



HIGHWAY 252/I-94 EQUITY AND HEALTH ASSESSMENT

**Report #3: Impacts
May 2023**



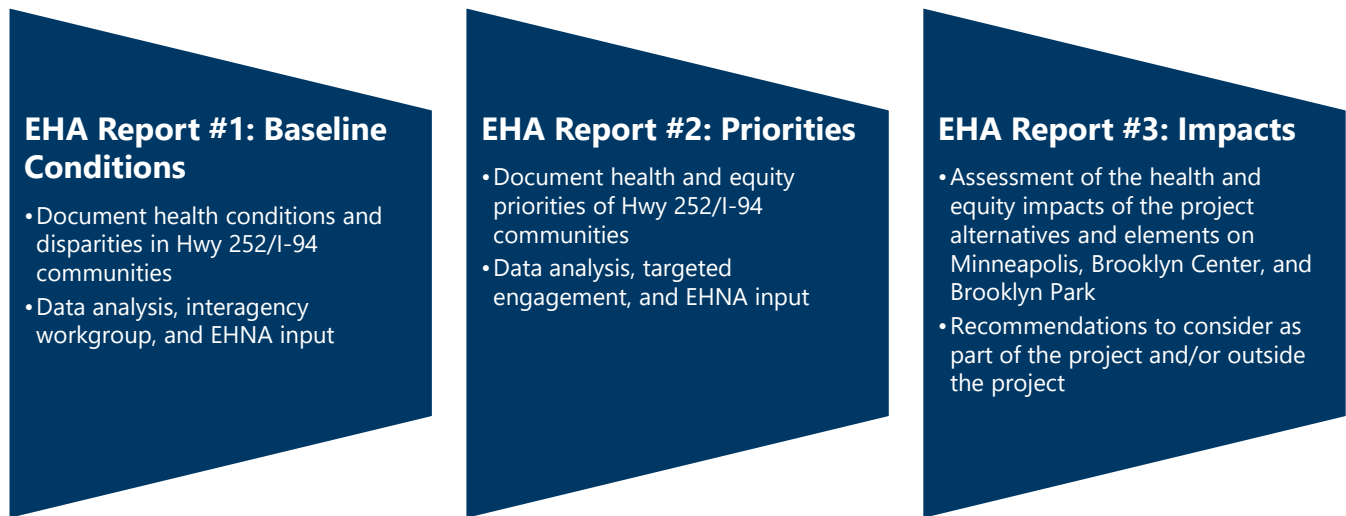
1. Equity and Health Assessment Overview

The views expressed in this report reflect those of those of the Highway 252/Interstate-94 Equity and Health Neighborhood Advisors group and information collected through the Equity and Health Assessment process. They are not necessarily representative of the views of MnDOT.

The Equity and Health Assessment (EHA) is a new pilot project conducted by the Minnesota Department of Transportation (MnDOT) Sustainability and Health Division on the Scoping Document (SD) for Highway (Hwy) 252/Interstate (I)-94 through Brooklyn Park, Brooklyn Center and North Minneapolis. The purpose of the Hwy 252/I-94 EHA is to understand how changes to Hwy 252/I-94 impact equity and health for communities in the project area. As well as provide recommendations to MnDOT on the proposed Hwy 252/I-94 alternatives and elements in the draft Scoping Decision Document (SDD) public comment period (March 21 - May 19, 2023) to advance community priorities, including Community Livability, Roadway Safety, and Transportation Equity.

This report summarizes the results of the Equity and Health Assessment, which uses the research of EHA Report #1: Baseline Conditions and the community engagement in EHA Report #2: Priorities to assess the equity and health impacts of the proposed alternatives and elements, including but not limited to projected traffic volumes, water quality, and crashes, in the Hwy 252/I-94 SD.

