SDD. SRF produced the draft given the technical information at hand to provide a starting point for MnDOT review.

2. Who read it before EHNA saw it in August?

- a. MnDOT staff saw portions or incomplete versions of this document as it pertained to their area of expertise. None of the document was shared with the public or external agencies.

3. Who will review the SDD? The agencies and names of staff.

- a. MnDOT staff, FHWA and the cooperating and participating agencies will review the SDD. The agency names and staff are listed in the [Coordination Plan](#) on the website.

4. Can we see the previous drafts of the SDD from 1.0 to 2.4?

- a. MnDOT staff are not able to provide information to the EHNA that's not already available to the public without a data practice request. EHNA members are members of the public and do not receive information prior to public release. This allows for MnDOT project staff to provide documents that have been through the project review and concurrence process with partners.

5. Are you as EHNA-related staff, whether as part of the EHA process or on the MnDOT project team (including SRF Consultants) or as MNDOT representatives generally, aware of the ongoing work, various versions and status of the Draft SDD for the Hwy 252 / I-94 Project? We found version 2.4, dated June 2022: when were the previous versions written, and when did the process of writing the working drafts of the Draft SDD begin (i.e. when was the version 1.0 version written)?

- a. MnDOT staff working on the EHA Team attended project meetings that discussed the development of the SDD. While the EHA team staff were aware of ongoing work, they had not seen the full draft of the SDD and have been working under the expectation that all alternatives are under consideration.
- b. MnDOT received partial, working drafts on these dates: 7/2/21, 10/20/21, 11/19/21, and 6/23/22. The consultant contract for the Hwy 252/I-94 SDD was executed on January 28, 2021, and the consultant began formatting and outlining the document soon after that date.

6. **Are you aware of the timelines, content, intent and recommendations of the working drafts of the Draft SDD? Are you aware of the working draft of the Draft SDD (version 2.4, dated June 2022)'s recommendation to advance only the 6-lane freeway project alternatives? How early in the process were these 6-lane freeway project alternatives recommended as the only ones to move forward to the Draft EIS?**
 - a. The MnDOT staff on the EHA team only reviewed the EHA portion of the draft SDD document. The EHA and the EIS project are separate, parallel processes with different MnDOT staff leading each. The power point presentation given to the TAC at TAC Meeting #20 September 23, 2021 was the first time initial recommendations were made to the TAC. The recommendation to only include the 6 lane alternatives was part of this presentation. MnDOT staff on the EHA team do not attend the TAC meetings. A draft of the SDD itself was not shared with the TAC.
7. **Was it a mistake to put the Draft SDD, version 2.4, in the public view, or a mistake in what it says?**
 - a. It was a mistake to allow the draft SDD, version 2.4, viewable to the public. The content in version 2.4 is incomplete and has since changed. We are still amid the environmental review process — the document has changed and will continue to change. We will release the draft SDD for public review, including review by the EHNA, in early 2023.
8. **Do we have assurances that Draft SDD will ever include options other than the 2 options in the Draft SDD version 2.4 (6 lane and 6 lane with managed lanes)?**
 - a. The SDD considers approximately 52 alternatives. Alternatives that advance will be identified through a review and concurrence process at MnDOT, with FHWA, and with cooperating and participating agencies. Upon concurrence, the document will be shared with the public during the public comment period, which includes the EHNA.

EHA and EIS Process

1. **Are we a partner agency or member of the public? Can you clarify how the EHNA is part of this process? How will Report 3 be used?**
 - a. The EHNA are members of the public. The EHNA provides input on equity and health that is considered in the process as public comment. The EHNA is not a partner agency in this process. Cooperating and Participating agencies designated through the federal process have specific roles and responsibilities.
 - b. The EHNA is a part of the process by describing equity and health conditions in their communities; providing input on equity and health engagement activities; and providing input on potential transportation improvements to Hwy 252/I-94 project elements and alternatives.
 - c. Report 3 is a community-driven health and equity review of the Hwy 252/I-94 SDD project alternatives. The Report will provide recommendations for what, if any, changes to the SDD should be considered before MnDOT moves forward with final review and approval. MnDOT will receive and review the Report as part of the public comment period in early 2023. MnDOT will review the public comments and determine if there are substantive comments that could inform changes.

- d. We've shared this process at EHNA meetings (see [meeting 5 slides](#) as an example) and have documented it on the [EHA website](#). Apologies for any ongoing confusion with communicating this, we can do better with making sure everyone is on the same page moving forward.
- 2. Can the SDD process be slowed down so Report 3 can be included in the SDD that goes to partner agencies?**
- a. MnDOT is following the NEPA process for developing the project SDD. We cannot make adjustments to this process.
 - b. The EHA Report 3 is submitted as public comment during the SDD public comment period. This occurs after the Cooperating and Participating Agencies have reviewed and provided concurrence on the SDD. This pilot process was agreed upon between MnDOT and FHWA, which allows for the EHA process to fold into the NEPA process at the public comment period for consideration.
- 3. Can we revisit the purpose and need statement of the Hwy 252/I-94 project to include EHA health and equity priorities?**
- a. The public can submit comments on the purpose and need during both the SDD and NOI public comment periods. The purpose and need explain why MnDOT is undertaking the proposed project.
 - b. The Hwy 252/I-94 project objectives include health and equity considerations. They reflect input received from past community engagement and were developed with input from the Policy Advisory Committee (PAC). Some of the objectives are related to criteria used in alternative development and evaluation. The objectives include:
 - i. Reduce injuries and fatalities associated with crashes along Hwy 252/I-94;
 - ii. Promote public health by improving bikeability/walkability on and across Hwy 252/I-94, and by supporting reliable transit service;
 - iii. Ensure solutions are consistent with local planning and compatible with existing roadway network;
 - iv. Minimize the need to acquire additional property; and
 - v. Achieve equitable social, environmental, and economic outcomes.
- 4. Can we get a timeline of the Environmental Review? Why did it begin in May 2020? Why did FHWA fail the Environmental Assessment (EA)? Why did MnDOT not spend any time reflecting on the EA before beginning the Environmental Review?**
- a. MnDOT is working on the SDD phase through the spring of 2023. The DEIS phase will follow until we receive the ROD, which is anticipated in 2025.
 - b. MnDOT was developing an EA, at which time we received substantive comments that included transit and environmental impact concerns. Because of those comments, MnDOT and FHWA made the decision to develop the EIS, which provides the highest level of analysis.
 - c. Please watch the Project History and Overview video found at the bottom of this website [Highway 252/I-94 - MnDOT \(state.mn.us\)](#). Direct link to video: https://youtu.be/lurAPDPy_rl