Figure 1. Hwy 252/I-94 EHA process



Equity and Health Neighborhood Advisors

The Equity and Health Neighborhood Advisors (EHNA) are a committee of community members, recruited through an application process conducted by MnDOT, to take part in the Equity and Health Assessment, which is led by MnDOT's Sustainability and Health Division. The EHNA is composed of community members from Brooklyn Park, Brooklyn Center, and Minneapolis who live, work, or own a business in the project area and have an interest in advancing equity and health in the Hwy 252/I-94 project area. Together with a team of consultants and MnDOT staff, EHNA is tasked with:

- Describing equity and health conditions in their communities
- Providing input on equity and health engagement activities
- Providing input on potential transportation improvements to Hwy 252/I-94 project elements and alternatives

2. EHA Priorities

The EHA priorities are the top focus areas to advance health and equity in the Hwy 252/I-94 project area based on community engagement and existing conditions data analysis. These priorities were narrowed down through a two-step process:

1. EHA Report #1: Baseline Conditions documented 31 considerations for how transportation can impact the physical, mental, social, environmental, and economic health in Hwy 252/I-94 communities. These were categorized into 6 equity and health focus areas: environment and human health, sense of community, property impacts, transportation safety, transportation options, and access to destinations.
2. EHA Report #2: Priorities summarized feedback from historically underserved communities in the Hwy 252/I-94 project area to prioritize the health and equity focus areas into three top priorities: **Community Livability, Transportation Equity, and Roadway Safety.**

EHA consultants analyzed data, conducted community outreach, narrowed down priorities, and drafted EHA Reports #1 and #2. The EHNA reviewed EHA Reports #1 and #2 and the priorities and used the reports to guide the development of the equity and health assessment elements for each of the three priorities. The elements are the factors in the Hwy 252/I-94 alternatives that are important to advance equity and health in the community. These elements are used to identify the potential impacts of the Hwy 252/I-94 project alternatives in the SD.

Table 1: Hwy 252/I-94 EHA priorities and elements

Priorities	Elements	Supporting statements
Community Livability	Traffic volume	Reduce traffic volumes on roadways serving Hwy 252/I-94 communities
Community Livability	Air quality	Improve air quality along Hwy 252/I-94
Community Livability	Traffic noise & light pollution	Reduce traffic noise and light pollution along Hwy 252/I-94
Community Livability	Water quality	Reduce the impervious surface area of Hwy 252/I-94 and roadways in Hwy 252/I-94 neighborhoods
Community Livability	Neighborhood impacts	Preserve and enhance existing homes, businesses, and community resources in Hwy 252/I-94 neighborhoods
Community Livability	Personal safety	Promote the sense of safety and security of people living in Hwy 252/I-94 neighborhoods
Roadway Safety	Traffic crashes – highway	Reduce the number of crashes on Hwy 252/I-94

Roadway Safety	Traffic crashes – local roads	Reduce the number of crashes on local roadways in Hwy 252/I-94 neighborhoods
Roadway Safety	Traffic crashes – pedestrians & bicyclists	Reduce the number of crashes involving pedestrians and bicyclists on local roadways in Hwy 252/I-94 neighborhoods
Transportation Equity	Access to destinations	Increase the number and variety of places people living in Hwy 252/I-94 communities can go to work, school, shop, play, and receive services without access to a personal motor vehicle
Transportation Equity	Distribution of benefits	Promote equitable (fair and just) distribution of project benefits between the local community and the region
Transportation Equity	Distribution of burden	Promote equitable (fair and just) distribution of project burdens between the local community and the region

Community Livability

Improving the livability and wellbeing of communities and individuals are ways that transportation advances health and equity. A livable community is one that is safe, accessible, and offers a high quality of life for its residents. By lowering traffic and air, noise, and water pollution and thereby increasing green spaces and supporting the area’s water resources and natural environment, livable communities improve the physical and mental health of their residents. Furthermore, a livable community promotes equity by ensuring that all community members have access to these resources, regardless of their income, ability, or race/ethnicity.

EHA Definition: **Community Livability** refers to the impact that traffic volume, air and water quality, traffic noise and light pollution, neighborhoods, businesses, community resources, and personal safety have on livability and wellbeing in Hwy 252/I-94 communities.

- Compared to the typical Minnesotan, people living along Hwy 252/I-94 are at greater risk of disease, hospitalization, and death due to **poor air quality**.*
- There is **limited access to parks** in the Hwy 252/I-94 project area. About six in 10 residents can access a park within a 10-minute walk.*

**Data from Hwy 252/I-94 SD, Appendix E: EHA Report #1 Baseline Conditions, Report Findings*

Figure 2: Michael, EHNA member, shares why Community Livability is a community priority



Findings on the Community Livability impacts of the Hwy 252/I-94 alternatives:

- **Traffic volume:** Increasing car and truck traffic volumes on Hwy 252/I-94 leads to more air pollution and noise and light pollution, increased numbers of crashes, and an environment less conducive to walking and biking. Reduced number of access points, to and from Hwy 252 in particular, leads to higher traffic volumes on local streets and increased issues related to that.
- **Air quality:** Increasing car and truck traffic volumes on Hwy 252/I-94 will increase air pollution in the project area. Air pollution impacts of the alternatives were not studied in the SD phase and are part of the next environmental phase.
- **Traffic noise & light pollution:** Increasing traffic volumes on Hwy 252/I-94 leads to more noise pollution and light pollution. Traffic noise and light pollution impacts were not studied in the SD and are part of the next environmental phase.
- **Water quality:** Increasing impervious surface will cause more water runoff. Water quality impacts were not studied in the SD and are part of the next environmental phase.
- **Neighborhood impacts:** Building new interchanges will cause right-of-way impacts and property acquisitions. However, detailed study of property impacts is intended for the next environmental phase.
- **Personal safety:** Improving aesthetics, greenspace, and visibility between pedestrians and bicyclists and neighborhoods improves the sense of safety and security for people walking, biking, and rolling in the Hwy 252/I-94 project area. Analyzing opportunities to enhance the project area aesthetics are part of the next project phase.

Roadway Safety

Being and feeling safe on public roadways is another way a well-designed transportation system contributes to community and individual health and wellbeing. Unsafe roads and inadequate pedestrian and bicyclist infrastructure leads to an increased risk of vehicular crashes and discourages people from walking, biking, and seeking physical activity. This results in serious emotional, mental, and physical health consequences in communities and exacerbates existing health disparities. Additionally, roadway safety is essential for promoting equity by ensuring all members of a community have access to safe transportation options, particularly for populations more likely to rely on walking or biking such as children, the elderly, people with disabilities, and people with low incomes.

Figure 3: Tara, EHNA member, shares why Roadway Safety is a community priority

EHA Definition: **Roadway Safety** refers to the importance of decreasing the number of crashes involving people driving, walking, and biking on Hwy 252/I-94 and intersecting or adjacent roadways.

- There are **more vehicle crashes** on Hwy 252 than on similar highways across the region.*
- Although there are fewer people walking, biking, and rolling compared to people driving in the Hwy 252/I-94 project area, **pedestrians and bicyclists** are significantly more likely to be involved in a fatal or serious injury crash at a Hwy 252 intersection than are people in motor vehicles.*

**Data from Hwy 252/I-94 SD, Appendix E: EHA Report #1 Baseline Conditions, Report Findings*



Findings on the Roadway Safety impacts of the Hwy 252/I-94 alternatives:

- **Traffic crashes – highway:** Reducing the total number of crashes on Hwy 252/I-94 is important to increasing wellbeing and equity in the community. Especially with the existing safety issues in the project area, alternatives advanced should substantially reduce crashes on Hwy 252/I-94 to at least the state average on similar roadways. However, the ultimate intent should be eliminating all serious injuries and deaths on Hwy 252/I-94.
- **Traffic crashes – local road:** Reducing the total number of crashes on local roads within ½ mile Hwy 252/I-94 is important to increasing wellbeing and equity in the community. The SD provides some analysis of projected crashes on local roads, however the area selected for analysis should be widened to include more local roads that intersect with Hwy 252 and local roads that are in the communities adjacent to Hwy 252/I-94 to better understand the impacts and reduce crashes on the local roadway.
- **Traffic crashes – pedestrians & bicyclists:** Creating safe, convenient, and accessible pedestrian and bicyclist connections across and adjacent to Hwy 252/I-94 is important to limit crashes and support more walking and biking in the community. Alternatives advanced should support walking, biking, and rolling convenience and opportunities for aesthetics at any pedestrian crossings like crosswalks, bridges, overpasses, and underpasses.

Transportation Equity

Minnesota faces several transportation inequities as a result of unequal societal structures that are built into the fabric of our cities. Policies that support sprawling development patterns and highway construction have led to residential segregation, automobile dependency, and increasing transportation costs. These policies have exacerbated inequities that affect neighborhoods and individuals due to their race/ethnicity, income, and ability. Examples of transportation disparities include increased exposure to air pollution, fewer and lower quality transportation options, and decreased community cohesion caused by decades of transportation decisions directing high volume, grade-separated roadways through communities of color and low-income areas.

EHA Definition: **Transportation Equity** refers to the importance of walking, biking, and transit to people who don't have cars, as well as the importance of an equitable distribution of project benefits and burdens between the adjacent Hwy 252/I-94 neighborhoods and the region.

- Twenty-two percent of households with children along Hwy 252/I-94 are experiencing **poverty**, compared to 10 percent of households with children for Hennepin County.
- Fourteen percent of households along Hwy 252/I-94 **do not have access to a personal motor vehicle**, compared to nine percent for Hennepin County.
- Residents of majority Black, Indigenous and People of Color (BIPOC) areas along Hwy 252/I-94 are 20 to 25 percent more likely than residents of majority white areas to experience **asthma and other chronic diseases**.

**Data from Hwy 252/I-94 SD, Appendix E: EHA Report #1 Baseline Conditions, Report Findings*

Figure 4: Nahid, EHNA member, shares why Transportation Equity is a community priority



Findings on the Transportation Equity impacts of the Hwy 252/I-94 alternatives:

- **Access to destinations:** Maintaining access points across and to Hwy 252/I-94 in the project area supports health by easing transportation to key destinations, like grocery stores, jobs and schools, health care facilities, and parks and trails. Improving access for walking, biking, rolling, and public transit advances equity by supporting many travel needs in the project area, especially since many residents do not have access to a car. The access combinations advanced should support ease of access for local community travel and support many travel needs.
- **Distribution of burdens & benefits:** Providing fair and just distribution of transportation burdens and benefits between Hwy 252/I-94 local communities and the region is important to the community to advance equity, especially with the existing health disparities in BIPOC and low-income communities in the project area. The SD does not provide an analysis of the distribution of transportation benefits and burdens among Hwy 252/I-94 project area users, this analysis will occur as part of the next project phase.

3. Conclusion

The EHA researched existing conditions and collected feedback from historically underserved communities in the project area to identify three priorities for advancing health and equity through the Hwy 252/I-94 alternatives and elements:

- Community Livability
- Roadway Safety

- Transportation Equity

The Hwy 252/I-94 SD does not study many elements most important to advance health and equity in the community, including:

- Air quality
- Traffic noise and light pollution
- Groundwater and surface water quality
- Property impacts
- Tree canopy and green space
- Local road crashes in the wider project area
- Distribution of transportation burdens and benefits

The SD states that many of these analyses will be provided in the Draft Environmental Impact Statement (EIS), which is in the next phase of the Hwy 252/I-94 environmental process. However, the SD proposes eliminating several alternatives, many of which are low traffic volume and non-freeway alternatives, before these analyses are conducted. **To understand the health and equity impacts of the Hwy 252/I-94 alternatives that are important to the EHA, MnDOT and project partners should advance more project alternatives, particularly low traffic volume and non-freeway alternatives, for additional environmental analysis.** Additionally, more analysis should be done to understand how transportation burdens and benefits are distributed between Hwy 252/I-94 project area users, the local community and commuters, and predominantly BIPOC communities and white communities in the project area, to ensure equitable outcomes as a result of the project.

4. Recommendations

Project Alternatives

The Equity and Health Assessment (EHA) process included developing an understanding of the existing equity and health conditions in Hwy 252/I-94 communities (Appendix E: EHA Report #1 Baseline Conditions), listening to underserved communities in the Hwy 252/I-94 project area on their equity and health priorities (Appendix F: EHA Report #2 Priorities), and concluded with an assessment of the equity and health impacts of the Hwy 252/I-94 project alternatives (EHA Report #3 Impacts). The findings from the EHA reports identified three key community priorities for advancing equity and health in the Hwy 252/I-94 project alternatives: Community Livability, Roadway Safety and Transportation Equity. Each priority has several elements, which are used to identify the impacts of the Hwy 252/I-94 project alternatives in the SD. However, the Hwy 252/I-94 SD does not study many elements most important to the EHA process to advance health and equity in the community. Instead, the SD notes that these analyses will be provided in the Draft EIS.

Recommendations:

- Advance more alternatives that were eliminated in the SD, particularly those with lower projected traffic volumes like the Hwy 252 Four-Lane Low Speed Freeway and non-freeway

alternatives, for additional analysis in the Draft EIS. Many of the elements most important to the community to advance health and equity, like air quality, traffic noise and light pollution, water quality, and property impacts, will not be assessed until later in the environmental process. Maintaining a range of alternatives will provide a more thorough analysis and comparison of the health and equity impacts of all alternatives.

Transportation Equity

Transportation burdens and benefits

One of MnDOT's Project Objectives of the Hwy 252/I-94 SD is "Achieve equitable social, environmental, and economic outcomes (equity means fair and just, taking into consideration the conditions and needs of persons/communities impacted)." Additionally, Appendix E: EHA Report #1 Baseline Conditions uses MnDOT's definition of transportation equity, "the benefits and burdens of transportation systems, services, and spending are fair and just which historically has not been the case. Transportation equity also requires that people of underserved communities, especially BIPOC communities, share in the power of decision-making."

Feedback from underserved communities in the Hwy 252/I-94 project area on how MnDOT can ensure equitable outcomes of the Hwy 252/I-94 project was collected in Appendix F: EHA Report #2 Priorities. Many people said that equity is ensuring the benefits and burdens of the roadway's changes are equitably shared between the local communities and the commuters from outside the area, and people expressed concerns that MnDOT's changes to Hwy 252 and I-94 would make it easier for pass-through traffic at the expense of making it harder for local residents to live comfortably and travel within their communities by walking, biking, rolling, or driving. Additionally, Appendix E: EHA Report #1 Baseline Conditions highlights existing disparities in Hwy 252/I-94 communities between BIPOC residents and neighborhoods and white residents and neighborhoods that could be exacerbated through major roadway changes if not addressed by the project.

Recommendations:

- Revisit the project's Purpose and Need Statement in the Draft EIS process to include equity to solidify MnDOT's and project partners' commitment to transportation equity. The SD states objectives and considerations related to equity several times but including equity as a foundational purpose for this project ensures that future analysis and decision-making aligns with the Equity and Health Assessment. It also offers assurance to the community that their priorities expressed in Report #2 are being considered and carried forward.
- Assess and disclose how all alternatives evaluated in the SD are expected to distribute transportation benefits and burdens to local communities and the region, and between majority BIPOC areas and majority white areas in the project area in the Draft EIS. This analysis should use the elements identified through the EHA process to complete the comparison. This analysis is important to understand how transportation equity is impacted by project alternatives.

Public transit

Appendix E: EHA Report #1 Baseline Conditions found that 14% of households along Hwy 252/I-94 do not have access to a personal motor vehicle. This is higher than the region. In Hennepin County, 9% of households do not have access to a motor vehicle. Additionally, Appendix F: EHA Report #2 Priorities found that many people said that communities along Hwy 252/I-94 need more reliable and frequent public transit service to and from key destinations like jobs, grocery stores, and health care, and more high-quality transit could help reduce single occupancy trips so there may be less pollution and traffic in the communities adjacent to Hwy 252/I-94.

Recommendations:

- As the alternatives are advanced, identify opportunities to increase destinations accessible by public transit and the frequency of transit service in communities around Hwy 252/I-94 to advance health and equity.

Access combinations

Appendix E: EHA Report #1 Baseline Conditions states that access to goods and services is crucial to improving and maintaining health. In an inclusive transportation system, access and accessibility depend on a well-connected, multimodal transportation system that enables people to reach everyday destinations, like jobs, schools, grocery stores, healthcare facilities, and parks – safely, reliably, and conveniently. Additionally, a key finding from engagement with underserved communities in Appendix F: EHA Report #2 Priorities found that BIPOC respondents highlighted the importance of maintaining access to and from Hwy 252/I-94 and crossing the roadway to access jobs, food options, and green space for healthy lives and equitable communities. The findings from both appendices stress the importance of maintaining local access for the health and equity of Hwy 242/I-94 communities.

Recommendations:

- Assess and disclose how the alternatives evaluated in the SD are expected to impact local travel patterns and travel times in the Hwy 252/I-94 communities in the Draft EIS. This analysis is important to understand the health and equity impacts of all the project alternatives evaluated. Additionally, analysis looking at access point impacts in majority BIPOC areas and majority white areas in the project area will help understand how project alternatives may impact equity in the community.
- As MnDOT continues to study all access combinations proposed in the SD, prioritize combinations that will have the least property impacts and local travel impacts to support health and equity in the community.
- Ensure local access design and considerations prioritize walking, biking, rolling, and public transit access. Providing alternatives to driving for local access is important to health in communities as well as equity by accommodating different travel options or needs in Hwy 252/I-94 area communities.

Community Livability

Traffic volumes

Appendix E: EHA Report #1 Baseline Conditions finds that high traffic volumes affect health and community livability through air, noise, and light pollution. These impacts are experienced disproportionately by BIPOC residents and neighborhoods in the Hwy 252/I-94 project area.

Additionally, the findings from Appendix F: EHA Report #2 Priorities show that many residents, particularly BIPOC, are concerned that increased traffic volumes in the Hwy 252/I-94 communities would increase air pollution, respiratory illnesses, noise pollution, light pollution, the number of car crashes, stress of residents, and decrease property values, livability, and the mental, emotional, and physical wellbeing of people and communities near the highway. Because of these concerns, maintaining low traffic volumes is an important element to align the Hwy 252/I-94 project with the equity and health priorities of the community.

Recommendations:

- Advance more alternatives that were eliminated in the SD, particularly those that have the lowest projected traffic volumes like the Four-Lane Low-Speed Freeway and non-freeway alternatives, for additional analysis in the Draft EIS. The EHA process found that maintaining low traffic volumes or reducing them further on Hwy 252/I-94 will advance health and equity in the community.
- Assess and disclose how the alternatives evaluated in the SD are expected to impact traffic volumes on local roads in majority BIPOC areas and majority white areas in communities adjacent to Hwy 252/I-94 will help understand how project alternatives may impact equity in the community.

Air quality and water quality

Appendix E: EHA Report #1 Baseline Conditions found that compared to the typical Minnesotan, people living in Hwy 252/I-94 communities are at greater risk of disease, hospitalization, and death due to poor air quality. Additionally, Appendix F: EHA Report #2 Priorities found that people in Hwy 252/I-94 communities are concerned that air pollution from Hwy 252/I-94 negatively impacts the health of people in the project area. Pollution is a major health concern of the community due to the existing health issues resulting from poor air quality, and people are concerned that higher traffic volumes will contribute to more air pollution in local communities.

Additionally, because of the proximity of Hwy 252/I-94 to the Mississippi River, Appendix F: EHA Report #2 Priorities found many people are concerned that widening the roadway and increasing impervious roadway surfaces would have a negative impact on water quality and the Mississippi River wildlife and habitat. The natural environment is important to human health and wellness as well as environment and ecology in the area surrounding Hwy 252 /I-94. The SD states that water and air quality will be assessed in the Draft EIS.

Recommendations:

- Advance more alternatives eliminated in the SD, particularly those that have the lowest projected traffic volumes and fewest travel lanes like the Four-Lane Low-Speed Freeway and non-freeway alternatives to assess their air and water quality impacts in the Draft EIS. This analysis is important to evaluate the health and equity impacts of the project alternatives.

Property impacts

Appendix F: EHA Report #2 Priorities found that many people were concerned about losing homes and property values decreasing because of the Hwy 252/I-94 project. Increasing traffic volumes and widening the roadway right of way will impact property values and home equity, neighborhood integrity, community livability, and the quality of life for people living adjacent to Hwy 252/I-94. The SD states that property impacts will be assessed in the Draft EIS.

Recommendations:

- Advance more alternatives eliminated in the SD, particularly those with the lowest projected traffic volumes and the fewest travel lanes like the Four-Lane Low-Speed Freeway and non-freeway alternatives, to assess their property impacts in the Draft EIS. This analysis is important to evaluate the project alternatives health and equity impacts.
- Assess and disclose how property acquisitions are expected to impact majority BIPOC areas compared to majority white areas in the Hwy 252/I-94 project area to understand how the project alternatives may impact equity.

Tree canopy, green space and public art

Appendix F: EHA Report #2 Priorities identifies that public art and green space are important to people in the Hwy 252/I-94 project area to “contribute to a community’s cohesion and sense of place.” Aesthetics are important to creating a welcoming environment for people walking, biking, rolling, and driving, developing a sense of community and safety, and contributing to the mental and emotional health of communities and individuals.

Additionally, Appendix E: EHA Report #1 Baseline Conditions states that areas in the Hwy 252/I-94 project area with majority BIPOC residents have less tree canopy coverage compared to areas with majority white residents. This disparity could be addressed through the project design to increase tree canopy in critical areas.

Recommendations:

- Assess and disclose how the alternatives evaluated in the SD are expected to impact green space and the tree canopy in Hwy 252/I-94 communities in the Draft EIS. This analysis is important to understand the health and equity impacts of the project alternatives. Additionally, analysis comparing projected tree and greenery impacts in majority BIPOC areas and majority white areas in the project area will help understand how project alternatives may impact equity in the community.

- As the alternatives are advanced, explore opportunities to integrate decorative design and public art in the design to enhance community cohesion, sense of place, and seek input from Hwy 252/I-94 communities and advisory groups, like the Minneapolis Arts Commission and the Brooklyn Center Cultural and Public Arts Commission.

Personal safety

Appendix F: EHA Report #2 Priorities found that people said crime in neighborhoods negatively affects the quality of life and wellbeing of the community and changes to the highway should not encourage additional criminal behavior or attract criminal activities from outside the Hwy 252/I-94 areas.

According to feedback, a highway-built environment feels unwelcoming to people because of fewer pedestrians and bicyclists, high traffic volumes and speeds, and noise and exhaust. Grade separated roadways and increased travel lanes may also hinder sight line distances for people walking or biking between neighborhoods, making the space feel less comfortable and safe. Lighting, visibility, sense of place, and aesthetics help create an environment that feels safe for people to walk, bike, or roll.

Recommendations:

- Advance more alternatives eliminated in the SD, particularly those with low impacts to visibility for pedestrians and bicyclists to neighborhoods, to continue to evaluate them against other alternatives for their health and equity impacts in the Draft EIS.

Roadway Safety

Crashes

According to the findings from Appendix E: EHA Report #1 Baseline Conditions, there are more vehicle crashes on Hwy 252 than on similar highways across the region. Appendix F: EHA Report #2 Priorities identified that safety is a high priority for Hwy 252/I-94 improvements. Additionally, Appendix E: EHA Report #1 Baseline Conditions states that “as vehicle speeds and volumes increase, the number of people injured or killed by drivers while walking or biking increases” (pg. 9). Lowering traffic speeds and reducing traffic volumes will limit the number and severity of vehicular, pedestrian and bicyclist crashes, which is a top priority to advance health and equity in communities.

Recommendations:

- Assess and disclose how the alternatives evaluated in the SD are expected to impact crashes on local roads within ½ mile of Hwy 252/I-94. The SD provides some analysis of projected crashes on local roads, however the area selected for analysis should be widened to include more local roads that intersect with Hwy 252 and local roads that are in the communities adjacent to Hwy 252/I-94 to better understand how project alternatives may impact health and equity.
- Advance more alternatives eliminated in the SD, particularly those with low projected traffic crashes, low vehicle speeds, and traffic volumes like the Four-Lane Low-Speed Freeway and non-freeway alternatives, to continue to evaluate them against other alternatives for their health and equity impacts in the Draft EIS.

Walking, biking and rolling

Appendix E: EHA Report #1 Baseline Conditions found that Hwy 252 and I-94 presents a major barrier to people walking, biking, and rolling to destinations throughout the project area. Crossings, where they do exist, provide poor multimodal levels of service. This leads to unsafe conditions that discourage people without motor vehicles from crossing Hwy 252/I-94.

Appendix F: EHA Report #2 Priorities found that people want safe and easy access to walking, biking and rolling connections in the Hwy 252/I-94 project area. Prioritizing pedestrians and bicyclists supports health and equity by encouraging people to get out of cars and be physically active, as well as supporting other modes of transportation for people who do not have access to a car. Trail connections, street lighting, marked crosswalks, benches, bus shelters, and other pedestrian amenities can help create a safe environment for pedestrians and bicyclists.

Recommendations:

- Advance more alternatives eliminated in the SD, particularly those with opportunities for direct and convenient access to walking, biking, and rolling across Hwy 252 and I-94, to continue to evaluate them against other alternatives for their health and equity impacts in the Draft EIS
- As the alternatives are advanced, identify opportunities to build out and improve the pedestrian and bicyclist network in the Hwy 252/I-94 area and create trail connections to key destinations, parks, and trails like the North Mississippi Regional Park and Upper Harbor Terminal.